

Company	Confidential/ Anonymous	1. Do you understand the intent of DCP 305?
ESP Electricity (ESPE)	Non-confidential	Yes, ESPE understands the intent of DCP 305.
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	Yes.
npower	Non-confidential	Yes.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Yes.
UK Power Networks	Non-confidential	Yes.
WPD	Non-confidential	Yes

Company	Confidential/ Anonymous	2. Do you agree that there is a defect in the methodology associated with Scenario A resulting in double charging? If not why not?
ESP Electricity (ESPE)	Non-confidential	Yes, ESPE agrees that there is a defect in the methodology associated with Scenario A resulting in double charging.
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	Yes.
npower	Non-confidential	No comment
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Yes.
UK Power Networks	Non-confidential	Yes, the methodology could result in charging for the same assets twice under scenario A depending upon the interpretation of the methodology.
WPD	Non-confidential	Yes

Company	Confidential/ Anonymous	3. Do you agree that there is a defect in the methodology associated with Scenario B resulting in DNO charges recovering nothing in respect of assets that are for the sole use of the LDNO network? If not why not?
ESP Electricity (ESPE)	Non-confidential	Yes, ESPE agrees that there is a defect in the methodology associated with Scenario B resulting in DNO charges recovering nothing in respect of assets that are for the sole use of the LDNO network.
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	Yes.
npower	Non-confidential	No comment
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Yes.
UK Power Networks	Non-confidential	Yes, we believe that the working group have identified a flaw in the methodology, where DNO assets used for the sole use of the LDNO are not charged.
WPD	Non-confidential	Yes

Company	Confidential/ Anonymous	4. Question to DNOs only: if DCP 305 was implemented immediately, would your published charges for 2018/19 and 2019/20 remain compliant? Please provide rationale.
ESP Electricity (ESPE)	Non-confidential	N/A
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	<p>Yes.</p> <p>We have two sites which fall under scenario A, but we are acting under a derogation from Ofgem allowing us to not follow specific aspects of the EDCM and instead to allocate the Point of Common Coupling following a logical approach which avoids double charging – this results in the same Point of Common Coupling being applied in respect of these sites as would be required if DCP 305 were implemented immediately. The derogation remains in place until DCP 305 is either implemented or rejected.</p>
npower	Non-confidential	n/a
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	<p>Yes, as we do not have any customers that fall into scenarios A or B.</p> <p>However, we could potentially be impacted by other DNOs having non-compliant 2018/19 and 2019/20 charges, as we pass these charges through to EHV Properties connected to our embedded networks.</p>
UK Power Networks	Non-confidential	<p>Yes, based upon our customers which are already connected, or that we knew when setting prices were due to connect within that period of time, then our published charges would remain compliant.</p> <p>However we could receive a connection request from another customer who wants to connect within the period of time covered by our charges which have been already published which might change</p>

		this position, if this was to occur we may need to seek a derogation from the common methodology if this change were to be approved.
WPD	Non-confidential	Yes

Company	Confidential/ Anonymous	5. Do you have any comments on the proposed legal text?
ESP Electricity (ESPE)	Non-confidential	ESPE notes that the proposed legal text states that the LDNO's distribution system would be <i>assigned the demand Connectee category</i> determined by reference to that Embedded LDNO distribution system's point of common coupling. For clarity, we suggest including a reference to the demand Connectee categories (section 15 where the end user categories are defined), given the 15 IDNO Party boundary categories have been deleted.
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	No.
npower	Non-confidential	n/a
Southern Electric Power Distribution plc and	Non-confidential	No.

Scottish Hydro Electric Power Distribution plc		
UK Power Networks	Non-confidential	No
WPD	Non-confidential	No

Company	Confidential/ Anonymous	6. Should the legal text be updated to other sections of the impacted Schedules to replace IDNO with LDNO? Please provide your rationale.
ESP Electricity (ESPE)	Non-confidential	ESPE agrees that the impacted schedules should be amended to refer to LDNO consistently throughout. This would avoid sections of the legal text referring specifically to IDNOs, making clear that the methodology and definitions within these schedules apply to all LDNOs.
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	Yes. This change presents a good opportunity to 'tidy up' the legal text in this regard. If this is not done as part of this change, a housekeeping change should be raised to rectify this drafting inconsistency.
npower	Non-confidential	n/a
Southern Electric Power Distribution	Non-confidential	The legal text should be updated but we believe the drafting error in Schedule 17/18 should have already been picked up in DCUSA's housekeeping log following the rejection of DCP 252.

plc and Scottish Hydro Electric Power Distribution plc		
UK Power Networks	Non-confidential	Yes we believe that this would be a useful change to improve the clarity of the existing legal text.
WPD	Non-confidential	As long as the legal text and use of IDNO and LDNO is consistent with the other definitions within DCUSA then this would not be an issue.

Company	Confidential/ Anonymous	7. Which DCUSA Charging Objectives does the CP better facilitate? Please provide supporting comments.
ESP Electricity (ESPE)	Non-confidential	<p>This CP better facilitates DCUSA Charging Objective 3. By removing the possibility of double charging and/or not charging at all for the use of certain DNO assets, the methodology produces charges that better reflect the costs incurred or expected to be incurred by the DNO with regards to these assets.</p> <p>This CP also better facilitates Charging Objective 6. The proposed changes should promote efficiency within the charging methodology as it eliminates possibility of users misinterpreting the definitions and therefore facilitates a more consistent approach across all DNOs/LDNOs.</p>
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	<p>Charging Objectives 1, 2, 3, 4 and 6.</p> <p>As the Proposer, our view and reasoning remains as submitted in the Change Proposal form.</p>

npower	Non-confidential	n/a
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Charging Objective 3 is better facilitated because the costs recovered will be more reflective of the actual sole use and share use of the DNO's network by the LDNO network.
UK Power Networks	Non-confidential	We believe that charging objective one and two would be better facilitated as it would remove an undue barrier to growth in this area when a second customer is connected changing the customer categorisation defined within the methodology.
WPD	Non-confidential	Charging objective 3

Company	Confidential/ Anonymous	8. Are you aware of any wider industry developments that may impact upon or be impacted by this CP?
ESP Electricity (ESPE)	Non-confidential	The wider charging futures work may impact this CP, should the review recommend that the EDCM be fundamentally changed; however, ESPE believes this CP should proceed to resolve a current defect in the methodology.
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern	Non-confidential	No.

Powergrid (Yorkshire) plc		
npower	Non-confidential	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Not aware of any.
UK Power Networks	Non-confidential	The work under CFF could result in changes to the EDCM arrangements, however the extent of any revisions is unknown. As a result we believe that this change proposal should progress independently.
WPD	Non-confidential	Charging Futures Forum

Company	Confidential/ Anonymous	9. Are there any alternative solutions or unintended consequences that should be considered by the Working Group?
ESP Electricity (ESPE)	Non-confidential	No, not that we have identified.
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern	Non-confidential	No.

Powergrid (Yorkshire) plc		
npower	Non-confidential	n/a
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Not aware of any.
UK Power Networks	Non-confidential	None that we are aware of.
WPD	Non-confidential	No

Company	Confidential/ Anonymous	10. Do you agree with the proposed implementation approach for DCP?
ESP Electricity (ESPE)	Non-confidential	Yes, ESPE agreed with the proposed implementation approach for the DCP.
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern	Non-confidential	Yes.

Powergrid (Yorkshire) plc		
npower	Non-confidential	n/a
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Yes.
UK Power Networks	Non-confidential	We believe that this change should be introduced to take effect from April 2020, to provide the appropriate notice period which is the usual approach for charging related changes.
WPD	Non-confidential	Yes