

Company	Confidential/ Anonymous	1. Do you understand the intent of DCP 295?	Working Group Comments
GFP Trading	Non-Confidential	Yes	
SP Distribution and SP Manweb	Non-Confidential	Yes	
Northern Powergrid	Non-Confidential	Yes	
British Gas	Non-Confidential	<p>The purpose of the Change Proposal talks about 'facilitating' accession to DCUSA of CVA Registrants, however the detail seems clear that the aim is to mandate accession.</p> <p>However, it is not clear for whom accession will be mandatory, or what the impact of accession will be for particular sites – for example it would be helpful to understand the impact for:</p> <ul style="list-style-type: none"> Existing CVA sites with DCUSA party as registrant New CVA sites with DCUSA Party as registrant Existing CVA sites with non-DCUSA party as registrant New CVA sites with non-DCUSA party as registrant Existing CVA sites with non-DCUSA party as registrant in one DNO area, if the non-DCUSA party is subsequently mandated to become a DCUSA party due to a new CVA site (potentially in another DNO area) 	
UK Power Networks	Non-Confidential	Yes.	
Flexible Generation Group	Non-Confidential	Yes.	

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.	
Working Group Conclusions:			

Company	Confidential/Anonymous	2. Are you supportive of DCP 295?	Working Group Comments
GFP Trading	Non-Confidential	Yes, strongly	
SP Distribution and SP Manweb	Non-Confidential	Yes	
Northern Powergrid	Non-Confidential	Yes	
British Gas	Non-Confidential	<p>We previously noted that we are unable to assess the true impact of the change proposal – unfortunately the revised consultation document has not set out the additional detail we would hope for to form an opinion.</p> <p>We also remain of the view that any CVA customer affected by this change needs to be engaged with directly by the DNO on a bilateral basis as part of the change process, rather than after it.</p>	
UK Power Networks	Non-Confidential	Yes.	

Flexible Generation Group	Non-Confidential	<p>Yes. However, we do not believe that this should be a mandatory requirement, but an option.</p> <p>It will be a more efficient way to manage the relationship between the DNOs and the parties with CVA registered BMUs which are connected to distribution networks. If a party has sites in more than one DNO region, they also only have to sign up once, rather than employ lawyers to negotiate multiple bi-lateral agreements.</p> <p>If the industry does have to design and maintain more commercial agreements, this will be inefficient in terms of time and associated costs, but it will also create the potential for the agreements to diverge, having an adverse impact on competition between different classes of users.</p>	
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.	
Working Group Conclusions:			

Company	Confidential/Anonymous	3. Will there be an impact on the existing connection agreements between Distributors and Customers?	Working Group Comments
GFP Trading	Non-Confidential	Not to our knowledge	
SP Distribution and SP Manweb	Non-Confidential	Our standard connection agreements remain appropriate.	

Northern Powergrid	Non-Confidential	<p>No, there will be no impact on existing connection agreements. Section 1, paragraph F of the NTC has been amended by a previous change proposal and now contains the text '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)'.</p> <p>Previously any bilateral terms would apply 'to the extent that the two are inconsistent'.</p> <p>Our point is we believe that any CVA site with an existing bilateral connection agreement will not be affected by a change in the NTC. In addition, an existing customer and the Distributor would be free to establish a new connection agreement between them that may be aligned to the NTC.</p>	
British Gas	Non-Confidential	<p>We consider it appropriate for DNOs, who are a party to both DCUSA and all bilateral agreements to answer this question rather than expecting existing CVA customers who are not, or may not be, party to DCUSA to provide this insight (noting that some may be unaware of this change).</p> <p>We have sought views from our wider Centrica colleagues responsible for a number of CVA sites across the country, however, they are unclear of the impact of this change on their bilateral agreements and no relevant DNO has contact them to explain whether there is an impact. We would welcome engagement and are happy to provide contact details if required.</p> <p>More generally, we had hoped that following the Ofgem send back that DNOs would engage on a bilateral basis with all CVA customers with a bilateral agreement to explain the change, whether the individual CVA customers is affected, and if so how. This would seem necessary to is to fulfil the conditions of the send back.</p>	

UK Power Networks	Non-Confidential	As these proposed changes are to the NTC, only those customers whose connection agreements incorporate the NTC will be affected.	
Flexible Generation Group	Non-Confidential	We are aware of parties with bi-lateral agreements who would need to sign the DCUSA, but we have not checked individual agreements to see if other changes are required.	
Western Power Distribution	Non-Confidential	No, the existing CVA Connection agreements will not be affected as they do not have the NTC implied into their Connection Agreements.	
Working Group Conclusions:			

Company	Confidential/ Anonymous	4. Will there be an impact on the existing Use of System terms between DNOs and CVA Registrants? Please explain your rationale.	Working Group Comments
GFP Trading	Non-Confidential	Not to our knowledge	
SP Distribution and SP Manweb	Non-Confidential	This will depend upon the agreement in place and will be assessed on an individual basis.	
Northern Powergrid	Non-Confidential	NPG does not envisage that there will be an impact on existing Use of System terms between DNOs and CVA Registrants for 2 reasons. Firstly, in our licence areas the vast majority of the small number of CVA sites are already registered by licenced suppliers (and are therefore already DCUSA parties). Secondly, we assume that matters such as payment terms for DUoS are already applied consistently to CVA customers by DNOs	

		whether they are registered by suppliers or non-suppliers. Any impact can only be positive by putting non-supplier CVA registrants and supplier CVA registrants on the same use of system terms under DCUSA.	
British Gas	Non-Confidential	As per our answer to question 3.	
UK Power Networks	Non-Confidential	There will no longer be a need to have separate use of system terms in place between DNOs and CVA Registrants as a result of this change, which will significantly minimise the administration workload for all parties (the DNO and the CVA Registrant).	
Flexible Generation Group	Non-Confidential	We do not expect there to be changes unless a party has a very bespoke bi-lateral agreement. For this reasons, we believe the definition of who can sign the DCUSA should be changes, rather than mandating all CVA BMU registrants to sign the DCUSA.	
Western Power Distribution	Non-Confidential	No, because the existing combined Connection and Use Agreements do not refer to the NTC.	
Working Group Conclusions:			

Company	Confidential/ Anonymous	5. 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
GFP Trading	Non-Confidential	The legal text appears to satisfy the intentions of DCP295	

SP Distribution and SP Manweb	Non-Confidential	No	
Northern Powergrid	Non-Confidential	No comments.	
British Gas	Non-Confidential	N/A	
UK Power Networks	Non-Confidential	No we do not have any comments to make and agree with the changes made to the legal text.	
Flexible Generation Group	Non-Confidential	No.	
Western Power Distribution	Non-Confidential	No, we are happy with the proposed wording.	
Working Group Conclusions:			

Company	Confidential/ Anonymous	6. 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 as well?	Working Group Comments
GFP Trading	Non-Confidential	The current definition appears clear enough	

SP Distribution and SP Manweb	Non-Confidential	Yes	
Northern Powergrid	Non-Confidential	We do not think this is absolutely necessary, but as some licenced suppliers are already registrants for a CVA site it may be worthwhile clarifying that the new CVA category is for CVA registrants that are not already Supplier Parties in DCUSA, i.e. non-supplier CVA Registrants. We are not concerned how the legal drafting deals with this differentiation and we are comfortable that this can be readily dealt with by DCUSA's lawyers.	
British Gas	Non-Confidential	N/A	
UK Power Networks	Non-Confidential	Failure to ensure that all CVA registrants (including Suppliers, DNOs and IDNOs) are treated on a consistent basis would be against the intent and original objectives of this change. However, consideration may need to be given as to whether there is any impact on voting arrangements if a parts falls into more than one party category.	
Flexible Generation Group	Non-Confidential	This seems to restrict who may become a CVA registrant, so potentially limiting wider market developments. This therefore appears an unnecessary constraint.	
Western Power Distribution	Non-Confidential	Yes	
Working Group Conclusions:			

Company	Confidential / Anonymous	7. Which DCUSA General Objectives does the CP better facilitate? Please provide supporting comments.	Working Group Comments
GFP Trading	Non-Confidential	<p>The CP facilitates General Objectives 1,2 and 3</p> <p>GO1 and 3 are met by the CP allowing the more efficient operation of DNOs and IDNO, removing a requirement to produce and maintain bespoke use of system contracts with CVA registrants</p> <p>GO2 is met, as this CP removes a significant barrier to entry for small CVA Registrants, taking away the expensive legal and resource burden of negotiating the bespoke contracts, thereby allowing greater competition in the market for route to market providers to CVA registered sites.</p>	
SP Distribution and SP Manweb	Non-Confidential	<p>This change will save administrative cost and effort for parties and put consistent legal obligations are in place therefore DCUSA general objective 3 and 4 will be better facilitated.</p>	
Northern Powergrid	Non-Confidential	<p>This CP better facilitates CP Objective 4 as this will improve the efficiency of the administration between DNOs and the network users who are CVA Registrants.</p>	
British Gas	Non-Confidential	<p>We previously noted that we are unable to asses the true impact of the change proposal – unfortunately the revised consultation document has not set out the additional detail we would hope for to form an opinion.</p> <p>We acknowledge the likelihood of some potential administrative savings for DNOs, although the extent of this would appear limited given that the workgroup sets out in paragraph 8.6 of the consultation that it considers there will only be a small number of existing and future Registrants affected. However, it is less clear to</p>	

		<p>us whether there would be similar savings for CVA sites since under the proposal CVA sites would need to monitor, and would be subject to, any changes proposed by any DCUSA party – this seems more of an administrative burden than the bilateral approach to changes currently.</p> <p>Also, it would be of interest to know if the workgroup has investigated whether any existing CVA sites, which tend to be the largest sites connected to the Distribution System, have non-standard connection/usage terms inserted at the request of the DNO in order to manage the system efficiently, and if so, whether the workgroup considers that there will not be a requirement any such non-standard terms for future CVA sites.</p>	
UK Power Networks	Non-Confidential	We believe that DCUSA General Objectives 3 & 4 are better facilitated by this change as it will reduce the administrative cost and effort, whilst also ensuring consistent legal provisions across parties are in place, which will promote efficiency and consistency.	
Flexible Generation Group	Non-Confidential	Objective 2 – The facilitation of effective competition in the generation and supply of electricity will be improved if parties can more easily develop businesses with CVA registered assets on the same commercial footing. This is particularly true for parties with assets in a number of DNO regions.	
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.	
Working Group Conclusions:			

Company	Confidential/ Anonymous	8. Do you believe that only a small number of CVA Registrants would be impacted by this Change Proposal? Please provide your rationale.	Working Group Comments
GFP Trading	Non-Confidential	Yes, there are a limited number of CVA Registrants who are not already DCUSA parties. For any future potential registrants, the requirement to become a DCUSA party is of a similar level of resource requirement to signing a single bespoke use of system contract, so the impact would be minimal/positive.	
SP Distribution and SP Manweb	Non-Confidential	Yes, we have only a small number of CVA connected customers and not all are affected by the change.	
Northern Powergrid	Non-Confidential	Yes, we strongly believe that only a small number of CVA Registrants will be impacted by this CP as only a very small minority of existing CVA sites in our areas are registered by non-suppliers; we expect this situation is replicated in other DNO area. However, even though a number of impacted customers will be very small we believe this change proposal is worthwhile to ensure consistency and ongoing efficiency in respect of new CVA sites.	
British Gas	Non-Confidential	Don't know – this would be for DNOs to set out. It is also difficult to judge the merits of the change without knowing this information. Also, if only a small number are affected, this brings into question the perceived administrative benefits claimed by the proposal, and also the appropriateness of having mandatory arrangements for a small subset of CVA registered sites, but not for all.	
UK Power Networks	Non-Confidential	We believe it would be preferable if all CVA Registrants of customers connected to distribution networks were party to DCUSA. In practice, the outcome of this change will mean that it	

		is optional, except in the case of those CVA Registrants which are associated with customers who are bound by the National Terms of Connection. Those will become obliged to be a party. We expect this to be a small number but it could be a large proportion, depending on how DNOs' Connection Agreements are worded.	
Flexible Generation Group	Non-Confidential	Yes – there are not many DNO connected, CVA registered sites. However, we would expect this to increase with TERRE and wider BM access.	
Western Power Distribution	Non-Confidential	Yes, as this corresponds with the information we hold about our own customers.	
Working Group Conclusions:			

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
GFP Trading	Non-Confidential	The rapid growth in distribution connection generation sites and expected changes in the market around such ancillary services as STOR and TERRE may well see a greater requirement for the greater market access which is possible for CVA Registrants (for example, direct access to the balancing mechanism), and a growth in the number of small parties which could offer this service. This CP would significantly assist those parties in entering the market.	
SP Distribution and SP Manweb	Non-Confidential	No.	

Northern Powergrid	Non-Confidential	No.	
British Gas	Non-Confidential	Ofgem's review of access and forward looking charges seems to be advocating increasing the choice of access arrangements to the distribution system and so the working group may wish to consider whether the standardisation of connection terms is consistent with this direction of travel.	
UK Power Networks	Non-Confidential	No nothing we are aware of.	
Flexible Generation Group	Non-Confidential	Only those mentioned above.	
Western Power Distribution	Non-Confidential	No	
Working Group Conclusions:			

Company	Confidential/ Anonymous	10. Are there any alternative solutions or unintended consequences that should be considered by the Working Group?	Working Group Comments
GFP Trading	Non-Confidential	None that we can foresee	
SP Distribution and SP Manweb	Non-Confidential	None that we are aware of.	

Northern Powergrid	Non-Confidential	No.	
British Gas	Non-Confidential	The first part of the change i.e. changing DG party to CVA party, which genuinely seems limited to 'facilitating' accession to DCUSA should be considered without the 'mandatory' element introduced by the proposed change to the NTC.	
UK Power Networks	Non-Confidential	No nothing we are aware of.	
Flexible Generation Group	Non-Confidential	We believe this should be voluntary and not mandatory.	
Western Power Distribution	Non-Confidential	No	
Working Group Conclusions:			

Company	Confidential/ Anonymous	11. Do you agree with the phased approach for the implementation of this change? Please provide your rationale.	Working Group Comments
GFP Trading	Non-Confidential	The phased approach is required to avoid current CVA registrants being forced into a breach of the NTC.	
SP Distribution and SP Manweb	Non-Confidential	Yes.	

Northern Powergrid	Non-Confidential	Northern Powergrid does not believe a phased approach is necessary given the small number of customers impacted, but we are comfortable if this is deemed the most practical route for implementation.	
British Gas	Non-Confidential	The lead times appear reasonable based on the evidence provided, but crucially this is dependent on the relevant CVA customers being made aware of the need to do something. We remain of the view that any CVA customer affected by this change needs to be engaged with directly by the DNO on a bilateral basis as part of the change process, not after it.	
UK Power Networks	Non-Confidential	Yes as we can appreciate the need for a period of time between the changes to the legal text taking effect and as a result the changes to the NTC taking effect a few months later.	
Flexible Generation Group	Non-Confidential	Yes, as it would allow time for compliance, but we believe it should not be mandatory.	
Western Power Distribution	Non-Confidential	Yes, as it will give affected parties sufficient time to comply with the change prior to it being mandated.	
Working Group Conclusions:			