

DCUSA DCP 167 Consultation Responses – Collated Comments

Question One	Do you understand the intent of DCP 167?	Working Group Comments
ENWL	Yes	Noted.
Peel Ports Group Limited	Yes.	Noted.
Northern Powergrid	Yes	Noted.
PowerCon (UK) Ltd	Yes	Noted.
Renewable Energy Association	Yes	Noted.
SP Distribution / SP Manweb	Yes	Noted.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Yes.	Noted.
UK Power Networks	Yes	Noted.
Western	Yes	Noted.

Power Distribution		
Question Two	Are you supportive of the principles of DCP 167?	Working Group Comments
ENWL	Yes	Noted.
Peel Ports Group Limited	Yes.	Noted.
Northern Powergrid	Yes	Noted.
PowerCon (UK) ltd	<p>We will always be supportive of the principle of clarifying the connection charges – this being to the benefit of customers in general. However with this particular Change Proposal we do not believe that the examples 8C and 8D are consistent.</p> <p>In both cases additional capacity has been made available at the location where it is required.</p> <p>In case 8D the fact that no <u>additional</u> ‘overall’ network capacity is created is not relevant as one must presume that there was no immediate or foreseeable use for the spare capacity available from the network associated with Primary Substation B and the transfer works merely serves to make the spare capacity available where it is required.</p>	<p>The majority of the Working Group considered it to be a reconfiguration of the network and therefore fully chargeable. Some Working Group members do not agree with this and an alternate Change Proposal is to be submitted.</p>
Renewable Energy Association	<p>The principle of clarifying how connection charges would be calculated is supported. We do not however think that the examples 8C and 8D are consistent. The key is that in both cases additional capacity is created where it is needed and the fact that in case 8D no additional overall capacity is created is not relevant as one presumes that there was no foreseeable use for the spare capacity and primary substation B which was why it was decided to transfer two substations to it. Further details of the inconsistency</p>	<p>The majority of the Working Group considered it to be a reconfiguration of the network and therefore fully chargeable. Some Working Group members do not agree with this and an alternate Change Proposal is to be submitted.</p>

	between examples 8C and 8D are given in response to Q4 and Q5	
SP Distribution / SP Manweb	Yes	Noted.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Yes.	Noted.
UK Power Networks	Yes	Noted.
Western Power Distribution	Yes. The CP seeks to provide increased clarity within the CCCM for the calculation of connection charges where it is proposed to carry out reinforcement remote from the connection point or to reconfigure the network in order to transfer capacity.	Noted.
Question Three	Do you have any comments on the proposed legal text?	Working Group Comments
ENWL	Yes, please see question 9 and 11.	Noted.
Peel Ports Group Limited	As things stand, the proposed approach to example 8C (which is, in my view, a good approach) is not compatible with the legal text. This is because the Relevant Section of Network is defined by reference to parts of the network used to supply the new customer, and DCP 167 does not propose to change that definition.	

	<p>The consultation document says that “associated DCP162” proposes to change the definition of Relevant Section of Network. But the assessment of DCP 167 cannot rely on the assumption that DCP 162 will be approved.</p> <p>Furthermore, I think that the definition of Relevant Section of Network proposed under DCP 162 is inappropriate and that it might not deliver the intended effect for DCP 167.</p> <p>I think that we need a more targeted approach that specifically addresses the needs of DCP 167. I suggest the following text to replace the definition of Relevant Section of Network in the table after clause 1.24:</p> <p>“If the assets installed that add capacity (network or fault level) to the existing shared use Distribution System are not being used to supply you in either normal and abnormal running arrangements, but instead are being used to supply other loads as part of a load transfer, then the Relevant Section of Network is that part or parts of the Distribution System that can be used to supply the transferred loads in both normal and abnormal running arrangements.</p> <p>Otherwise, the Relevant Section of Network is that part or parts of the Distribution System that can be used to supply you in both normal and abnormal running arrangements.</p> <p>There may be more than one Relevant Section of Network, e.g. at different voltage levels.”</p>	<p>The Working Group agreed that although there is a reference to DCP 162 changes at 2.5 of the consultation, DCP 167 is not dependent on DCP 162 changes in order to be progressed.</p> <p>Following consultation responses to the DCP 162 it is now proposed to change the definition of the Relevant Section of Network that will better accommodate remote reinforcement than the proposed text from the respondent. The Working Group has not agreed whether load transfer is reinforcement.</p>
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Northern Powergrid	No	Noted.
PowerCon (UK) Ltd	<p>We would refer you to the suggestions made within the Change document and with particular reference to the Customers Representative responses.</p> <p>One further point that should be noted relates to the fact that any changes so implemented should be unambiguous, consistent and not open to any further interpretation.</p>	<p>Noted. The respondent has agreed to submit an alternate Change Proposal.</p> <p>Noted.</p>
Renewable Energy Association	<p>We would propose changing two parts of the DCUSA which are not currently proposed to be changed. These are:</p> <p><i>Change “Work required to reconfigure the Distribution System to meet your requirements where no additional Network or Fault Level Capacity is made available shall be charged in full to you” to “Work required to reconfigure the Distribution System to meet your requirements where no additional Network or Fault Level Capacity is made available or transferred from a network where it is not utilised to one where it shall be charged in full to you”</i></p> <p><i>Change “Reinforcement is defined as assets installed that add capacity (network or fault level) to the existing shared use Distribution System” to “Reinforcement is defined as assets installed that add capacity (network or fault level) to the existing shared use Distribution System or allow such capacity to be transferred from a network where it is not utilised to one where it is”</i></p>	<p>Noted. The respondent has agreed to submit an alternate Change Proposal.</p> <p>The majority of the Working Group do not support this view as it is not proposed to change the existing text at 1.13 in this Change Proposal. This will be covered within the Alternate Change Proposal.</p> <p>The majority of the Working Group do not support this view as it is not proposed to change the definition of Reinforcement at 1.16 in this Change Proposal. This will be covered within the Alternate Change Proposal.</p>
SP Distribution / SP Manweb	No	Noted.

Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	No.	Noted.
UK Power Networks	No	Noted.
Western Power Distribution	We believe the associated CP to amend the definition of the Relevant Section of Network will enable the DNO to consider the application of cost apportionment when dealing with remote parts of the network and not just those used to supply the customer.	Noted.
Question Four	Do you agree with proposed example 8C as set out in this CP? (Please see 3.2 to 3.4 of this consultation) Do you have any comments on proposed example 8C? (Please refer to 3.3 to 3.4 of this consultation)	Working Group Comments
ENWL	I agree with the proposed example 8C. There are no specific comments on this proposal.	Noted.
Peel Ports Group Limited	Example 8C could be made even clearer by highlighting the relevant section of network on the diagram, and/or by specifying it in more detail in the text. On a first read of the document, because I was looking for a section of network supplying the new development, I wrongly assumed that the first mention of "Primary Substation B" under "The RSN for the Reinforcement"	The Working Group believe the RSN to be fully described within the text and would not wish to also mark on the diagram as this would be inconsistent with the other examples in the methodology.

	<p>was a typo and should read “Primary Substation A”. This kind of confusion would be avoided by the change to the table after clause 1.24 suggested in my answer to Q3, and by changing the text in Example 8C under “The RSN for the Reinforcement” to read:</p> <p>“The Relevant Section of Network is the three-feeder network from Primary Substation B which supplies the loads on the existing two feeders from Primary Substation B as well as the loads at points C and D transferred from the network from the Primary Substation A. The Relevant Section of Network does not supply the new development in this case. The numerator [... continue as current draft]”</p>	The Working Group agreed to amend the text at example C to the respondents proposed text.
Northern Powergrid	We agree with example 8C as set out in the CP. In this example additional capacity is created at primary B and existing capacity is released at primary A.	Noted.
PowerCon (UK) ltd	We are generally in agreement with the suggested changes under 8C.	Noted.
Renewable Energy Association	Note that it is proposed to allocate the cost of joints at A,B,C,D,E and F as reinforcement. Whilst the cost of the new circuit breaker at A and the cable AF increases the capacity within primary substation B, the jointing in of the two substations being transferred from substation A does not and therefore if considered reinforcement (which we would support) can only be considered this if reinforcement includes work to transfer spare capacity from where it is not used to where it is used.	At the Working Group meeting the respondent explained that this comment is intended to highlight the different treatment between identical work in example 8C and 8D. The proposer explained that it was intentional as the jointing configuration is different in 8C where it provides reinforcement whereas in 8D it does not. Another view is that capacity is being made available where previously the connections could not be made. This alternative view will be presented in the Alternate Change Proposal.
SP Distribution /	Yes	Noted.

SP Manweb		
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	We are happy with proposed example 8C as set out in the CP and have no additional comments.	Noted.
UK Power Networks	Yes	Noted.
Western Power Distribution	We believe example 3c demonstrates the principles for applying cost apportionment where it is proposed to reinforce an adjacent network so that exiting capacity may be transferred on to it.	Noted.
Question Five	Do you agree with proposed example 8D as set out in this CP? (Please see 3.5 to 3.12 of this consultation)	Working Group Comments
ENWL	I agree with the proposal as currently written in this proposal.	Noted.
Peel Ports Group Limited	Yes, but see also responses to Q7–Q11.	Noted.
Northern Powergrid	We agree with example 8D as set out in the CP.	Noted.
PowerCon (UK) Ltd	No, the work described is identical to that classed as reinforcement in example 8C and not necessary to provide additional capacity in that example but rather only to transfer capacity from where it is not used to where it is required. To be consistent with example 8C the work required to transfer capacity from Primary substation B to primary substation A should be classed as reinforcement.	Noted but this alternative view will be presented in an Alternate Change Proposal.

Renewable Energy Association	No, some of the work described is identical to that classed as reinforcement in example 8C and not necessary to provide additional capacity in that example but rather only to transfer capacity from where it is not used to where it is. To be consistent with example 8C the work required to transfer capacity from primary substation B to primary substation A should be classed as reinforcement.	Noted but this alternative view will be presented in an Alternate Change Proposal.
SP Distribution / SP Manweb	No	Noted.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	We are happy with proposed example 8D as set out in the CP.	Noted.
UK Power Networks	Yes	Noted.
Western Power Distribution	We believe example 3d clarifies the principle that cost apportionment is not applicable where it is proposed to reinforce an adjacent network so that exiting capacity may be transferred on to it.	Noted.
Question Six	Do you have any comments on proposed example 8D? (Please see 3.5 to 3.12 of this consultation)	Working Group Comments
ENWL	No further comments.	Noted.
Peel Ports	Only as noted in responses to Q7–Q11.	Noted.

Group Limited		
Northern Powergrid	In this example no additional capacity is created as the net capacity available for primaries A & B, which form the assets being studied as part of the connection request, is the same before and after the work is carried out. Part of the network is transferred to an adjacent network and this allows the efficient use of existing assets as part of providing the minimum scheme.	Noted.
PowerCon (UK) Ltd	We are supportive of the views expressed within Appendix A of the consultation document (Working Group Customer Representative Letter) rather than the views expressed within the main document.	Noted.
Renewable Energy Association	See above.	Noted.
SP Distribution / SP Manweb	<p>The transferring of load out of one area of the network to free up capacity to enable a connection to be offered to a customer is normally considered where this offers a means of providing the connection at minimum cost and as suggested avoids other reinforcement works having to be undertaken. This in principle DOES NOT constitute reinforcement unless also adding additional new assets so feel that this proposal will only add future confusion and unnecessary debates rather than add greater clarification as it is proposed.</p> <p>Normally this is done by transferring substations from one circuit to another as per the example 8D this would not generate any additional capacity within the group or circuit in question and only removes load from the original circuit to free up ability to make the new connection at minimum cost. Therefore cannot see how</p>	Noted.

	<p>this can be classed as reinforcement.</p> <p>It is noted in the customer representative letter there is mention of Effective Additional Capacity. We would comment that by simply transferring load out of one circuit or group to an adjacent circuit or group is unlikely to increase the capacity within the relevant section of network. In the event that the works did actually increase the capacity within the relevant section of network we believe the existing principles cover such eventualities and allow for the apportionment rule to come into place.</p> <p>The fact that when transferring load out of one circuit to an adjacent circuit we may move more load than the new customer requires this does not add capacity.</p>	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	No.	Noted.
UK Power Networks	We agree with the principle that no new network capacity has been created overall and therefore this is not considered to be reinforcement and it is appropriate for the works to be charged in full.	Noted.
Western Power Distribution	Reinforcement does not actually take place as the reconfiguration of the network merely transfers capacity and does not create additional capacity. As a consequence the example demonstrates	Noted.

	that in this instance the customer is required to pay the full cost of the works.	
Question Seven	Do you believe it would be more appropriate for example 8D to be considered to illustrate 'Reinforcement' such that the Cost Apportionment Factor may be considered to apply? (Please see 3.5 to 3.12 of this consultation)	Working Group Comments
ENWL	No.	Noted.
Peel Ports Group Limited	Yes.	Noted.
Northern Powergrid	We do not believe example 8D involves Reinforcement and the CAF should not be applied.	Noted.
PowerCon (UK) Ltd	Yes	Noted.
Renewable Energy Association	Yes	Noted.
SP Distribution / SP Manweb	No	Noted.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	No. We see this as seriously distorting the current concept of 'reinforcement' and that apportionment should not apply. See also Q11.	Noted. See the Working Group response to Q11.

UK Power Networks	No	Noted.
Western Power Distribution	No.	Noted.
Question Eight	In example 8D do you believe that capacity has been created or transferred? (Please see 3.5 to 3.12 of this consultation)	Working Group Comments
ENWL	<p>I believe that no new capacity has been created. The assets installed are there only to facilitate the transfer of spare network capacity. These assets do not add any capacity they just facilitate the use of available capacity on adjacent network.</p> <p>I would argue that network capacity has been effectively reduced by transferring load, but if it is the minimum scheme to meet the customer requirements it should always be considered.</p>	Noted.
Peel Ports Group Limited	<p>Additional capacity to deliver power to the POC has been created by constructing additional network assets.</p> <p>This has been achieved by removing a load from points G/H, which in took advantage of the spare capacity to deliver power at points A/F, so it can be described as a transfer of capacity as well.</p> <p>What really matters is whether adding capacity to deliver power at the POC in this particular way amounts to “adding capacity (network or fault level) to the existing shared use Distribution System”. That is not clear from the current methodology statement and clarifying it one way or the other would be</p>	<p>Noted.</p> <p>A Working Group member explained that capacity of a network at the point of connection (POC) is not changed by the removal of demand. Another Working Group member commented that the methodology should recognise how capacity is effectively created by the</p>

	excellent.	transfer of an existing demand.
Northern Powergrid	We believe capacity has been transferred and not created.	Noted.
PowerCon (UK) Ltd	Capacity has been <u>transferred</u> from where it is not used to where it is required.	Noted.
Renewable Energy Association	Capacity has been transferred from where it is not used to where it is used.	Noted.
SP Distribution / SP Manweb	No	Noted.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Capacity is transferred between sections of the network but no additional capacity overall is created within the totality of the DNO's system. We therefore do not see that there is a reasonable case for the costs of the works in such a case to be apportioned and potentially partly funded by customers through use of system charges.	Noted.
UK Power Networks	This illustrates an example where existing demand has been transferred to a different part of the Distribution system such as to release capacity for use in respect of the new connection.	Noted.
Western Power Distribution	We believe that capacity has been transferred.	Noted.
Question Nine	Do you consider that two types of Reinforcement ('conventional	Working Group Comments

	<p>reinforcement’ and ‘load transfer reinforcement) should be defined in the DCUSA? (Please see 3.5 to 3.12 of this consultation)Do you believe that DCUSA Schedule 22 clause 1.13 of the Common Connections Charging methodology is appropriate or does it require to be changed (Please see 2.8 of this consultation)?</p> <p>DCUSA Schedule 22 Clause 1.13</p> <p><i>“Work required to reconfigure the Distribution System to meet your requirements where no additional Network or Fault Level Capacity is made available shall be charged in full to you. See Example 8B”.</i></p>	
<p>ENWL</p>	<p>I believe that the current description of Reinforcement “as assets installed that add capacity (network or fault level) to the existing shared use Distribution System” is adequate and allows a clear distinction to be made on what work is determined to be reinforcement. The introduction of definitions for “conventional reinforcement” and “load transfer reinforcement” would only be required if the current proposal for example 8D were to be changed.</p> <p>I believe that the current wording of DCUSA Schedule 22 clause 1.13 is an appropriate description and does not require any amendment.</p>	<p>Noted.</p>
<p>Peel Ports Group Limited</p>	<p>Your question seems a bit garbled. See answer to Q11 in relation to the definition of Reinforcement (clause 1.16). If the definition</p>	<p>Noted.</p>

	of Reinforcement is clarified then there might be no need to change clause 1.13, since it relies on the same concept of additional Network or Fault Level Capacity.	
Northern Powergrid	We do not believe that there is a requirement to define “load transfer reinforcement” and consider that load transfer is not reinforcement. As reinforcement requires assets to be installed which adds capacity then we believe that any transfer of capacity does not fall under this definition. Transferring capacity is making more efficient use of the existing distribution system.	Noted.
PowerCon (UK) Ltd	We are supportive of the views expressed within Appendix A of the consultation document (Working Group Customer Representative Letter) rather than the views expressed within the main document.	Noted.
Renewable Energy Association	No we do not think that two types of reinforcement need to be defined. We do however think that DCUSA Schedule 22 Clause 1.13 should be changed as per our response to Q3.	Noted. Please see the Working Group response to Q3.
SP Distribution / SP Manweb	No	Noted.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	We do not agree with the proposals to add and define ‘categories’ of reinforcement and are satisfied that the existing wording of this clause remains appropriate and fit for purpose.	Noted.
UK Power	No. We believe that this would be both inappropriate and	Noted.

Networks	<p>unnecessary.</p> <p>Yes, we believe that 1.13 is appropriate and seeks to reinforce and support the definition of reinforcement provided in paragraph 1.16</p>	
Western Power Distribution	<p>We do not consider that two types of reinforcement should be defined in DCUSA as we do not agree with principle behind the argument for doing so.</p> <p>We believe that DCUSA Schedule 22 Clause 1.13 does not need amending. The principles are clear and the proposed example 8D provides adequate clarification.</p>	Noted.
Question Ten	Where capacity is transferred as described in example 8D are there any circumstances where you believe that the costs should or should not be apportioned? Please describe.	Working Group Comments
ENWL	<p>The current wording of DCUSA schedule 22 clauses 1.16-1.28 clearly defines the situations where costs should or should not be apportioned between the LDNO and the customer. I believe that these clauses clearly distinguish when work is chargeable to either the LDNO or customer. I therefore do not believe there are any circumstances where transfer costs as described in Example 8D should be apportioned.</p>	Noted.
Peel Ports Group Limited	See answer to Q7.	Noted.
Northern Powergrid	We do not believe that transferred capacity should be apportioned for the reason given above.	Noted.
PowerCon	Where capacity is transferred from a location where it is otherwise	Noted and an alternate Change Proposal will be raised

(UK) ltd	available to one where it is required – then the costs of undertaking this work should be apportioned. The reasoning behind this stance has been promoted and justified as part of Appendix A Statement within the main document.	on this alternate view.
Renewable Energy Association	Where capacity is transferred from a location where it is not used to one where it is the costs of doing this should be apportioned.	Noted and an alternate Change Proposal will be raised on this alternate view.
SP Distribution / SP Manweb	We do not agree that capacity is being transferred	Noted.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	We do not agree with the proposals to add and define ‘categories’ of reinforcement and are satisfied that the existing wording of this clause remains appropriate and fit for purpose.	Noted.
UK Power Networks	No. The arrangements indicate a cost efficient method of providing the connection for the customer and as no additional capacity is needed to be made available overall the costs should be charged in full.	Noted.
Western Power Distribution	No.	Noted.
Question Eleven	Do you believe that any other parts of the methodology need to be revised in relation to this issue of transferring capacity – e.g.	Working Group Comments

	<p>1.16 (Please see 2.9 of this consultation)?</p> <p>DCUSA Clause 1.16</p> <p><i>“Reinforcement is defined as assets installed that add capacity (network or fault level) to the existing shared use Distribution System. The costs of Reinforcement shall be apportioned between you and us. The methods used to apportion the costs of Reinforcement are set out in paragraphs 1.23- 1.28. There are five exceptions to this rule. Where an exception applies Reinforcement will treated as Extension Assets and costs will not be apportioned. These exceptions are described below and the application of exceptions 1, 2, 4, and 5 is demonstrated in the Examples”.</i></p>	
<p>ENWL</p>	<p>No I believe that clause 1.16 and paragraphs 1.23 to 1.28 provide suitable guidance to customers on where costs are shared and sole use.</p>	<p>Noted.</p>
<p>Peel Ports Group Limited</p>	<p>I think that the words in the statement of methodology should be as unambiguous as possible, and therefore that the current ambiguity in the definition of Reinforcement in clause 1.16 should ideally be resolved by using better words (and not just by an illustrative example).</p> <p>But the counterarguments in the middle sentence of paragraph 3.11 of the consultation have some force.</p> <p>I think that it might be possible to solve this issue by adding to the definition rather than by replacing it. For example, to implement the answer “yes” to Q7:</p>	<p>Noted.</p>

	“Reinforcement is defined as assets installed that add Network or Fault Level Capacity to the existing shared use Distribution System or to any point within the existing shared use Distribution System.”	Noted. The alternate view will be raised in a separate alternate Change Proposal.
Northern Powergrid	No	Noted.
PowerCon (UK) Ltd	Yes, please see the suggested arrangements /amendments proposed within Appendix A of the main consultation document.	Noted. The alternate view will be raised in a separate alternate Change Proposal.
Renewable Energy Association	Yes, see response to Q3 on changing the definition of reinforcement.	Noted. Please see Working Group response to Q3.
SP Distribution / SP Manweb	No	Noted.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	We are satisfied that the existing definition and interpretation of ‘reinforcement’ remain appropriate and fit for purpose. If the concept of capacity transfer (with no capacity addition to the Distribution System) is accepted as being ‘reinforcement’, this would require the whole policy area to be comprehensively reviewed, including the potential impacts on connection charging and distributor funding arrangements.	Noted.
UK Power Networks	No	Noted.
Western Power Distribution	No.	Noted.
Question Twelve	Which DCUSA General Objectives does the CP better	Working Group Comments

facilitate? Please provide supporting comments.

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.
4. The promotion of efficiency in the implementation and administration of this Agreement and the arrangements under it.
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.	
ENWL	Objectives 1 and 3.	
Peel Ports Group Limited	The change better facilitates number 4, if the application of the connection charging methodology can be considered to be part of the implementation and administration of DCUSA (even though the connection charging methodology has no contractual effect between DCUSA parties).	The majority of the Working Group agreed that Objective 4 is not better facilitated by this change.
Northern Powergrid	We believe that general objectives 1 and 3 are better facilitated by this CP by allowing an efficient development of the distribution system and the provision of reasonable economic signals. This CP also improves clarity and transparency for both customers and distributors.	Noted.
PowerCon (UK) Ltd	Objectives 2 and 3 (if altered as suggested).	The majority of the Working Group agreed that there is no competition benefit and therefore Objective 2 is not better facilitated by this change. The Working Group agrees that Objective 3 is better facilitated.
Renewable Energy Association	Objectives 2 and 3 (if altered as suggested).	The majority of the Working Group agreed that there is no competition benefit and therefore Objective 2 is not better facilitated by this change. The Working Group agrees that Objective 3 is better facilitated.
SP Distribution / SP Manweb	We note the intention of the CP and that it if implemented would seek to provide clarity within the methodology which would align with objective 1.	Noted.
Southern Electric Power Distribution plc and	See Q13.	Noted.

Scottish Hydro Electric Power Distribution plc		
UK Power Networks	We agree with the working group assessment.	Noted.
Western Power Distribution	<p>We believe the Change Proposal better facilitates DCUSA General Objective 1; ‘The development, maintenance and operation by each of the DNO Parties and IDNO Parties of an efficient, co-ordinated, and economical Distribution System’ as implementing the CP will ensure DNOs are conversant with the requirement to reinforce or reconfigure remote parts of the network when considering the minimum scheme.</p> <p>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.’</p> <p>Licence Condition 13 requires each DNO to have in force a connection charging methodology and this CP allows the DNO to discharge this obligation efficiently by ensuring the methodology is, as far as reasonably possible, balanced and clear.</p>	Noted.
Question Thirteen	<p>Which DCUSA Charging Objectives does the CP better facilitate?</p> <p>Please provide supporting comments.</p> <p>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</p>	Working Group Comments

	<p>Distribution Licence.</p> <ol style="list-style-type: none">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 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	
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	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.	
ENWL	Objective 1	Noted.
Peel Ports Group Limited	<p>The change better facilitates number 3, because apportioning reinforcement costs incurred for remote reinforcement shared with other network users is appropriate; and because a clearer methodology is likely to be fairer and more cost-reflective since interested parties have a better chance of understanding it and challenging any errors.</p> <p>If the affected distributors believe that the existence of the types of cases in respect of which this DCP improves the connection charging methodology can be seen as a development in their business, then the change better facilitates number 4.</p>	<p>The Working Group considered that Objective 3 was not better facilitated as cost apportionment is not recognised within this Objective.</p> <p>The Working Group considered that Objective 4 is not better facilitated by this change as the proposal is to provide clarification not any new development.</p>
Northern Powergrid	We believe that general objective 1 is better facilitated by this CP by allowing improved clarity and transparency for customers and distributors.	Noted.
PowerCon (UK) Ltd	<p>We would suggest that Objectives 2 and 3; if amended as suggested.</p> <p>This is based upon the premise that the CP would then allow costs to be apportioned and recovered in an appropriate manner.</p>	The majority of the Working Group agreed that there is no competition benefit and therefore Objective 2 is not better facilitated by this change. The Working Group considered that Objective 3 was not better facilitated as cost apportionment is not recognised within this Objective. The Working Group agrees that Objective 1 is better facilitated.
Renewable Energy Association	Objectives 2 and 3 is amended as suggested as this will allow costs to be recovered appropriately between parties that precipitate the work and those who may make use in the future of additional	The majority of the Working Group agreed that there is no competition benefit and therefore Objective 2 is not better facilitated by this change. The Working Group

	capacity created or transferred from where it is not used to where it is or could be.	considered that Objective 3 was not better facilitated as cost apportionment is not recognised within this Objective. The Working Group agrees that Objective 1 is better facilitated.
SP Distribution / SP Manweb	We note the intention of the CP and that it if implemented it seeks to establish greater clarity and consistent application which would align with objective 1.	Noted.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	We believe that this CP better facilitates DCUSA Charging Objective 1, as implementation of the proposed additional text and examples would improve the level of explanation of potential connection charges set out within the Connection Charging Methodology. This would assist DNO compliance with Standard Licence Condition 13.1.	Noted.
UK Power Networks	We agree with the working group assessment.	Noted.
Western Power Distribution	We believe the Change Proposal better facilitates DCUSA Charging Objective 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”. Improved clarity within the CCCM will help ensure more consistent application in accordance with the relevant licence conditions 13 and 14.	Noted.
Question Fourteen	Are you aware of any wider industry developments that may impact upon or be impacted by this CP? If so, please give details,	Working Group Comments

	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.	
ENWL	No	Noted.
Peel Ports Group Limited	DCP 162, as outlined in my response to Q3. But the adverse impact here is only due to deficiencies in DCP 162 and does not reveal any problem with DCP 167 provided that DCP 167 is modified as suggested in my response to Q3.	Noted. Please see Working Group response to Q3.
Northern Powergrid	No	Noted.
PowerCon (UK) ltd	No	Noted.
Renewable Energy Association	No	Noted.
SP Distribution / SP Manweb	No	Noted.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	No, other than the changes proposed under DCP162 to the definition of 'Relevant Section of Network' referred to in paragraph 2.5 of the consultation document.	Noted.
UK Power Networks	No	Noted.

Western Power Distribution	No.	Noted.
Question Fifteen	Are you supportive of the proposed implementation date of the next DCUSA release following Authority consent?	Working Group Comments
ENWL	Yes	Noted.
Peel Ports Group Limited	Yes. But if the argument from price-controlled distributors at the end of paragraph 3.11 of the consultation can be shown to be valid then perhaps there would be some grounds to defer the implementation of a clearer and wider definition of Reinforcement to 1 April 2015.	Noted.
Northern Powergrid	Yes	Noted.
PowerCon (UK) Ltd	No comment	Noted.
Renewable Energy Association	There should be no reason to delay implementation.	Noted.
SP Distribution / SP Manweb	We have no objection to the date proposed if approved	Noted.
Southern Electric Power Distribution plc and Scottish Hydro	Yes.	Noted.

Electric Power Distribution plc		
UK Power Networks	Yes	Noted.
Western Power Distribution	Yes.	Noted.
Question Sixteen	Are there any alternative solutions or matters that should be considered by the Working Group?	Working Group Comments
ENWL	No	Noted.
Peel Ports Group Limited	No.	Noted.
Northern Powergrid	No	Noted.
PowerCon (UK) Ltd	We are supportive of the views expressed within Appendix A of the consultation document (Working Group Customer Representative Letter) rather than the views expressed within the main document.	Noted.
Renewable Energy Association	See response above which proposes clarifying the definition of reinforcement.	Noted.
SP Distribution / SP Manweb	No	Noted.
Southern Electric Power	We do not believe so.	Noted.

Distribution plc and Scottish Hydro Electric Power Distribution plc		
UK Power Networks	No	Noted.
Western Power Distribution	No.	Noted.