

### DCUSA CHANGE DECLARATION

#### DCP 063 – VOTING ARRANGEMENTS FOR IDNOS UNDER CLAUSE 12

**VOTING DATE:** 06 May 2010

DCP 063	WEIGHTED VOTING				
	DNO <sup>1</sup>	IDNO	SUPPLIER <sup>2</sup>	DG <sup>3</sup>	OTSO
CHANGE SOLUTION	n/a	Accept	n/a	n/a	n/a
IMPLEMENTATION DATE	n/a	Accept	n/a	n/a	n/a
RECOMMENDATION	<p><b>Change Solution – ACCEPT.</b> In respect of each Party Category that was eligible to vote, the sum of the Weighted Votes of the Groups in that Party Category which voted to accept the change solution was greater than 50% in all Categories.</p> <p><b>Implementation Date –ACCEPT.</b> In respect of each Party Category that was eligible to vote, the sum of the Weighted Votes of the Groups in that Party Category which voted to accept the implementation date was greater than 50% in all Categories.</p>				
PART ONE / PART TWO	Part One – Authority Determination Required				

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<sup>1</sup> Category not eligible to vote on this CP

<sup>2</sup> Category not eligible to vote on this CP

<sup>3</sup> Category not eligible to vote on this CP

PARTY	SOLUTION (A / R)	IMPLEMENTATION DATE (A/R)	COMMENTS
<b>IDNO PARTIES</b>			
EDF Energy (IDNO) Limited	Accept	Accept	
ESP Electricity	Accept	Accept	
Independent Power Networks Limited	Accept	Accept	
The Electricity Network Company Ltd	Accept	Accept	<p>We recognise the anomaly and accept the change.</p> <p>Of broader concern is that OTSOs are deemed to be the same class of user as an IDNO. This is clearly not the case, for example, charging methodologies in respect of IDNOs do not apply to OTSOs. Whilst this has not raised any issues to date we make the following points:</p> <ul style="list-style-type: none"> <li>• An IDNO panel member, whilst acting independently, is unlikely to have relevant experience of OTSO activities. The same is true of an OTSO party in respect of their knowledge of IDNOs.</li> <li>• Clause 9.4 excludes matters impacting on transmission from being a Part 1 matter.</li> <li>• Under the Electricity Act 1989, "distribute", means:  <i>"... [to] distribute by means of a distribution system, that is to say, a system which consists (wholly or mainly) of low voltage lines and</i></li> </ul>

			<p><i>electrical plant and is used for conveying electricity to any premises or to any other distribution system" .</i></p> <p><i>and electricity distributor          "...means any person who is authorised by a distribution licence to distribute electricity except where he is acting otherwise than for purposes connected with the carrying on of activities authorised by the licence"</i></p> <p>The Act appears to exclude from the activity of distribution any obligations on the distributor to offer connection or use of system to Transmission System Operators. Therefore we question under what powers the Authority is able to direct changes to the DCUSA in respect of OTSO requirements.</p>
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