

DCP 251 and DCP 252 Working Group Minutes

Meeting Name	DCP 251 and DCP 252 Working Group
Meeting Number	14
Date	15 November 2016
Time	14:00
Venue	Teleconference

Attendee	Company
John Lawton [JL] (Chair)	ElectraLink
Anika Brandt [AB]	SSE
Dave Wornell [DW]	Western Power Distribution
Franck Latremoliere [FL]	Reckon
Keith Burwell [KB]	Ofgem
Mike Harding [MH]	Brookfield Utilities
Pat Wormald [PW]	Northern Powergrid
Dan Fittock [DF] (Secretariat)	ElectraLink
Apologies	Company
Chris Allanson	Northern Powergrid

1 ADMINISTRATION

- 1.1 It was confirmed that attendees had read the “Competition Law Dos and Don’ts” and all attendees agreed to be bound by the Competition Law for the duration of the meeting.
- 1.2 The Working Group reviewed the minutes of the previous meeting and agreed that they were a fair and accurate reflection of the discussions that took place.
- 1.3 Please refer to Appendix A for an update on all of the actions.

2 REVIEW AND FINALISATION OF THE DCP 251 & 252 DRAFT CONSULTATION DOCUMENT

- 2.1 The Working Group reviewed the finalised version of the DCP 251 & 252 Draft Consultation Document which included the comments made by PW. The Working Group agreed with the majority of the amendments made by PW and also made a number of additional changes.
- 2.2 A few small grammatical changes were made to ensure that the consultation document would be clear to read and the debates surrounding whether ‘*undue discrimination*’ is taking place or not is clear and concise to allow respondents to make a decision and align the use of language and definitions throughout the document. These amendments can be found in Attachment 1.
- 2.3 The Working Group supported and refined the definition of ‘Qualifying Network Operator’ in preference to Qualifying Network Operator tariffs so that it could be easily incorporated into DCUSA Schedules 16, 17 and 18. This definition was added into the consultation document.
- 2.4 The Working Group discussed the relevant DCUSA Objectives that this Change Proposal (CP) better facilitates. It was agreed that as this CP addresses issues of charging and as such will be

measured against the DCUSA Charging Objectives. It was agreed that the CP better facilitates the following DCUSA Charging Objectives with supporting rationale:

Charging Objective One: That compliance by each DNO Party with the Charging Methodologies facilitates the discharge by the DNO Party of the obligations imposed on it under the Act and by its Distribution Licence.

- DCP 252 corrects errors in the methodology statement of the EDCM where there is no reference to DNOs operating out of area and therefore facilitates compliance.

Charging Objective Two: That compliance by each DNO Party with the Charging Methodologies facilitates competition in the generation and supply of electricity and will not restrict, distort, or prevent competition in the transmission or distribution of electricity.

- DCPs 251 and 252 - Distortions to competition are reduced by removing undue discrimination between licensed distributors and distributors who do not hold a licence.

2.5 To ensure the consultation gives respondents enough opportunity to respond fully to the consultation, a number of additional questions were added by the Working Group:

- Do you agree with the Working Group's view that the introduction of a Qualifying Network Operator (QNO) definition and a QNO tariff will alleviate any undue discrimination?
- What lead time do parties require in order to implement this Change Proposal?
- Do you have any comments on the legal drafting?
- Do you have any further comments?

2.6 Following these amendments ElectraLink agreed to take an action to prepare the consultation document for issuing to industry for a five week period commencing 21 November 2016.

ACTION: 14/01 - ELECTRALINK

3 REVIEW OF ISSUES LOG

3.1 The Working Group reviewed the DCP 251 & 252 Issues Log and made a number of updates to each of the entries and closed a number down that are covered off either by the consultation and deemed out of scope of this change proposal. The updated log can be found in Attachment 2.

4 REVIEW OF WORK PLAN

4.1 The Working Group reviewed the Work Plan and agreed that ElectraLink will make updates in line with the discussions held at today's Working Group meeting.

ACTION: 14/02 - ELECTRALINK

5 NEXT STEPS

5.1 The Working Group agreed to the following next steps:

- ElectraLink to update the consultation document in line with discussions at today's meeting.
- ElectraLink to issue the consultation to parties for a five-week period.

6 ANY OTHER BUSINESS

- 6.1 There was no AOB and the Chair closed the meeting.

7 NEXT MEETING

- 7.1 The next DCP 251 & 252 Working Group will be held in person on 10 January 2017 with the venue TBC.

8 ATTACHMENTS

- Attachment 1 – DCP 251 & 252 Draft Consultation Document (with mark-up)
- Attachment 2 – DCP 251 & 252 Issues Log
- Attachment 3 – DCP 251 & 252 Work Plan

APPENDIX A: SUMMARY OF ACTIONS

NEW AND OPEN ACTIONS

Action Ref.	Action	Owner	Update
10/03	Determine if undue discrimination is taking place so that this view can be captured in the consultation document.	All	Ongoing, part of the consultation document
14/01	To prepare the consultation document for issuing to industry for a five week period week commencing 21 November 2016.	ElectraLink	
14/02	To make changes to the Work Plan in line with the discussions held at today's Working Group meeting.	ElectraLink	

CLOSED ACTIONS AT THE MEETING

Action Ref.	Action	Owner	Update
11/02	To review Working Group 08 Minutes, clause 2.9 and Working Group 09 Minutes, clause 2.2, decide whether the assumptions made by the Working Group are true and whether the minutes accurately recorded the discussions.	All	Complete – Working Group 08 Minutes agreed correct and Working Group 09 Minutes updated to reflect Working Group comments.
11/03	To submit views in writing on whether ' <i>undue discrimination</i> ' is taking place so that this can then be reviewed at the next Working Group meeting.	All	Complete – Discussed at Working Group 12.
12/01	To review whether Private Network Operator had been used in the legal text or previous consultation so that the Working Group could decide at a later date if a definition was required.	ElectraLink	Completed post-meeting. The term 'Private Network Operator' is not included in the Change Proposal legal text and was used once in the first consultation as an example of an unlicensed distribution system.
12/04	To review the definition of Associated Distribution Systems and determine whether it could be used in the definition of Qualifying Network Operator	Electralink (Chair)	Completed
13/01	To include the refined Qualified Network Operator definition in the consultation document.	ElectraLink	Completed post-meeting.
13/01	To locate the Ofgem documentation that reflects the chosen wording 'Total avoided costs to the DNO' used in Working Group 09 meeting minutes.	MH	Complete: MH confirmed that he could not locate the Ofgem document in question, and as such the minutes of working group 9 need to be updated to make it clear that although the statement was a true reflection of what was said

			at the meeting, no supporting evidence is available to justify the statement.
13/02	To draft a new definition for Qualifying Network Operator ahead of the next Working Group.	MH	Complete: The Qualifying Network Operator definition has been updated and included in the consultation document.
13/03	To develop a strawman paragraph on the outcome of the discussions on undue discrimination	Chair	Complete: The strawman has been incorporated into the consultation document.