

DCUSA DCP 172 Consultation Responses – Collated Comments

Company	Confidential / Anonymous	1. Do you understand the intent of the DCP 172?	Working Group Response
Electricity North West Limited	Non-confidential	Yes	Noted.
Northern Powergrid	Non-confidential	Yes	Noted.
RES LTD	Non - Confidential	Yes	Noted.
Scottish Power Connections	Non - confidential	Yes	Noted.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Yes	Noted.
UK Power Networks	Non-confidential	Yes	Noted.

Western Power Distribution (South West/South Wales/West Midlands/East Midlands)	Non-confidential	Yes	Noted.
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Company	Confidential/Anonymous	2. Are you supportive of the principles of the DCP 172?	Working Group Response
Electricity North West Limited	Non-confidential	Yes	Noted.
Northern Powergrid	Non-confidential	Yes	Noted.
RES LTD	Non-Confidential	Yes. There is demonstratively a needs case to provide a method of apportionment for the instances of reinforcement triggered by voltage change (rise or drop).	Noted.
Scottish Power Connections	Non-confidential	Yes	Noted.

Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Yes. We believe changes are required to provide clarity and consistency of application of cost apportionment principles associated with voltage issues.	Noted.
UK Power Networks	Non-confidential	Yes	Noted.
Western Power Distribution (South West/South Wales/West Midlands/East Midlands)	Non-confidential	Yes	Noted.

Company	Confidential/	3. Options 1-4 have been set out in table 1 of this consultation. Which Option do you prefer	Working Group Response
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	Anonym ous	and why?	
Electricity North West Limited	Non-confidential	Option 4 as it most accurately reflects the reinforcement charges associated with a DG connection.	Noted. The ENWL attendee agreed with the Northern Powergrid attendees thought that Option 4 provided a definite thermal benefit to provide a more favourable calculation but did not discount Option 1.
Northern Powergrid	Non-confidential	Option 4 is relatively simple and reflects the driver behind the need to reinforce in most cases, but gives a thermal option should potential thermal benefits result.	Noted. The NPG attendee explained that Northern Powergrid did not discount Option 1 but thought that Option 4 provided a definite thermal benefit to provide a more favourable calculation.
RES LTD	Non - Confidential	None. Recommend the consultation document is improved and recirculated. "Voltage Rise Calculation" is not explained fully in the consultation document, which gives the user insufficient information to consider any answer. The worked example seems to (irrespective of the definition of option 1?) be a security CAF calculation rather than introducing a voltage rise CAF per se. Can you explain why a "voltage rise CAF" was not considered? There is no EHV example shown. The worked examples are insufficient to significantly assist understanding of the options and in particular offer insufficient help with the defined terms detailed under options 3 and 4.	The respondent provided a representative to attend the Working Group meeting considering the consultation responses. A CAF in relation to percentage voltage rise was considered and the respondent agreed to consider whether it is appropriate to prepare a more detailed strawman for consideration. The worked examples were discussed the respondent accepted the necessary high level nature of the methodology document however; further detail on the calculation was requested to better understand the consultation. The Working Group agreed to consider whether more detail could be provided regarding the CAF calculation in any further documentation as appropriate. The Working Group noted that the number of worked examples in the methodology is currently limited and not intended to cover every conceivable example. The comments about defined terms have been noted.
Scottish Power Connections	Non - confidential	1 it is clear and simple and reflects the driver for the required work	Noted.

Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Option 2. In our view, this is the most pragmatic compromise solution to an extremely complex issue. It is straight forward for customers to understand and can be readily applied by DNOs in a consistent manner – a key feature of a successful change.	Noted.
UK Power Networks	Non-confidential	<p>We would support options 1 and 4.</p> <p>Option 1 properly takes account of the actual limiting factor for New Network Capacity and is the most appropriate option for the circumstances under consideration.</p> <p>Option 4 is also appropriate as it uses a methodology to identify scenarios where the reinforced assets are likely to also provide usable 'demand' capacity and which leads to the thermal capacity method being used. Option 4 provides a simple mechanism to define which of the two calculation methods should apply.</p>	Noted.
Western Power Distribution (South West/South Wales/	Non-confidential	<p>Option 1.</p> <p>It is transparent and simple to administer. Where reinforcement is required because of voltage limitations it is logical to assess the new network capacity based on the voltage rise constraints following the reinforcement.</p>	Noted.

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Company	Confidential/Anonymous	4. Options 1-4 have been set out in table 1 of this consultation. Which Option would you definitely not support and why?	Working Group Response
Electricity North West Limited	Non-confidential	Option 2 – it does not reflect accurately the costs that should be attributed to a generation customer. This method could be seen to subsidise a DG connection.	Noted.
Northern Powergrid	Non-confidential	Option 2 it is not cost reflective of the driver for reinforcement for generators. In most areas where reinforcement is required for generation there are no thermal issues, hence no thermal benefits, the benefit is only for voltage headroom.	Noted.
RES LTD	Non - Confidential	1-4. Recommend the consultation document is improved and recirculated. "Voltage Rise Calculation" is not explained fully in the consultation document, which gives the user insufficient information to consider any answer. The worked example seems to (irrespective of the definition of option 1?) be a security CAF calculation rather than introducing a voltage rise CAF per se. Can you explain why a "voltage rise CAF" was not considered? There is no EHV example shown. The worked examples are insufficient to significantly assist understanding of the options and in particular offer insufficient help with the	Noted. The Working Group responded to these comments in their response above.

		defined terms detailed under options 3 and 4.	
Scottish Power Connections	Non - confidential	Option 3 – overly complex	Noted.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Option 3. In our view, this option is the most complicated to administer and also may have risks of alternative interpretations.	Noted.
UK Power Networks	Non-confidential	We would not support option 3 because under this option the definition of 'complete asset' is too complicated and likely to lead to disagreement on its interpretation.	Noted.
Western Power Distribution (South West/South Wales/West Midlands)	Non-confidential	Option 2. This option recognises thermal capacity created that has very little correlation to system constraints that may still exist for generation following the reinforcement.	Noted.

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Company	Confidential/ Anonymous	5. Do you support Option 1 to always apply the voltage rise method?	Working Group Response
Electricity North West Limited	Non-confidential	No –we believe option 4 is a more reflective method to apportion charges for a DG connection	Noted.
Northern Powergrid	Non-confidential	No	Noted.
RES LTD	Non - Confidential	No. In addition to the comments above it is too easy to create practical examples where 100% cost is apportioned to a triggering user who will make use of only a fraction of the new asset capacity; a non-cost-reflective cost signal. More practically, this straw-that-broke-camels-back approach will become a barrier to project entry thereby creating an obstacle to competition in the generation of electricity (contrary to DNO license).	Noted.
Scottish Power Connections	Non - confidential	Yes	Noted.

Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	No.	Noted.
UK Power Networks	Non-confidential	Yes.	Noted.
Western Power Distribution (South West/South Wales/West Midlands/East Midlands)	Non-confidential	Yes	Noted.

Company	Confidential/	6. Can you identify any additional advantages or disadvantages to Options 1-4 that are not	Working Group Response
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	Anonym ous	captured in table 1 of this consultation? Please comment.	
Electrici ty North West Limited	Non- confident ial	None	Noted.
Norther n Powergr id	Non- confident ial	No	Noted.
RES LTD	Non- Confiden tial	"Voltage Rise Calculation" is not explained fully in the consultation document, which gives the user insufficient information to consider any answer.	Noted. The Working Group agreed to ensure that any further documentation provides more information about methods of calculation.
Scottish Power Connect ions	Non - confident ial	No	Noted.
Souther n Electric Power Distribu tion plc and Scottish Hydro Electric Power Distribu	Non- confident ial	No.	Noted.

tion plc			
UK Power Networks	Non-confidential	No.	Noted.
Western Power Distribution (South West/South Wales/West Midlands/East Midlands)	Non-confidential	No	Noted.

Company	Confidential/Anonymous	7. Do you agree with the high level approach of Option 3?	Working Group Response
Electricity North West Limited	Non-confidential	<p>No. We believe that the high level approach of option 3 will introduce a methodology that is complicated, difficult to understand and difficult to apply. We believe it will not be easily interpreted or implemented by DNOs in a consistent fashion. More importantly we do not believe it will be readily understandable by customers.</p> <p>We believe it introduces levels of subjectivity and possible discrimination as it only becomes active above</p>	Noted.

		<p>a set of minimum criteria, ie customer numbers, size of assets and whether the network is demand or generation dominated.</p> <p>It would introduce a new set of definitions to the CCCM which make it less clear on what is determined to be reinforcement.</p>	
Northern Powergrid	Non-confidential	No, we believe option 3 is too complex and the definition of "Substantial Asset" may be too subjective.	Noted.
RES LTD	Non-Confidential	<p>Unable to answer based on the limited information in the consultation document. Recommend the consultation document is improved and recirculated.</p> <p>"Voltage Rise Calculation" is not explained fully in the consultation document, which gives the user insufficient information to consider any answer. The worked example seems to (irrespective of the definition of option 1?) be a security CAF calculation rather than introducing a voltage rise CAF per se. Can you explain why a "voltage rise CAF" was not considered? There is no EHV example shown. The worked examples are insufficient to significantly assist understanding of the options and in particular offer insufficient help with the defined terms detailed under options 3 and 4.</p> <p>Concerned that "Complete Asset" classification is unnecessarily complicated and may lead to users 'gaming' the system. Likely to produce perverse incentives which could lead the industry away from the most efficient, coordinated and efficient overall connection solution.</p>	<p>Noted. Please see the response from the Working Group above.</p> <p>The Working Group discussed Examples of possible gaming opportunities. Ofgem noted that it would be beneficial to discuss in the report the potential for gaming and how it could be mitigated.</p>

Scottish Power Connections	Non - confidential	No it does not reflect the driver for the additional work which is the new generation request	Noted. The Scottish Power attendee advised that Option 3 was also overly complex.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	No. We appreciate the thought that has gone into this proposal but believe it to be an overly complex solution for consistent DNO application and customer understanding.	Noted.
UK Power Networks	Non-confidential	No.	Noted.
Western Power Distribution (South West/South Wales/West Midlands/East Midlands)	Non-confidential	Option 3 may recognise thermal capacity created as a by-product of reinforcement that could be utilised in predominantly demand areas but is potentially difficult to administer, could be subjective in some instances and is not as transparent.	Noted.

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Company	Confidential/Anonymous	8. If you are in agreement with the high level approach of Option 3, do you agree with the detail of this approach? Please provide any alternative methodology which could be employed.	Working Group Response
Electricity North West Limited	Non-confidential	Not in agreement. See 7 above	Noted.
Northern Powergrid	Non-confidential	We do not support option 3.	Noted.
RES LTD	Non-Confidential	N/A	
Scottish Power Connections	Non - confidential	N/A	
Southern Electric Power Distribution plc and Scottish	Non-confidential	N/A	

Hydro Electric Power Distribution plc			
UK Power Networks	Non-confidential	N/A.	
Western Power Distribution (South West/South Wales/West Midlands/East Midlands)	Non-confidential	See above	Noted.

Company	Confidential/Anonymous	9. Do you agree with use of the consideration of a substantial asset and if so would you have any alternative way of defining this term?	Working Group Response
Electricity North West Limited	Non-confidential	No	Noted.

Northern Powergrid	Non-confidential	We do not support option 3.	Noted.
RES LTD	Non-Confidential	"Voltage Rise Calculation" is not explained fully in the consultation document, which gives the user insufficient information to consider any answer. The worked example seems to (irrespective of the definition of option 1?) be a security CAF calculation rather than introducing a voltage rise CAF per se. Can you explain why a "voltage rise CAF" was not considered? There is no EHV example shown. The worked examples are insufficient to significantly assist understanding of the options and in particular offer insufficient help with the defined terms detailed under options 3 and 4.	Noted. Please see response above.
Scottish Power Connections	Non - confidential	No it does not reflect the driver for the additional work which is the new generation request	Noted.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	No. We see this as part of an overly complex solution, as set out in our response to Q7.	Noted.

UK Power Networks	Non-confidential	This is only relevant for option 3 but we would not propose any alternative.	Noted.
Western Power Distribution (South West/South Wales/West Midlands/East Midlands)	Non-confidential	The definition seems somewhat arbitrary. The justification for using these thresholds, or any other threshold may require some explanation.	Noted.

Company	Confidential/Anonymous	10. Do you agree with use of the consideration of a complete asset and if so would you have any alternative way of defining this term?	Working Group Response
Electricity North West Limited	Non-confidential	No	Noted.
Northern Powergrid	Non-confidential	We are satisfied with the definition of a "Complete Asset" as defined in option 4.	Noted.
RES	Non-	"Voltage Rise Calculation" is not explained fully in the	Comments as above.

LTD	Confidential	<p>consultation document, which gives the user insufficient information to consider any answer. The worked example seems to (irrespective of the definition of option 1?) be a security CAF calculation rather than introducing a voltage rise CAF per se. Can you explain why a "voltage rise CAF" was not considered? There is no EHV example shown. The worked examples are insufficient to significantly assist understanding of the options and in particular offer insufficient help with the defined terms detailed under options 3 and 4.</p> <p>Concerned that "Complete Asset" classification is unnecessarily complicated and may lead to users 'gaming' the system. Likely to produce perverse incentives which could lead the industry away from the most efficient, coordinated and efficient overall connection solution.</p>	
Scottish Power Connections	Non - confidential	No it does not reflect the driver for the additional work which is the new generation request	Noted.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Please see our response to 9 above.	Noted.

UK Power Networks	Non-confidential	Yes we agree with the term and prefer the simplified definition under option 4 to that under option 3.	Noted.
Western Power Distribution (South West/South Wales/West Midlands/East Midlands)	Non-confidential	The term may be open to interpretation, especially with regard to complex networks.	Noted. The Working Group considered that this response referred to the Complete Asset definition in Option 3.

Company	Confidential/Anonymous	11. Do you agree with use of the consideration of a Demand Dominated Network?	Working Group Response
Electricity North West Limited	Non-confidential	No	Noted.
Northern Powergrid	Non-confidential	Yes however, the definition of demand needs to make it clearer if it is the maximum over an annual period, or at any given time, e.g. in summer the maximum output of a photovoltaic site could exceed the maximum demand of the network, but the reverse could be true in the winter.	The chair commented that the intention was to be for the maximum sustained demand at any time to be compared against the maximum sustained DG at any time even though they might occur at different times of the year (a simple approach). It was agreed that the document could have been

			clearer on this point.
RES LTD	Non-Confidential	<p>The intention appears to be that in a generation-dominated network any voltage-triggered reinforcement should be apportioned 100% to the new party. Where such a charge is levied as an up-front capital charge significantly in advance of energisation I would consider such an approach to be a barrier to market entry; thereby preventing effective competition in generation of electricity.</p> <p>As such, I would consider the proposals regarding Demand Dominated Networks as undue discrimination against generation. However, if something can be done to address the charging barrier described above (perhaps in a similar manner to transmission connection charging) then this may be less of an obstacle.</p>	<p>The Working Group explained that the methodology was not intended to always apportion 100% to a new generator.</p> <p>The RES LTD attendee's view remains that considering thermal CAF only for demand dominated networks as an approach is undue discrimination.</p> <p>The RES LTD attendee explained that with transmission connection charging the applicant has the option to pay charges over time which eases project financing.</p>
Scottish Power Connections	Non - confidential	No it does not reflect the driver for the additional work which is the new generation request	Noted.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Please see our response to 9 above.	Noted.

UK Power Networks	Non-confidential	Yes. (We note that the definition in the legal text attachments is missing the bracketed explanation)	Noted.
UK Power Networks	Non-confidential	We note that the Demand Dominated Network definition in the legal text is missing the bracketed explanation.	Noted.
Western Power Distribution (South West/South Wales/West Midlands/East Midlands)	Non-confidential	It depends how it is measured and could be subjective.	Noted.

Company	Confidential/Anonymous	12. Do you agree with use of the consideration of a Number of Customers Threshold?	Working Group Response
Electricity North West Limited	Non-confidential	No	Noted.
Norther	Non-	We do not support option 3 and believe that the use of total	The Northern Powergrid attendee explained that the total

n Powergrid	confidential	demand is more relevant.	demand could be more significant than the number of customers in relation to the capacity and demand of each customer.
RES LTD	Non-Confidential	N/A	
Scottish Power Connections	Non-confidential	No it does not reflect the driver for the additional work which is the new generation request	Noted.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Please see our response to 9 above.	Noted.
UK Power Networks	Non-confidential	This only applies to option 3. We prefer option 4 to option 3.	Noted.
Western Power Distribution	Non-confidential	The definition seems somewhat arbitrary. The justification for using these thresholds, or any other threshold may require some explanation.	Noted.

(South West/South Wales/West Midlands/East Midlands)			
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Company	Confidential/Anonymous	13. Do you consider that Option 3 is more appropriate than Option 4? Please explain.	Working Group Response
Electricity North West Limited	Non-confidential	We don't believe option 3 is more appropriate. Refer to answer 7	Noted.
Northern Powergrid	Non-confidential	No, we think it is overly complex and the definitions of "Substantial Asset" and "Customer Threshold" appear to be arbitrary.	Noted.
RES LTD	Non-Confidential	Unable to provide an answer based on the consultation document. "Voltage Rise Calculation" is not explained fully in the consultation document, which gives the user insufficient information to consider any answer. The worked example seems to (irrespective of the definition of option 1?) be a security CAF calculation rather than introducing a voltage rise CAF per se. Can you explain why a "voltage rise CAF" was not considered? There is no EHV example shown. The worked examples are	Please see response above.

		insufficient to significantly assist understanding of the options and in particular offer insufficient help with the defined terms detailed under options 3 and 4.	
Scottish Power Connections	Non-confidential	No it is overly complex	Noted.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Please see our response to 9 above.	Noted.
UK Power Networks	Non-confidential	No. Option 3 is overly complicated.	Noted.
Western Power Distribution	Non-confidential	Neither option is particularly transparent but of the two, Option 3 would appear to be more difficult to administer.	Noted.

tion (South West/S outh Wales/ West Midland s/East Midland s)			
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Compa ny	Confide ntial/ Anonym ous	14. Do you consider that Option 4 is more appropriate than Option 3? Please explain.	Working Group Response
Electrici ty North West Limited	Non- confident ial	Yes we believe option 4 is more appropriate. It is less complicated to use and does not have the subjectivity of having to assess what "sizeable Assets" or "Customer Numbers" connected. It would not discriminate between different customers	Noted.
Norther n Powergr id	Non- confident ial	Yes, we believe it is simpler to apply in a consistent manner and has clearer definitions. However see Q11 for our comments on the subject a demand dominated network.	Noted.
RES LTD	Confiden tial	Unable to provide an answer based on the consultation document. "Voltage Rise Calculation" is not explained fully in the consultation document, which gives the user insufficient information to consider any answer. The worked example seems to (irrespective of the definition of option 1?) be a security CAF calculation rather than introducing a voltage rise	Please see response above.

		CAF per se. Can you explain why a “voltage rise CAF” was not considered? There is no EHV example shown. The worked examples are insufficient to significantly assist understanding of the options and in particular offer insufficient help with the defined terms detailed under options 3 and 4.	
Scottish Power Connections	Non - confidential	Option 4 is more straight forward however does not reflect the driver for the additional work which is the new generation request	Noted.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	We see a marginal benefit with Option 4 in comparison to Option 3, as a consequence of a slightly lesser degree of complication.	Noted.
UK Power Networks	Non-confidential	Yes. Option 4 sets out the circumstances where each of the two methodologies will apply, but would be easier to apply in practice than option 3.	Noted.
Western Power Distribution (South	Non-confidential	As above – it may be more workable but is still subject to arbitrary rules.	Noted.

West/South Wales/ West Midlands/ East Midlands)			
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Company	Confidential/ Anonymous	15. What are the potential costs of this change? Which option for your organisation would have the lowest or highest cost?	Working Group Response
Electricity North West Limited	Non-confidential	We believe that option 1 would have the lowest charge and option 2 the maximum. My estimate is that the adoption of option 4 could result in an increase in DNO funded DG related reinforcement of 4%	Noted.
Northern Powergrid	Non-confidential	The costs for a DNO would be unchanged as the apportionment of reinforcement costs is split between the general mass of DUoS customers and the customer requesting the connection so, in theory, the DNO sees no net change in costs. It could be argued that option 3, being the most complex, may mean that the design takes longer but as the costs of designs are borne by customers who proceed then again there is no net change in cost.	Noted.

RES LTD	Non-Confidential	<p>Unable to provide an answer based on the consultation document.</p> <p>“Voltage Rise Calculation” is not explained fully in the consultation document, which gives the user insufficient information to consider any answer. The worked example seems to (irrespective of the definition of option 1?) be a security CAF calculation rather than introducing a voltage rise CAF per se. Can you explain why a “voltage rise CAF” was not considered? There is no EHV example shown. The worked examples are insufficient to significantly assist understanding of the options and in particular offer insufficient help with the defined terms detailed under options 3 and 4.</p>	Please see response above.
Scottish Power Connections	Non - confidential	Option 1	<p>Noted. The Scottish Power attendee considered that Option 2 would have the highest cost as it would not be adopting a current practice. Whilst Option 1 is already a current practice in Scottish Power so would be the lowest cost to apply.</p>
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	<p>Overall costs will remain the same for any individual connection. However the sharing of these costs between connecting and DUoS customers may change markedly, depending on the solution ultimately adopted (if any).</p> <p>Potentially, some connection projects, such as for medium sized rural embedded generation, may no longer be economically viable, with particular effect on those with little geographic flexibility (e.g. community renewables projects).</p>	Noted.

UK Power Networks	Non-confidential	We currently only use the thermal methodology and so any move away from this position would potentially lead to higher connection charges in our areas.	Noted.
Western Power Distribution (South West/South Wales/West Midlands/East Midlands)	Non-confidential	Costs would be limited to the additional administrative burden which would probably be higher using Options 3 or 4.	Noted.

Company	Confidential/Anonymous	16. Are you supportive of DCP 172 being implemented at the next DCUSA release following Authority consent?	Working Group Response
Electricity North West Limited	Non-confidential	Yes	Noted.
Northern Powergrid	Non-confidential	Yes	Noted.
RES	Non-	I do NOT.	Noted.

LTD	Confidential	<p>For all the reasons outlined above, I would strongly prefer to see further information relating to the proposed changes and the resulting impact before I am able to provide comment.</p> <p>It is evident that the proposed changes will have a profound impact on generation customers and I sincerely hope that generation customers feedback is given full consideration before such a proposal goes ahead. I would like to see further demonstrations on the impact on generation customers and customers as a whole.</p>	
Scottish Power Connections	Non - confidential	Yes	Noted.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Yes.	Noted.
UK Power Networks	Non-confidential	Yes.	Noted.

Western Power Distribution (South West/South Wales/West Midlands/East Midlands)	Non-confidential	Yes	Noted.
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Company	Confidential/Anonymous	17. Which DCUSA General Objectives does the CP better facilitate? Please provide supporting comments. <ol style="list-style-type: none"> 1. The development, maintenance and operation by each of the DNO Parties and IDNO Parties of an efficient, co-ordinated, and economical Distribution System. 2. The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent with that) the promotion of such competition in the sale, distribution and purchase of electricity. 3. The efficient discharge by each of the DNO Parties and IDNO Parties of the obligations imposed upon them by their Distribution Licences. 	Working Group Response
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		<p>4. The promotion of efficiency in the implementation and administration of this Agreement and the arrangements under it.</p> <p>5. compliance with the Regulation on Cross-Border Exchange in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.</p>	
Electricity North West Limited	Non-confidential	2, 3, 4	Noted.
Northern Powergrid	Non-confidential	DCUSA General Objectives 3 is better facilitated as compliance with the methodology facilitates the discharge by the licensee of the obligations imposed on it under their licence.	Noted.
RES LTD	Non-Confidential	There is insufficient information in the consultation document as it stands to be able to comment.	Noted. The RES LTD attendees advised that Options 3 and 4 may fail to meet Objective 2 on Competition on grounds of undue discrimination against generation.
Scottish Power Connections	Non-confidential	And 3	Noted.
Southern Electric Power Distribution	Non-confidential	<p>In our view, this CP better facilitates General Objectives 1, 2 and 4 in relation to Options 2, 3 and 4.</p> <p>In relation to Option 1, we believe that General Objectives 1 and 4 are better facilitated.</p>	Noted.

tion plc and Scottish Hydro Electric Power Distribu tion plc			
Southern Electric Power Distribu tion plc and Scottish Hydro Electric Power Distribu tion plc	Non- confident ial	In our view, this CP better facilitates Charging Objective 1..	Noted.
UK Power Network s	Non- confident ial	General objective 3 is bettered by adding further clarity to the CCCM which allows distributed generators, other developers and ICPs to estimate more accurately the costs they will be subject to.	Noted.
Western Power Distribu tion (South West/S outh	Non- confident ial	We believe the Change Proposal better facilitates DCUSA General Objective 3; 'The efficient discharge by each of the DNO Parties and IDNO Parties of the obligations imposed upon them by their Distribution Licences.' Licence Condition 13 requires each DNO to have in force a connection charging methodology and this CP allows	Noted.

Wales/ West Midland s/East Midland s)		the DNO to discharge this obligation efficiently by ensuring the methodology is, as far as reasonably possible, balanced and clear.	
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Company	Confidential/ Anonymous	<p>18. Which DCUSA Charging Objectives does the CP better facilitate? Please provide supporting comments.</p> <ol style="list-style-type: none"> 1. that compliance by each DNO Party with the Charging Methodologies facilitates the discharge by the DNO Party of the obligations imposed on it under the Act and by its Distribution Licence 2. that compliance by each DNO Party with the Charging Methodologies facilitates competition in the generation and supply of electricity and will not restrict, distort, or prevent competition in the transmission or distribution of electricity or in participation in the operation of an Interconnector (as defined in the Distribution Licences) 3. that compliance by each DNO Party with the Charging Methodologies results in charges which, so far as is reasonably practicable after taking account of implementation costs, reflect the costs incurred, or reasonably expected to be incurred, by the DNO Party in its Distribution Business 4. that, so far as is consistent with Clauses 3.2.1 to 3.2.3, the Charging 	Working Group Response
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		Methodologies, so far as is reasonably practicable, properly take account of developments in each DNO Party's Distribution Business 5. that compliance by each DNO Party with the Charging Methodologies facilitates compliance with the Regulation on Cross-Border Exchange in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	
Electricity North West Limited	Non-confidential	1, 2, 3	Noted.
Northern Powergrid	Non-confidential	DCUSA Charging Objective 1 is better facilitated as it will provide clarity and consistency to customers and allow DNO to fulfil their obligations under the licence.	Noted.
RES LTD	Non-Confidential	There is insufficient information in the consultation document as it stands to be able to comment.	Noted.
Scottish Power Connections	Non-confidential	N/A	
Southern Electric Power	Non-confidential	In our view, this CP better facilitates Charging Objective 1.	Noted.

Distribu tion plc and Scottish Hydro Electric Power Distribu tion plc			
UK Power Network s	Non- confident ial	Charging Objectives 1 and 3 are bettered for the same reasons shown for the general objectives.	Noted.
Western Power Distribu tion (South West/S outh Wales/ West Midland s/East Midland s)	Non- confident ial	<p>We believe the Change Proposal better facilitates DCUSA Charging Objective 1:</p> <p>“that compliance by each DNO Party with the Charging Methodologies facilitates the discharge by the DNO Party of the obligations imposed on it under the Act and by its Distribution Licence”.</p> <p>Improved clarity within the CCCM will help ensure more consistent application in accordance with the relevant licence conditions 13 and 14.</p>	Noted.

Compa ny	Confide ntial/ Anonym ous	19. Do you have any comments on the proposed legal text for DCP 172?	Working Group Response
Electrici	Non-	no	Noted.

ty North West Limited	confidential		
Northern Powergrid	Non-confidential	<p>Each of the options propose two overall changes:</p> <ul style="list-style-type: none"> a) modify the wording in the main body of the text of the common methodology; and b) additional examples in the Worked Examples section. <p>Bearing in mind the recent decision on DCP162/DCP162A (Non-Secure Connections in the Common Connections Charging Methodology) where the Authority stated that the examples “do not necessarily represent the Minimum Scheme and are provided purely for illustrative purposes” are the group satisfied that the proposed minimal change to the wording in the main body of text in options 1 and 2 are sufficient to demonstrate that this represents the clear, consistent and common approach that the industry proposes to take.</p>	<p>The chair considered that the methodology must be consistent and covers a wide range of connection scenarios. Some Working Group members considered that the examples form part of the methodology equal to the legal text. However, this is an important observation in relation to DCP 162. In this case it is not clear what further change could be made to the main body of the text to provide further clarity.</p>
RES LTD	Confidential	There is insufficient information in the consultation document as it stands to be able to comment.	Noted.
Scottish Power Connections	Non-confidential	No	Noted.
Southern Electric Power	Non-confidential	No.	Noted.

Distribu tion plc and Scottish Hydro Electric Power Distribu tion plc			
UK Power Network s	Non- confident ial	We note that the Demand Dominated Network definition in the legal text is missing the bracketed explanation.	Noted.
Western Power Distribu tion (South West/S outh Wales/ West Midland s/East Midland s)	Non- confident ial	If either of Option 3 or 4 are taken forward the definitions will probably need to be refined.	Noted.

Compa ny	Confide ntial/ Anonym ous	20. Are there any alternative solutions, refinements to any of the proposed solutions or any other matters that should be considered by the Working Group?	Working Group Response
Electrici	Non-	none	Noted.

ty North West Limited	confidential		
Northern Powergrid	Non-confidential	In options 3 and 4 the proposed paragraph 1.26 states that, for generation connections, where the reinforcement is required to keep the voltage rise within acceptable limits only, the voltage rise limit will be used to calculate the New Network Capacity and then lists some exceptions however the text does not specify that the thermal capacity method will be used where these exceptions are present. Are the group confident that the wording in the proposed examples clarifies this?	The Working Group added further wording to the legal drafting of Option 3 and Option 4 to reflect this point.
RES LTD	Non-Confidential	There is insufficient information in the consultation document as it stands to be able to comment.	Noted.
Scottish Power Connections	Non-confidential	No	Noted.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	No.	Noted.

UK Power Networks	Non-confidential	No.	Noted.
Western Power Distribution (South West/South Wales/West Midlands/East Midlands)	Non-confidential	No.	Noted.