

DCP 251 and DCP 252 Issues Log

Area	Ref	Issue	Update
Future publications	01	Lack of engagement with QNOs	It was agreed for the distribution lists from DCP 124 and DCP 263 to be used for future publications
Future publications	02	Ensure the background paper and future publications covers full settlement metering, and difference metering solutions.	Ongoing
Review	03	Undertake a review of Schedule 19 Sections 2 and 3, in terms of the NHH and HH portfolio tariffs	Ongoing
Review	04	Qualifying Network Operator definition to be developed further	Post review of ref 13
Review	05	There is a risk with the term “unlicensed” is that it might be taken to exclude licensed generators and suppliers operating private distribution networks	Operating unlicensed pursuant to Electricity Act (check ref against consultation)
Review	06	Consider whether we need to have separate terms for LDNO and QNO in the legal text	Post review of ref 13
Review	07	Should it be the Use of System services that the unlicensed operator provides or should it be the Use of System services it receives from the DNO that determines applicable tariffs.	Ongoing
Review	07A	Should it be the Use of System services that the unlicensed operator provides or should it be the Use of System services it receives from the DNO that	Ongoing

		determines the differences between the operations of LDNO's and PNO's that informs what a QNO is.	
Review	08	Sch 16 114 and 117: we would be in favour of using LDNO network data as a proxy for QNO network data. The unlicensed QNOs may include less sophisticated entities that are not DCUSA parties and obtaining data from them may be problematic	Will depend on scenarios reviewed for applicability
Portfolios	09	The portfolio billing that supports IDNO tariffs relies on the IDNO constructing the portfolio data for all its registered MPANs on its sites that are connected to a particular DNO's assets. The IDNO sends this portfolio data to the DNO. IDNOs (as market participants) access industry systems and data to construct the portfolio data, whereas it is difficult to see how a Distribution Exempt Holders who is not a market participant could do this	Will await outcome of scenarios
Portfolios	10	Distribution Exempt Holders tend to own self-contained individual sites that exist for specific and dissimilar purposes e.g. ports and airports, whereas the IDNO model replicates very similar sites e.g. new housing and that model lends itself well to portfolio billing	Awaiting outcome of 'undue discrimination' review
Non-metered end users	11	Distribution Exempt Holders sites utilising the BSC difference metering solution have both boundary meters and some end-user meters. Not all end users would be metered so a way of applying the IDNO tariffs to the boundary MPAN's would need to be found	Will await outcome of scenarios

Customer choice	12	To qualify as a QNO an unlicensed network operator must notify the DNO. This allows an unlicensed operator to choose between an LDNO or ordinary tariff (which can result in lower charges in some circumstances) which is an option not available to LDNOs	Links to the 'undue discrimination' review
Review	13	Working group needs to capture relevant different network scenarios	Ongoing