

**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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Response <sup>1</sup> :	Non-confidential

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

Yes.

I'm not convinced that creation of a national register would create complexities for sharing the data but do agree that removing "national" from the intent statement will help ensure the base information is published as soon as possible.

**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.

We believe the primary objective of the CP should be to improve data availability to market participants using and connecting to the network and facilitate new initiatives such as trading of capacity.

<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Confidential responses will not be published on the DCUSA website but submitted solely to the Working Group for the analysis of the CP.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

**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.

We would be asking for more information on the network if there were no signs that this could be provided elsewhere. To achieve the principles that underpin this CP market participants need information on **both** the networks and on embedded capacity

We acknowledge that Ofgem and industry is acting elsewhere – for example around the reform to the Long-Term Development Statement (LTDS).

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

No

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

Yes. We agree that the priority should be to get the data published and accessible to users as soon as possible. A national data platform or register should be implemented later.

**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. This model already works, to degree, for other registers such as the SWWR. Links to all the DNO registers should be published in a central location, such as on the "DER Information" page of the ENA website.

**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. Whilst the register is limited to spreadsheet format, there is no reason why a national register could not be published by a third party like the ENA within 12 months. Especially given the work the ENA has already done on the System Wide Resource Register.

**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.

**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?**

Yes

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

Yes

**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?**

Yes mostly – although I was expecting to see a more detailed legal opinion.

**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

- 1) Agree – Positive – better information on assets connected to DNO and IDNO networks will contribute to more efficient operation and better-informed decisions by network operators.
- 2) Agree – Positive – will help provide investors with some of the information they need to connect and operate new generation and demand response. Investors in flexibility still need more transparent network information, which is not part of this change.
- 3) Agree – Positive – for the same reasons given above, contributes to more efficient operation of the network and should help support the connection of more low carbon generation.
- 4) Agree – No impact

- 5) Partially Disagree – Positive - Is likely to indirectly support ESO reporting and system planning requirements under the EU Network Codes and Guidelines required by the Electricity Directive.

**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