

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

Hydro Electric Power Distribution plc			
UK Power Networks	Non-confidential	Yes.	Noted.
WPD	Non-confidential	Yes	Noted.
The Working Group noted that the responses were a unanimous acceptance that they understand the intent of the CP.			

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?	Working Group Comments
ESP Electricity (ESPE)	Non-confidential	Yes, ESPE agrees that there is a defect in the methodology associated with Scenario A resulting in double charging.	Noted.
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern	Non-confidential	Yes.	Noted.

Powergrid (Yorkshire) plc			
npower	Non-confidential	No comment	Noted.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Yes.	Noted.
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.	Noted.
WPD	Non-confidential	Yes	Noted.
The Working Group noted that, of those who commented, there was a unanimous agreement that there was an impact in this area.			

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?	Working Group Comments
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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.	Noted.
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	Yes.	Noted.
npower	Non-confidential	No comment	Noted.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Yes.	Noted.
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.	Noted.

WPD	Non-confidential	Yes	Noted.
The Working Group noted that, of those who commented, there was a unanimous agreement that there was an impact in this area.			

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.	Working Group Comments
ESP Electricity (ESPE)	Non-confidential	N/A	Noted.
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	Yes. 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.	Noted, and as such the reason for the change being raised.
npower	Non-confidential	n/a	Noted.
Southern Electric Power Distributio	Non-confidential	Yes, as we do not have any customers that fall into scenarios A or B.	Noted. The rationale for this response being that until all the responses are received, they would not know

n plc and Scottish Hydro Electric Power Distribution plc		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.	whether they could be an impact.
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 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.</p>	<p>Noted.</p> <p>The Working Group agreed that this could be possible. This comment to be included in the discussion on the implementation date.</p>
WPD	Non-confidential	Yes	Noted.
<p>The Working Group noted that based on the DNOs that chose to respond, there are customers that are impacted by these scenarios, however these are currently either covered by a derogation or the point of common coupling and boundary are one and the same and as a consequence the tariff is the same. It was also noted that there may be further Customer connections and that dependent on the implementation date of DCP 305, some DNOs may wish to seek a derogation to cover these. However, those Parties may still be compliant with DCUSA as it currently stands. See decision by the Working Group on the implementation date.</p>			

Company	Confidential/ Anonymous	5. Do you have any comments on the proposed legal text?	Working Group Comments
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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.	The Working Group agreed with ESPE's comments and have updated the legal text to this effect.
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non- confidential	No.	Noted.
npower	Non- confidential	n/a	Noted.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non- confidential	No.	Noted.

UK Power Networks	Non-confidential	No	Noted.
WPD	Non-confidential	No	Noted.
The Working Group noted the responses to this question and have updated the legal text accordingly.			

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.	Working Group Comments
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.	Noted.
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.	Noted.
npower	Non-confidential	n/a	Noted.

Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	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.	It was noted that the proposed DCP 315 Housekeeping change has already included this within its scope, and as such the Working Group will only progress changes relevant to the sections they modify.
UK Power Networks	Non-confidential	Yes we believe that this would be a useful change to improve the clarity of the existing legal text.	Noted.
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.	Noted.
The Working Group noted the responses and, as a consequence of the proposed housekeeping change which covers these two schedules amongst other changes, the Working Group agreed to only update the legal text to reflect LDNO instead of IDNO in the sections of Schedules 17, 18 and XX that this change impacts.			

Company	Confidential/Anonymous	7. Which DCUSA Charging Objectives does the CP better facilitate? Please provide supporting comments.	Working Group Comments
ESP Electricity (ESPE)	Non-confidential	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.	Noted.

		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.	
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	Charging Objectives 1, 2, 3, 4 and 6. As the Proposer, our view and reasoning remains as submitted in the Change Proposal form.	Noted.
npower	Non-confidential	n/a	Noted.
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.	Noted.
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	Noted.

		customer is connected changing the customer categorisation defined within the methodology.	
WPD	Non-confidential	Charging objective 3	Noted.
The Working Group noted the responses and will discuss these during the Change Report stage.			

Company	Confidential/ Anonymous	8. Are you aware of any wider industry developments that may impact upon or be impacted by this CP?	Working Group Comments
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.	Noted.
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	No.	Noted.
npower	Non-confidential		Noted.

Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Not aware of any.	Noted.
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.	Noted.
WPD	Non-confidential	Charging Futures Forum	Noted.
The Working Group noted that the responses indicated a desire for the proposal to continue being developed as a standalone CP Working Group.			

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

of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc			
npower	Non-confidential	n/a	Noted.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Not aware of any.	Noted.
UK Power Networks	Non-confidential	None that we are aware of.	Noted.
WPD	Non-confidential	No	Noted.
The Working Group agreed that no unintended consequences of DCP 305 had been identified and that the proposal could continue.			

Company	Confidential/	10. Do you agree with the proposed implementation approach for DCP?	Working Group Comments
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	Anonymou s		
ESP Electricity (ESPE)	Non- confidential	Yes, ESPE agreed with the proposed implementation approach for the DCP.	Noted.
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non- confidential	Yes.	Noted.
npower	Non- confidential	n/a	Noted.
Southern Electric Power Distributio n plc and Scottish Hydro Electric Power Distributio n plc	Non- confidential	Yes.	Noted.

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.	Noted.
WPD	Non-confidential	Yes	Noted.
The Working Group unanimously agreed that this Change Proposal's implementation date should be the next release following Authority decision since this change does not impact the tariff setting, rather it changes how the tariffs are applied and, as such, a 15 month lead time for the change is not required. This would also allow for derogations to lapse early and no need for others to potentially be raised if the alternative suggestion of 01 April 2020 was agreed.			