

DCP 350 Working Group Meeting 02

08 October 2019 at 10:30am

The Office Group, 10 Bloomsbury Way, London

Attendee	Company
Working Group Members	
Alex Travell [AT]	BU-UK
Chris Kukla [CK]	BEIS
Donald Preston [DP] (Teleconference)	SSEN
Donna Townsend [DT] (Teleconference)	ESPUG
Helen Stack [HS] (Teleconference)	Centrica
Ian Povey [IP]	ENWL
Lisa Waters [LW]	Waters Wye Associates
Mark Carolan [MC]	Ofgem
Rachel Ollis [RO] (Part-Meeting)	ElectraLink
Rob Nickerson [RN]	National Grid Electricity System Operator
Ryan Kavanagh [RK]	WPD
Code Administrator	
Dylan Townsend (DT) (Chair)	ElectraLink
Hollie Nicholls [HN] (Technical Secretary)	ElectraLink

Apologies	Company
Andrew Dobbie	National Grid
Richard Colwill	ElectraLink
Steve Halsey	UKPN
Tom Kenyon-Brown	Ofgem

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 Working Group reviewed the minutes from the first meeting, held on 11 September 2019, where it was noted that there was an action missing. A copy of the finalised minutes can be found as Attachment 1.

Action 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

- 1.4 The Working Group welcomed BEIS to the meeting to obtain an update on the action taken at the last meeting.
- 1.5 It was noted that providing legal advice is not something that BEIS are able to do and a legal steer would need to be obtained from Ofgem. However, BEIS highlighted their support for the change and explained that the proposal would contribute to a smarter more flexible grid due to having information and data regarding assets that are connected to the distribution system. BEIS understand that there are some challenges that need to be discussed but overall, they are happy to support the Change Proposal (CP) and what it is intending to accomplish.
- 1.6 The Ofgem representative explained to Working Group members that they are still reviewing the legality of the CP and they are looking at whether there is a possibility of differentiating between what data is publicly available and what data can be provided to the Electricity System Operator (ESO) to help to provide an economic and efficient system. Ofgem will provide a further update within the next two weeks.

ACTION 02/01: Ofgem to provide an update regarding the legality of publishing MPAN information no later than 22 October 2019

2. Purpose of the Meeting

- 2.1 The Chair set out that the purpose of the meeting was to continue to develop the solution for the change and review the draft consultation document.

3. DCP 350 Solution Development and Review of Consultation

- 3.1 One Working Group member discussed the advice from Ofgem (paragraph 1.6 above) and voiced that they did not agree with the suggestion that different data should be made publicly available to that sent to the ESO as there would need to be some form of governance in place to ensure that the data is accurate and constantly correct. It was noted by another Working Group member that the Utilities Act provides the Distribution Network Operators (DNOs) the ability to share the data with National Grid for business purposes and therefore, there would be no problem with the DNOs ensuring that the data is accurate.
- 3.2 It was noted that there would need to be consideration when developing the solution for this CP as to whether some of the DNOs older connection agreements have confidentiality clauses included and how these will be dealt with. It was highlighted that it would be useful to know the number of connection agreements that include the confidentiality clause.

ACTION 02/02: DNO Working Group members to provide an estimated number of how many of their connection agreements could potentially include confidentiality clauses.

- 3.3 The Working Group discussed the importance of having the Meter Point Administration Number (MPAN) or whether the site name would be sufficient. The ESO representative agreed to provide the Working Group with a paragraph as to why it would be useful for the ESO to be provided with the MPAN rather than just the site name.

ACTION 02/03: The ESO to provide rationale as to why it would be beneficial to review the MPAN rather than just the site name.

- 3.4 The Working Group discussed the data items being considered as part of the work undertaken via the ENA Open Networks (ON) Project, specifically, Work Stream 2 – Product 1 (System Wide Resource Register), which seeks to achieve a similar result to that which DCP 350 seeks to provide. That is, to provide information on resources that are already connected, or approved to connect, to distribution networks, enabling network users and network companies to better understand where there are opportunities to connect and opportunities to utilise flexible resources.
- 3.5 It is proposed that the data would be contained in registers for each of the network companies in a consistent format that would be regularly updated and there is an expectation that the first phase of these registers will be completed by January 2020 and the final phase by July 2020.
- 3.6 The Working Groups discussion centred around a comparison of which data items are being proposed by this CP and those being considered for inclusion via the ON Project Work Stream, to which it was noted that the only data items that aren't being considered as part of the latter of the two was the MPAN related to the site and the connection type (i.e. whether a connection is firm or non-firm).
- 3.7 The Working Group agreed that clarity is needed around definitions for all items but specifically, it was noted that industry appears to use/understand the words 'Flexible' and 'Non-Firm' to be either one and the same or different, depending on the context. Therefore, it was agreed, that each item would need to include a definition and that instead of duplicating work, it appeared sensible to use the definitions as already determined via the ON Project.
- 3.8 The Secretariat noted that DCP 348 'DNO charging for installing capacity management and communications equipment to enable Flexibility in Connections' is currently consulting and their proposed legal text includes a definition for "Firm" connections.
- 3.9 One Working Group member questioned whether the group would need to define specifically what would be published, i.e. what should be included under customer name; is it the company that owns the site or the company that is operating the site. It was agreed that the DNOs would have to include what information they have and then the site would have the right to be able to change it.
- 3.10 The Working Group agreed that a specific question should be included within the consultation regarding what the customer name should be defined as, who should be contacted in the event of a query of the data and how many years' worth of data would Parties like to see in the register.
- 3.11 It was also agreed that the consultation should include questions regarding what the register should look like, where it should be hosted and who should govern it. The Chair agreed to update the consultation document to reflect the discussions held.

ACTION 02/04: The Chair to update the DCP 350 consultation document to reflect the discussions held.

4. Implementation Techniques

- 4.1 The Working Group welcomed RO to the meeting to provide her perspective on any General Data Protection Regulation (GDPR) issues that the group should be cognisant of. It was noted that Working Group member should be wary of expressed consent when they are publishing the personal data for the sites (including site names and MPAN data) and that each site would have the right to remove their consent at any time.
- 4.2 The Working Group questioned whether there would be any GDPR implications if the sites were business names rather than personalised data. It was noted that there could be some sites (although minimal) that could be owned by individuals rather than businesses.
- 4.3 It was highlighted that Ofgem will be providing their legal view on the CP in the next couple of weeks and the Chair recognised that it would be beneficial to start to obtain legal advice from the DCUSA Legal Advisors which will include what the DNOs are planning on publishing in December, whether there is anything under GDPR that would stop the group publishing the data and it was suggested that it should be made clear that there are other areas of the industry that this information is published, albeit that there is not one single source of truth.

ACTION 02/05: The Chair to draft a request to the DCUSA Legal Advice to ask for legal advice on the solution for the CP.

- 4.4 As part of these discussions the Chair highlighted options that ElectraLink Ltd had produced to help aid the implementation and publication of the register for the Working Group's determination. The options include:
 - Using ElectraLink FlowBuilder service for DNOs to submit data securely over the Data Transfer Service;
 - Provide an Application Programming Interface functionality for DNO's to submit/query data securely over the internet; and
 - DNO's submit data in spreadsheets via email.
- 4.5 All of these can be presented on the DCUSA Website or another portal which will support:
 - Public limited view of submitted data;
 - Private unfiltered view for ESO personnel;
 - Contact details for DNO's for corrections/queries;
 - Record update details (date/time);
 - Potential for provision of derived DNO heat maps; and
 - Reporting on data submission.

5. Work Plan

5.1 An updated version of the DCP 350 Work Plan can be found as Attachment 2. The following next steps for the change were agreed:

- The Chair to ensure the Working Group receive legal advice from Ofgem;
- The Chair to draft a request for legal advice from the DCUSA Legal Advisors;
- The consultation document to be updated to reflect the discussion held; and
- The Working Group to finalise the consultation document via email before publication to DCUSA Parties and any other interested Parties.

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 Working Group agreed that they would attempt to finalise the consultation document via email. If a further teleconference is required, then this will be arranged.

New and Open Actions

Ref.	Action	Owner	Update
01/04	SH to circulate the notes from the ENA Open Networks Customers Advisory Group regarding customer feedback on the capacity register.	Steve Halsey	Ongoing
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	Ongoing AT confirmed that on average there was one connection per month. RK to obtain numbers.
01/07	The DNOs to share a list of what they plan for their register and the definitions that go with the list.	DNO Working Group members	Ongoing The DNOs highlighted during the meeting what they were planning to include in their register, but the definitions are still outstanding.
02/01	Ofgem to provide an update regarding the legality of publishing MPAN information no later than 22 October 2019	Ofgem	
02/02	DNO Working Group members to provide an estimated number of how many of their connection agreements could potentially include confidentiality clauses.	DNO Working Group members	
02/03	The ESO to provide rationale as to why it would be beneficial to review the MPAN rather than just the site name.	ESO Working Group member	
02/04	The Chair to update the DCP 350 consultation document to reflect the discussions held.	ElectraLink	
02/05	The Chair to draft a request to the DCUSA Legal Advice to ask for legal advice on the solution for the CP.	ElectraLink	

Closed 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	Action Closed
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	Action Closed
01/03	Draft a request for legal advice which will contain relevant background material and circulate to the Working Group for approval.	ElectraLink	Superseded by Action 02/05
01/05	Secretariat to create initial draft consultation and circulate to Working Group prior to next meeting.	ElectraLink	Action Closed