

DCP 190 Working Group Minutes

Meeting Name	DCP 190 Working Group
Meeting Number	04
Date	18 September 2014
Time	10:00
Venue	Web-Conference

Attendee	Company
Peter Turner [PT] (Chair)	Northern Powergrid
Neil Magrath [NM]	UK Power Networks
Paul Smith [PS]	Western Power Distribution
Stacy Feldmann [SF]	Ofgem
Claire Hynes [CH] (Secretariat)	ElectraLink

1 ADMINISTRATION

- 1.1 The minutes of the last meeting were approved with minor amendments.
- 1.2 The group reviewed the open actions. Updates on all actions are set out in Appendix A.

2 COMPETITION LAWS DO'S AND DON'TS

- 2.1 The Working Group reviewed the "Competition Law Dos and Don'ts". All Working Group members agreed to the terms set out in the document.

3 REVIEW OF WORKING GROUP COMMENTS ON THE DCP 190 CONSULTATION

- 3.1 The Working Group reviewed the respondents' comments on the DCP 190 consultation document. The Working Group response to the DCP 190 collated consultation comments acts as Attachment 1.
- 3.2 The Working Group agreed that a footnote would be added to the redacted DCP 190 consultation collated comments (which does not include the anonymous confidential response) to state that the anonymous respondent had requested for their response to be shared with the Working Group and Ofgem only with the provision that a summary may be included in the Change Report. As a result their comments have been redacted from the consultation collated comments document.

ACTION 04/01: ELECTRALINK

4 REVIEW OF THE DRAFT DCP 190 AND DCP 190A CHANGE REPORT

- 4.1 The Working Group reviewed and revised the draft DCP 190 and DCP 190A Change Report. The revisions to the Change Report are displayed as red-lining and act as Attachment 2.
- 4.2 The Working Group revised the wording at point 6.19 of the Change Report based on Bob Weaver's 18 September 2014 e-mail to the Working Group and his response to consultation two. PS advised that he had conferred internally and could confirm that Western Power Distribution refurbish and reuse secondhand switch gear up to five years old where the equipment proves to be reusable. It was noted that ground mounted as opposed to pole mounted equipment was more often in re-usable condition.

- 4.3 The Working Group noted that some respondents to consultation two had highlighted that they were unhappy with the concept of the De-Minimus value. Members considered that the concern may relate to the ability of each DNO to interpret the De-Minimus value differently for their DNO area (which is required under competition law) and that no refund may be received due to a high De-Minimus value set in Section 6. The Working Group agreed with Western Power Distribution's response that the De-Minimus value should be a nominal sum. The Working Group considered that each DNO would be required to submit its calculation of the De-Minimus value to Ofgem for approval if the DCP 190 change was implemented. The Ofgem observer agreed to check whether Ofgem will have the power to veto the DNO's De-Minimus value calculation in Section 6 of the Connection Charging Methodology Statement (CCMS).

ACTION 04/02: SF

- 4.4 SF queried how a sample calculation may look for Section 6 as all DNOs would need to propose a calculation for their CCMS. Members noted that as the calculation sits under Section 6 it is outside of the scope of DCUSA. However, one member agreed to draft some common wording that could be applied to all DNOs to facilitate the expediency of the process and add it to the Change Report as the Working Group's best practice recommendation.

ACTION 04/03: PT

- 4.5 The Working Group considered that the implementation of the DCP 190 change would be dependent upon Ofgem's approval of the DNO calculation of the De-Minimus value inserted in to Section 6 of the CCMS. The Working Group noted that the next DCUSA implementation dates following the timetable for an Authority decision on the DCP 190 change would be the 12 February 2015 and the 01 April 2015. The Working Group queried with SF which date would make the best implementation date for Ofgem to facilitate this change to Section 6 of the CCMS if they chose to approve the DCP 190 change.

ACTION 04/04: SF

- 4.6 It was noted that the DCP 190A change if approved could be implemented in the next DCUSA release following Authority consent.
- 4.7 SF requested DCUSA's view on the powers of Ofgem such as whether Ofgem's powers included accepting or rejecting the implementation date only or if they could provide an implementation date. The secretariat advised that in the case of the DCP 195 and DCP 195A decision letter, the Authority stipulated the implementation date but that the secretariat would confer internally and provide a response to SF and the Working Group.

ACTION 04/05: ELECTRALINK

- 4.8 One member asked the Secretariat whether the DCP 190 legal text could be interpreted in such a way that if no value is stipulated in Section 6 of the DNO's CCMS whether the DNO would just take a loss on their refund for the amount that the De-Minimus value would have represented until an approved De-Minimus value is inserted in Section 6. The Secretariat advised that once the legal text has been inserted as an obligation in to DCUSA and implemented that the DNO would normally have to request a derogation from that Clause if they were unable to meet the obligation. However, the secretariat agreed to confer internally and provide a response to the Working Group.

ACTION 04/06: ELECTRALINK

- 4.9 One member agreed to draft some proposed wording for the DCUSA Objectives best facilitated by this change based on the Working Group view from consultation one and the CP forms for Working Group approval.

ACTION 04/07: PT**5 NEXT STEPS**

5.1 The DCP 190 Working Group agreed that the next steps were as follows:

- Issue the revised draft DCP 190 Change Report to Working Group members for comment for a period of one week.
- Request Working Group approval of DCUSA Objectives for the DCP 190 and DCP 190A and the implementation date of both changes.
- Present the DCP 190 Change Report at the 15 October 2014 DCUSA Panel meeting.

ACTION 04/08: ELECTRALINK**6 ANY OTHER BUSINESS**

6.1 There were no items of any other business.

7 NEXT MEETING

7.1 Any further DCP 190 Working Group meetings will be planned as required.

8 ATTACHMENTS

- Attachment 1 - DCP 190 Consultation Two Collated Responses - Non Confidential Responses Only With Working Group Comments v1.0
- Attachment 2 - DCP 190 and DCP 190A Red-Lined Change Report v04

APPENDIX A: SUMMARY OF ACTIONS**NEW AND OPEN ACTIONS**

Action Ref.	Action	Owner	Update
04/01	Add a footnote to the DCP 190 consultation two collated comment document to state that one of the comments section has been redacted as an anonymous respondent has requested for their response to be shared with the Working Group and Ofgem only with the provision that a summary may be included in the Change Report.	ElectraLink	19 September 2014
04/02	Check whether Ofgem will have the power to veto the DNO's De-Minimus value calculation in Section 6 of the Connection Charging Methodology Statement (CCMS).	Stacy Feldmann	
04/03	Draft common wording for Section 6 of the CCMS that could be applied to all DNOs to facilitate the expediency of the process and add it to the Change Report as the Working Groups best practice recommendation.	Peter Turner	
04/04	Advise which date would make the best implementation date for Ofgem to facilitate this change to Section 6 of the CCMS if they chose to approve the DCP 190 change.	Stacy Feldmann	
04/05	Provide DCUSA's view on the powers of Ofgem to accept or reject the implementation date only or	ElectraLink	

	whether Ofgem has the power to stipulate the implementation date.		
04/06	Confirm whether the DCP 190 change proposed Clause 1.33 could be interpreted in such a way that if no value is stipulated in Section 6 of the DNO's CCMS when the Clause is implemented in DCUSA whether the DNO would just take a loss on their refund for the amount that the De-Minimus value would have represented until an approved De-Minimus value is inserted in Section 6 or whether a derogation from the Clause would be required.	ElectraLink	
04/07	Draft wording for the DCUSA Objectives best facilitated by this change.	Peter Turner	
04/08	Issue the revised draft DCP 190 Change Report to Working Group members for comment for a period of one week. Request Working Group approval of DCUSA Objectives for the DCP 190 and DCP 190A changes and the implementation date of both changes. Present the DCP 190 Change Report at the 15 October 2014 DCUSA Panel meeting.	ElectraLink	15 October 2014

ACTIONS AGREED CLOSED AT THE MEETING

Action Ref.	Action	Owner	Update
03/01	Re-draft the legal text to incorporate the wording 'de-minimus value' and circulate to the Working Group for their review.	Peter Turner	Completed.