

# DCP 336 Working Group Meeting 02

07 May 2019 at 10:00am

Web-Conference

Attendee	Company
<b>Working Group Members</b>	
Chris Ong [CO]	UK Power Networks
John Campbell [JC]	SSEN
Karl Maryon [KM]	Haven Power
Kevin Woollard [KW]	British Gas
<b>Code Administrator</b>	
Dylan Townsend [DT] (Chair)	ElectraLink
Hollie Nicholls [HN] (technical secretariat)	ElectraLink

## 1. Administration

- 1.1 The Chair welcomed the members to the 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 meeting minutes for the last Working Group meeting, held on 15 March 2019 and agreed that these were a true reflection of the discussions held.

## 2. Purpose of the Meeting

- 2.1 The Chair set out that the purpose of the meeting is to review the DCP 336 consultation responses, legal text and agree next steps for the change.

## 3. Review of the DCP 336 Consultation Responses

- 3.1 The Working Group reviewed the consultation responses received from DCUSA Parties and a copy of their comments and conclusions can be found as Attachment 1.
- 3.2 The Working Group noted all the responses to question one and concluded that all respondents understood the intent of DCP 336.
- 3.3 In regard to question two, the Working Group noted the majority of the responses. However, one respondent suggested that the solution should not include a specific transfer medium (i.e. a .csv file).

The Working Group requested that the Secretariat obtain further clarity on this response as the DCUSA legal text already states that the file format should be in .csv format and so the solution is not changing anything from the status quo.

**ACTION 02/01: The Secretariat to obtain clarity from Northern Powergrid regarding their response to question two of the consultation document.**

- 3.4 A further respondent to question two raised concerns that the wording regarding the process may be slightly vague and it would be preferable for a full procedure to be developed. SSEN concerns that the wording may be a bit vague on the process and would prefer for a full procedure be developed.
- 3.5 The Chair highlighted that along with the proposed solution there are two other potential solutions that the Working Group may want to consider. These being:
- Electronic Format is redefined as per the proposed solution however the information would still be provided to the Suppliers via the Nominated Central Source, so in essence the use of a DVD would be the only change to the status quo; and
  - Electronic Format is redefined as per the proposed solution however, the Nominated Central Source would provide the new format to the DCUSA Secretariat for them to upload to the password protected pages of the DCUSA Website, who would then issue a formal notification to DCUSA Parties to state that the information is available.
- 3.6 The Working Group discussed all potential solutions and agreed that they believed that the proposed original solution highlighted in the consultation document was the most appropriate route to take rather than retaining the use of a Nominated Central Source.
- 3.7 The Working Group reviewed the responses to question three and noted the majority. One respondent highlighted that although they are supportive of the solution they would prefer for any costs that would be incurred to by the DCUSA Secretariat to undertake the work to be ringfenced to only DNO and IDNO Parties as Suppliers do not currently pay for this data or the collation of it and so suggested that this should not change. The Working Group agreed that they will be able to recommend to the DCUSA Panel that this is the case.
- 3.8 A further respondent highlighted that they believe that the proposed solution goes above the desired intent of the Change Proposal (CP). The Working Group reviewed the intent of the CP and agreed that they did not believe that the solution goes above the original intent, however, as compared to the original discussions, it has been highlighted that further development is required.
- 3.9 This respondent also noted that the replacement of the Nominated Central Source with the DCUSA Secretariat has not been fully evaluated and so the Secretariat have agreed to seek clarity with the ENA on the process used to collate the data and potentially ask to observe the process they will be completing this year.

**ACTION 02/02: The Secretariat to seek clarity on the process used by the ENA to collate the data and potentially observe the process.**

- 3.10 Another respondent to question three noted that when a postcode falls under more than one DNO area, ENA currently assign to the DNO with the higher number of customer in that postcode and so

the Secretariat agreed to review this process with the ENA and ensure that the legal text is updated to make sure that it is clearly set out.

**ACTION 02/03: The Secretariat to update the legal text to ensure the process for assigning a postcode that falls under more than one DNO are is clear.**

- 3.11 In regard to question four, the Working Group noted all responses and concluded that there is no desire to change the file format from a .csv file. One Working Group member highlighted that the file format has been around since before computing and there could be a potential risk that if the file format is not defined then the Secretariat would need to update the formats of all the DNOs and IDNOs to ensure they are consistent.
- 3.12 The Working Group noted all responses to question five and again highlighted that the Secretariat will be reviewing the process with the ENA to ensure they are comfortable with what is required. It was also suggested that an email communication should be sent from the Secretariat when the data is available for Parties to download. It was suggested that this would be made clear that this would be part of the process in the Change Report.
- 3.13 In question six, the Working Group requested Party views on the proposed legal text. Five of the nine respondents had no comments on the legal text. The Working Group reviewed the other comments and noted that there were some common themes that had been discussed in response to earlier questions. These being that there were concerns regarding the removal of “free of charge” from the legal text and the use of the .csv file format.
- 3.14 The Working Group agreed that they were comfortable with the proposed drafting of the legal text and would include an extra clause to explicitly state that any costs incurred will be ring-fenced to the DNO and IDNO Parties only.
- 3.15 The Working Group noted the responses to question seven and highlighted that the majority of respondents believed that DCUSA General Objectives 1, 3 and 4 were better facilitated by the implementation of this CP.
- 3.16 The Working Group noted all responses to question eight of the consultation. One respondent highlighted that other industry parties can use the data for other purposes such as the 105-emergency number and “who is my network operator” website lookups and believed that this had not been considered with the development of this CP. The Working Group agreed that the DNOs would be able to share the data with any other interested parties who do not have access to the DCUSA Website if it is requested. There are no GDPR implications with sharing the data as no personal data is being shared.
- 3.17 The Working Group noted all responses to question nine and agreed that the next DCUSA Release following Party approval would be the best implementation data for this CP.

## 4. Review of the DCP 336 Draft Legal Text

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- 4.1 The Working Group reviewed the draft legal text and an updated version can be found as Attachment 2.
- 4.2 The Working Group agreed that they will be continuing to progress the original solution and therefore Secretariat will continue to replace the Nominated Central Source.
- 4.3 The Chair questioned whether Working Group members had any desire to retain the use of “free of charge” within the legal text. The Working Group agreed that they didn’t feel it was necessary but requested that it is made explicit in the Change Report that the Supplier Parties will not have to pay for the administration of the collation of the data and “free of charge” in its original form was referring to the costs of providing a DVD and postage fees. An extra clause will be included within the legal text which sets out the ring-fenced costing.

**ACTION 02/04: The Secretariat to include an extra clause within the draft legal text to state that the costs for administrating this process will be ringfenced to DNOs and IDNOs only.**

## 5. Review of the DCP 336 Draft Change Report

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- 5.1 The Working Group agreed that the draft Change Report needing further updating to reflect the discussions held in this meeting. An updated version will be circulated with the minutes of the meeting for Working Group member to review.

**ACTION 02/05: The Secretariat to update the draft Change Report to reflect the discussions held.**

## 6. Work Plan and Next Steps

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- 6.1 The Working Group reviewed the Work Plan and an updated version can be found as Attachment 3. Working Group members agreed that the following next steps:
  - The Secretariat to update the consolidated responses form with further Working Group comments and conclusions;
  - The Secretariat to update the legal text to include a clause regarding ring-fencing any cost to DNO and IDNO Parties only;
  - The Secretariat to contact the current Nominated Central Source to obtain clarity on the process required to collate the data;
  - The Secretariat to update the draft Change Report to reflect the discussions held.

## 7. Agenda Items for the next meeting

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- 7.1 The Working Group agreed to add the following items to the agenda for the next meeting;
- 7.2 Review of the DCP 336 draft Change Report; and
- 7.3 Review of the DCP 336 Legal Text and any comments sent from the DCUSA Legal Advisors.

## 8. Any Other Business

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8.1 There were no further items of AOB and the Chair closed the meeting.

## 9. Date of Next Meeting – Tuesday 11 June 2019

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9.1 The Working Group agreed that the next meeting will be held on Tuesday 11 June 2019 at 2pm via teleconference.

## 10. Attachments

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- Attachment 1 – DCP 336 Updated Consolidated Consultation Responses
- Attachment 2 – DCP 336 Updated Legal Text
- Attachment 3 – DCP 336 Update Work Plan

## New and open actions

Action Ref.	Action	Owner	Update
<b>02/01</b>	The Secretariat to obtain clarity from Northern Powergrid regarding their response to question two of the consultation document.	ElectraLink	
<b>02/02</b>	The Secretariat to seek clarity on the process used by the ENA to collate the data and potentially observe the process.	ElectraLink	
<b>02/03</b>	The Secretariat to update the legal text to ensure the process for assigning a postcode that falls under more than one DNO are is clear.	ElectraLink	
<b>02/04</b>	The Secretariat to include an extra clause within the draft legal text to state that the costs for administrating this process will be ringfenced to DNOs and IDNOs only.	ElectraLink	
<b>02/05</b>	The Secretariat to update the draft Change Report to reflect the discussions held.	ElectraLink	

## Closed Actions

Action Ref.	Action	Owner	Update
<b>01/01</b>	CO to update the background section of the draft consultation document to include more detail regarding the current arrangements in regard to rota disconnections and include detail on the Supplier and DNO obligations	Chris Ong	07 May 2019: Completed
<b>01/02</b>	DCUSA Secretariat to update the draft consultation document to reflect the discussions held	ElectraLink	07 May 2019: Completed
<b>01/03</b>	The Chair agreed to obtain an idea of the costs for the DCUSA Secretariat to conduct the collation of data and website maintenance	ElectraLink	07 May 2019: Completed
<b>01/04</b>	The Chair to investigate whether it would be possible for DNOs to upload the rota disconnections data to the new DCUSA website themselves.	ElectraLink	07 May 2019: Completed
<b>01/05</b>	The Secretariat to update the DCP 336 Work Plan to reflect the discussion held and submit to the DCUSA Panel at their next meeting on 17 April 2019.	ElectraLink	07 May 2019: Completed