

## **Email Chain 1**

**From:** Saker, Paul

**Sent:** 12 December 2014 10:39

**To:** Brogden, Dave; DCUSA; Tilquin, Dominique; Graham Brewster; John Lawton; Kevin Woollard; Glenn Sheern; Jones, Andrew; Maria Hesketh; David Boyer; Keren Kelly; Hazel ward; Chris Allanson; Law, Emslie; Rory McCarthy; jane.eccles ; Jones, Andrew; tim.bailey; peter.morgan; Monks, Andrew

**Subject:** RE: Website Updated: DCP 204 Meeting 09 Minutes

Dave/Roz,

In regards to my first point below I have considered the legal text further and I am not sure the proposed amendment needs to be made. The existing text for the various Notices already states that they constitute a notice that changes in Customer Demand could affect Security of Supply, and presumably therefore should not be made.. For LMAs the reference is to 'significant modifications of Customer Demand', and for SRNs and Emergency SRNs it is 'any modifications of Customer Demand'. My interpretation is then that this means changes to Load Switching Regimes that amend the pattern of Customer Demand should not be made, I am not sure that the legal text needs to be more explicit than this and I am keen not to make changes just for the sake of it. However I would again welcome any feedback on this point.

In regards to the second point about clarifying that an SRN can only be issued where an LMA is already in effect I propose adding the following text into section 6 of the legal text to provide this clarification.

6.1A A Security Restriction Notice shall only be issued in relation to a geographical area for which a Load Managed Area Notice is already in effect, and the requirements set out in paragraph 5 shall continue to apply accordingly.

I hope this is OK, but please let me know if you have any questions or would like to discuss further.

Regards,

Paul Saker  
Senior Business Analyst  
Smart Metering  
Customers Branch  
EDF Energy

**From:** Brogden, Dave

**Sent:** 08 December 2014 10:38

**To:** Brogden, Dave; DCUSA; Tilquin, Dominique; Graham Brewster; John Lawton; Kevin Woollard; Glenn Sheern; Jones, Andrew; Maria Hesketh; David Boyer; Keren Kelly; Hazel ward; Chris Allanson; Law, Emslie; Rory McCarthy; jane.eccles ; Jones, Andrew; tim.bailey; peter.morgan; Monks, Andrew

**Subject:** RE: Website Updated: DCP 204 Meeting 09 Minutes

Paul,

Many thanks for raising these issues, I would be happy for you to propose changes to the legal text which we can review at the next meeting.

Roz,

I have reviewed the legal text and have found some areas which require amendment, these are detailed below:

- i) In the definition of Network Capacity Engineering Recommendation P2 should actually be Engineering Recommendation P2/6
- ii) Clause 5.4(c) – this should be changed to read; any future changes to Load Switching Regimes **and/or** the Randomised Offset Limit in force at particular Metering Points in that area may be subject at the request of the Company to change in accordance with Paragraph 6.6 or 7.6; and
- iii) Clause 5.4(d) – any changes to Load Switching Regimes **and/or** the Randomised Offset Limit referred to in Paragraph 5.4(c) will, if requested by the Company pursuant to Paragraph 6.6 or 7.6 or if made voluntarily by a Supplier, be at the relevant Supplier's cost.

Regards

David C Brogden  
**Smart Metering Programme and Compliance Manager**  
Any future changes to Load Switch

**From:** Saker, Paul

**Sent:** 05 December 2014 11:47

**To:** Brogden, Dave; DCUSA; Tilquin, Dominique; Graham Brewster; John Lawton; Kevin Woollard; Glenn Sheern; Jones, Andrew; Maria Hesketh; David Boyer; Keren Kelly; Hazel ward; Chris Allanson; Law, Emslie; Rory McCarthy; jane.eccles ; Jones, Andrew; tim.bailey; peter.morgan; Monks, Andrew

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All,

In regards to action 09/08, as noted in the last meeting I had noticed a couple of issues with the legal text. I have added comments to the relevant sections in the attached, the issues I have noticed are:

- The legal text only refers to replicating the Load Switching Regime on a new meter when the meter is replaced, it no longer makes any reference to amending the Load Switching Regime on an existing meter (i.e. reconfiguring a meter). This would then mean that a Supplier could change the Load Switching Regime on a smart meter in an LMA remotely without contravening the requirements of Schedule 8, even though this would presumably create the same risk to the security of supply. I thought we had previously agreed that the legal text would need to account for any changes to Load Switching Regimes and not just those related to replacing a Load Switching Device, if this is the case then this needs to be added back into the legal text for all of the relevant notices. Please let me know if you agree that this needs to be accounted for in the legal text and I will draft the changes.
- Although it was suggested in the last working group that an SRN would only be implemented where an LMA had already been declared, I do not believe that this is explicit enough in the legal text. If this is the case then the restrictions that apply to an LMA can be taken to apply to an SRN as well, which means that the requirements related to replacing (and reconfiguring) devices would not need to be re-stated in the section on SRNs. This is implied by the current text but I think this needs to be much clearer. However this is not the case and an SRN can be declared with there being an LMA in force, then the restrictions that apply to an LMA need to be replicated to the section on SRNs. Please let me know if you believe that an SRN can only be issued when an LMA is already in place, and if so whether the legal text needs to be clearer on this point.

If people can provide feedback on the two points above I will draft the relevant changes and issue them to the group for review. I hope that this is all clear but please let me know if you have any questions or would like to discuss the points above.

Thanks and regards,

Paul Saker  
Senior Business Analyst  
Smart Metering  
Customers Branch  
EDF Energy

### **Email Chain 2**

**From:** Saker, Paul

**Sent:** 08 December 2014 13:13

**To:** Brogden, Dave; Graham Brewster; DCUSA; Dominique Tilquin; John Lawton; Kevin Woollard; Glenn Sheern; Andrew Jones; Maria Hesketh; David Boyer; Keren Kelly; Hazel ward; Chris Allanson; Emslie Law; Rory McCarthy; jane.eccles; Andrew Jones; tim.bailey; peter.morgan; Monks, Andrew

**Subject:** RE: Website Updated: DCP 204 Meeting 09 Minutes

Graham/Dave,

Looking in more detail at the legal text I think the key difference between SRNs and Emergency SRNs is in clause 7.6(c) of the legal text which states that:

“provided that where the Company requires changes to Load Switching Regimes and/or the Randomised Offset Limit in an area which is not a Load Managed Area or to Load Switching Regimes and/or the Randomised Offset Limit which have not been modified by the Supplier since the Effective Date of the current Load Managed Area Notice, then the reasonable cost required to affect such changes shall be at the Company’s cost.”

This indicates that, where an Emergency SRN has been issued where an LMA was not previously declared and the issue is not created by the way that Suppliers have applied switching times, that any changes that need to be made to amend Load Switching Regimes or randomisation settings would be at the DNO’s cost as this would be failure on the part of the DNO to notice demand constraints developing and issue an LMA to manage them.

My view is that an SRN can only be issued where an LMA is already in effect and Supplier(s) have failed to follow the restrictions applied by that notice and have increased the risk to the Security of Supply. An Emergency SRN can then be issued either as a consequence of the SRN failing to have the desired effect (which should not usually be within 20 days as this would indicate the SRN was not issued early enough), or where an issue has suddenly arisen or has not been previously identified and managed by the DNO. The LMA/SRN/Emergency SRN notices that are issued set out the general obligations that Suppliers need to adhere to in the affected areas, the Compliance Notices that are then issued in association with these notices will direct Suppliers to take specific actions for specific customers or groups of customers, such as amending randomisation parameters.

As Dave has noted I think there is a clear differentiation between the notices but I would agree that this probably does need to be more clearly articulated in the legal text, I am not sure how we get to a conclusion on that.

Regards,

Paul Saker  
Senior Business Analyst  
Smart Metering  
Customers Branch  
EDF Energy

**From:** Brogden, Dave

**Sent:** 08 December 2014 12:07

**To:** Brogden, Dave; DCUSA; Tilquin, Dominique; Graham Brewster; John Lawton; Kevin Woollard; Glenn Sheern; Jones, Andrew; Maria Hesketh; David Boyer; Keren Kelly; Hazel ward; Chris Allanson; Law, Emslie; Rory McCarthy; jane.eccles ; Jones, Andrew; tim.bailey; peter.morgan; Monks, Andrew

**Subject:** RE: Website Updated: DCP 204 Meeting 09 Minutes

Graham,

I still feel that there is a sufficient difference between the SRN and the Emergency SRN to justify the existence of both notices. A separate section on compliance notices could be added if it was felt that this would provide benefit / better clarity on the legal text, though I'm not convinced that this would necessarily do either.

Regarding the individual points you raise my comments are detailed in red text below:

- (a) Move Clause 4.1 into Section 3 (General Obligations) This seems appropriate if carried out with (b) below.
- (b) Rename Section 4 as "Advisory Notices" See comment to (a).
- (c) Rename Section 5 as "Load Managed Area Notices" This seems appropriate.
- (d) Insert a new Section 8 "Compliance Notices" I'm not sure that this is necessary but I'm happy to discuss at the next WG meeting.
- (e) For each Section 4 to 8 inclusive clarify the circumstances in which the Notice would be issued, the measures to be taken and the timescales this should be accomplished in I think the legal text actually achieves this if it doesn't it needs to be corrected.

I am happy to discuss these issues at the next meeting, it would be desirable to get a group consensus on the issues you raise.

Regards

David C Brogden  
**Smart Metering Programme and Compliance Manager**

**From:** Brewster, Graham P.

**Sent:** 05 December 2014 15:41

**To:** Brogden, Dave; DCUSA; Tilquin, Dominique; Graham Brewster; John Lawton; Kevin Woollard; Glenn Sheern; Jones, Andrew; Maria Hesketh; David Boyer; Keren Kelly; Hazel ward; Chris Allanson;

Law, Emslie; Rory McCarthy; jane.eccles ; Jones, Andrew; tim.bailey; peter.morgan; Monks, Andrew  
**Subject:** RE: Website Updated: DCP 204 Meeting 09 Minutes

Hi All,

Section 3.4 of the Change Report says “The current notices defined in Schedule 8 and the differences between each type of notice are not currently very clear” and then goes on to explain the measures that have been taken to remedy this. At the last meeting I mentioned that I still found the proposed Notices very confusing. It appears (to me anyway) that there is very little difference between the wording of some of them, and also what in practice the Suppliers would be expected to do differently.

1. Section 3.5 of the Change Report describes the notices and the associated obligations. For Emergency SRNs it states “As for SRNs, additionally the DNO may also issue a Compliance Notice”. However, Clause 6.6 of the legal text says that the Company may issue a Compliance Notice in respect of an SRN. There are two issues (i) the change report appears to be factually incorrect and (ii) there does not appear to be any significant difference between an SRN and an Emergency SRN
2. There is a view that Emergency SRNs are required because a Company may need to issue one in an area not subject to an LMA Notice or SRN. However, the matter is a little confusing because:
  - Clause 3.2 of the legal text states that the Company shall use “reasonable endeavours” to issue notices in an ascending order of significance, and consequently issuing an Emergency SRN in an area not subject to an LMA Notice or SRN is not prohibited
  - Clause 6.4(b) states that “Emergency SRNs... will normally not be issued within 20 Working Days of the Effective Date of the relevant SRN”, which seems to infer that they can only be issued in an area subject to an LMA Notice and/or SRN
  - Clause 7.1 states that “for the avoidance of doubt, the issue of an emergency SRN need not be restricted to Load Managed Areas”

I would tentatively like to suggest we consider doing the following:

- (a) Move Clause 4.1 into Section 3 (General Obligations)
- (b) Rename Section 4 as “Advisory Notices”
- (c) Rename Section 5 as “Load Managed Area Notices”
- (d) Insert a new Section 8 “Compliance Notices”
- (e) For each Section 4 to 8 inclusive clarify the circumstances in which the Notice would be issued, the measures to be taken and the timescales this should be accomplished in

My suspicion is that we will struggle to differentiate between some of the notices (SRN, Emergency SRN and Compliance Notices in particular) which would beg the question whether we can rationalise the overall number of them.

Regards,

**Graham Brewster**  
Technical Policy Manager  
Design & Development  
Western Power Distribution