

DCUSA DCP 176 Consultation Responses – Collated Comments

Question One	Do you feel that DCP 176 better facilitates any of the DCUSA General Objectives?	Working Group Comments
Electricity North West	This change proposal will better facilitate General Objective 4 because it provides clarification over when to Disconnect and when to De-energise and rectifies the inconsistencies between the definitions covering Section 2A and 2B. The rest of the objectives are neutral.	The Working Group noted that all respondent's agreed that DCUSA Objectives are better facilitated by the CP, with four of the respondent's referencing Objective 4.
Northern Powergrid	Yes	Noted
SSE Distribution	We agree with the Working Group view that Objective 4 would be better facilitated by this CP, as detailed in paragraph 3.2 of the consultation.	Noted
SSE Energy Supply Ltd	Yes	Noted
UK Power Networks	Yes, we believe this betters General Objective 4 The promotion of efficiency in the implementation and administration of this Agreement.	Noted
Western Power Distribution	Yes. General Objective 4	Noted
Question Two	Do you have any comments on the proposed legal drafting of DCP 176?	Working Group Comments
Electricity North West	Additional clarification is required when referring to 'the Act'. In this instance we are talking about Section 17 of the Act. The reason for such a clarification is because the Act also covers off references to disconnect and then states when a reconnect should take place. In these instances DCUSA	The respondent explained that there are a number of references to the Act and suggested that the relevant sections should be referenced in the

	<p>language uses De-energise and Re-energise.</p> <p>We therefore suggest inserting ‘section 17 of’ between ‘...in accordance with’ and ‘the Act...’ in both part a) and b).</p> <p>DCUSA does make such specific references to the Act rather than just the Act so this is accepted practice.</p> <p>.....</p> <p>The other codes (MRA and the BSC) use the term De-registration notice and De-register (capitalised in MRA but not so in BSC).</p> <p>That said, DCUSA also contains a definition of De-register which then links to both the MRA and the BSC.</p> <p>De-register means:</p> <p>(a) in relation to a Metering Point, to change the status of the Supply Number relating to that Metering Point within MPAS so as to prevent any further registrations (as defined by the Master Registration Agreement) in respect of that Supply Number (and De-registered shall be construed accordingly, and De-registration Notice shall be construed as a notice issued by the Company to De-register); and</p> <p>(b) in relation to a Metering System, to De-register that Metering System in accordance with the provisions of the Balancing and Settlement Code.</p> <p>We should therefore try and avoid the inclusion of ‘and includes the de-registration of..’ within the definition of Disconnect because it is mixing up two activities i.e to Disconnect and to De-register.</p> <p>The de-registration is covered off by clause 25.20 and perhaps needs a slight modification to refer to the term ‘De-registered’ rather than in lower case. Also, this clause indicates that we do something different for</p>	<p>DCP 176 legal text to make it clearer to those reading the legal text. Working Group members agreed that this would provide clarity.</p> <p>The Working Group noted the suggestion that “de-registered” be capitalised in paragraph 25.20, so that it refers back to the definition of “de-registered”.</p> <p>A Working Group member expressed the view that a disconnection should follow a de-registration and asked that this flow be maintained. It was agreed that the suggested change to the DCP 176 legal text would not affect the order of processes. Attendees agreed to make the proposed change to paragraph 25.20.</p> <p>The Working Group agreed to amend the definition of disconnect as suggested by the respondent.</p> <p>It was queried whether it would always be the case that a metering point or system is disconnected , as a connection point may be to another distributors system.</p> <p>The group noted that the definition of Metering System in the DCUSA is</p>
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	<p>Metering Systems i.e. send a disconnection certificate rather than refer to de-registration.</p> <p>We therefore propose a change to clause 25.20 and the definition of Disconnect.</p> <p>Clause 25.20 proposed change</p> <p>25.20 Subject to Clauses 25.17 and 25.19A, the Company shall carry out the Disconnection of the Metering Point or Metering System in accordance with the Disconnection Notice, and shall:</p> <p>25.20.1 in respect of a Metering Point, send a Registration Notice to the MPAS Provider instructing it to register the Metering Point as dDe-registered; or</p> <p>25.20.2 in respect of a Metering System, provide a disconnection certificate to the User,</p> <p>(in each case) in accordance with the BSC.</p> <p>Disconnect definition</p> <p>Disconnect means:</p> <p>(a) in respect of Section 2A, to permanently disconnect a Metering Point or Metering System by the removal of all or part of the Company's equipment associated with the connection of such Metering Point or Metering System in accordance with Section 17 of the Act and includes the de-registration of such Metering Point or Metering System; or</p> <p>(b) in respect of Section 2B, to permanently De-energise disconnect a Connection Point in accordance with Section 17 of the Act by the</p>	<p>as follows:</p> <p>“means a metering system registered in CMRS in accordance with the provisions of the BSC, and relating to an Entry Point or an Exit Point.”</p> <p>An attendee highlighted that metering point is being used as a proxy for the point at which a customer is connected. From a statutory point of view the focus is on connections to owner/occupier premises.</p> <p>It was clarified that a metering point must have an MPAN. In some cases this can be a one to many relationship, such as for unmetered supply.</p> <p>It was noted that connections in Central Volume Allocation do not have an MPAN.</p> <p>The group agreed with the revised wording for the definition of Disconnect proposed by the respondent.</p> <p>The DCP 176 legal text was updated to capture the respondent’s suggested changes.</p>
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	<p style="color: red;">removal of all or part of the company's Connection Equipment and connection Assets</p> <p>when you then consider the above this can be simplified further as: Disconnect means:</p> <p style="color: red;">(a) in respect of Section 2A, to permanently disconnect a Connection Point, Metering Point or Metering System by the removal of all or part of the Company's equipment associated with the connection of such Metering Point or Metering System in accordance with Section 17 of the Act and includes the de-registration of such Metering Point or Metering System; or</p> <p style="color: red;">(b) in respect of Section 2B, to permanently De-energise disconnect a Connection Point in accordance with Section 17 of the Act by the removal of all or part of the company's Connection Equipment and connection Assets</p>	
<p>Northern Powergrid</p>	<p>The original intent of the CP was to “Correct the definition of Disconnection so it is the same for section A and section B.”</p> <p>The Business Justification and Market Benefits was because “This anomaly was introduced by the Green Deal changes.”</p> <p>The legal review of the text needs to ensure that all anomalies, relating to this issue, have been addressed. We have provided 2 examples below:</p> <ol style="list-style-type: none"> 1. Within DCUSA the definition of “Disconnect” in Section 1A, subsection 1 “Definitions and interpretation” is different to the definition of “Disconnection” (where “Disconnect” shall be construed accordingly) within Schedule 2B “National Terms of Connection”. Given the intent is to ensure that the definition is the 	<p>A Working Group member observed that with regards to point 2 there is a significant difference between permanent disconnection of the meter compared to the temporary disconnection for safety reasons. It was noted that carrying out an action for safety reasons is de-energising not disconnecting.</p> <p>The group noted that Northern Powergrid’s comment may be technically correct due to differences in the meanings of definitions within the Act and DCUSA.</p> <p>The group considered whether the</p>

	<p>same between section A and Section B then surely the NTC version will need reviewing. Otherwise end customers cover under the NTC as part of Section A, clause 17 will have a different definition to IDNOs covered under Section B.</p> <p>2. The legal text refers to disconnection “in accordance with the Act” whereas section 3 clause 6.2 of the NTC states that “The Company shall be entitled to Disconnect the Connection Point where it is permitted to do so in accordance with the Act or the Electricity Distribution Licence (including if the Company reasonably considers it necessary to do so for safety reasons)” [emphasis added].</p> <p>The point is that disconnection by the DNO is not purely limited to the Act and needs to consider both the Licence and/or safety reasons.</p>	<p>National Terms of Connection (NTC) was within the scope of DCP 176. It was observed that the NTC is written with reference to the customer and in relation to a connection it has a termination clause. The term termination is not used in the Supplier side of things.</p> <p>An attendee suggested that DCP 176 does not have a knock on impact on the NTCs and that these should be subject to a separate review if required. It was noted that if the NTC were to be amended then a further consultation would be required.</p> <p>The Ofgem representative in attendance at the meeting asked that it be confirmed that the MRA and BSC had been included within the DCP 176 consultation distribution list, so that should they be impacted they have had the opportunity to identify this impact. It was also agreed that if the MRA and BSC should be sent the latest version of the legal text for review.</p> <p>The Working Group noted that the intent of DCP 176 was to clarify the process between Distributor and Supplier, not to consider the relationship between Customer and</p>
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		<p>Supplier.</p> <p>It was observed that DCP 182¹ has been raised seeking to remove the requirement for a Disconnection Notice in accordance with clause 6.1 of the DCUSA agreement. It was suggested that Northern Powergrid’s comments should be fed into the DCP 182 Working Group’s discussion, rather than both the DCP 176 and DCP 182 Working Groups both reviewing this area. An action was taken to inform Northern Powergrid that the DCP 176 group is uncomfortable looking at this area as it is under review by the DCP 182 group and suggest that Northern Powergrid feed its comments to this group.</p> <p>It was agreed that the Working Group’s comment should be fed back to Northern Powergrid and they should be invited to raise this as a separate change should they wish to.</p> <p>An attendee highlighted that there may be other housekeeping changes needed to the NTC in addition to this area highlighted by Northern</p>
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¹ DCP 182 - Removal of Disconnection Notice

		Powergrid. JL took an action to raise this area for inclusion in the DCUSA Panel housekeeping log should not be picked up by the DCP 182 group and also if Northern Powergrid choose not to raise a DCP to address it.
SSE Distribution	No	Noted
SSE Energy Supply Ltd	No	Noted
UK Power Networks	No	Noted
Western Power Distribution	We agree the drafting	Noted
Question Three	Do you feel that DCP 176 will have any effect on other Industry codes?	Working Group Comments
Electricity North West	No	Noted
Northern Powergrid	No, not in terms of consequential impacts (unless there is any need for the definition of disconnection to be consistent with other codes eg CUSC	Noted
SSE Distribution	No	Noted
SSE Energy Supply Ltd	No	Noted
UK Power Networks	The proposed changes will not have an effect on other codes, however any further development/changes need to be monitored to ensure they do not impact on the MRA.	It was noted that the legal text is to be modified slightly and assurance will be sought from the code administrators of the MRA and BSC that the legal text does not impact their codes. It was agreed that it should be made clear to the MRA and Elexon that

		<p>temporary safety dis-connections which are reversible once the safety issue is resolved are not Section 17 disconnections and consequently are not events requiring de-registration, i.e. the MPAN remains traded and will be restored to energised status just as soon as the relevant remedial measures have been taken.</p> <p>The Working Group agreed that the DCP 182 Working Group should be informed of the work that the DCP 176 group is undertaking in this area so that they are aware of it.</p>
Western Power Distribution	No	Noted
Question Four	Are you aware of any wider industry developments that may impact upon or be impacted by this CP? If so, please give details, and comment on whether the benefit of the change may outweigh the potential impact and whether the duration of the change is likely to be limited.	Working Group Comments
Electricity North West	<p>There are no industry developments that would impact this change proposal but its progression will help to further understand what type of activities are being undertaken in the Revenue Protection Code of Practice since the definition of Disconnect in that part of DCUSA is referring to the electricity act and makes a reference to 'and 'includes' De-energisation.</p> <p>"Disconnect means to disconnect a premises as referred to in the Electricity Act, and includes 'De-energisation' (as defined in Clause 1 of the DCUSA)"</p> <p>There may well be a further change proposal to the Revenue Protection</p>	<p>An attendee suggested that once DCP 176 has been completed there will be a need to revisit the revenue protection code of practice as this document contains a reference to disconnect. It was agreed that this should be a next step rather than part of DCP 176, as this will first allow DCP 176 to be agreed. It was</p>

	Code of Practice to clarify in what circumstance the activity identified is then alluding to i.e. Disconnect or De-energise.	noted that another Change Proposal will therefore be raised once DCP 176 is completed to bring further clarification of this area within the DCUSA schedules. The Working Group also noted that DCP 182 is looking at the NTC.
Northern Powergrid	No	Noted
SSE Distribution	N/A	Noted
SSE Energy Supply Ltd	No	Noted
UK Power Networks	No	Noted
Western Power Distribution	No	Noted
Question Five	Do you agree with the implementation date of DCP 176?	Working Group Comments
Electricity North West	Yes.	Noted
Northern Powergrid	Yes	Noted
SSE Distribution	Yes	Noted
SSE Energy Supply Ltd	Yes	Noted
UK Power Networks	Yes	Noted
Western Power Distribution	Yes. No changes to processes are needed so it should be implemented as soon as possible.	Noted
Question Six	Are there any alternative solutions or matters that should be considered by the Working Group?	Working Group Comments

Electricity North West	No	Noted
Northern Powergrid	Please refer to our answer to question 2.	See response to question 2
SSE Distribution	N/A	Noted
SSE Energy Supply Ltd	No	Noted
UK Power Networks	No	Noted
Western Power Distribution	No	Noted