

DCP 358/359/360/361 Joint Working Group Meeting 01

30 January 2020 (10:00am to 3:00pm)

Skype/Teleconference

Attendee	Company	Attendee	Company
Working Group Members		Working Group Members	
Alessandra De Zottis [ADZ]	Sembcorp	Karl Maryon [KM]	Haven Power
Ben Tucker [BT]	Good Energy	Kyran Hanks [KH]	Waters Wye Associates
Brandon Rodrigues [BR]	ESP Electricity	Lee Wells [LW]	Northern PowerGrid
Chris Ong [CO]	UK Power Networks	Lina Apostoli [LA]	Ofgem
Claire Campbell [CC]	Scottish Power Energy Networks	Mark James [MJ]	UK Power Networks
Dave Wornell [DW]	Western Power Distribution	Mark Jones [MJ1]	SSE Business Energy
Donald Preston [DP]	SSE Networks	Nicholas Rubin [NR]	Exelon
Elizabeth Allkins [EA]	OVO Energy	Paul Duffus [PD]	Western Power Distribution
Grahame Neale [GN]	National Grid ESO	Paul Farmer [PF]	Shell Energy
Helen Inwood [HI]	Npower	Richard Brooks [RB]	Shell Energy
Helen Tsang [HT]	EDF Energy	Thomas Cadge [TC]	BUUK Infrastructure
Josephine Lord [JL]	Cornwall Insight	Tony Collings [TC1]	ecotricity
Julia Haughey [JH]	EDF Energy	Tony McEntee [TM]	Electricity North West
Kara Burke [KB]	Northern PowerGrid		
Code Administrator			
John Lawton (JL1) (Chair)	ElectraLink	Dylan Townsend [DT] (Technical Secretary)	ElectraLink

Apologies

Apologies	Company	Apologies	Company
George Moran	Centrica	Tom Chevalier	Power Data Associates

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 area:
 - it shall be for this Working Group to consider and decide whether there is a need to dissolve or amend the membership of the group in order to establish one or more subsequent Working Groups whose duties will be to assess one or more of the DCPs, whether in isolation or grouped where it considers it beneficial to do so.

2. Purpose of the Meeting

- 2.1 The Chair set out that the purpose of the meeting was to review and analyse the Change Proposals (CPs) and to start to develop potential solutions, alongside agreeing any next steps.

3. Overview of DCPs that implement TCR Direction:

Overview of DCP 358 ‘Ofgem Targeted Charging Review Implementation: Determination of Banding Boundaries’

- 3.1 TM provided an overview of the content of DCP 358. It was noted that the purpose the CP is to implement certain areas of Ofgem’s TCR Decision; specifically relating to the determination of charging bands for non-domestic distribution connected customers. This CP seeks to address paragraphs 20, 21, 30, 31 and 32 whilst having regard for paragraphs 34 and 36-39, of the TCR Direction. For ease of reference the aforementioned paragraphs are set in appendix 2 below.

Overview of DCP 359 ‘Ofgem Targeted Charging Review Implementation: Customers – who should pay?’

- 3.2 LW provided an overview of the content of DCP 359. It was noted that the purpose the CP is to implement certain areas of Ofgem’s TCR Decision; specifically relating to the identification of which ‘customers’ are eligible for a residual fixed charge. This CP seeks to address paragraphs 12-16, and paragraph 30, whilst having regard for paragraphs 34 and 36-39, of the TCR Direction. For ease of reference the aforementioned paragraphs are set in appendix 2 below.
- 3.3 Further to the above it was noted that in developing changes with respect to the above items, consideration will need to be give to the approach to establishing appropriate and proportionate arrangements for residual charges for Independent Distribution Network Operator (IDNO) customers, customers connected with private wires and complex sites, considering relative charging arrangements on IDNO networks and the customer’s voltage of connection.
- 3.4 The Proposer also noted that it is highly likely that a cross-code Working Group with the transmission counterparts will be needed in order to ensure that the solution that is developed is aligned across by distribution and transmission.

Overview of DCP 360 ‘Ofgem Targeted Charging Review Implementation: Allocation to Bands and Interventions’

- 3.5 DW provided an overview of the content of DCP 360. It was noted that the purpose the CP is to implement certain areas of Ofgem’s TCR Decision; specifically relating to the allocation and reallocation of ‘customers’ to residual charging bands. This CP seeks to address paragraphs 21-23, paragraphs 29-30, and paragraph 33, whilst having regard for paragraphs 34 and 36-39, of the TCR Direction. For ease of reference the aforementioned paragraphs are set in appendix 2 below.
- 3.6 An observer to the Working Group explained that there is an overlap with Connection Use of System Code (CUSC) modification, with the intention being that the ESO will determine bands and the DNOs via this CP will do the allocating of customer to the correct band and thus it is expected that there is a need for alignment with the relevant CUSC Modification, being CMP332. In response to this a Working Group member highlighted that it the solution could be that the ESO or an agent acting or performing the role on behalf of the ESO.

Overview of DCP 361 ‘Ofgem Targeted Charging Review Implementation: Calculation of Charges’

- 3.7 CC provided an overview of the purposed of the CP, which is to is to implement certain areas of Ofgem’s TCR Decision; specifically relating to the calculation of charges. This CP seeks to address paragraphs 17-19, paragraphs 24-28 and paragraph 30, whilst having regard for paragraphs 34 and 36-39, of the TCR Direction. For ease of reference the aforementioned paragraphs are set in appendix 2 below.

4. Proposed way forward: Development of CPs by one or more Working Group(s)

- 4.1 The Chair opened up a discussion on whether members had any thoughts as to how they’d like to approach the development of the four CPs, and whether there is a desire to create separate Working Groups to develop one or more of the CPs.
- 4.2 There was general agreement that DCP 359 should be assessed separately from the three, given the interdependencies and need for alignment with the relevant CUSC modification.
- 4.3 One member suggested that it would appear that there are synergies between what DCP 358 is doing and what DCP 360 is doing and that it would make sense for a one group to be formed to separately asses the two together. It was noted that this leaves DCP 361, which the Working Group agreed should be assessed on its own, as its timeline will differ, given the need for modelling work to be carried out.

5. Review and Discussion of each CP

Proposed way forward – DCP 358

- 5.1 It was noted that the Proposer had circulated a first draft of proposed legal text for DCP 358 and so it was agreed that the Working Group could make a start with reviewing it. Attachment 1 contains the updated version of the DCP 358 draft legal text following the Working Groups discussion. The following actions were recorded during the Working Groups review of the draft legal text:

ACTION 01/01: TM to review paragraph 1.2 of the DCP 358 draft legal text as it is providing context only and may not be necessary, however could also be amended such that it acts as an overall introduction to the new Schedule.

ACTION 01/02: LW to include some generic wording in DCP 358 draft legal text around price controls, potentially including text specifying the need to account for the 15-months' notice of changes to DUoS charges where certain dates or points in time have been included within the text.

ACTION 01/03: DNOs/IDNOs to confirm availability of data needed for paragraphs 2.4 and 2.5 of the DCP 358 draft legal text and provide this data to the Working Group so that analysis can be undertaken which will need to be done prior to going out for consultation such that respondents are able to see how it is proposed that the initial determination of charging bands is to occur. More specifically, it was believed to be beneficial to understand what % of data is held or achievable by the DNOs, such data potentially being that which was introduced by BSC Modification 'P222'. The 'P222' process provides DNOs/IDNOs, who wish to receive it, with a snapshot of Estimated Annual Consumption (EAC) data through placing a specific obligation on the supplier (via their Non Half Hourly Data Aggregator) to send a new quarterly data flow on a CD. The data details Non-Half Hourly consumption EAC by GSP Group, Profile Class and Line Loss Factor to provide site specific consumption data but this may not provide 100% of the data needed.

ACTION 01/04: Working Group to further consider the roles and responsibilities between IDNOs/DNOs and the ESO where interaction is necessary and where the DCP 358 draft legal text specifies an interaction.

Proposed way forward – DCP 360

- 5.2 One members raised concerns over what time period the data that is to be used for consumer allocation will averaged over, which was noted as being set out in paragraph 22 of 'the Direction' as a period of no less than 24 months prior to the setting of the applicable residual charges, or longer if the requisite data can be made readily available at proportionate cost. The members concern centred around at what point in time will a snapshot be taken from, specifically that if it is not made clear then there could be issues, as DNOs may have different data at different times and so it was thought consistency is key and thus a date in time should be defined.
- 5.3 One member suggested the next question is then, how do you calculate it? To which it was noted that there is potentially a two part process to go about this task, which is undertake an initial 'rough and ready' process which allocates in the fairest way possible and include the results in the consultation such that this draws out any outliers, which could be used to determine who may well raise a dispute if the initial approach is utilised.
- 5.4 It was noted that following on from the initial discussions during the CMP332 workgroup, it appears that there is an expectation that processes should be tightly defined meaning the number of disputes should almost be none. However, it was agreed that it is inevitable that some disputes will be raised, and one member suggested that a potential solution could be to utilise some form of disputes committee.
- 5.5 The group discussed what, if any, actions should or could be taken in the event that a customer constantly exceeds their agreed capacity limits, with one member suggesting that this could be dealt with by utilising the Excess Capacity charge that currently exists. One member noted that during the

initial CMP332 workgroup meetings, it has been suggested there could be a mechanism whereby a DNO would be able to amend which band the customer is allocated to in the event that they constantly exceed their agreed capacity limit. It was suggested that this scenario and potential methods for dealing with it are consulted on.

- 5.6 A further aspect which the Working Group discussed was what should be allowable in terms of customers being able to dispute their allocated band or request to be re-allocated to a different band, with one member suggesting that rules could be based on a defined step change threshold level at which point it would be deemed to be appropriate to explore such a dispute or request. Members noted that this could be set at a level that would mean DNOs/IDNOs would only give consideration to disputes/request as to a customer's banding where there had been a step change in consumption/capacity levels that would involve movement between more than a single band (e.g. say between classification of band 1 as compared to band 3).
- 5.7 The Working Group discussed that there appear to be two types of disputes that could arise, and thus two sets of processes may be needed, being an enduring process where mid-cycle disputes/requests for changes are made and potentially dispute that the calculation was wrong. The group agreed that to do this, they first need to obtain the data and then create a set of indicative bands which would allow for a dispute to be raised prior to the actual bands being set.
- 5.8 It was agreed that the types of disputes need to be set out in the consultation document alongside the proposed mechanisms for resolving any such disputes (e.g. a banding disputes committee) and subsequent questions should be asked.
- 5.9 One member noted that if a customer does go through dispute process and does change then there needs to be a process to notify the ESO of such a change so that they are made aware and can modify on their side things.
- 5.10 One member suggested that consideration should be given to how to deal with a potential issue relating to backdating of charges to suppliers (to the benefit of customers), seeing as there is a relevant law surrounding this area but that it may be that it is only applicable to DNOs/IDNOs and not the ESO.
- 5.11 The Working Group discussed and agreed that clarity should be included in the legal text to make sure that the threshold of band 4 doesn't specify a limit per se, but potentially utilises a 'greater than or equal to' approach thereby avoiding a scenario where a new or existing customer requests capacity above what would be the calculated limit of the band.
- 5.12 DW took an action to produce a first draft of the proposed legal text for DCP 360 such that it can be circulated to the Working Group prior to the planned meeting.

ACTION 01/05: DW to produce a first draft of the proposed legal text for DCP 360 such that it can be circulated to the Working Group prior to the planned meeting.

Proposed way forward – DCP 361

- 5.13 The Working Group had a brief discussion around the calculation of charges, but it was generally agreed that this should be the easier of the components that will implement Ofgem's TCR Direction.

- 5.14 One member suggested that consideration should be given to how to deal with a potential scenario where negative charges are seen or where negative scaling results from the allocation of the forward-looking element of charges.
- 5.15 The Secretariat, on behalf of a member who was unable to attend, noted that with respect to the outcome for unmetered customers, the member wished to note that residual charges have to be based on p/kwh basis not a fixed charged basis and proposes that the criteria should be based on a whole current vs. CT metered approach rather than a HH/NHH approach as this is the direction of travel for market wide HH settlement.
- 5.16 CC and CO took an action to produce a first draft of the proposed legal text for DCP 361 such that it can be circulated to the Working Group prior to the planned meeting

ACTION 01/06: CC and CO to produce a first draft of the proposed legal text for DCP 361 such that it can be circulated to the Working Group prior to the planned meeting.

6. Work Plan

- 6.1 Following the earlier discussion on the proposed way forward for the development of the four CPs by one or more Working Group(s), the Chair sought to confirm dates on which each of the three groups should meet. The Working Group discussed their availabilities and agreed to the following:
- DCP 358 and DCP 360 will be jointly progressed via a subset of any interested members and it was agreed to hold the first meeting on Thursday, 13 February 2020 between 10am and 3pm via Skype/Teleconference.
 - DCP 361 will be progressed on its own via a subset of any interested members and it was agreed to hold the first meeting on Friday, 14 February 2020 between 1pm and 5pm via Skype/Teleconference.
 - DCP 359 will be progressed with its sister CUSC Modification 'CMP 334', which are both concerned with the definitions for a 'site' and for 'final demand' and this will be a cross-code Working Group with the CUSC. The first DCP 359/CMP 334 Cross Code Working Group meeting has been set for Tuesday, 04 February 2019 between 10am and 3pm.

Further Considerations

- 6.1 The Working Group agreed that the Interdependencies between DCPs 358, 359 and 360 should be included within the consultation document(s) and resultant Change Reports.
- 6.2 The Secretariat took an action to provide draft consultation documents and updated Work Plans for the three Working Groups that will progress the four CPs such that they can be reviewed by the respective Working Groups during their planned meetings.

ACTION 01/07: ElectraLink to provide draft consultation documents and updated Work Plans for the three Working Groups that will progress the four CPs such that they can be reviewed by the respective Working Groups during their planned meetings.

7. Items for the Next Meetings

- 7.1 At the next meetings of the various Working Groups, there will be a need to further define the proposed solutions based on the outcomes of the actions from this meeting and review any draft legal text and/or consultation documents.

8. Any Other Business

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

Appendix 1 - New and Open Actions

Ref.	Action	Owner	Update
01/01	TM to review paragraph 1.2 of the DCP 358 draft legal text as it is providing context only and may not be necessary, however could also be amended such that it acts as an overall introduction to the new Schedule.	Tony McEntee	
01/02	LW to include some generic wording in DCP 358 draft legal text around price controls, potentially including text specifying the need to account for the 15-months' notice of changes to DUoS charges where certain dates or points in time have been included within the text.	Lee Wells	
01/03	DNOs/IDNOs to confirm availability of data needed for paragraphs 2.4 and 2.5 of the DCP 358 draft legal text and provide this data to the Working Group so that analysis can be undertaken which will need to be done prior to going out for consultation such that respondents are able to see how it is proposed that the initial determination of charging bands is to occur. More specifically, it was believed to be beneficial to understand what % of data is held or achievable by the DNOs, such data potentially being that which was introduced by BSC Modification 'P222'. The 'P222' process provides DNOs/IDNOs, who wish to receive it, with a snapshot of Estimated Annual Consumption (EAC) data through placing a specific obligation on the supplier (via their Non Half Hourly Data Aggregator) to send a new quarterly data flow on a CD. The data details Non-Half Hourly consumption EAC by GSP Group, Profile Class and Line Loss Factor to provide site specific consumption data but this may not provide 100% of the data needed.	DNOs/IDNOs	
01/04	Working Group to further consider the roles and responsibilities between IDNOs/DNOs and the ESO where interaction is necessary and where the DCP 358 draft legal text specifies an interaction.	Working Group	
01/05	DW to produce a first draft of the proposed legal text for DCP 360 such that it can be circulated to the Working Group prior to the planned meeting.	Dave Wornell	
01/06	CC and CO to produce a first draft of the proposed legal text for DCP 361 such that it can be circulated to the Working Group prior to the planned meeting.	Claire Campbell & Chris Ong	
01/07	ElectraLink to provide draft consultation documents and updated Work Plans for the three Working Groups that will progress the four CPs such that they can be reviewed by the respective Working Groups during their planned meetings.	ElectraLink	

Appendix 2 – References to Ofgem’s Direction to DNOs for each DCP

DCP 358 ‘Ofgem Targeted Charging Review Implementation: Determination of Banding Boundaries’

This CP seeks to address paragraphs 20, 21, 30, 31 and 32:

20.

- a. *that there will be four charging bands for each of the non-domestic distribution-connected consumer groups (set out in paragraph 18 a. to d. above), the boundaries for which will be set at the 40th, 70th and 85th percentiles; and*
- b. *that the percentiles for each band boundary will be determined by consumer numbers on a GB-wide basis on the basis of:*
 - i. *increasing agreed capacity levels for consumers connected to the EHV and HV distribution networks and LV-connected consumers with an agreed import capacity; or*
 - ii. *increasing net consumption volumes for LV-connected consumers without an agreed capacity.*

21. *that the band boundaries for distribution-connected consumers will be established on a GB wide basis and consumers will be allocated to bands based on industry agreed capacity where available, or final consumption data, as applicable. In setting and allocating users to charging bands, regard must be had to paragraph 3.54(9) of the TCR Decision relating to redundant connection capacity.*

30. *appropriate arrangements to develop the following:*

- a. *the frequency and relevant units of the fixed charge, considering a proposal of a pence/site/day structure;*
- b. *the mechanism to identify which sites should be classified as final demand for the purposes of determining residual charges. In doing so, the DNOs must have regard to paragraph 3.55(2) of the TCR Decision;*
- c. *any consequential changes that may be required in relation to residual charges for Independent Distribution Network Operators (IDNOs), consumers connected to private wire and complex sites, noting that the Authority expects that the IDNO charging regime (which operates via a Relative Price Control) to continue to function as it does today; and*
- d. *the systems and processes to implement the Proposal(s). In doing, so the DNOs must have regard to paragraph 3.55(4) of the TCR Decision.*

31. *appropriate arrangements to review the charging bands to ensure they remain fit for purpose, reflecting the requirements set out in paragraph 3.54(11) and 3.57 to 3.58 of the TCR Decision.*

32.

- a. *an assessment of whether there may be circumstances, in particular for EHV-connected consumers, where regional differences in consumer types lead to substantially different distributions of consumers in a DNO region and result in very low consumer numbers in some bands (having regard to paragraph 3.56(1) of the TCR Decision); and*

- b. *if this is found to be the case, develop and bring forward alternative modification proposals for options to address this, which could include:*
 - i. *regionally-derived boundaries, rather than GB-wide boundaries; or*
 - ii. *combining bands when a minimum number of consumers would be in a particular band.*

DCP 359 ‘Ofgem Targeted Charging Review Implementation: Customers – who should pay?’

This CP seeks to address paragraphs 12-16, and paragraph 30:

12. *The Proposal(s) must set out:*

Final demand

- 13. *that applicable residual charges must be applied to final demand consumers only.*
- 14. *the definition of ‘final demand’ is as follows “Final Demand means electricity which is consumed other than for the purposes of generation or export onto the electricity network”. Therefore, generation only and storage only sites will not pay residual charges.*

Single site

- 15. *that the residual fixed charge is to be levied on a single site basis.*
- 16. *the definition of ‘site’, having regard to paragraph 3.54 (10) of the TCR Decision.*
- 30. *appropriate arrangements to develop the following:*
 - a. *the frequency and relevant units of the fixed charge, considering a proposal of a pence/site/day structure;*
 - b. *the mechanism to identify which sites should be classified as final demand for the purposes of determining residual charges. In doing so, the DNOs must have regard to paragraph 3.55(2) of the TCR Decision;*
 - c. *any consequential changes that may be required in relation to residual charges for Independent Distribution Network Operators (IDNOs), consumers connected to private wire and complex sites, noting that the Authority expects that the IDNO charging regime (which operates via a Relative Price Control) to continue to function as it does today; and*
 - d. *the systems and processes to implement the Proposal(s). In doing, so the DNOs must have regard to paragraph 3.55(4) of the TCR Decision.*

DCP 360 ‘Ofgem Targeted Charging Review Implementation: Allocation to Bands and Interventions’

This CP seeks to address paragraphs 21-23, paragraphs 29-30, and paragraph 33:

- 21. *that the band boundaries for distribution-connected consumers will be established on a GB wide basis and consumers will be allocated to bands based on industry agreed capacity where available, or final consumption data, as applicable. In setting and allocating users to charging bands, regard must be had to paragraph 3.54(9) of the TCR Decision relating to redundant connection capacity.*
- 22. *that the data to be used for consumer allocation will relate to and be averaged over a period of no less than 24 months prior to the setting of the applicable residual charges, or longer if the requisite data can be made readily available at proportionate cost. For any consumers for whom data is not available for a period of 24 months, the process for new consumers in paragraph 23 below is to be followed.*

23. *that a process must be established to allocate 'new' consumers and consumers for whom the appropriate data is not available to be the relevant charging band, based on an assessment of their agreed capacity or consumption, as applicable. The process shall make use of such information as is available to best estimate the expected usage of the consumer, e.g. by taking an average of all of the data that is available, or based on an understanding from such sources as are considered appropriate of the typical profile of a similar consumers.*
29. *an appropriate process to manage any disputes in relation to consumers' residual charges, using and building upon (as necessary) any disputes processes already in place in the relevant industry code(s) and ensuring that the process should be efficient and proportionate. In developing the process, the DNOs must consider any data which may be needed to support this process and ensure the process has clear interfaces with such other processes as may be relevant.*
30. *appropriate arrangements to develop the following:*
- a. the frequency and relevant units of the fixed charge, considering a proposal of a pence/site/day structure;*
 - b. the mechanism to identify which sites should be classified as final demand for the purposes of determining residual charges. In doing so, the DNOs must have regard to paragraph 3.55(2) of the TCR Decision;*
 - c. any consequential changes that may be required in relation to residual charges for Independent Distribution Network Operators (IDNOs), consumers connected to private wire and complex sites, noting that the Authority expects that the IDNO charging regime (which operates via a Relative Price Control) to continue to function as it does today; and*
 - d. the systems and processes to implement the Proposal(s). In doing, so the DNOs must have regard to paragraph 3.55(4) of the TCR Decision.*
33. *such alternative modification proposals as it considers necessary following consideration of whether there should be mechanisms available for dealing with situations where there have been changes in use or ownership of a site. This should include an exceptions process to apply for reclassification of a user to another band in tightly defined circumstances, where substantial changes in usage occur, resulting in significant changes in the level of agreed capacity required (having regard to paragraph 3.56(3) of the TCR Decision).*

DCP 361 'Ofgem Targeted Charging Review Implementation: Calculation of Charges'

This CP seeks to address paragraphs 17-19, paragraphs 24-28 and paragraph 30:

17. *that there will be a single fixed DUoS residual charge for domestic LV-connected consumers; and*
18. *that there will be a set of single fixed DUoS residual charges for distribution-connected consumers within each of the following distribution-connected groups (except unmetered supplies):*
- a. EHV-connected consumers;*
 - b. HV-connected consumers;*
 - c. Non-domestic LV-connected consumers with an agreed capacity as the basis for their current charge; and*

d. Non-domestic LV-connected consumers without an agreed capacity.

19. the fixed DUoS residual charge that will apply to consumers within each of the above groups will be determined by reference to the charging band to which they are allocated as set out in paragraph 20 below.

Unmetered

24. that DUoS residual charges for unmetered consumers will be derived considering their net consumption volume or agreed capacity on the basis of their 'profiled' demand and the applicable charging methodology.

Allocation of DUoS residual charges

25. that applicable residual charges for each licensed area for consumers are allocated to the different voltage levels, according to the total net consumption volumes of all consumers at each voltage level.

26. that residual charges for each voltage level are allocated further to charging bands according to the total net consumption volumes for all consumers in each charging band.

27. that the allocated proportion of the residual charges for each charging band is divided equally among all consumers in that band with all consumers in a charging band paying the same level of fixed charge.

28. that allocation to unmetered supply will be by net volumes.

30. appropriate arrangements to develop the following:

- a. the frequency and relevant units of the fixed charge, considering a proposal of a pence/site/day structure;*
- b. the mechanism to identify which sites should be classified as final demand for the purposes of determining residual charges. In doing so, the DNOs must have regard to paragraph 3.55(2) of the TCR Decision;*
- c. any consequential changes that may be required in relation to residual charges for Independent Distribution Network Operators (IDNOs), consumers connected to private wire and complex sites, noting that the Authority expects that the IDNO charging regime (which operates via a Relative Price Control) to continue to function as it does today; and*
- d. the systems and processes to implement the Proposal(s). In doing, so the DNOs must have regard to paragraph 3.55(4) of the TCR Decision.*