

DCP 210 Working Group Minutes

Meeting Name	DCP 210 Working Group
Meeting Number	10:00
Date	23 September 2014
Time	10:00
Venue	ElectraLink Ltd

Attendee	Company
Alex Greetham [AG] (Chair)	UKPN
Amanda Rooney [AR] (teleconference) (part meeting)	Ofgem
Angus Rae [AR] (teleconference)	SSE
John Lawton [JL]	ENWL
Maria Hesketh [MH] (teleconference)	Scottish Power
Rosalind Timperley [RT] (Secretariat)	ElectraLink

Apologies	Company
Sue Calvert [SC]	Northern Powergrid

1 ADMINISTRATION

- 1.1 The Working Group reviewed the "Competition Law Dos and Don'ts". All Working Group members agreed to the terms set out in the document.
- 1.2 The group reviewed the DCP 210 Terms of Reference. It was noted that the title of a previous CP was included within the paragraph 12 of the terms of reference. Electralink took an action to correct this.

Action 01/01: ElectraLink

- 1.3 It was drawn to the Working Group's attention that paragraph 2.10 of the standard terms of reference may need to be amended for future DCUSA Working Groups should DCP 210 be implemented. The paragraph currently reads as follows:

"The Working Group may apply to the Panel for an extension setting out a clear justification for the request and providing a timetable for progression of the Change Proposal."

2 APPOINTMENT OF WORKING GROUP CHAIR

- 2.1 AG was appointed as Working Group chair.

3 BACKGROUND OF DCP 210

- 3.1 It was explained that the DCUSA Panel has carried out a review of the DCUSA change process and a number of changes have been raised as an outcome of this review, one of which is DCP 210. The CP seeks to look at the assessment timetable and associated extensions given to each Change Proposal and determine a more suitable approach going forward.
- 3.2 The Working Group noted the analysis prepared by the proposer of DCP 210, which shows that on average 42% of CPs require an extension to their assessment timetable. This analysis is provided as Attachment 1.

- 3.3 It was cautioned that when reviewing the analysis in Attachment 1 it needs to be kept in mind that changes to the Charging Methodologies may have taken longer to progress than they might otherwise have done, as they were delayed waiting for modelling support.
- 3.4 The Working Group then reviewed a document which detailed the assessment timetables of other industry codes; this document is provided as Attachment 2. It was noted that there is a mixture of prescriptive deadline dates and options for the Code Panel to decide.
- 3.5 The Working Group next reviewed a spreadsheet which listed all CPs which had completed the DCUSA Change Process. This spreadsheet is provided as Attachment 3. It was noted that a large number of these CPs required an extension at the end of the 40 working day assessment period.
- 3.6 It was noted that some of the CPs were placed on hold whilst waiting for others to progress; some CDCM changes were delayed whilst waiting for a modelling support contract to be established and some changes are highly complex and will naturally take a long time to develop.
- 3.7 The importance of the Working Group demonstrating how DCP 210 better meets the DCUSA objectives was stressed to attendees.

4 DISCUSSION ON DCP 210

- 4.1 The Working Group noted that there were three potential options that could be consulted on:
- **Option 1:** replace the current 60 and 40 working day values in the DCUSA with new values. (As part of this option, the DCP 210 consultation should seek industry views on what the value(s) should be and whether Parties feel that there should be a fixed value at all.)
 - **Option 2:** the Panel ask the Working Group to recommend proposed timescales following the first Working Group meeting. The DCUSA legal text would permit the Panel to choose a timescales based on the Working Group recommendation, i.e. there would no longer be fixed values within the DCUSA. This option however would retain extensions to the review period of by successive periods of up to 40 Working Days once the expected timescale had been reached.
 - **Option 3:** the initial assessment period remains at 60 working days but when the group returns to the Panel to ask for an extension it will recommend to the Panel how much additional time is required for the assessment process, i.e. the 40 working day value would be replaced by a variable value chosen by the Panel taking into account the Working Group recommendation. Under this option, the initial 60 working day period would remain in the DCUSA but there would no longer be a fixed extension period.
- 4.2 JL took an action to prepare legal text for each of the options, for inclusion within the DCP 210 consultation document.

Action 01/02: JL

- 4.3 The Working Group discussed having different timescales for differing sections of the DCUSA. For example, charging methodology changes would have a longer assessment timescale than general changes, and the value would be fixed by change type (i.e. general, EDCM, CDCM, NTC and CCCM). The Working Group noted that some complex general changes take significantly longer than simple charging methodology changes, thus the length of time to progress the change is not necessarily related to the area of the Code that it impacts. The group therefore felt that this was not an appropriate option to take forward.

- 4.4 The Working Group noted that a hybrid of option 2 and 3 is that the Panel could decide on either of the initial and extension period based on a recommendation of the Working Group.
- 4.5 The Working Group noted that a legal text change would not be required to update the DCUSA CP form such that the proposer is required to provide an estimated assessment timescale when raising the Change Proposal.
- 4.6 It was also noted that the current Working Group terms of reference require Working Groups to provide an estimated timescale for progress when requesting an extension. Currently, the Secretariat provides the Panel with a brief update on the status of each CP but more detail potentially could be provided to aid the Panel.
- 4.7 The group observed that reducing the number of times that a Working Group extension is requested will reduce the administrative burden on the Panel.
- 4.8 It was agreed that as part of the DCP 210 consultation document, the following consultation questions should be asked:
1. Of the options listed above, do you have a preferred option? Please provide your rationale.
 2. Do you believe that it would be helpful if, on the Change Proposal form, the proposer indicates how long they would expect the assessment period to be for the change proposal?
 3. Do you believe that there should be defined assessment period timescales, or should the assessment period be determined by the Panel?
 4. The Working Group discussed whether to codify the assessment timescales by change type (e.g. CDCM, EDCM, NTC, general) but felt that this would not be appropriate as the type of change does not necessarily relate to its complexity.
 5. Should the Working Group maintain a timetable showing expected timescales for the progression of the CP. This timetable would be submitted to the DCUSA Panel each time an extension is requested?
 6. Are there any road blocks that are slowing the DCUSA Working Group process down? From your experience of DCUSA changes and other Code changes, are there any improvements that you would recommend to the process?
 7. If fixed values are to be included in the DCUSA (i.e. under options 1 and 3), what values would you recommend for:
 - The initial assessment period (currently 60 working days)
 - The extension period (currently 40 working days)
- 4.9 It was agreed that the standard consultation questions should also be included in the consultation document.
- 4.10 The Working Group then reviewed the September 2014 DCUSA Panel change register paper. This is provided as Attachment 4. The group noted that the current extension process does not give a clear justification for why the Working Group requires an extension and the date that the Working Group expects to provide the Change Report to the DCUSA Panel. The group

agreed that the Change Register paper should be provided as part of the DCP 210 consultation.

Action 01/02: ElectraLink

- 4.11 The group discussed what would be the implications if a Working Group does not meet the assessment timescales and an extension is not granted. It was noted that currently there are no implications but that other changes may be raised around the withdrawal process.

5 NEXT STEPS

- 5.1 The work plan was agreed as follows:

No.	Event	Target Date
1	Electralink to draft consultation document and circulate to Working Group members for review. JL to prepare draft legal text for inclusion in the consultation document	30 Sep 2014
2	Working Group to review the consultation document and submit comments to ElectraLink	7 Oct 2014
3	ElectraLink updates consultation document and circulates to group for final sign off	10 Oct 2014
4	Consultation Document issued for a period of two weeks	13 Oct 2014
5	Consultation Responses due (based on two week consultation period)	27 Oct 2014
6	Electralink collates consultation responses and circulates to Working Group members	30 Oct 2014
7	Meeting to review consultation responses via webinar	10am on 4 Nov 2014
8	Implement changes to legal text in light of consultation responses	4 Nov 2014
9	Legal text issued to the DCUSA legal consultant for review	4 Nov 2014
10	Electralink to draft Change Report and circulate to Working Group	14 Nov 2014
11	Meeting to review draft Change Report and DCUSA legal consultant comments on the legal text	w/c 18 Nov 2014
12	Change Report submitted to DCUSA Panel (Panel paper day)	10 Dec 2014
13	DCUSA Panel approves Change Report	17 Dec 2014
14	Change Report issued for voting	19 Dec 2014
15	Voting Closes	9 Jan 2015
16	Change Declaration issued	13 Jan 2015
17	Ofgem Decision	17 Feb 2015
18	Subject to option progressed, DCUSA Panel to consider amending the CP form and Working Group terms of reference. Also, to prepare proposed work plan template.	17 Feb to 31 Mar 2015
19	Implementation Date	1 April 2015

- 5.2 Based on the timeline above the Working Group agreed to recommend a proposed implementation date of 1 April 2015.

- 5.3 It was also agreed that the DCP 210 work plan should be included within the consultation document to give respondents view of what Working Groups could be asked to submit to the DCUSA Panel.

Action 01/03: ElectraLink

6 ANY OTHER BUSINESS

- 6.1 There were no items of any other business.

7 NEXT MEETING

- 7.1 The next DCP 210 Working Group meeting is at 10am on Tuesday, 4 November 2014 via web-conference.

APPENDIX A: SUMMARY OF ACTIONS

NEW AND OPEN ACTIONS

Action Ref.	Action	Owner	Update
01/01	Prepare legal text for the three options identified by the Working Group	John Lawton	
01/02	Include the DCUSA Panel Change Register paper as part of the consultation document	ElectraLink	
01/03	Include the 210 work plan within the consultation document to give respondents view of what Working Groups could be asked to submit to the DCUSA Panel.	ElectraLink	

ACTIONS AGREED CLOSED AT THE MEETING

Action Ref.	Action	Owner	Update