

Company	Confidential/ Anonymous	1. Do you understand the intent of DCP 295?	Working Group Comments
Electricity North West	Non-confidential	We understand the intent of DCP 295.	Noted
Northern Powergrid	Non-confidential	Yes	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Yes.	Noted
SP Distribution and SP Manweb	Non-confidential	Yes	Noted
UK Power Networks	Non-confidential	Yes	Noted
Western Power Distribution	Non-confidential	Yes, The intent of this change is to simplify and standardise the process around CVA connections to Distribution Networks and their related Connection and Use of System Agreements.	Noted
Working Group Conclusion: The Working Group concluded that all respondents understood the intent of DCP 295.			

Company	Confidential/ Anonymous	2. Are you supportive of DCP 295?	Working Group Comments
Electricity North West	Non-confidential	We are generally supportive of DCP 295 to ensure use of system and connection elements evolve in line with national agreements together with improving the standardisation of agreements.	Noted
Northern Powergrid	Non-confidential	Yes	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Yes. We believe that this Change would be of benefit to both registrants of CVA metered connections and distributors, as it would facilitate a clearer, more streamlined and consistent basis for Use of System contractual arrangements for these connections. We also feel that this CP would address a gap in the current DCUSA arrangements as the DG Party category is too limited in scope to reflect the range of parties who may require Use of System terms directly with distributors, such as operators of large battery storage developments.	Noted
SP Distribution and SP Manweb	Non-confidential	Yes	Noted
UK Power Networks	Non-confidential	Yes	Noted
Western Power Distribution	Non-confidential	Yes, as it will reduce admin at the same time as providing a consistent and transparent process for the parties affected.	Noted
Working Group Conclusions: The Working Group concluded that all respondents were supportive of DCP 295			

Company	Confidential/ Anonymous	3. Will there be an impact on the existing connection agreements between Distributors and Customers?	Working Group Comments
Electricity North West	Non-confidential	We believe that existing connection and use of system agreements would need to be amended or replaced with the National Terms of Connection. It may be a variation could be issued to terminate such agreements when the CVA Registrant accedes to the DCUSA.	Some DNOs may wish to review existing connection and use of system agreements to determine whether amendments would be needed.
Northern Powergrid	Non-confidential	We note that there is an action (01/01) resulting from the first meeting of the working group on 3 July whereby the National Terms of Connection (NTC) will be amended. Section 1, paragraph F of the NTC has been amended by a previous change proposal such that <i>'If you are party to the existing terms, then the existing terms shall apply instead of the National Terms of Connection (while the existing terms remain in effect)'</i> . Previously any bilateral terms would apply <i>'to the extent that the two are inconsistent'</i> . Our point is that any CVA site with an existing bilateral connection agreement will not be affected by a change in the NTC.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	In our view, we do not believe that our existing bilateral connection agreements for CVA registered connections on our networks would be affected. However, if this CP is implemented, new or amended CVA registered connections to our networks would be subject to the amended connection terms proposed by this Change, as we would reflect those amended terms in our standard forms of connection agreement. However, the impact of this CP in relation to existing connection agreements may vary between distributors, depending on the terms of their agreements.	Noted
SP Distribution	Non-confidential	UoS terms in place for existing CVA connected customers will require to be reviewed.	Noted

and SP Manweb			
UK Power Networks	Non-confidential	Only to customers who are trading CVA and whose connection agreement references the terms and conditions in the NTC. We do not expect there to be many of these.	Noted
Western Power Distribution	Non-confidential	The change will affect the Connection Agreements of existing SVA Customers by implying the new terms into their Connection Agreements however there will be no impact on them as their registrant, the Supplier, will already be a DCUSA Party. The existing CVA Connection agreements will not be affected as they do not have the NTC implied into their Connection Agreements due to their age.	Noted
Working Group Conclusions: The Working Group concluded that some DNOs may wish to review their existing CVA Registrant connection and Use of System agreements to determine whether amendments are required.			

Company	Confidential/ Anonymous	4. Will there be an impact on the existing Use of System terms between DNOs and CVA Registrants?	Working Group Comments
Electricity North West	Non-confidential	We do not believe there will be a material impact on terms and we already calculate charges in accordance with the EDCM.	Noted
Northern Powergrid	Non-confidential	NPG does not envisage that there will be an impact on existing Use of System terms with current CVA Registrants in Yorkshire and the Northeast.	Noted
Southern Electric Power Distribution plc and Scottish Hydro	Non-confidential	In our view, existing Use of System terms would not be affected as our existing bilateral agreements would continue in effect. However, we would be likely to encourage existing CVA Registrants to accede to DCUSA, to facilitate the application of	Noted

Electric Power Distribution plc		consistent terms and potentially greater participation in industry governance. The impact of this CP in relation to existing UoS terms may vary between distributors however.	
SP Distribution and SP Manweb	Non-confidential	No	Noted
UK Power Networks	Non-confidential	If the changes to the NTC are approved, existing CVA Registrants will have the option to accede to DCUSA for Use Of System terms. This will imply that the existing terms will need to be terminated but it might be that terms within the accession agreement could be used to effect this?	Noted
Western Power Distribution	Non-confidential	No, because the existing combined Connection and Use Agreements do not refer to the NTC, again because of their age.	Noted
Working Group Conclusions: The Working Group concluded that some DNOs may wish to review their existing CVA Registrant connection and Use of System agreements to determine whether amendments are required.			

Company	Confidential/ Anonymous	5. Do you prefer to add CVA Registrants into DCUSA as a new Party Category or to replace the DG Party Category?	Working Group Comments
Electricity North West	Non-confidential	Our preference is to add CVA Registrants as a new Party category. It is noted within 5.2 of the consultation that not all CVA Registrants requiring use of the system are DG Parties.	Preference to add CVA registrant Party

Northern Powergrid	Non-confidential	Northern Powergrid's preference is for CVA Registrants to replace the DG Party Category (assuming that Parties currently in DG category fall neatly into the CVA Registrant category definition).	Preference to replace DG Party with CVA Registrant
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	<p>We do not feel it is necessary or the most efficient solution to have both a 'CVA Registrant' category and a 'DG Party' category.</p> <p>We do not see any practical benefit in having two categories, as we believe it to be highly unlikely under current trading arrangements that anyone would wish or have any need to accede to DCUSA as a DG Party unless they were a CVA registrant. On this basis, we feel that only the (broader scope) CVA Registrant category is required.</p> <p>We anticipate continued growth of CVA registrations across GB (albeit not on a large scale) and believe it more logical and efficient to have a larger single category group within DCUSA to cover the wider community of CVA registrants, in a consistent and transparent manner.</p>	Preference to replace DG Party with CVA Registrant
SP Distribution and SP Manweb	Non-confidential	As a new party.	Preference to add CVA Registrant Party
UK Power Networks	Non-confidential	Replace the DG Party.	Preference to replace DG Party with CVA Registrant
Western Power Distribution	Non-confidential	It would be our preference to add CVA Registrants as a new party category to avoid an unforeseen consequences or removing the DG Party category from the DCUSA.	Preference to add CVA Registrant Party

Working Group Conclusions: The Working Group concluded that they are going to accept the preference to replace DG Party with CVA Registrant.

Company	Confidential/ Anonymous	6. Do you have any comments on the proposed legal text for DCP 295, including the changes to the National Terms of Connection?	Working Group Comments
Electricity North West	Non-confidential	<p>Prefer to add CVA Registrant rather than replace DG Party with CVA Registrant.</p> <p>There are minimal changes being put forward to the National Terms of Connection:</p> <p>4. <u>THE CUSTOMER'S RIGHT TO BE (AND REMAIN) ENERGISED</u></p> <p>4.1 The Customer's right to be (and remain) Energised is subject to the Company's right to De-energise the Connection Point in accordance with Clause 5, and is conditional upon:</p> <p>4.1.1 the Customer having the ability to perform and comply with all of its obligations under this Agreement;</p> <p>4.1.2 the Customer or an Electricity Supplier or Registrant being registered, in accordance with the BSC, as responsible for the Metering System</p> <p>4.1.2.1.3 the Customer ensuring that the Registrant for the Metering System, at any time, is a party to the DCUSA;</p>	<p>Noted</p> <p>Keep 4.1.2 the same</p> <p>Ask legal advisors their opinion on 4.1.3</p>

4.1.2 - Do we need to delete '*the Customer or an Electricity Supplier*'? Couldn't 'Customer' include a 'CVA Registrant'?

4.1.3 – How would a Customer fulfil this obligation?

		<p>4.3 This Agreement shall not give the Customer any right to:</p> <p>4.3.1 receive a supply of electricity to the Premises;</p> <p>4.3.2 sell electricity exported from the Premises; and/or</p> <p>4.3.3 use the Distribution System for the purposes of providing a supply of electricity (or to otherwise have electricity transported through the Distribution System),</p> <p>and the Company therefore makes no warranty to the Customer in relation thereto. In respect of each Metering System, the Registrant for the Metering System will contract with the Company for the matters outlined in Clause 4.3.3. Where the Customer is the Registrant, it must contract for the matters outlined in Clauses 4.3.1 and 4.3.2 pursuant to the BSC, and must contract separately with the Company for the matters outlined in Clause 4.3.3. <u>Contrasting for the matters outlined in Clause 4.3.3 shall be through the DCUSA.</u></p>	
Northern Powergrid	Non-confidential	No comments.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	We have enclosed with our response some possible amendments to the legal text and NTC, which are primarily intended to be more consistent with existing DCUSA and/or BSC terms than the existing proposed text.	The Working Group agreed to accept the SSEN amendments to the legal text
SP Distribution and SP Manweb	Non-confidential	No.	Noted

UK Power Networks	Non-confidential	<p>It is unfortunate that the change to the NTC is required.</p> <p>It would be far better to place the obligation on to the party that we wish to take action (the CVA Registrant). The best place for this is the BSC but we understand the CP to effect this was rejected as not meeting the code objectives. This is a fundamental issue in that the BSC appears to allow a CVA registrant (of a site connected to a LDSO) to continue to supply or take energy without there being a Use Of System agreement being in place so long as the BSC is complied with. Obliging DCUSA accession via the BSC would have provided the right transparency to the BSC that the required agreements are in place and would have provided consistency between Use Of System parties as to the terms.</p> <p>Given that the BSC door is closed, the Working Group has adopted an alternate approach to attempt to oblige the CVA Registrant to become a party to DCUSA by placing an obligation on the connectee of the CVA site to only use a CVA Registrant that is a party. Whilst it's suboptimal it is the only option available for distributors (other than disconnection) to ensure that the correct Use Of System agreements are in place.</p>	Noted
Western Power Distribution	Non-confidential	No, we are happy with the proposed wording.	Noted
Working Group Conclusions: The Working Group accepted the amendments that were suggested by SSEN. There was a question around whether the Working Group would need to state "Party Category" in the new 4.1.3 clause. This will be determined by the legal advisor.			

Company	Confidential / Anonymous	7. Do you think for clarity the DCUSA legal text should also specify that an existing Supplier, DNO or IDNO DCUSA Party cannot be treated as a CVA Registrant?	Working Group Comments
Electricity North West	Non-confidential	While not opposed to adding clarity, we are not sure this level of clarity would be needed.	Noted
Northern Powergrid	Non-confidential	We do not think this is absolutely necessary, but as some licenced suppliers may also be the registrant for a CVA site it may be worthwhile clarifying that the CVA category is for CVA registrants that are not already Supplier Parties in DCUSA.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Having considered this, we do not think it is necessary as the proposed definition of a CVA Registrant covers this area off.	Noted
SP Distribution and SP Manweb	Non-confidential	Yes.	Noted
UK Power Networks	Non-confidential	Yes, so long as the legal terms applying to them in their existing Party Category are sufficient to cover the requirements of them in the capacity of CVA registrant.	Noted

		It would be wrong for a party to be able to vote in more than one Party Category as this may distort the outcome. This is an already potential problem with Electricity and Gas Suppliers being different Party Categories. It may be that a change to the voting process is required but that is outside the scope of this DCP.	
Western Power Distribution	Non-confidential	Yes, as it may help understanding in the future.	Noted
Working Group Conclusions: The Working Group concluded that they will ask the DCUSA Legal Advisor whether the clarity is needed.			

Company	Confidential/ Anonymous	8. Which DCUSA General Objectives does the CP better facilitate? Please provide supporting comments.	Working Group Comments
Electricity North West	Non-confidential	As this DCP will result in agreements being maintained and kept up to date with the potential to reduce administrative costs, we believe DCUSA General Objectives 3 and 4 will be better facilitated.	3 & 4
Northern Powergrid	Non-confidential	This CP better facilitates CP Objective 4 as this will improve the efficiency of the administration between DNOs and network users who are CVA Registrants.	4
Southern Electric Power Distribution plc and Scottish Hydro Electric Power	Non-confidential	In our view, General Objective 3 is most clearly better facilitated, as the Change would enable distributors to 'offer terms' for Use of System to CVA registrants, as required by Licence Condition 12, in a considerably more efficient, transparent and consistent manner.	3

Distribution plc			
SP Distribution and SP Manweb	Non-confidential	This change will save administrative cost and effort for parties and ensure consistent legal obligations are in place therefore DCUSA generation objective 3 and 4 will be better facilitated.	3 & 4
UK Power Networks	Non-confidential	<p>Objective 1 as it gives a better control over there being a Use Of System agreement in place and hence the right obligations, limitations and rights.</p> <p>Objective 2 as it means all Use Of system parties are on the same set of terms that vary at the same time.</p> <p>Objective 3 as it helps to prevent any risk of discrimination in providing Use Of System.</p>	1, 2 & 3
Western Power Distribution	Non-confidential	The CP will have a positive impact of General Objectives 3 & 4 by negating the need for bilateral Use of System agreements between DNOs and CVA Registrants so saving cost and effort and promoting efficiency and consistency.	3 & 4
Working Group Conclusions: The Working Group concluded that they believe General Objectives 1, 2 & 3 were better facilitated by processing this change.			

Company	Confidential / Anonymous	9. 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	We are not aware of any wider industry developments that may impact this change proposal.	Noted

Northern Powergrid	Non-confidential	No.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	No.	Noted
SP Distribution and SP Manweb	Non-confidential	No.	Noted
UK Power Networks	Non-confidential	No	Noted
Western Power Distribution	Non-confidential	No	Noted
Working Group Conclusions: The Working Group concluded that all respondents believe there to be no wider industry developments that may be impacted by this change proposal.			

Company	Confidential/ Anonymous	10. Are there any alternative solutions or unintended consequences that should be considered by the Working Group?	Working Group Comments
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Electricity North West	Non-confidential	We do not believe so.	Noted
Northern Powergrid	Non-confidential	No.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Not that we are aware of.	Noted
SP Distribution and SP Manweb	Non-confidential	No.	Noted
UK Power Networks	Non-confidential	No	Noted
Western Power Distribution	Non-confidential	No	Noted
Working Group Conclusions: The Working Group concluded that all respondents are happy that there are no alternative solutions or unintended consequences that should be considered by the Working Group			

Company	Confidential/ Anonymous	11. The proposed implementation date for DCP 295 is the 01 November 2017. Do you agree with the proposed implementation date?	Working Group Comments
Electricity North West	Non-confidential	As existing use of system and connection agreements will need to be reviewed by Parties maybe the February 2018 release would be more helpful.	Noted
Northern Powergrid	Non-confidential	Yes.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Yes.	Noted
SP Distribution and SP Manweb	Non-confidential	We have no issue with 1 st November 17 implementation however believe it would be best to align with the NTC change.	Noted
UK Power Networks	Non-confidential	Yes	Noted
Western Power Distribution	Non-confidential	Yes	Noted

Working Group Conclusions: The Working Group concluded that the implementation should be phased for this Change Proposal. Amendments to DCUSA should be implemented on the February scheduled release and the amendments to the NTC should be implemented in August.

Company	Confidential/ Anonymous	12. Does there need to be a phased approach to the implementation of this CP (through the NTC changes being enacted later) and if so how long and why?	Working Group Comments
Electricity North West	Non-confidential	As mentioned in our response to Q11 Parties would need to review all existing agreements in preparation for this change, so should changes be required to the National Terms of Connection a phased approach would seem reasonable, maybe 12 months from the implementation of the body text changes would provide sufficient time.	Noted
Northern Powergrid	Non-confidential	Northern Powergrid does not believe a phased approach is necessary.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	There may be benefit in delaying the NTC implementation (perhaps to 1 April 2018) to enable affected Parties to comply with aspects of the Change.	Noted
SP Distribution and SP Manweb	Non-confidential	It would be best to align the implementation with the NTC changes.	Noted

UK Power Networks	Non-confidential	We agree with the suggestion that there needs to be a lead-in time for the changes to the NTC in order for customers to be sure that they are compliant with the new obligations.	Noted
Western Power Distribution	Non-confidential	Yes, 3 months, as this will give affected parties sufficient time to comply with the change prior to it being mandated.	Noted
Working Group Conclusions: The Working Group concluded that the implementation should be phased for this Change Proposal. Amendments to DCUSA should be implemented on the February scheduled release and the amendments to the NTC should be implemented in August.			