

DCP 341/342 Joint Working Group Meeting 03

23 April 2019 at 2:00pm

Skype Meeting / Teleconference

Attendee	Company
Working Group Members	
Alessandra De Zottis [AZ]	UK Power Reserve
Andrew Enzor [AE]	Northern Powergrid
Chris Barker [CB]	ENWL
Dave Wornell [DW]	WPD
Emma Clark [EC]	SSEN
Julia Haughey [JH]	EDF Energy
Karl Maryon [KM]	Haven Power
Kathryn Evans [KE]	SP Energy Networks
Lee Wells [LW]	Northern Powergrid
Matt Thomas [MT]	Fulcrum
Sebastian Eyre [SE]	ESP Electricity
Tom Chevalier [TC]	Power Data Associates
Observers	
Ankita Mehra [AM]	Ofgem
Nicholas Rubin [NR]	Elxon
Code Administrator	
John Lawton [JL] (Chair)	ElectraLink
Dylan Townsend [DT] (Technical Secretariat)	ElectraLink

Apology	Company
Chris Ong [CO]	UKPN

1. Administration

- 1.1 The Secretariat welcomed those in attendance and noted the apologies for this meeting.
- 1.2 The Working Group reviewed the "Competition Law Guidance". All Working Group members agreed to be bound by the Competition Law Guidance for the duration of the meeting.
- 1.3 The Working Group reviewed the minutes for meeting 02, with one member asking for a further amendment to that which was requested to be carried out to the last sentence of paragraph 3.5 of the minutes of meeting one and had been set out under paragraph 1.3 of the minutes for meeting two. The final version of the minutes from meeting one are contained in Attachment 1 to these minutes.
- 1.4 It was also requested that the Secretariat make amendments to paragraph 2.3 of the minutes for meeting two, to reflect that the discussion was related to the EDCM and not the CDCM. The Chair requested that Action 01/01 be added back into the open actions list and removed from the closed actions list as, although the documentation had been provided to the Working Group, there was still a need to discuss it during this meeting and as such would likely be closed following meeting three. The updated version of the draft minutes from meeting two are contained in Attachment 1 to these minutes.
- 1.5 The Working Group reviewed the items on the actions list from the last meeting. Updates on all actions are provided in Appendix A.

2. Discussion related to information provided following Action 01/01

- 2.1 NR provided the Working Group with a brief overview of the email he circulated previously which was noted as a summary of the CMP280/281¹ solutions which may be of use to the Working Group but noted that it does not capture the final solution nor all elements/details. In providing a summary, NR highlighted the rationale for the proposed alignment between the different industry modifications. The rationale is based on:

"if ELEXON is keeping a register of SVA Storage Facilities and MSIDs for TNUOS and BSUOS purposes, assuming the definitions of a SVA Storage Facility are the same or at least very similar between CUSC and DCUSA, ELEXON could notify DNOs of the SVA Storage MSIDs it registers. This would save Suppliers notifying ELEXON and separately DNOs, ensure there is a single, common registration record for SVA Storage MSIDs and mean that BSC assurance measures we apply in validating SVA Storage Facilities provide value to both CUSC and DCUSA."

- 2.2 One member raised the point that the use of two metering systems for either import and export, whether registered in Central Volume Allocation (CVA) or Supplier Volume Allocation (SVA) could lead to 'gaming' and wondered if there was a way to prevent any 'gaming'. There was a related question regarding what, if any, limit (minimum) is or will be applied to such an approach, to which it was noted that the operator would be licenced and only using HH metering systems alongside providing a director signed declaration.

¹ CMP281 'Removal of BSUoS Charges From Energy Taken From the National Grid System by Storage Facilities'

CMP280 'Creation of a New Generator TNUoS Demand Tariff which Removes Liability for TNUoS Demand Residual Charges from Generation and Storage Users'

- 2.3 One member questioned whether this would apply to bulk aggregation of such systems (e.g. 1000 small storage sites, possibly at household level, but operated by a licensee), to which it was noted that this is negated by the way in which the legal text is drafted being that the tariffs will only apply to storage facilities whose sole function is electricity storage and so a domestic property with a battery would not fit into that definition.
- 2.4 Further to this, members discussed whether there is need to be explicit that storage tariffs will only be applicable to Current Transformer (CT) metered sites as the chances of whole current (non-CT) metered sites requesting the tariff would be small. It was suggested that the group should be clear on what the change caters for (e.g. CT metered sites) and that a question about whether this approach is appropriate and fair could be added in the consultation document
- 2.5 A Working Group member questioned whether any thought has been given to the fact that Electric Vehicles (EVs) are either importing for charging or potentially exporting if/when needed, to which it was noted that EVs are outside of the scope of these Change Proposals (CPs).
- 2.6 The Chair noted that it would be good to align the definitions across the industry but that as it stands, it might be difficult as those definitions are yet to be finalised and there is a real need to progress to a tight timeline for these CPs.
- 2.7 The Chair also noted that it could be being restrictive to only apply the tariffs to CT sites but suggested that this can be picked up during the discussion on the next agenda item and see whether a Working Group view can be added or if a question is asked so that a view from industry can be gained.
- 2.8 The Elexon representative questioned the Working Group on their views of using a common system for registering details of such storage systems to which it was noted that the principle will be applied but use of the system may not. It was then asked if it will apply to a storage facility irrespective of whether the operator is a licensee, to which it was confirmed that these CPs are not basing eligibility around holding a licence.
- 2.9 The Chair suggested that the group could seek guidance from industry via consultation question on whether the Balancing and Settlement Code (BSC) Modification P383 *'Enhanced reporting of demand data to the NETSO to facilitate CUSC Modifications CMP280 and CMP281'* should be broadened to include all SVA storage sites not just those that hold a licence. It was noted that this might negate the need for Suppliers to provide confirmation, but that the real issue is the timing of the relevant changes.
- 2.10 The Chair noted that the drafting could take account of the two process, being that the current drafting is used until such time as the BSC process is in place. It was explained that there is precedence for such an approach and so it is for the Working Group to consider if they wish to do so in this case.

3. Review and discussion of draft legal text (supplier confirmation)

- 3.1 It was noted that at the previous meeting, the Working Group had drafted legal text around the Supplier providing confirmation that a site is eligible for a storage tariff for DCP 341 but that it still needed to be included in Schedules 17 and 18 for DCP 342. The text added to DCP 341 was read out and is set out below for reference:

“Note 8: The ‘LV Site Specific Storage Import’, ‘LV Sub Site Specific Storage Import’ and HV HH Site Specific Storage Import’ tariffs will only be applicable to Electricity Storage Facilities whose sole function is Electricity Storage. Eligibility for use of these tariffs will only be applicable once certified by the Supplier.”

- 3.2 The Elexon representative suggested that this wouldn’t be necessary if you go with the approach being developed under BSC P383. The Chair noted that including the BSC P383 solution at this point causes potential issues related to the respective implementation dates as well as the possibility that one or another of any of the modifications could be accepted or rejected, leaving the solution stranded.
- 3.3 The Elexon representative suggested that the three code administrators (DCUSA, BSC and CUSC) could meet to further understand the expected timelines for change reports and implementation for such an arrangement to work and discuss whether it is believed that alignment can be achieved and what contingency processes might look like. It was noted that the current timeline for the CUSC modifications are heading towards a ‘go live’ from April 2020 and that the BSC solution is seeking to align to this date which means that final reports are currently expected in mid to late summer. The Secretariat took an action to liaise with NR and the relevant National Grid representatives to undertake such a discussion.

ACTION: 03/01 – ElectraLink to liaise with NR and relevant National Grid representatives to understand the expected timelines for change reports and implementation for the other related changes and discuss whether it is believed that alignment can be achieved and what contingency processes might look like if the BSC approach is to be incorporated into the solutions for DCP 341/342.

- 3.4 The Chair moved the group onto the drafting of the legal text and asked for their view as to the inclusion of the Supplier confirmation aspect. Upon starting to draft text, it was noted that Supplier confirmation aspect won’t be applicable to CVA sites and so further consideration was given to how confirmation could be achieved. It was noted that CVA sites are registered in the Central Meter Registration Service (CMRS) and so the Working Group agreed that confirmation would need to be provided by the customer with the agreement of the DNO where that customer does not have a contract with a Supplier.
- 3.5 The updated legal text document for DCP 342 acts as Attachment 2 to these minutes

4. Review of draft consultation document

- 4.1 The Working Group reviewed and updated the consultation document during the meeting and the document that captures these amendments acts as Attachment 3 to the minutes. During their review, the following actions were captured:

ACTION: 03/02 – Working Group to consider the case for looking at shared MPANs as this is being discussed within the Workgroup developing BSC modification P379 ‘Multiple Suppliers through Meter Splitting’ that is looking into this. Specifically, to consider what the impacts might be and to understand how DUoS is attributed to the different MPANs.

ACTION: 03/03 – ElectraLink to find the documentation provided by the Elexon representative during the development of the now withdrawn DCPs 319 and 321 and share these with the Working Group.

5. Next steps and Work Plan

- 5.1 The Working Group reviewed and updated the Work Plan and in doing so agreed that the next steps should cover off the actions taken during the meeting. The updated Work Plan acts as Attachment 4 to the minutes and a summary of the next steps is below:
- ElectraLink to update consultation document as agreed during the meeting and circulate to the Working Group for review;
 - Relevant Code Administrators from Elexon, National Grid and ElectraLink to hold discussion around alignment of solution and current timescales; and
 - Next meeting to be held at 10am on 16 May 2019 to walk through consultation document.

6. Any Other Business

- 6.1 There were no items of any other business and the Chair closed the meeting.

7. List of Attachments

- Attachment 1 – DCP 341/342 Updated Meeting Minutes
- Attachment 2 – DCP 342 Draft Legal Text - Updated
- Attachment 3 – DCP 341/342 Draft Consultation - Updated
- Attachment 4 – DCP 341/342 Work Plan - Updated

Appendix A – Actions

New and Open Actions *(Updates set out in blue)*

Ref.	Action	Owner	Update
03/01	The Secretariat and NR liaise with NR and relevant National Grid representatives to understand the expected timelines for change reports and implementation for the other related changes and discuss whether it is believed that alignment can be achieved and what contingency processes might look like if the BSC approach is to be incorporated into the solutions for DCP 341/342.	ElectraLink / NR	
03/02	Consider the case for looking at shared MPANs as this is being discussed within the Workgroup developing BSC modification P379 'Multiple Suppliers through Meter Splitting' that is looking into this. Specifically, to consider what the impacts might be and to understand how DUoS is attributed to the different MPANs.	Working Group	
03/03	Find the documentation provided by the Elexon representative during the development of the now withdrawn DCPs 319 and 321 and share these with the Working Group.	ElectraLink	

Closed Actions *(Updates set out in blue)*

Ref.	Action	Owner	Update
01/01	Find/collate and circulate any relevant materials related to the CUSC and BSC modifications to the Working Group.	Nicholas Rubin	12/04/2019 – Ongoing 23/04/2019 – Completed: Provided to the Working Group on 12 April 2019 and discussed during meeting held on 23 April.
01/05	Complete a first draft of the consultation document and circulate to the Working Group by 12 April 2019.	ElectraLink	12/04/2019 – Ongoing: further discussion held on 12 April 2019 and so new date will be by 16 April 2019. 23/04/2019 – Completed: Consultation document circulated to Working Group on 17 April.
02/01	Consider where within Schedules 17 and 18 the confirmation of eligibility for storage facilities should sit.	Working Group	23/04/2019 – Completed: Working Group discussed and updated legal text during meeting held on 23 April.
02/02	Compile forecast volumes data based on the assumption that 5% of generators are storage sites and thus use the import data of these sites as the forecast volumes across the DNO areas and circulate to the Working Group for review.	Andrew Enzor	23/04/2019 – Completed: Provided to the Working Group on 12 April 2019