



DCUSA DCP 350: Creation of Embedded Capacity Registers

Voting end date: 1 May 2020

DCP REF	WEIGHTED VOTING				
	DNO	IDNO	SUPPLIER	CVA REGISTRANT	GAS SUPPLIER
CHANGE SOLUTION	Accept	Reject	n/a	Accept	n/a
IMPLEMENTATION DATE	Accept	Accept	n/a	Accept	n/a
RECOMMENDATION	<p>Change Solution – Accept.</p> <p>In respect of each Party Category that was eligible to vote, the sum of the Weighted Votes of the Groups in that Party Category which voted to accept the change solution was more than 50% in all Categories.</p> <p>Implementation Date – Accept.</p> <p>In respect of each Party Category that was eligible to vote, the sum of the Weighted Votes of the Groups in that Party Category which voted to accept the implementation date was more than 50% in all Categories.</p>				
PART ONE / PART TWO	Part One – Authority Determination Required				

PARTY	SOLUTION (A / R)	IMPLEMENTATION DATE (A / R)	WHICH DCUSA OBJECTIVE(S) IS BETTER FACILITATED?	COMMENTS
DNO PARTIES				
Electricity North West	Accept	Accept	We believe this change will have a positive impact on competition and provide another source of data for certain Parties, improving information transparency and so will better facilitate General Objective 2. We support data transparency where this has a demonstrated positive consumer benefit.	<p>While we agree with the high-level intent of this change to increase data transparency, we consider alternative approaches should have been further considered and taken forward.</p> <p>Specifically, an alternative modification where the data schema itself is subject to the level of rigour and stakeholder input of a full code modification process is an improvement on the modification as presented here.</p> <p>We also don't think proper consideration has been given to exploring where the costs and benefits will crystallise for providing additional data. This modification will increase costs for Distribution Business customers, including vulnerable customers with benefits accruing to other segments of the energy sector. The Proposer sights the ESO as a key beneficiary of this change, so it would be an improvement on this current modification if the ESO funded DNOs to undertake collecting any data not benefitting DNO customers who will otherwise fund it.</p> <p>We are concerned that this modification duplicates much of the System Wide Resource Register (SWRR data) solution already being provided by DNO's. See</p>

				<p>https://www.enwl.co.uk/get-connected/network-information/system-wide-resource-register/</p> <p>Additionally the Flexr project is being developed https://www.electralink.co.uk/wp-content/uploads/2020/04/Flexr_consultation_21.04.2020.pdf that could potentially improve the sharing of data.</p> <p>So this modification is not co-ordinated with a range of proactive steps we are taking to make data available and therefore this modification could increase overall consumer costs of achieving an aim we support of greater data transparency.</p> <p>We were pleased to see that the legal text doesn't require data to be provided retrospectively. We are therefore reliant upon relevant customers providing data before we can publish it. Additionally, we support the modification acknowledging that we should take the data we receive at face value as it's provided by relevant customers.</p> <p>Therefore, the impact of this change on DCUSA General Objectives 1, 3, 4 and 5 is neutral.</p>
--	--	--	--	--

Northern Powergrid (Northeast) Ltd	Accept	Accept	<p>DCUSA general objective 2 (effective competition) is likely to be better facilitated assuming that industry participants use the data to further support the generation and supply markets.</p> <p>DCUSA general objective 3 (efficient discharge of Distribution Licences) is likely to be better facilitated in respect of anticipated Distribution Licence obligation changes for whole system purposes.</p>	<p>Comment1. We do not agree that DCUSA general objective 1 is necessarily better facilitated by the proposed change as, from Northern Powergrid's perspective, it continues to develop, maintain and operate an efficient, co-ordinated, and economical Distribution System with the data sets already held.</p> <p>Comment 2. The Embedded Capacity Register and the data items for inclusion therein were developed through iterations within working group activity. We ask the DCUSA Panel to require the Secretariat to double-check that the Embedded Capacity Register to be published as Version 1.0 is the correct version i.e. the version that was agreed and supported by the majority of DNOs and IDNOs.</p>
Northern Powergrid (Yorkshire) plc	Accept	Accept		
Southern Electric Power Distribution plc (SEPD)	Reject	Reject	<p>Agree with the Proposer that DCUSA General Objectives 1, 2 and 3 might be better met by this change. However, that is predicated on an assumption that the unresolved matters on costs and implementation are addressed. Some of these are noted in the comments section, below.</p>	<p>Whilst we have voted to reject DCP350 and the proposed implementation date, SSEN does still support the aims of this change and the ECR. However, there are significant hurdles to be cleared before we could implement a useful ECR. Funding the development and management of the ECR suggest that implementation after ED1, when DNOs can seek the inclusion of these costs in the future funding, would be reasonable.</p> <p>In the CR (para 4.51) it's suggested that the current Covid-19 pandemic shows the wider benefits of DCP 350. This may be</p>
Scottish Hydro Electric Power Distribution plc (SHEPD)	Reject	Reject		

				true, if a mature ECR could be referred to. However, as the crisis tests processes and resourcing, introducing such a significant Licence obligation [ECR] on the DNOs at this time seems ill-judged.
Eastern Power Networks	Reject	Reject		We have concerns with the proposed approach that some of the proposed fields (largely relating to Resource and Technology) have not been historically collected, stored or maintained.
London Power Networks	Reject	Reject		
South Eastern Power Networks	Reject	Reject		
Western Power Distribution (East Midlands) plc	Accept	Accept	We agree with the Change Report that this change has appositve effect on General Objectives 1,2 & 3	As per the impact analysis submitted as part of the consultation, we do not believe there is sufficient justification or value to retrospectively populate the new DER type fields. However, the implementation of these fields will be done on reasonable endeavours where we either already hold or have requested the data. We'd also request the list of DER types is double checked to refer to the list agreed by DNOs within the workgroup.
Western Power Distribution (West Midlands) plc	Accept	Accept		
Western Power Distribution (South Wales) plc	Accept	Accept		
Western Power Distribution (South West) plc	Accept	Accept		
IDNO PARTIES				
Leep Electricity Networks Ltd	Reject	Accept	DCUSA General Objectives 1, 2 and 3 are better facilitated by this change	We are accepting of the solution with the exception of publishing the customer's name which we believe should remain private
SUPPLIER PARTIES				
N/A				

CVA REGISTRANTS				
Centrica	Accept	Accept	We agree with the proposer that this change proposal will better facilitate DCUSa objectives 1, 2 and 3 improving transparency and market knowledge therefore enabling the GB electricity market can operate more efficiently which will ultimately benefit customers	
GAS SUPPLIER PARTIES				
N/A				