




DCUSA Change Report		At what stage is this document in the process?
<div>DCP 315</div> <div>Housekeeping</div> <div>Raised on 16 February 2018 as a Standard Change</div>	01 – Change Proposal	
	02 – Consultation	
	03 – Change Report	
	04 – Change Declaration	
<div>Purpose of Change Proposal:</div> <div>DCP 315 seeks to address various housekeeping issues (HK100-HK104).</div>		
<div></div>	<div>This document is issued in accordance with Clause 11.20 of the DCUSA, and details DCP 315 – Housekeeping</div> <div>DCP 315 is considered a Part 2 matter and Parties are invited to consider the proposed amendment (Attachment 1) and submit their votes using the Voting form (Attachment 2) to <a href="mailto:dcusa@electralink.co.uk">dcusa@electralink.co.uk</a> by <b>24 April 2018</b>.</div> <div>The voting process for the proposed variation and the timetable of the progression of the Change Proposal (CP) through the DCUSA Change Control Process is set out in this document.</div> <div>If you have any questions about this paper or the DCUSA Change Process, please contact the DCUSA by email to <a href="mailto:dcusa@electralink.co.uk">dcusa@electralink.co.uk</a> or telephone 0207 432 3000.</div>	
<div></div>	<div>Parties Impacted: <b>All Parties</b></div>	
<div></div>	<div>Impacted Clauses: <b>Various Clauses in Sections 1C and 2B and Schedules 7, 17, 18 and XX</b></div>	

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Any questions?

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## Timetable

The timetable for the progression of the CP is as follows:

### Change Proposal timetable

Activity	Date
Initial Assessment Report Approved by Panel	21 February 2018
Change Report Approved by Panel	21 March 2018
Change Report issued for Voting	23 March 2018
Party Voting Closes	24 April 2018
Change Declaration Issued to Parties	26 April 2018
Implementation	28 June 2018

# 1 Executive Summary

## What?

1.1 A number of housekeeping items have been identified by various parties over time and are recorded in the housekeeping log. Throughout this document the use of the acronym 'HK' followed by a numerical value refers to a specific housekeeping log item.

1.2 The Electricity Distribution License states:

22.14 *No modification of the DCUSA may be made unless:*

- (a) *the parties to the DCUSA have voted, pursuant to paragraph 22.12A(a), in favour of the modification described in the relevant modification report; or*
- (b) *the Authority, having had regard to the Applicable DCUSA Objectives, directs the licensee, in conjunction with every other Electricity Distributor, to modify the DCUSA in such manner as is stated in that direction following the making of a recommendation to the Authority by the parties to the DCUSA pursuant to paragraph 22.12A(b).*

22.12A *The procedures must ensure that parties to the DCUSA, having regard to whether the modification would, as compared with the existing provisions of the DCUSA, better facilitate the achievement of the Applicable DCUSA Objectives, are able to vote for:*

- (a) *the implementation or rejection of the proposed modification, in the case of a proposal that is to be determined in accordance with paragraph 22.9F; or*
- (b) *a recommendation to the Authority to approve or reject the proposed modification, in the case of a proposal that requires Authority approval.*

1.3 This CP seeks to address the following housekeeping log items:

- HK100 - Amendment to IDNO references throughout Schedules 17 and 18.
- HK101 - Amendment to Clause references in Clause 11.31.
- HK102 - Amendment to Clause 4.1 in Schedule 7 'DCUSA Standing Issues Group' (SIG)
- HK103 - Amendment to update IDNO references to LDNO in Clause 46A and 46B of the new Schedule [x] which is being introduced by DCP 234 in April 2018
- HK104 - Amendment to Clause reference in Clause 46A.4

## Why?

1.4 This CP has been raised to resolve the issues that are periodically identified within DCUSA which are recorded in the housekeeping log. The implementation of this CP will ensure that the legal text throughout the DCUSA document is correct.

## How?

1.5 By completing a review of the items recorded in the housekeeping log and subsequently revising the DCUSA document to incorporate the required amendments.

## 2 Governance

### Justification for consideration as either a Part 1 or Part 2 Matter

- 2.1 DCP 315 has been classed as a Part 2 Matter as the proposed amendments are for housekeeping purposes and as such there is no material impact on DCUSA Parties.

### Requested Next Steps

- 2.2 The Panel considered that the Proposer has carried out the level of analysis required to enable Parties to understand the impact of the proposed amendment and to vote on DCP 315.
- 2.3 The DCUSA Panel recommends that this CP:
- Be issued to Parties for Voting.

## 3 Why Change?

### Background of DCP 315

- 3.1 DCP 315 was raised by UK Power Networks to address the items recorded in the housekeeping log. The proposer has reviewed the items in the housekeeping log that this change seeks to address, being HK100, HK101, HK102, HK103 and HK104.

#### Housekeeping Item 100

- 3.2 HK 100 was identified during the DCP 251/252 Working Groups review of consultation responses, it was noted by one DNO that Schedules 17 and 18 only reference IDNOs and not both IDNOs and DNOs operating out of area. It was noted that the aforementioned will need to be addressed, via a housekeeping change, should DCP 251/252 not be approved. HK100 was introduced by DCP234, as a result of the new Schedule XX including references to LDNOs and Schedules 17 and 18 still referencing only IDNOs.

#### Housekeeping Item 101

- 3.3 HK101 was in the very first designated DCUSA document and is noted as being an incorrect Clause cross reference. Clause 11.31 states *"Where, within 10 Working Days of the Secretariat sending notice under Clause 11.29, the Secretariat receives notice from a Party that it is prepared to support the Change Proposal, that Party shall:"*. However, the reference to Clause 11.29 is incorrect as nowhere within Clause 11.29 does it state that the Secretariat sends notice. The reference to Clause 11.29 within Clause 11.31 should be corrected reference Clause 11.30.

#### Housekeeping Item 102

- 3.4 HK102 arises due to regulatory change that diverged from the original DCP 043 'Creation of DCUSA Standing Issues Group' text. The Secretariat noticed that paragraph 4.1 of Schedule 7

'DCUSA Standing Issues Group' (SIG) states that the Chair "will at all times be from a company that is Party", however the Chair is now appointed by the DCUSA Panel and is independent.

#### **Housekeeping Item 103**

- 3.5 HK103 was erroneous, as it was found that the incorrect references to IDNO will be introduced by a CP that is still in development. It is noted that the CP also introduces the paragraphs where the incorrect references would be contained and as such could be amended as part of the legal drafting process carried out by the Working Group created to develop the CP.

#### **Housekeeping Item 104**

- 3.6 HK104 was introduced by DCP282 and was identified by the Secretariat and noted as being an incorrect Clause cross reference to a Clause 45A.2 in Clause 46A.4. No such Clause 45A.2 exists and as such should be amended to 46A.2 which is the correct reference.

## **4 Solution**

### **DCP 315 Assessment**

- 4.1 The DCUSA Panel recommended that the CP be progressed to the Change Report Phase.
- 4.2 This change seeks to revise the DCUSA document to incorporate housekeeping log items being HK100, HK101, HK102, HK103 and HK104. The Proposer has carried out the review and has drafted the amendments to the effected legal text as was necessary to resolve each applicable housekeeping item. This legal text drafting was then passed to the legal advisor for review. More details on the legal text can be found in Section 8 below.
- 4.3 Following the review of each housekeeping item, the Proposer believes that this CP is required to address HK100, HK101, HK102, HK104 and the additional items identified below, in accordance with the Distribution License. Where an error is introduced that has been voted on then it should fall within the scope of the Distribution License.
- 4.4 The Proposer is of the view that if an error is introduced in publishing the DCUSA, e.g. a true typo, then a DCP should not be required and the error should be corrected as soon as practicable and that version of DCUSA republished.
- 4.5 It is noted that the Proposer believes HK103 should be deleted from the Housekeeping log as it has been confirmed in the legal review that the amendment is not necessary.
- 4.6 For the avoidance of doubt, DCP 315 is not concerned with HK105 or any later, higher numbered, items in the Housekeeping log.

#### **Additional Items**

- 4.7 In reviewing the Housekeeping log entries, another error was found in Schedule XX, where there is an erroneous reference to IDNO in the formula below paragraph 37 which should be amended to

reference LDNO. The Proposer of DCP 315 believes that this should also be amended by DCP 315. The formula to be replaced is shown below:

$$HV\ Split = 1 - \frac{Sum\ of\ IDNO\ network\ length/Number\ of\ IDNO\ connections}{Sum\ of\ DNO\ network\ lengths/Number\ of\ DNO\ connections}$$

4.8 During the review of the draft legal text by the DCUSA legal advisor it was noted that:

- Schedule 18 contains a duplicate paragraph 24.2. and it was agreed with the Proposer of DCP 315 that the duplicate paragraph can be removed as part of this CP.
- There is an interaction with the legal text for DCP 305 'LDNO Boundary Level Definitions in the EDCM', which means that some changes will not be necessary if DCP305 is approved and implemented at the same time or before DCP 315.
- The definition of LDNO in Schedule XX is very slightly different to the definition that was being proposed by DCP 315 for inclusion into Schedules 17 and 18. In Schedules 17 and 18, LDNO refers to a DNO Party acting out of area, whereas in the current Schedule XX definition LDNO refers to all DNO Parties.

4.9 The Proposer has agreed that DCP 315 can pick up both the removal of the duplicate paragraph 24.2 in Schedule 18 and the change to the definition of LDNO in Schedules 17 and 18. It is noted that DCP 305 also includes a provision for the addition of a definition of LDNO in Schedules 17 and 18, which is different to that originally proposed by DCP 315. For DCP 315, it has been agreed that the inclusion of the definition of LDNO in Schedules 17 and 18 will be updated to match the wording proposed by DCP 305.

## 5 Relevant Objectives

### Assessment Against the DCUSA Objectives

5.1 For a DCUSA Change Proposal to be approved it must be demonstrated that it better meets the DCUSA Objectives. The CP form provided as Attachment 3, details which of the DCUSA Objectives the Proposer considers DCP 315 better facilitates.

Impact of the Change Proposal on the Relevant Objectives:	
Relevant Objective	Identified impact
General Objective Four - The promotion of efficiency in the implementation and administration of this Agreement	Positive

5.2 Correcting the housekeeping items that have been periodically identified within the DCUSA document ensures that the legal text throughout the DCUSA document is accurate which will aid comprehension thereby improving efficiency which better facilitates DCUSA General Objective four. It is noted that although some impacted clauses are within the methodology sections, this is not a methodology change.

## 6 Impacts & Other Considerations

**Does this Change Proposal impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?**

6.1 Not applicable

### Consumer Impacts

6.2 No consumer impacts have been identified.

### Environmental Impacts

6.3 In accordance with DCUSA Clause 11.14.6, the Proposer assessed whether there would be a material impact on greenhouse gas emissions if DCP 315 were implemented. The Proposer did not identify any material impact on greenhouse gas emissions from the implementation of this CP.

## 7 Implementation

7.1 The proposed implementation date for DCP 315 is 28 June 2018 as this is the next applicable DCUSA release date.

## 8 Legal Text

8.1 The legal text for DCP 315 has been reviewed by the DCUSA legal adviser and is provided as Attachment 1.

8.2 The legal text sets out the amendments made to the legal text which addresses housekeeping items HK100, HK101, HK102, HK104 and the additional items identified as noted in paragraphs 4.7 to 4.9. The Proposer is satisfied that the legal text meets the intent of the change.

8.3 It is noted that the legal text document also highlights that some changes will not be necessary if DCP 305 is approved and implemented at the same time or before DCP 315.

## 9 Code Specific Matters

### Modelling Specification Documents

9.1 Not applicable.

### Reference Documents

9.2 Not applicable.

## 10 Recommendations

### Panel's Recommendation

- 10.1 The Panel approved this Change Report on 21 March 2018. The Panel considered that the Proposer has carried out the level of analysis required to enable Parties to understand the impact of the proposed amendment and to vote on DCP 315.
- 10.2 The Panel have recommended that this report is issued for Voting and DCUSA Parties should consider whether they wish to submit views regarding this Change Proposal. The Voting Form can be found in Attachment 2.

### Attachments

- Attachment 1 – DCP 315 Legal Text
- Attachment 2 – DCP 315 Voting Form
- Attachment 3 – DCP 315 Change Proposal