

DCP 251/252 Working Group Meeting

16 February 2017 at 10:00am

Web-conference

Attendee	Company
Working Group Members	
Anika Brandt [AB]	SSE Networks
Chris Barker [CB]	ENWL
Chris Ong [CO]	UK Power Networks
Dave Wornell [DW]	Western Power Distribution
Pat Wormald [PT]	Northern Powergrid
Tim Aldridge [TA]	Ofgem
Code Administrator	
John Lawton [JL] (Chair)	ElectraLink
Dan Fittock [DF] (Secretariat)	ElectraLink
Apologies	
Chris Allanson	Northern Powergrid
Mike Harding	The Electricity Network Company

Welcomes and Apologies

The Chair noted the welcomes for this meeting.

1. Administration

- 1.1 The Working Group reviewed the “*Competition Law Do’s and Don’ts*”. All Working Group members agreed to be bound by the Competition Laws Do’s and Don’ts for the duration of the meeting.

- 1.2 The Working Group reviewed the minutes of the last meeting and approved the minutes as an accurate representation of the discussions held.

2. Purpose of the Meeting

- 2.1 The Chair confirmed that the purpose of the meeting was to review the legal text and finalise the DCP 251 & 252 Change Reports. It was agreed that due to the similarities between the DCP 251 and DCP 252 Change Reports, the Working Group would review the DCP 251 Change Report first and note the sections which require reference amendments and other small updates for DCP 252.

3. Review of Legal Text

Schedule 19

- 3.1 Following feedback that the legal text may require updating, the Working Group agreed to walk through the proposed amendments as suggested by MH and the Chair. An overview of these discussions has been provided below:
- **Clause 1.3:** It was highlighted that an amendment to the drafting of this clause would be required as the proposed definition of EDNO applies to a Distribution System which is relevant to a DNO and an IDNO Party. To remedy this the Working Group agreed to amend the schedule to read:
- 1.3 In this Schedule, an “**Embedded Distribution Network Operator**” or “**EDNO**” is: ~~in respect of each DNO Party:~~
- (a) any IDNO Party; or
- (b) any DNO Party acting outside of that DNO Party’s Distribution Services Area,
- which (in each case) has a Distribution System within a GSP Group associated with that DNO Party;
- or
- (c) any Qualified Network Operator who has a distribution system within a GSP Group associated with that DNO Party
- 3.2 Some Working Group members were concerned that it was not clear which DNO Party was being referred to (by the deletion of ‘in respect of each DNO Party’) with this approach, however it was agreed that as this legal text was due to be submitted to the DCUSA Legal Advisor these checks would be carried out and that this concern would be highlighted.
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3.3 Schedule xx

- 3.4 Schedule xx, which has been approved for implementation in April 2017, contains two references to LDNO and the Chair asked the Working Group whether they believed that these references should be replaced with the term QNO. The Working Group noted that there were two references to LDNO in Schedule xx – one in the Schedule's title and one in clause 1, and agreed that these should be replaced with QNO.

Additional Required Updates

- 3.5 The Working Group agreed that updates were also required to the following DCUSA documents:

- The EDCM and CDCM Models require updating as named references to the LDNO Tariffs require updating to QNO Tariffs; and
- The ARP requires LDNO references to state QNO Tariffs.

4. Review of the DCP 251/252 Change Reports

- 4.1 The Chair noted that the intent of a Change Report is to create a clear and concise narrative to detail and summarise the discussions held by the Working Group. On this basis, the Working Group walked through the draft Change Report provided by ElectraLink and suggested a number of amendments. An overview of the main amendments has been detailed below:

- **Impacted Parties:** It was noted by a Working Group Member that Suppliers may be impacted by this CP if changes are made to billing arrangements. No Working Group member could suggest specific instances where a Supplier may be impacted in such a fashion, although the Chair did suggest that this may be an upfront process whereby legacy fully settled sites would require MPANs to be disconnected by the host DNO and new MPANs raised by the Distribution Business appointed by the unlicensed distributor and as such the supplier would be impacted by such a process. ElectraLink agreed to take an action to contact Chris Allanson at Northern Powergrid for further information on this matter.

ACTION: 17/01 - ElectraLink

- **Clause 1.7:** Additional context explaining that operators of distribution systems under license exemption are sometimes referred to as private network operators where competition in supply is being enjoyed by end users.

- **Consultation 1:** The Working Group agreed that some further details should be added to this section and provided a number of insights for this overview section.
- **Working Group Review of First Consultation:** It was agreed that this section should include the main points from the Issues Log and how the Working Group decided to proceed ahead of the decisions made regarding the contents of Consultation 2.
- **Consultation 2 introduction:** The Working Group agreed that this section should include the fact that the consultation went out to the large PNO and BNO distribution list as compiled by DCP 263 in an attempt to foster interaction with these Parties.
- **Consultation 2:** The Working Group agreed that some further details should be added to this section and provided a number of insights for this overview section.
- **Revised QNO Definition:** This section is to be moved to the Legal Text section and replaced with a 'Working Group Assessment' section to summarise the outcomes of the Issues Log.

4.2 A change-tracked version of the DCP 251 Change Report with Working Group comments has been included in Attachment 1.

5. Next Steps

5.1 The DCP 251/252 Working Group agreed the next steps as follows:

- ElectraLink to circulate the updated DCP 251 Change Report to the Working Group for consideration by W/C 6 March 2017;

ACTION: 17/02 - ElectraLink

- ElectraLink to send the legal text to the DCUSA Legal Advisor; and

ACTION: 17/03 - ElectraLink

- ElectraLink to issue a Doodle Poll for the next Working Group meeting date to discuss the finalised legal text.

6. AOB

6.1 There were no items of any other business and the Chair closed the meeting.

7. Next Meeting

7.1 The next DCP 251 & 252 Working Group meeting date will be arranged via Doodle Poll.

8. Attachments

- Attachment 1 – DCP 251 Change Report with WG Comment

New and open actions

Action Ref.	Action	Owner	Update
15/03	To update the network setup diagrams to reflect the Working Group's comments for greater clarity.	ElectraLink	On-going. BNO template.
16/02	<ul style="list-style-type: none"> • update the relevant template documents with the suggested amendments; • amend the references at para 26.4 and the missing full stops in the legal text; • update the definition of QNO for DCP 251 and DCP 252 in line with the comments made; • raise the housekeeping items identified to the DCUSA Panel housekeeping log to be monitored should DCP 251/252 be rejected; and • change QNO back to LDNO in line with the decision made covering issue 08 to use LDNO network data as a proxy for QNO network data. 	ElectraLink	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing. The incorrect reference was made to the DCUSA Panel. The issue is for DCP252 and DNOs operating out of area.</p> <p>Ongoing</p>

16/04	<ul style="list-style-type: none"> • ElectraLink to draft a change report for submission to Working Group for review on the 03 February 2017; • FL to undertake the modelling changes required; and • ElectraLink to circulate the updated legal text to MH and the incorporated changes from MH to be circulated to the Working Group for review. 	ElectraLink, Mike Harding and Franck Latremoliere	<p>Completed</p> <p>A review during the working group highlighted changes to the various models and legal text – completed</p> <p>Completed.</p>
17/01	To contact Chris Allanson at Northern Powergrid for further information on this matter.	ElectraLink	Completed post-meeting
17/02	To circulate the updated DCP 251 Change Report to the Working Group for consideration by W/C 6 March 2017	ElectraLink	
17/03	To send the DCP 251 & 252 legal text to the DCUSA Legal Advisor	ElectraLink	
17/04	To doodle poll working group members for the next meeting date	ElectraLink	

Closed actions

Action Ref.	Action	Owner	Update
16/01	To amend the legal text to ensure that where previously licence distributors has been referenced, it will be changed to licence exempt distributors in the legal text and the definition of QNO is amended.	ElectraLink	Complete
16/03	MH agreed to draft the new Clause and circulate the updated draft to Parties.	ElectraLink	Complete