

Company	Confidential/ Anonymous	1. Do you understand the intent of DCP 313?	Working Group Comments
Electricity North West	Non-confidential	<p>No, the stated intent of this Change Proposal is “to improve transparency of the eligibility criteria for EDCM generators to receive super red credits, and to improve consistency in the application thereof”, however the proposed options for change are not restricted to changes to transparency or ensuring consistency of application but actually propose changes to the criteria in the methodology used to determine eligibility for super red credits. Such changes would seem to be outside the scope of the intent.</p> <p>The proposed options for change seem to be focused on addressing the specific case of non-intermittent generators with a zero f-factor. If the treatment of such customers is thought to be a concern it would be better to consider that issue directly, rather than indirectly through this change proposal.</p>	The Working Group note the interpretation from ENWL. The Working Group discussed the intent and agreed to submit an amended intent that still meets the spirit of the original intent to the DCUSA Panel as stated in the working group terms of reference.
Flexible Generation Group	Non-confidential	Yes	Noted
Northern Powergrid	Non-confidential	Yes	Noted
SP Distribution/SP Manweb	Non-confidential	Yes we understand the intent of DCP 313	Noted
UK Power Networks	Non-confidential	Yes	Noted

UK Power Reserve Ltd	Non-confidential	Yes, UKPR understands the intent of DCP 313. In light of the current arrangements and the lack of transparency as to whether and to what extent an embedded generator is eligible for EDCM credits, UKPR believes that it is important to transition to a more transparent and user-friendly solution. This would provide network users with more reliable information when exploring connections in a given network.	Noted
Welsh Power Group Limited	Non-confidential	Yes	Noted
WPD	Non-confidential	Yes	Noted
Working Group Conclusions: The Working Group noted all responses to question one and highlighted that they were going to submit a slightly amended version of the intent to the DCUSA Panel to ensure that it is as clear as it can be, but still within the spirit of the intent.			

Company	Confidential/ Anonymous	2. Are you supportive of the principles of DCP 313?	Working Group Comments
Electricity North West	Non-confidential	No, we are supportive of the principle that the credits available to EDCM generators should reflect the benefits available to network operators under the current engineering standards. It is our view that under ETR130 the f-factor determines the extent to which a generator can provide the required network security to base network management decisions on. Therefore, we believe that using f-factor in the methodology is the most direct way to reflect this in customers' charges.	The Working Group note the response and from a cost reflectivity perspective the use of f factors is as described. However, the purpose of the change is to create a balance between transparency and cost reflectivity.

Flexible Generation Group	Non-confidential	<p>The Flexible Generation Group (FGG) represents the interests of small peaking power producers. Our members operate across the GB market, helping the SO to balance the system. FGG members believe it is essential that the charging methodology is applied consistently and in a manner that is transparent and predictable in order to facilitate effective competition and the economic, efficient operation of the GB energy market.</p> <p>At the present time the application of F factors in the EDCM charging formula is opaque, varying across the DNO regions and cutting across the cost reflective signals which are calculated under Charge 1 credits through the load flow model. FGG members are the parties who are meant to respond to the pricing signals. Without this change, a positive charge 1 indicating whether it is possible to delay reinforcement works is not seen by the generator if the F factor is set to zero. This will lead to a suboptimal outcome.</p> <p>It is our view, having reviewed the charging methodology, that it is incorrect to infer from P2/6 that the F factor should be set to zero. P2/6 assesses whether the network is adequate without requiring a contribution from distributed generation. Only when the network is inadequate does P2/6 take account of the contribution of embedded generation based on a measure of its inherent reliability or persistence (as detail in Table 2-4).</p> <p>A measure of network adequacy is not the same as assessing whether generation can defer or delay network reinforcement. If the F factor is set to zero in the calculation of generation credits it overrides the reinforcement calculation and prevents signals being presented to generators to produce electricity at</p>	<p>DNO Working Group representatives will discuss this internally to consider whether the information provided by FGG is accurate to their interpretation of P2/6.</p>
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		times of system peak demand and help defer the reinforcement.	
Northern Powergrid	Non-confidential	<p>Yes.</p> <p>We are in favour of a charging methodology which achieves an appropriate level of cost-reflectivity without excessive complexity or lack of transparency. We believe that DCP 313 achieves this balance more effectively than the status quo, and so support the principles.</p>	Noted
SP Distribution/SP Manweb	Non-confidential	Yes we are supportive of the principles of DCP 313	Noted
UK Power Networks	Non-confidential	Yes	Noted
UK Power Reserve Ltd	Non-confidential	<p>Yes, UKPR supports the principles of DCP 313. We in particular support the aim of increasing transparency and favouring commonality in the methods by which DNOs determine the F Factor – and as such, determine the eligibility for charge one credits. Same generation technology being assigned a zero or non-zero F Factor depending on the DNO licence areas does not adequately reflect the real support of non-intermittent embedded generators to the network. The generators that offset reinforcement costs should be awarded credits consistently throughout the distribution network areas.</p>	Noted
Welsh Power Group Limited	Non-confidential	<p>Yes we believe it is essential that the charging methodology is applied consistently and in a manner that is transparent and predictable. Currently the application of F factors in the EDCM charging formula is opaque, varying by DNO region and cutting across the cost reflective signals which are calculated under</p>	Noted. Please refer to FGG response above.

		<p>Charge 1 credits through the load flow model. A positive charge 1 indicates whether it is possible to delay reinforcement works. Overwriting the F factor to zero prevents those signals being presented to DG.</p> <p>It is our view from a review of the charging methodology that it is incorrect to infer from P2/6 whether the F factor should be set to zero. P2/6 assesses whether the network is adequate without requiring a contribution from DG. Only when the network is inadequate does P2/6 take account of the contribution of embedded generation based on a measure of its inherent reliability or persistence (as detail in Table 2-4)</p> <p>A measure of network adequacy is not the same as assessing whether DG can defer or delay network reinforcement. BY setting the F factor to zero in the calculation of generation credits overrides the reinforcement calculation and prevents signals being presented to DG to generate at times of system peak demand and help defer the reinforcement</p>	
WPD	Non-confidential	Yes	Noted
Working Group Conclusions: DNO representatives will discuss in their business the P2/6 requirements and whether it aligns with the response from FGG and Welsh power Group limited.			

Company	Confidential / Anonymous	3. Is this an issue for P2/6 and the connection offer whereby generators ask the question as to whether they would qualify for a credit or not at the time rather than charging methodology change?	Working Group Comments
Electricity North West	Non-confidential	We can see no issue with generators being provided with a copy of the f-factor calculation at the time of connection or prior. However, like other inputs to the methodology the f-	This response is the current status quo; however, the Working Group are looking to change this so that the

		<p>factor may change over time as the network develops if the DNO reviews the calculation based on the latest information, and especially if the DNO takes the view that the f-factor should be zero if the part of the network affected does not require additional security any longer (e.g. if a nearby major demand customer closes).</p> <p>We believe that it is appropriate for the f-factor input to the model to reflect the current status of the customer and network as this approach is in line with the other inputs (for example, NUFs and power flow data).</p>	<p>decision is determined on a fixed technology type rather than network changes.</p>
Flexible Generation Group	Non-confidential	<p>All generation needs clear and consistent signals about where to operate at times where it is beneficial to the wider system. It would be inefficient to address this via the P2/6, as charging methodologies need to send transparent signals to generators. Furthermore the solution must address the inconsistencies across DNO regions.</p>	<p>The inconsistencies across DNO areas is not necessarily true but is understandable. DNOs are following a due process in P2/6 and the EDCM. The outcome is dependent on whether there is a need for network reinforcement irrespective of whether the same type of technology is used. This therefore can result in the same type of technology receiving a credit in one region and not in another. Similarly, the generator may be given a credit at the connection stage, but over time this could be removed due to a change in the network design making it no longer a requirement (See ENW comment above). It is not just determined by technology type.</p>

		FGG believe that setting the F factor to zero is an incorrect application of the charging methodology and must be changed to 1 in all DNO areas.	The Working Group to seek clarity on this point.
Northern Powergrid	Non-confidential	Under the current arrangements, generators are able to request this information from the Distribution Network Operator (DNO) at the time of connection. However, this does not resolve the issue on an ongoing basis, where there is the potential for a generator's eligibility for credits to change year-on-year. DCP 313 would remove this uncertainty.	Noted
SP Distribution/ SP Manweb	Non-confidential	We do not see any issue with this.	Noted
UK Power Networks	Non-confidential	We are of the view that this change should follow pricing signal principles and support the provision of a credit if the charge signal provides for one, regardless of the type of generator they are.	Noted. More information is provided in other responses.
UK Power Reserve Ltd	Non-confidential	No, although the credit eligibility information at the offer stage would be beneficial for customers, UKPR believes that this does not solve the defect identified by DCP 313 and it does not contribute to eliminate inconsistencies across DNOs licence areas. We should bear in mind that the defect this modification is trying to address concerns not only transparency of the information but also – and especially - a uniform approach on classification of charge one eligible embedded generators.	Noted
Welsh Power Group Limited	Non-confidential	This is inefficient and will not correct the inconsistency of approach across DNO regions. We are of the view that setting F factor to zero is an incorrect application of the charging methodology	As with the FGG response above, this point will need clarifying.

WPD	Non-confidential	No	Noted
Working Group Conclusions: If it is not already provided, it would be beneficial to provide the f factor for the type of generation at the time of connection, however, this would not alleviate the perceived inconsistencies between the DNO areas. Clarity will be sought from FGG and Welsh Power on their responses.			

Company	Confidential / Anonymous	4. Are parties comfortable with divorcing P2/6 with charging requirements? Please provide your rationale.	Working Group Comments
Electricity North West	Non-confidential	<p>We are comfortable with the charging requirements not directly reflecting P2/6, however, the charging methodology should reflect the underlying cost drivers of the network if it is to remain cost reflective.</p> <p>As the requirements of P2/6 currently determine the actions of network operators we believe it is appropriate that the charging methodologies should continue to recognise this at this time.</p>	The Working Group agree that to achieve ultimate cost reflectivity it is necessary to reflect the underlying costs drivers for the end user. For the charging methodology to be transparent and practical some simplifications will be required.
Flexible Generation Group	Non-confidential	P2/6 gives a measure of current network adequacy and does not address short terms signals around operation. The charging regime is meant to encourage generation to both locate and operate in a manner best designed to support the systems. Divorcing the two seems entirely logical.	The Working Group do not entirely agree with the statement made. The Working Group will review the clarifying information from question 3 to determine a view.
Northern Powergrid	Non-confidential	<p>In this specific instance, yes.</p> <p>We believe the distinction is necessary to remove unnecessary complexity and to increase transparency in the application of the EDCM, where at present an embedded generator cannot determine whether they will be eligible for credits as the</p>	Noted

		determination of the F Factor in accordance with P2/6 requires use of information only available to the DNO.	
SP Distribution/ SP Manweb	Non-confidential	Yes we are comfortable with divorcing P2/6 with charging requirements.	Noted
UK Power Networks	Non-confidential	We are comfortable, as we believe that the rational for Use of System charges is about creating a price signal to influence (future) behaviour rather than being too specific with regard to operations of the network, and thus they do not need to align with P2/6.	Noted
UK Power Reserve Ltd	Non-confidential	<p>UKPR supports a partial divorce of the EDCM from P2/6 as long as it allows non-intermittent generators to be eligible for charge one credits. This approach would guarantee simplicity and transparency.</p> <p>Should a total separation take place, significant issues would emerge in the context of new technologies not currently covered by Table 2.1 of P2/6. More details are outlined in Questions 7 and 8.</p>	<p>Noted. This will need re-reviewing once a decision has been made on the option being taken forward.</p> <p>The second paragraph related to Option B and was considered at the time of making the decision between the two options.</p> <p>The Working Group's decision is to support Option 1 which will provide all non-intermittent generators being eligible for charge one credits</p>
Welsh Power Group Limited	Non-confidential	It is our view that P2/6 and the charging requirements were designed to be divorced. P2/6 is a measure of current network adequacy, the charging signals are intending to reward and stimulate efficient locating of DG	Noted
WPD	Non-confidential	Yes	Noted

Working Group Conclusions: The Working Group's decision is to support Option 1 which will provide all non-intermittent generators being eligible for change one credits as well as intermittent generators with a non-zero f factor. (see response to question 5)

Company	Confidential / Anonymous	5. Which solution option do you support and why?	Working Group Comments
Electricity North West	Non-confidential	<p>We do not support the introduction of discrimination based on technology type into the EDCM. Technology type is not a driver of network requirements and therefore does not drive costs.</p> <p>Further, it is our understanding that the definitions of intermittent and non-intermittent will not be supported in the P2/7 and so we are not sure these solutions would be sustainable in the future. DCP268 <i>Charging using HH Settlement data</i> may result in the removal of the distinction between intermittent and non-intermittent from the CDCM, partly for this reason.</p>	<p>DNOs to check status of P2/7 and the understanding of ETR130 as to whether intermittent/non-intermittent generation is being retained within it.</p> <p>Noted</p>
Flexible Generation Group	Non-confidential	<p>FGG fully support option 1 as being more efficient although we can also see merit in option 2, which assesses the underlying characteristics of the controllable generator. This should not be necessary as the total revenue available to the generator will be operating hours x credit rate. A generation technology which is either less reliable or unable to maintain its maximum output will receive a lower credit by virtue of its lower output over the peak. However, if contributing at peak its MWh are as good as any other plant's.</p>	Note support for Option 1
Northern Powergrid	Non-confidential	<p>We believe both solutions are an improvement on the status quo, but our preference is for option two.</p>	Note support for Option 2

SP Distribution/ SP Manweb	Non-confidential	Option 1.	Note support for Option 1
UK Power Networks	Non-confidential	We are comfortable that either option creates an approximate price signal, however we believe that option one is clearer and easier for Customers and Suppliers to understand as it is unambiguous, whereas option two is more complex for parties to understand the arrangements which would apply to them.	Note support for Option 1
UK Power Reserve Ltd	Non-confidential	UKPR supports Option 1, which represents an evolution of the original arrangements rather than a completely new approach. Option 1 would allow a more consistent solution for all non-intermittent embedded generators. By allowing a separation of eligibility criteria for non-intermittent EDCM embedded generators from the site-specific assessment carried out to determine the F Factor, Option 1 would deliver the intent of DCP 313 and would duly address the issue of the lack of commonality in the method by which DNOs determine the F Factor.	Note support for Option 1, however, f factor will be assigned the same way as they are assigned now. For non-intermittent they will benefit from credits if they have a zero-f factor.
Welsh Power Group Limited	Non-confidential	We support option 1 as being more efficient although also see merit in option 2 which assesses the underlying characteristics of the non intermittent generator. This should not be necessary as the total revenue available to the DG will be operating hours x credit rate. A generator which is either less reliable or unable to maintain its maximum output will receive a lower credit by virtue of its lower output over the peak	Note support for Option 1
WPD	Non-confidential	Option 1 is easier to implement	Note support for Option 1
Working Group Conclusions: The Working Group are comfortable with supporting Option 1 following on from the responses received.			

Company	Confidential / Anonymous	6. Is there an alternative approach? If so, please provide details.	Working Group Comments
Electricity North West	Non-confidential	<p>For transparency, we would support providing copies of the f-factor calculation on request.</p> <p>For consistency of application we would favour the introduction of a forum where f-factor calculations could be discussed amongst peers, and where best practice could be agreed and shared. This group could be a special meeting of the DCMDG, perhaps on an annual basis with the invite extended to network representatives familiar with the f-factor calculations for their network areas.</p>	The Working Group are supportive of the initiative and it can be progressed without any impact on DCP313.
Flexible Generation Group	Non-confidential	No	Noted
Northern Powergrid	Non-confidential	There are multiple feasible approaches to resolving this issue – we believe the two solutions set out in the proposal are likely to be the most appropriate.	Noted
SP Distribution/ SP Manweb	Non-confidential	Not that we are aware of.	Noted
UK Power Networks	Non-confidential	We believe that an alternative option would be to award credits to all generators regardless of technology type and whether they are deemed to have intermittent or non-intermittent generation. The credits would only apply in the super red period and thus would only be awarded where there is a notional benefit to the network. We believe that the intent of this	The Working Group noted the response, however, no Working Group members, including the responder, wanted to raise this as an alternative to DCP 313 at this time.

		change proposal would allow this option to be considered further if felt to be appropriate.	
UK Power Reserve Ltd	Non-confidential	N/A	Noted
Welsh Power Group Limited	Non-confidential	No	Noted
WPD	Non-confidential	No	Noted
Working Group Conclusions: The Working Group are comfortable that there are no alternative approaches that should be considered.			

Company	Confidential / Anonymous	7. For option 2, are Parties comfortable with the value added in the "Other" section of the table? If no, please provide your rationale and if appropriate, any alternative suggestion.	Working Group Comments
Electricity North West	Non-confidential	<p>These values seem to be an unweighted arithmetical average of the other categories of generation. We are not comfortable that this is a better approach than that laid down in P2/6 ETR130 which we understand to include provision for undertaking separate calculations for those generation types not included in the tables.</p> <p>Hybrid sites including some form of generation and storage together are likely to form an increasing part of the energy landscape in future; the methodology is not clear on how to deal with these.</p>	Noted

Flexible Generation Group	Non-confidential	<p>FGG believes that it would be appropriate to have a technology class for gas reciprocating engines as they are currently the most common form of controllable generation be deployed on the DNO networks. For gas engines FGG would propose a value similar to landfill gas and CCGT.</p> <p>FGG also support the addition of a catch-all category.</p>	Noted
Northern Powergrid	Non-confidential	<p>We are comfortable with these values, on the basis that they will be only be used infrequently (i.e. when a new non-intermittent technology type connects to a DNO network) and on a short-term temporary basis (i.e. until a change proposal introduces more appropriate values).</p>	Noted
SP Distribution/ SP Manweb	Non-confidential	<p>Yes we are comfortable with this value.</p>	Noted
UK Power Networks	Non-confidential	<p>Yes as this provides future proofing to the methodology and is appropriate. Otherwise any future technology types will require a change proposal in order to be included.</p>	Noted
UK Power Reserve Ltd	Non-confidential	<p>It is challenging to decide and state whether we are comfortable with the value assigned to the "Other Non-Intermittent Generation" section of the table. The reasons lay behind a number of issues that are currently not addressed:</p> <ol style="list-style-type: none"> 1. What is the rationale for the calculation of these values? 2. Which specific technologies are included (or deemed to be included) in the "Other" section of the table? <p>For a more detailed explanation of our concerns over the technologies included in this table, please see our response to Question 8.</p>	Noted

Welsh Power Group Limited	Non-confidential	The largest volume of new (non intermittent) capacity currently being installed is spark ignition gas reciprocating engines. It would seem appropriate to have a separate category for this type of generation in addition to a catch all. For gas engines we suggest a value similar to landfill gas and CCGT	Noted
WPD	Non-confidential	Yes	Noted
Working Group Conclusions: The Working Group noted all responses and highlighted that they will be progressing Option 1. The simplicity of Option 1 outweighs the complexity of Option 2.			

Company	Confidential / Anonymous	8. For option 2, are there any other technologies that should be included in the table now? If yes, what F Factor should they be assigned?	Working Group Comments
Electricity North West	Non-confidential	Storage would seem to be an obvious example, which could be broken down further into different types of storage, for example, flow machines, batteries, which may have different characteristics as identified by National Grid's energy storage rating report.	Noted
Flexible Generation Group	Non-confidential	See above.	Noted
Northern Powergrid	Non-confidential	We believe large hydro should be included in the table. P2/6 states that small hydro ('small' being less than 1MW) should be treated as intermittent, with large hydro being treated as non-intermittent. We suggest a PDG factor of 0.5 for large hydro, but would be open to discussions with the Working Group on what value this should take.	Noted

		<p>On balance, we also believe battery storage should be included in the table. We recognise that this could be considered to fall beyond the scope of DCP 313 given that battery storage is not explicitly referenced in P2/6. However, DNOs have recently clarified that battery storage will be considered as non-intermittent generation and so may be assigned a non-zero F Factor, so its inclusion in this table would arguably be maintaining and clarifying the status quo and so achieving the intent of the change to “improve transparency of the eligibility criteria for EDCM generators to receive super red credits”. If this row were not included, we would envisage battery storage falling back on the ‘other’ row until a separate change could be progressed to include new values within the table.</p>	
SP Distribution/ SP Manweb	Non-confidential	Hydro appears to be missing from the list?	Noted
UK Power Networks	Non-confidential	No, not that we are aware of. And if there are, the ‘other’ section (as referred to in Q7) addresses this.	Noted
UK Power Reserve Ltd	Non-confidential	<p>In line with the original Table 2-1 in the P2/6 Engineering Recommendation document, the table proposed for Option 2 of DCP 313 has been updated to list several specific technologies to which a range of specific values has been assigned.</p> <p>UKPR believes that for consistency purposes, other non-intermittent generation technologies should be equally listed and singled out from the overarching category of “Other Non-Intermittent Generation”.</p> <p>Specifying the value of the PDG Factor of, for instance, gas reciprocating engines, would provide a much needed clarity. Simply including some (unspecified) technologies into the “Others” category, would undermine the level playing field for</p>	Noted

		<p>those non-intermittent technologies vis-à-vis the other technologies that have been listed.</p> <p>However, opting for this table brings to light a problem that would need to be constantly addressed in this context: i.e. the need to regularly clarify which technology types should be included in the table, whether they should be listed, whether they should be assumed to be included in the "Others" category and – if not – which treatment should new technologies have.</p> <p>The problem is further exacerbated if we think about the fast development and deployment of electricity storage. Ofgem has clearly signalled their intention to classify electricity storage as generation. As such, several doubts would arise very quickly, for instance:</p> <p>a) would storage be treated as non-intermittent generation as per the definition included in the legal text, whereby: <i>"Non-intermittent generation is defined as a generation plant where the energy source of the prime mover can be made available on demand, in accordance to the definitions in Engineering Recommendation P2/6. The generator can choose when to operate"</i>?</p> <p>b) would every type of electricity storage be assigned the same value?</p> <p>Furthermore, from a governance point of view, updating the table would require formal DCUSA modification proposals, with a range of delays that would depress the signal and hamper market participation of flexibility providers that would support the network in a competitive way, at the lowest costs to consumers.</p> <p>On a separate note, we would require clarification on the second part of the question <i>"If yes, what F Factor should they be assigned?"</i>: it is our understanding that the proposal is</p>	
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		<p>substituting F Factor with PDG Factor for Option 2. However, the question still refers to the F Factor.</p> <p>While consistency and clarity are key for stakeholders to be able to respond to the consultation, UKPR would like to stress that this is another example of how Option 2 would unnecessarily complicate the approach for determining the eligibility criteria for EDCM generation credits. We therefore believe that Option 2 would not serve the purpose to provide embedded generators with more clarity.</p>	
Welsh Power Group Limited	Non-confidential	See above	Noted
WPD	Non-confidential	None as yet	Noted
Working Group Conclusions: The Working Group noted all responses and highlighted that they will be progressing Option 1. The simplicity of Option 1 outweighs the complexity of Option 2.			

Company	Confidential / Anonymous	9. Do you have any other comments on both options of the proposed legal text?	Working Group Comments
Electricity North West	Non-confidential	None.	Noted
Flexible Generation Group	Non-confidential	No.	Noted
Northern Powergrid	Non-confidential	Not at this time.	Noted

SP Distribution/ SP Manweb	Non-confidential	No comments	Noted
UK Power Networks	Non-confidential	No.	Noted
UK Power Reserve Ltd	Non-confidential	<p>We would like to share further comments on an issue that does not seem to have been raised or addressed in the context of DCP 313: the modification needs to clearly resolve the issues that would emerge should a non-intermittent generation asset (with non-zero F Factor) be installed alongside an already existing non-eligible intermittent generator (i.e. <u>after</u> a non-eligible generator was already assigned a zero F Factor).</p> <p>Such scenario would occur, for instance, if a battery storage assets would be installed alongside a solar PV park or a wind farm. UKPR stresses the need to avoid the risk and the unintended consequences of an existing intermittent generation asset which is non-eligible for credits potentially becoming eligible following a review of the network connection due to the presence of batteries.</p> <p>Should this be allowed to happen, DNOs would have to deal with the likely consequence of battery storage assets being displaced and located where they could benefit more from Use of System charges</p>	The Working Group note this response and highlight that they agree with the mixed sites concern. They will add a paragraph into the proposed legal text to address this issue.
Welsh Power Group Limited	Non-confidential	No	Noted
WPD	Non-confidential	No	Noted

Working Group Conclusions: The Working Group decided that including a clause in the legal text that will address the issue of mixed site generation credits in the EDCM by looking at the Licence Condition 14 statement which addresses the same issue for CDCM connections (LV and HV). Option two legal text will also be removed in light of the Working Group deciding to progress with Option one.

Company	Confidential / Anonymous	10. Which of the DCUSA Charging Objectives does this CP better facilitate? Please provide supporting comments.	Working Group Comments
Electricity North West	Non-confidential	We are unsure that the proposal better facilitates any charging objectives as currently drafted.	Noted
Flexible Generation Group	Non-confidential	<ol style="list-style-type: none"> 1. Positive – the current application of F factors to generation credits is not in accordance with the current charging methodology in all DNOs, so this would be an improvement. 2. Positive – generators require clear, transparent signals and consistency across DNO regions and this will limit the distortion in competition and improve economic efficiency. 3. Positive – the current setting of F factors to zero in certain DNO regions prevents proper account of future reinforcement being made. 4. Positive – as above. 5. None 	<p>Clarity of Charging Objective one is needed due to the non-compliance issue.</p> <p>Noted support of Charging objectives 1, 2, 3 and 4</p>

		6. None	
Northern Powergrid	Non-confidential	<p>As the Proposer of this change proposal, our view against the Charging Objectives has not changed from that outlined in the proposal, which is as follows:</p> <ul style="list-style-type: none"> • Charging Objective two: <ul style="list-style-type: none"> ○ Better facilitated by both options than by the status quo. ○ Option 2 facilitates this objective better than option 1. • Charging Objective three: <ul style="list-style-type: none"> ○ Not as well facilitated by both options than by the status quo. ○ Option 2 facilitates this objective better than option 1. • When viewed in the round: <ul style="list-style-type: none"> ○ Both options better meet the objectives as a whole (i.e. the positive impact on Charging Objective two outweighs the negative impact on Charging Objective three). ○ Hence when viewed in the round, option 2 gives a greater positive impact against the Charging Objectives than option 1. 	Note support for Charging objectives 2 and 3
SP Distribution/ SP Manweb	Non-confidential	Charging Objective two as it will increase transparency.	Note support for Charging objective 2

UK Power Networks	Non-confidential	Charging objective 2 will be better facilitated as a result of this change, as it will provide better visibility to parties of the arrangements under which the charges which apply will be determined.	Note support for Charging objective 2
UK Power Reserve Ltd	Non-confidential	<p>UKPR believes that in addition to Principle n. 2 (identified by the Working Group), DCP 313 also facilitates:</p> <p>Principle n. 4: in the context of the transition from DNOs to DSOs, this modification would support network operators to meet the developments in their business. In their role as proactive parties on using and dispatching flexibility services, DSOs would benefit from a clear and standard approach when determining the eligible technologies.</p> <p>Principle n. 6: a harmonised approach in defining the eligibility criteria across DNOs will guarantee a more efficient implementation</p>	Note support for Charging objectives 2, 4 and 6
Welsh Power Group Limited	Non-confidential	<ol style="list-style-type: none"> 1. Positive – we do not believe the current application of F factors to generation credits is in accordance with the current charging methodology 2. Positive – generators require clear transparent signals and consistency across DNO regions 3. Positive – we believe that the current setting on F factors to zero in certain DNO regions prevents proper account of future reinforcement being made. 4. Positive – as above 5. None 	<p>Clarity for Charging objective one is needed due to compliance issue.</p> <p>Note support for Charging objectives 1, 2, 3 and 4.</p>

		6. None	
WPD	Non-confidential	The DCP better facilitates charging objective 2.	Note support for Charging objective 2
Working Group Conclusions: The Working Group noted that the majority of responses believe that Charging Objectives 2 and 3 are better facilitated by this change. The Working Group will summarise the responses and provide their view when drafting the Change Report.			

Company	Confidential / Anonymous	11. Do Parties believe that the DCode consultation will have a significant impact on this change? Please provide rationale.	Working Group Comments
Electricity North West	Non-confidential	No, this change as currently drafted breaks the link between the EDCM methodology and the DCode requirements. As previously noted, intermittent and non-intermittent may not feature post P2/7 so they would be separately defined DCUSA terms not supported by wider industry standards.	Noted
Flexible Generation Group	Non-confidential	FGG have no view on this question.	Noted
Northern Powergrid	Non-confidential	<p>This will depend which option is taken forward.</p> <p>If option two is used, the potential DCode change will have no impact on this area of the EDCM as P2/6 will no longer be referenced by the EDCM.</p> <p>If option one is taken forward (or the status quo maintained), a further DCUSA change is likely to be necessary in due course to ensure that the EDCM remains compatible with the new P2.</p>	Noted

SP Distribution/ SP Manweb	Non-confidential	Yes we agree that the Dcode consultation will potentially impact this change.	Noted
UK Power Networks	Non-confidential	<p>At this stage we do not believe that the DCode changes have progressed far enough for this to be known. However if the proposed DCode changes take effect then it is possible that this change would not be required, however the methodology would then likely require a change as P2/6 would have been superseded.</p> <p>This could be further future proofed by removing the reference to P2/6 from DCUSA and simply reference the Distribution Code and the latest 'Engineering recommendation' rather than P2/6 or P2/7, we believe that this would be allowed under the intent of this change.</p>	Noted
UK Power Reserve Ltd	Non-confidential	<p>The Distribution Code consultation DCRP/18/03/PC2 that is looking to replace P2/6 with a proposed P2/7 will have a significant impact on DCP 313: not only the F Factor was suggested to be removed from P2/7 but also Table 2-1 would disappear.</p> <p>Contrarily to what the Working Group has concluded (i.e. that "should P2/6 be replaced with P2/7, there will be a need for a further CP to be raised as P2/6 is referenced in other parts of the DCUSA not relating to this CP"), UKPR believes that DCP 313 would require substantial adjustments when referencing elements of P2/6 that would not exist anymore.</p> <p>UKPR calls for the Working Group to assess in more details the consequences on DCP 313 and the calculation of credits should P/7 be approved</p>	Noted

Welsh Power Group Limited	Non-confidential	We have no view on this question	Noted
WPD	Non-confidential	Another DCP may need to be introduced to update this DCP for the Dcode consultation.	Noted
Working Group Conclusions: The Working Group noted that because they are moving forward with Option 1, a further change will need to be raised as it still refers to P2/6 in the legal text. As above, the DNOs will be checking where the P2/7 consultation is up to.			

Company	Confidential / Anonymous	12. Are you aware of any wider industry developments that may impact upon or be impacted by this CP?	Working Group Comments
Electricity North West	Non-confidential	CFF and Taskforces continue, but we are not aware of how they might impact this area at this stage.	Noted
Flexible Generation Group	Non-confidential	No.	Noted
Northern Powergrid	Non-confidential	Not beyond those identified in the consultation.	Noted
SP Distribution/ SP Manweb	Non-confidential	No.	Noted
UK Power Networks	Non-confidential	No, other than the DCode consultation referred to in Q11.	Noted

UK Power Reserve Ltd	Non-confidential	The Working Group might need to assess and verify any impact connected to the ongoing Ofgem's Charging Futures Forum work stream, once the wide scope of the discussion will be narrowed down and the materiality assessment of the charging options will be finalised	Noted
Welsh Power Group Limited	Non-confidential	N/A	Noted
WPD	Non-confidential	None	Noted
Working Group Conclusions: The Working Group concluded that they did not believe that any other industry developments would impact this change.			

Company	Confidential / Anonymous	13. The proposed implementation date for DCP 313 is 01 April 2020. Do you agree with the proposed implementation date?	Working Group Comments
Electricity North West	Non-confidential	We are in agreement with this date as we can see no implementation difficulties with either option for this change.	Noted
Flexible Generation Group	Non-confidential	We do not believe that it is necessary to wait that long.	Noted, however, 01 April 2020 is the next available implementation date due to the 15-month lead time for Charging Methodology changes.
Northern Powergrid	Non-confidential	Yes.	Noted

SP Distribution/ SP Manweb	Non-confidential	Yes we agree with the proposed implementation date.	Noted
UK Power Networks	Non-confidential	Yes.	Noted
UK Power Reserve Ltd	Non-confidential	<p>Please bear in mind that the timeline for delivering generation assets could take as long as four years and that parties are required to declare whether their assets are intermittent or non-intermittent at the moment when submitting the network connection request. Should their expectations on eligibility for credits change dramatically in the course of their build-out, this could severely impact the revenue expectancy that was factored in at the beginning of the project.</p> <p>In order to limit such risk, UKPR would recommend to push the implementation of DCP 313 back to 2023, in line with the timeframe of the current price control RIIO-ED1, which is due to end in 2023</p>	The UKPR Working Group member noted that this concern has been alleviated by the Working Group's decision to progress Option 1.
Welsh Power Group Limited	Non-confidential	N/A	Noted
WPD	Non-confidential	Yes	Noted
Working Group Conclusions: The Working Group concluded that they are comfortable that the implementation date should remain as 01 April 2020.			