

DCP 350 Working Group Meeting 01

11 September 2019 at 10:00am

Teleconference

| Attendee | Company |
|--|-----------------------|
| Working Group Members | |
| Lisa Waters (LS) | Waters Wye Associates |
| Helen Stack (HS) | Centrica |
| Rob Nickerson | National Grid |
| Steve Halsey (SH) | UKPN |
| Alex Travell (AT) | BU-UK |
| Ian Povey (IP) | ENWL |
| Tom Kenyon-Brown (TKB) | Ofgem |
| Ryan Kavanagh | WPD |
| Code Administrator | |
| Dylan Townsend (DT) (Chair) | ElectraLink |
| Richard Colwill [RC] (Technical Secretary) | ElectraLink |

1. Administration

- 1.1 The Chair welcomed the members to the meeting.
- 1.2 The Working Group reviewed the “Competition Law Guidance”. All Working Group members agreed to be bound by the Competition Law Guidance for the duration of the meeting.
- 1.3 The Terms of Reference for the meeting were reviewed and the Working Group agreed that these were a fair and accurate representation of the Working Group’s objectives and agreed to be bound by them for the duration of the Working Group. In addition to the standard terms outlined in Part A of the ToR, the Working Group is required to consider and report on the following specific issues:
 - The Panel noted that ENA Open Networks have been reviewing something similar and therefore the Working Group should engage with Open Networks to ensure that work isn’t duplicated.
 - It was also noted that some of the information being considered for the register could be confidential and appropriate legal advice should be sought by the Working Group.
 - The Panel also requested that consideration is given by the Working Group regarding the governance of reviewing and updating the structure of the register.

2. Purpose of the Meeting

- 2.1 The Chair set out that the purpose of the meeting was to review and analyse the Change Proposal (CP) and potential solutions.

3. Review of Draft Change Proposal and Solutions

Overview

- 3.1 LW provided an overview of the content of DCP 350. The CP can be found as Attachment 1. The purpose the CP is to require the DNOs to create a national, public register of all sites that use their networks and influence the operation of the GB power market. The Register would contain details of each connected site and would be kept up to date by the DNOs.
- 3.2 While it is possible to see the generation/DSR/interconnectors connected to, or using, the GB transmission networks via registers held by the ESO, it is not possible to see the embedded power plants/DSR/storage. With increasing use of embedded generation/DSR/storage for balancing, within the capacity market and to manage local issues, it is important that this market becomes more transparent. This proposal would therefore require the DNOs to publish and maintain a register of all generators/DSR/storage (starting with those >1MW) connected to and using their networks.
- 3.3 It was noted that with the growth in embedded generation, and in order to inform the market and help with market forecasts done by the ESO, a register of embedded generation is needed. The proposal would be for each DNO to populate, and then keep up to date, as register of sites connected to their networks. This change proposes that the registers are presented both on the DNOs’ individual web-sites and in an amalgamated register on another web-site.

Working Group Considerations

- 3.4 The Working Group agreed that it was sensible to start with sites >1MW initially as these are the sites that are influencing the market the most. In the future it may be necessary to consider sites <1MW but this is out of the scope for this CP.

3.5 It is suggested that the following requirements apply in relation to the Embedded Capacity Register, which is split between the contents of the register itself (bullet points) and other requirements (numbers 1-6):

- Customer Name (meter registrant)
 - Project Name (power station/customer name)
 - Connection Site (local substation name, local GSP and OS Grid Reference)
 - MW Connected (current connection capacity – size of physical connection rather than export/import rights)
 - MW Capacity (current capacity rights – to use the network)
 - MW Increase / Decrease (expected increase/decrease – i.e. where a site is altering a capacity right)
 - MW Total (export and import capacity to be held at a date in time)
 - MW Effective Date (date the site goes live/expected to go-live/capacity changes)
 - Project Status (scoping, awaiting consent, consented, live, terminated, interactive, etc.)
 - Host DNO (which DNO)
 - Plant Type (CHP, CCGT, solar, wind, storage, DSR, etc.)
 - Type of connection (firm, non-firm, shared)
 - Licence area (DNO, IDNO)
 - MPAN
1. The Embedded Capacity Register is to comply with best practice regarding accessibility and the use of widely used or open formats.
 2. The Embedded Capacity Register is to be made available on the public facing pages of the DCUSA and/or ESO web-site (the Public Pages) that are accessible by all.
 3. The following information shall also be accessible through the Public Pages:
 - (a) Each DNO's Embedded Capacity Register
 - (b) An explanation as to the fields in the Register
 - (c) Contact details for each DNO so that a site which believes its details are incorrect can contact for a correction
 - (d) A date by each to show when the Register was last up dated
 - (e) Links to maps for each DNO region so that parties can identify regions referred to.
 - (f) Links to each DNO's heat map.
 4. Each DNO will update their Embedded Capacity Register not less than weekly if there are changes to be made.

5. All the registered are to be combined to create one GB Embedded Capacity Register which will be on the Public Pages [ESO or DCUSA web-site, or both?].
6. All DCUSA parties will be required to notify the relevant DNO if they are aware that any of the data on the registers is incorrect and the DNO must update that data within a week.
- 3.6 One Working Group member suggested that items 'e' and 'f' under no. 3 of other requirements aren't necessarily easily to produce, especially in the timeframes that this CP is seeking to achieve. LW confirmed that those items should be considered a 'nice to have' but aren't essential to achieving the goal of this CP.
- 3.7 The Working Group discussed the above data items and the concerns regarding confidentiality. The main items of concern were Customer Name, Project Name and MPAN. After much discussion it was agreed that appropriate legal advice needed to be sought and that this should happen as soon as possible. LW took an action to speak to BEIS regarding their interpretation of what can and cannot be shared from the data items above.

ACTION 01/01: LW to speak to BEIS and gain an understanding of their interpretation of what data is confidential, specifically if they see any issues with publishing MPANs.

- 3.8 One member raised whether there was a need for the MPAN. RN from National Grid informed the Working Group that this MPAN data is essential because it is the only unique data identifier that accurately links to other sources of information. For example, you cannot accurately link on customer name, project name, postal address as they are not always stated in the same format. This is particularly important as National Grid would like to match sites in the register to their generation output data in order to understand how the site is operating and understand the characteristics of each site. LW noted that the proposed content of the embedded capacity register had been shared with the Flexible Generation Group (FGG) and that no issues had been raised with respect to publishing Customer Name (meter registrant) or MPAN.
- 3.9 The Working Group discussed the need for analysis of the above data fields and reviewed the example DER Generation Register included as an attachment to the CP. The idea is that the register would be designed in the format of a database so that data can be easily extracted and manipulated and further consideration to the design of this should be considered once the solution has been agreed.
- 3.10 Ensuring appropriate engagement was discussed, for example, it was raised whether DNOs could write out to the connected customers asking for their permission to share the capacity register data. It was also noted that consideration was needed regarding work being completed from groups such as the Energy Data Task Force (EDTF) and the Open Networks (ON) Project. The Working Group took a joint action to circulate any information that they believe to contain material which could be used in support of this CP, for example the EDTF report and related documents from the ON Project etc.

ACTION 01/02: The Working Group took a joint action to circulate any information that they believe to contain material which could be used in support of this CP, for example the EDTF report and related documents from the ON Project etc.

- 3.11 The Working Group had a discussion on where the collated capacity register would best be located. For example, should this be located on the DCUSA website? Further consideration is required once the appropriate legal advice has been sought. It was agreed that a question around whether the DNOs and

and/or DCUSA Ltd, could publish a register containing details such as Customer Name, Project Name and MPAN on the DCUSA website. The Secretariat took an action draft a request for legal advice which will contain relevant background material and circulate to the Working Group for approval.

ACTION 01/03: The Secretariat took an action draft a request for legal advice which will contain relevant background material and circulate to the Working Group for approval.

- 3.12 It was suggested that once a legal advice has been received, each DNO should share this and seek legal their own advice internally.
- 3.13 The Working Group had a discussion on similar work being undertaken within the ENA Open Networks project and SH stated that there had been discussions within the Customers Advisory Group regarding feedback on a capacity register and how this data should best be presented and how it would be used. SH took an action to circulate the notes from these discussions to the Working Group.

ACTION 01/04: SH to circulate the notes from the ENA Open Networks Customers Advisory Group regarding customer feedback on the capacity register.

- 3.14 Another discussion was regarding a suggestion that certain customers may not wish to have their details published on such a register and thus whether exclusion on that basis was justified or not. It was noted that sites seeking such exclusion might be as they relate to critical infrastructure. It was agreed that if some sites should be allowed to be excluded, then a clearly defined set of criteria would need to drafted into the text, however, Working Group will consider this in more detail during the next meetings.

Consultation Considerations

- 3.15 The Working Group had a discussion regarding consulting on this change. It was agreed that it was necessary to define the solution and legal text further before consulting. The aim would be to only consult once on this change so that it can be implemented, and benefits can be realised, as soon as possible. The Secretariat took an action to create an initial draft consultation document and circulate to the Working Group for review prior to the next meeting.

ACTION 01/05: Secretariat to create initial draft consultation and circulate to Working Group prior to next meeting.

- 3.16 When considering what should be included in the consultation document, one question raised, was how often the register should be updated. It was noted that within the CP form, it was suggested that the register be updated 'not less than weekly if there are changes to be made' however some members of the Working Group thought that this may be too onerous for the DNOs and IDNOs and may require a full time employee to manage it. Those members suggested that a monthly update should suffice, to which it was questioned how many new connections/changes to connections the DNOs and IDNOs receive per week/ month/ year. AT and RK agreed to take an action to seek confirmation of the number new connections/changes to connections the they receive per week/month/year, which the Working Group agreed would be sufficiently representative of other DNOs and IDNOs. This data will then be reviewed by the Working Group to recommend how often the register should be updated. This analysis will be included in the consultation.

ACTION 01/06: AT and RK agreed to seek confirmation of the number new connections/changes to connections the they receive per week/month/year and report back to the Working Group on their findings.

Draft Legal Text Considerations

- 3.17 Within the CP form, the suggested approach to the drafting of the legal text was that it should only cover the creation and maintenance of the register, but the detail related to the content might best sit outside the text such that the content of the register can be altered or refined without the need to raise a CP to update the text. Some Working Group members raised a concern with this approach, as in their view, it potentially leaves it open for interpretation, potentially impacting the usability of the register. The Chair suggested that it is possible to define what DNOs/IDNOs would need to include and how it is to be presented within the register itself, potentially using a version control process that could be issued by the Panel, which is similar in concept to the models referred to in the Charging Methodologies. The Working Group agreed to give further consideration to how this is achieved, both as part of this change but also in consideration of how the market develops into the future..

4. Work Plan

- 4.1 An updated Work Plan can be found as Attachment 2.

5. Agenda Items for the Next Meeting

- 5.1 At the next meeting the Working Group will further define the proposed solution based on the outcomes of the actions from this meeting and review the draft consultation.

6. Any Other Business

- 6.1 There were no further items of AOB, and the Chair closed the meeting.

7. Date of Next Meeting

- 7.1 The date of the next meeting is scheduled for 8th October and will be a face to face meeting from 10:30am to 3pm. The location of the meeting will be confirmed in the outlook invite.

New and Open Actions

| Ref. | Action | Owner | Update |
|-------|--|---------------------------------|--------|
| 01/01 | Speak to BEIS and gain an understanding of their interpretation of what data is confidential, specifically if they see any issues with publishing MPANs. | Lisa Waters | |
| 01/02 | Find and circulate any information that they believe to contain material which could be used in support of this CP, for example the EDTF report and related documents from the ON Project etc. | The Working Group | |
| 01/03 | Draft a request for legal advice which will contain relevant background material and circulate to the Working Group for approval. | ElectraLink | |
| 01/04 | SH to circulate the notes from the ENA Open Networks Customers Advisory Group regarding customer feedback on the capacity register. | Steve Halsey | |
| 01/05 | Secretariat to create initial draft consultation and circulate to Working Group prior to next meeting. | ElectraLink | |
| 01/06 | Seek confirmation of the number new connections/changes to connections the they receive per week/month/year and report back to the Working Group on their findings. | Alex Travell & Ryan Kavanagh | |