

DCUSA Change Proposal Form

This form is issued in accordance with Clause 10.5 of the DCUSA.

Completed forms should be returned to dcusa@electralink.co.uk for assessment by the DCUSA Panel. Failure to complete all parts of the form may result in it being rejected by the DCUSA Panel.

- PART A – Mandatory for all Change Proposals
- PART B – Mandatory for Non Charging Methodologies Proposals
- PART C – Mandatory for Charging Methodologies Proposals
- PART D – Guidance Notes

PART A - MANDATORY FOR ALL CHANGE PROPOSALS

Document Control	
CP Status	Standard
CP Number	DCP 259
Date of submission	13/11/2015
Attachments	[See Guidance Note 1]
Originator Details	
Company Name	SP Distribution PLC
Originator Name	Paul McGimpsey
Category	DNO
Email Address	paul.mcgimpsey@spenergyneworks.co.uk
Phone Number	0141 614 1951
Change Proposal Details	
CP Title	CMP223 - Enduring Generation User Commitment
Impacted parties	DNOs, IDNOs, Distributed Generation
Impacted Clause(s)	Schedule 22
Part 1 / Part 2 Matter	Part 1
Provide your rationale why you consider this change is a Part 1 or Part 2 Matter	Clause 9.4.2 (B) and (D)
Related Change Proposals	
Change Proposal Intent	
To incorporate changes in the CCCM to reflect the changes resultant from CUSC Modification Proposal CMP223, approved by the Authority on 16th July 2015.	
Business Justification and Market Benefits	
<p>Prior to Ofgem’s approval of CMP223, the majority of DNOs sought security from distributed generators equal to the entire user commitment amount identified by NGET.</p> <p>CMP223 modified the CUSC such that distributed generation deemed to have an impact on the electricity transmission network are not faced with undue discrimination in the way that security requirements under the CUSC Section 15 are passed on.</p>	
Proposed Solution and Draft Legal Text	
The following changes to Section 5 of the common connection charging methodology are designed to	

align DNO practices with the principles of CMP223.

National Grid Electricity Transmission (NGET) Charges, Securities and Liabilities

5.43 We have an obligation under the CUSC to discuss certain requests for connection or changes in connection with NGET. Such requests are typically for large electrical demand or generation projects. Under certain circumstances, as determined by NGET, they may apply charges to assess the potential impact on the transmission system of a request or the combined effect of a number of requests and these will be included in the Connection Charge, or through a separate mechanism agreed between you and us.

5.44 Subsequent to such assessment NGET may also require works to be undertaken on the GB Transmission System as a condition of the connection being permitted.

~~5.44A In the event of~~Where NGET applies~~ing~~ charges for these works~~or where they require security in respect of the works~~, we will reflect such costs in our charges to you.

~~5.44B In the event of NGET applying securities for these works, we will reflect the value of those securities in our Connection Offer to you. Your total liability may be greater than the security and in those circumstances we will advise you of your total liability.~~

~~We will not carry out credit checks on you in circumstances where the amount of security is less than the full value of the works.~~

Proposed Implementation Date

Next DCUSA release date

Impact on Other Codes

Please tick the relevant boxes and provide any supporting information.

BSC	<input type="checkbox"/>
CUSC	<input type="checkbox"/>
Grid Code	<input type="checkbox"/>
MRA	<input type="checkbox"/>
SEC	<input type="checkbox"/>
Other	<input type="checkbox"/>
None	<input checked="" type="checkbox"/>

If other please specify

Consideration of Wider Industry Impacts

This change proposal ensures that Distributors meet their Statutory duties to facilitate competition in the generation of electricity.

Environmental Impact
There is no environmental impact of this change proposal
Confidentiality
none

PART B – MANDATORY FOR NON CHARGING METHODOLOGIES CHANGE PROPOSALS

DCUSA Objectives
<p><u>General Objectives:</u></p> <p>Please tick the relevant boxes. [See Guidance Note 9]</p> <p><input type="checkbox"/> 1 The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks</p> <p><input checked="" type="checkbox"/> 2 The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent therewith) the promotion of such competition in the sale, distribution and purchase of electricity</p> <p><input type="checkbox"/> 3 The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences</p> <p><input type="checkbox"/> 4 The promotion of efficiency in the implementation and administration of this Agreement</p> <p><input type="checkbox"/> 5 Compliance with the Regulation on Cross-Border Exchange in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.</p>
Detailed rationale for better facilitation of the DCUSA Objectives identified above
<p><i>Gen Objective 2</i></p> <p>The proposed changes facilitate competition by ensuring DNOs pass down equivalent security to distributed generators as is levied upon them by NGET.</p>

PART C – MANDATORY FOR CHARGING METHODOLOGIES CHANGE PROPOSALS

DCUSA Charging Objectives

Please tick the relevant boxes. [See Guidance Note 11]

Charging Objectives:

- 1 that compliance by each DNO Party with the Charging Methodologies facilitates the discharge by the DNO Party of the obligations imposed on it under the Act and by its Distribution Licence
- 2 that compliance by each DNO Party with the Charging Methodologies facilitates competition in the generation and supply of electricity and will not restrict, distort, or prevent competition in the transmission or distribution of electricity or in participation in the operation of an Interconnector (as defined in the Distribution Licences)
- 3 that compliance by each DNO Party with the Charging Methodologies results in charges which, so far as is reasonably practicable after taking account of implementation costs, reflect the costs incurred, or reasonably expected to be incurred, by the DNO Party in its Distribution Business
- 4 that, so far as is consistent with Clauses 3.2.1 to 3.2.3, the Charging Methodologies, so far as is reasonably practicable, properly take account of developments in each DNO Party's Distribution Business
- 5 that compliance by each DNO Party with the Charging Methodologies facilitates compliance with the Regulation on Cross-Border Exchange in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.

General Objectives:

- 1 The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks
- 2 The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent therewith) the promotion of such competition in the sale, distribution and purchase of electricity
- 3 The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences
- 4 The promotion of efficiency in the implementation and administration of this Agreement
- 5 Compliance with the Regulation on Cross-Border Exchange in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.

Detailed rationale for better facilitation of the DCUSA Objectives identified above

[See Guidance Note 10]

Charging Objectives:

Objective 1

The proposed changes facilitate competition by ensuring DNOs pass down equivalent security to distributed generators as is levied upon them by NGET, mirroring the requirements for generators seek connections directly to the transmission system.

Objective 2

The proposed changes facilitate competition by ensuring DNOs pass down equivalent security to

distributed generators as is levied upon them by NGET, mirroring the requirements for generators seek connections directly to the transmission system.

Objective 3

The proposed changes ensure DNOs pass down equivalent security to distributed generators as is levied upon them by NGET.

General Objectives:

Objective 2

The proposed changes facilitate competition by ensuring DNOs pass down equivalent security to distributed generators as is levied upon them by NGET, mirroring the requirements for generators seek connections directly to the transmission system.

Gen Objective 2

The proposed changes facilitate competition by ensuring DNOs pass down equivalent security to distributed generators as is levied upon them by NGET, mirroring the requirements for generators seek connections directly to the transmission system.

Has this issue been discussed at any other industry forums? If so please specify and provide supporting documentation

PART D – GUIDANCE NOTES FOR COMPLETING THE FORM

Guidelines for Working Group Members and Working Group Terms of Reference are available on the DCUSA Website and provide more information about the progression of the Change Process. www.dcusa.co.uk

Ref	Data Field	Guidance
1	Attachments	Append any proposed legal text or supporting documentation in order to better support / explain the CP.
2	Part 1 / Part 2 Matter	A CP must be categorised as a Part 1 or Part 2 matter in accordance with Clause 10.4.7 of the DCUSA. All Part 1 matters require Authority Consent.
3	Related Change Proposals	Indicate if the CP is related to or impacts any CP already in the DCUSA or other industry change process.
4	Proposed Solution and Draft Legal Text	Outline the proposed solution for addressing the stated intent of the CP. The Change Proposal Intent will take precedence in the event of any inconsistency. A DCUSA Working Group may develop alternative solutions. The plain English description of the proposed solution should include the changes or additions to existing DCUSA Clauses (including Clause numbers). Insert proposed legal drafting (change marked against any existing DCUSA drafting) which enacts the intent of the

		<p>solution. The legal text will be reviewed by the Working Group (if convened) and is likely to be subject to legal review as part of its progress through the DCUSA change process.</p>
5	Proposed Implementation Date	<p>The Change can be implemented in February, June, and November of each year or as an extraordinary release. For Charging Methodology CPs, select an implementation date which takes in to consideration the deadlines for publishing indicative tariffs.</p> <ul style="list-style-type: none"> • Submission of Company indicative tariffs is 31 December of each year. • Final tariffs are published on 1 April of each year. <p>Please select an implementation date that provides sufficient time for the change to be incorporated into the appropriate charging model and the DCUSA in order to be reflected within the December indicative tariffs.</p> <p>Contact the DCUSA helpdesk for any further information on the releases dcusa@electralink.co.uk.</p>
6	Consideration of Wider Industry Impacts	<p>Indicate whether this Change Proposal will be impacted by or have an impact upon wider industry developments. If an impact is identified, explain why the benefit of the Change Proposal may outweigh the potential impact and indicate the likely duration of the Change.</p>
7	Environmental Impact	<p>Indicate whether it is likely that there would be a material impact on greenhouse gas emissions as a result of the proposed variation being made. Please see Ofgem Guidance.</p>
8	Confidentiality	<p>Clearly indicate if any parts of this Change Proposal Form are to remain confidential to DCUSA Panel (and any subsequent DCUSA Working Group) and Ofgem.</p>
9	DCUSA General Objectives	<p>Indicate which of the DCUSA Objectives will be better facilitated by the Change Proposal.</p>
10	Detailed Rationale for DCUSA Objectives	<p>Provide detailed supporting reasons and information (including any initial analysis that supports your views) to demonstrate why the CP will better facilitate each of the DCUSA Objectives identified.</p>
11	DCUSA Charging Objectives	<p>Indicate which of the DCUSA Charging Objectives will be better facilitated by the Change Proposal. Please note that a CDCM or EDCM change may also facilitate the DCUSA General objectives.</p>