

**DCP 350 - CREATION OF EMBEDDED CAPACITY REGISTERS**To: **Richard Colwill**Email: [DCUSA@electralink.co.uk](mailto:DCUSA@electralink.co.uk)Due Date: **27 February 2020**

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Role:	Other - please specify (Trade Association)
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Response <sup>1</sup> :	Non-confidential

**1. Are you comfortable with the proposed amendments to the intent statement of this change?**

Yes.

**2. Do you understand the intent of the CP?**

Yes.

**3. Are you supportive of the principles that support this CP, which is to increase the availability of accessible data which is expected to improve the economic and efficient and operation of the energy market, while driving towards a lower carbon economy?**

Yes. This is particularly important given the scale of change the industry is undergoing and

**4. Do you agree with the data items that the Working Group have decided should be included in an ECR? If not, what items would you remove/add and why?**

Yes.

<sup>1</sup> All responses will be treated as non-confidential unless indicated otherwise.

Anonymous responses will omit the detail of the submitting party but the content of the response will be provided to the Working Group and published on the DCUSA website.

Confidential responses will not be published on the DCUSA website but submitted solely to the Working Group for the analysis of the CP. For all other confidentiality requirements please contact the secretariat at [DCUSA@electralink.co.uk](mailto:DCUSA@electralink.co.uk) or 0207 7432 3017

**5. Do you have any comments on the definitions that have been used for each item proposed to be contained in the ECR?**

Not at this time

**6. Do you agree with the format chosen by the Working Group for publishing the ECR?**

Yes

**7. Do you agree with the proposal that each DNO and IDNO is to publish a populated version of the common ECR on their individual website? Please provide rationale.**

Yes. The preferred solution is for the information to be all in one place to further enable clarity and ease of access. But we understand this may be difficult and this solution is a good interim solution.

**8. Do you believe that the publication of a national register by a third party in the future would be of most use to all market participants? If so, in what timeframe would you like to see this in place by?**

Yes. The proposal that each DNO and IDNO is to publish a populated version of the common ECR on their individual website will be sufficient for the time being.

A full national register should be complete as soon as practical. A central database is preferable to multiple registers.

**9. Do you agree with the proposal to mandate that the ECR is to be updated on a monthly basis on a set date?**

Yes. A monthly basis should not be burdensome but will ensure that the register is kept sufficiently up-to-date.

**10. Do you believe that the governance arrangements proposed by the Working Group as to how the ECR is populated will lead to DNOs and IDNOs updating it in a consistent manner?**

Energy UK currently has no position on this.

**11. Do you agree with the Working Group's proposed mechanism to deal with future amendments to the structure of the ECR?**

Energy UK currently has no position on this.

**12. Do you believe that the Working Group has sufficiently covered off concerns related to data privacy regulations and potentially commercially sensitive information, specifically given the range of benefits as described in sections 1 and 3? And if not, then what else do you consider that Working Group needs to do?**

Energy UK currently has no position on this.

**13. Do you consider that DCP 350 better facilitates the DCUSA General Objectives? If so, please detail which of the General Objectives you believe are better facilitated and provide supporting reasons. If not, please provide supporting reasons.**

Yes. Energy UK agrees with the proposer's justification that DCP350 will better facilitate DCUSA General Objectives 1, 2 and 3.

In addition to the DCUSA objectives, visibility of ECRs will not only assist DNOs and IDNOs to maintain an economical and efficient network, it will also better allow National Grid ESO to better balance the GB electricity system.

Further, with the ever-changing generation landscape, it will help GB government develop the policy positions to develop the most efficient and economical path to net zero.

**14. Are you supportive of the proposed implementation date being 10 Working Days following Authority approval?**

Yes.

**15. Do you have any comments on the draft legal text for DCP 350?**

No.