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The DCUSA Panel  
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30 July 2020

Dear Sir/Madam,

**Northern Powergrid's response to the Embedded Capacity Register Data Item Change Request Notice, published by the DCUSA Secretariat on 16 July 2020**

This response relates to the Proposals detailed in the Embedded Capacity Register (ECR) Data Item Change Request Notice published on 16 July 2020.

Northern Powergrid welcomes the publication of the Embedded Capacity Register as it provides additional transparency relating to the types of equipment connected, and in the process of being connected, to the distribution system.

We recognise that the change Proposal made by the ENA Open Network team described in the Change Request Notice aim to improve the explanations of the data fields and we agree that these are helpful clarifications. We would like to propose some minor changes to these proposed clarifications and also propose further minor clarifications. This Alternative Proposal has been discussed and broadly agreed with other DNOs via the ENA Open Network team. Our Alternative Proposal is included as Appendix 1.

In addition we have a concern that some of the data items in the ECR are very similar, but not the same as some data items currently widely used in other industry codes such as the Grid Code and the Distribution Code. We are of the view that slightly revising some of the data items would reduce the need to collect and record very similar data items yet retain the intent and benefits of the ECR, such slight revisions would improve the efficiency and consistency of data collection. Examples of such data items include the use of the term 'Installed Capacity' rather than 'Registered Capacity' and the options in the list of primary resource types. Northern Powergrid will work with other DNOs via the ENA to refine some of these data items and submit a future request for the DCUSA Panel to consider further amendments to the Agreed Version of the ECR.

Please contact me at the email address above or [alan.creighton@northernpowergrid.com](mailto:alan.creighton@northernpowergrid.com) if you have any questions.

Yours faithfully

*Sent by email*

NORTHERN POWERGRID

is the trading name of Northern Powergrid (Northeast) plc (Registered No: 2906593) and Northern Powergrid (Yorkshire) plc (Registered No: 4112320)

Registered Office: Lloyds Court, 78 Grey Street, Newcastle upon Tyne NE1 6AF. Registered in England and Wales.

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Alan Creighton  
Smart Grid Development Engineer

## Appendix 1 – Alternative Proposal

This table sets out the changes Northern Powergrid propose for the Embedded Capacity Register. ‘Proposal’ related to the change proposed in the Change Request Notice; ‘Alternative Proposal’ relates to Northern Powergrid’s proposal.

ECR Field	Description	Nature of Change	Why Change
MPAN	<p><b>Existing</b> The core meter point administration number, a 13-digit reference used in MPAS to identify the relevant Metering Point.</p> <p><b>Proposal</b> The core meter point administration number, a 13-digit reference used in MPAS to identify the relevant Metering Point. For generation entries, the "Export" MPAN should be included. For storage entries, the "Export" MPAN should also be included. For flexible demands, the "Import" MPAN should be included. Where sites are CVA Registered, no MPAN is included but indicate "CVA Registered" For "Accepted to Connect" generation, please indicate "data not available".</p> <p><b>Alternative Proposal</b> The core meter point administration number, a 13-digit reference used in MPAS to identify the relevant Metering Point. For flexible demand entries, the "Import" MPAN is included. For generation entries, the "Export" MPAN is included. For storage entries, the "Export" MPAN and the "Import" MPAN is included. Where sites are CVA Registered, "CVA Registered" is included rather than a MPAN. For "Accepted to Connect" generation, "data not available" is included.</p>	Expanded explanation of the field, to clarify the requirements for importing and exporting sites.	It is proposed this explanation is updated to clarify which MPANs should be provided and what to include if an MPAN is not available.
Line Address 1	<p><b>Existing</b> Site location.</p> <p><b>Proposal</b> None</p>	Consistency with other field explanations.	Consistency with other field explanations.

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ECR Field	Description	Nature of Change	Why Change
	<b>Alternative Proposal</b> Address line 1 of the Customer Site		
Line Address 2	<b>Existing</b> Site location  <b>Proposal</b> None  <b>Alternative Proposal</b> Address line 2 of the Customer Site	Consistency with other field explanations.	Consistency with other field explanations.
Town/ City	<b>Existing</b> Site location  <b>Proposal</b> None  <b>Alternative Proposal</b> Town / City of the Customer's Site	Consistency with other field explanations.	Consistency with other field explanations.
Town/ City	Change field heading from "Town/ City" to "Town / City" – missing space.	Editorial	Editorial
Country (Proposal)	<b>Existing</b> N/A  <b>Proposal</b> GB country Customer site is connected within.  <b>Alternative Proposal</b> GB country of the Customer Site.	New field.	Recording the country of the Customer's Site.
Location (X-coordinate): Eastings (where data is held)	<b>Existing</b> X coordinates for development site in British National Grid.  <b>Proposal</b> X coordinates for development site in British National Grid.	Expanded explanation of the field, to clarify the requirements.	It is proposed these explanations are updates to clarify the location that the grid reference should refer to using

ECR Field	Description	Nature of Change	Why Change
	<p>For "Accepted to Connect" generation, please include the location of the metering point agreed as part of the connection process as a 6/7 digit Easting. In exceptional cases where the metering point is not located at the DER site (e.g. some off-shore wind sites), please use the co-ordinates of the DER site if this is known.</p> <p><b>Alternative Proposal</b> Six digit British National Grid X coordinate of the Customers Site. Generally this is the same as the Point of Connection / Metering Point. In exceptional cases where the Point of Connection or Metering Point is not located at the Customer Site, the coordinates of the Customer Site is included.</p>		terms consistent with those used in the ECR e.g. Point of Connection and Customer Site.
Location (y-coordinate): Northings (where data is held)	<p><b>Existing</b> Y coordinates for development site in British National Grid.</p> <p><b>Proposal</b> Y coordinates for development site in British National Grid. For "Accepted to Connect" generation, please include the location of the metering point agreed as part of the connection process as a 6/7 digit Easting. In exceptional cases where the metering point is not located at the DER site (e.g. some off-shore wind sites), please use the co-ordinates of the DER site if this is known.</p> <p><b>Alternative Proposal</b> Six digit British National Grid Y coordinate of the Customers Site. Generally this is the same as the Point of Connection / Metering Point. In exceptional cases where the Point of Connection or Metering Point is not located at the Customer Site, the coordinates of the Customer Site is included.</p>	Expanded explanation of the field, to clarify the requirements.	It is proposed these explanations are updates to clarify the location that the grid reference should refer to using terms consistent with those used in the ECR e.g. Point of Connection and Customer Site.
Location (Y-coordinate): Northings (where data is held)	Change field heading from "Location (y-coordinate): Northings (where data is held)" to "Location (Y-coordinate): Northings (where data is held)" – i.e. capital 'y'.	Editorial.	Editorial.
Grid Supply Point	<p><b>Existing</b> The point of delivery from the transmission system to a distribution system that is linked with the Customer Site.</p> <p><b>Proposal</b></p>	Clarification, with the focus on the connectivity between transmission and distribution systems.	Clarification.

ECR Field	Description	Nature of Change	Why Change
	<p>None.</p> <p><b>Alternative Proposal</b> The point of connection between the transmission system and the distribution system that is linked with the Customer Site.</p>		
Bulk Supply Point	<p><b>Existing</b> The supply point on the DNO system (representing an EHV/EHV transformation level) linked with the Customer Site.</p> <p><b>Proposal</b> None.</p> <p><b>Alternative Proposal</b> The supply point on the distribution system (representing an EHV/EHV transformation level) linked with the Customer Site.</p>	The Alternative Proposal is consistent in the use of distribution system, rather than 'distribution network' and 'DNO system'.	Consistent in the use of distribution system.
Primary	<p><b>Existing</b> The relevant primary substation on the DNO system linked with the Customer Site.</p> <p><b>Proposal</b> None.</p> <p><b>Alternative Proposal</b> The primary substation on the distribution system linked with the Customer Site.</p>	The Alternative Proposal is consistent in the use of distribution system, rather than 'distribution network' and 'DNO system'. Removal of the word 'relevant' to be consistent with explanations of Grid Supply Point and Bulk Supply Point.	Consistent in the use of terminology.
Point of Connection (POC) (Proposal)	<p><b>Existing</b> N/A</p> <p><b>Proposal</b> This is the voltage at the Point of Connection to the distribution network.</p> <p><b>Alternative Proposal</b> The voltage at the Point of Connection to the distribution system.</p>	The Proposal is to add this as a new data item. The Alternative Proposal is consistent in the use of distribution system, rather than 'distribution network' and 'DNO system'.	This additional item is proposed based on feedback to the SWRR and is consistent with other field explanations.

ECR Field	Description	Nature of Change	Why Change
CHP Cogeneration	<p><b>Existing</b> The simultaneous generation of usable heat and power (usually electricity) in a single process, thereby leading to reductions in the amount of wasted heat.</p> <p><b>Proposal</b> None</p> <p><b>Alternative Proposal</b> Change heading to "CHP Cogeneration (Yes/No)" Change explanation to "Indicates whether the generation in the Customers Site forms part of a CHP scheme".</p>	The existing explanation describes a CHP scheme; the ECR requirement is to record whether such a scheme forms part of the Customers Installation.	The existing explanation describes a CHP scheme; the ECR requirement is to record whether such a scheme forms part of the Customers Installation.
Primary Resource Type - Installed Capacity (MW)	<p><b>Existing</b> This is the installed capacity of the "Primary Resource Type" expressed in MM.</p> <p><b>Proposal</b> None</p> <p><b>Alternative Proposal</b> This is the installed capacity of the "Primary Resource Type" expressed in MW.</p>	Editorial correction of MM to MW.	Editorial correction of MM to MW.
ANM connection	<p><b>Existing</b> Is the connection contingent on an Active Network Management (ANM) arrangement (including timed connection).</p> <p><b>Proposal</b> Is the connection contingent on a flexible connection arrangement during system normal operating conditions such as Active Network Management (ANM)?</p> <p><b>Alternative Proposal</b> Indicates whether the connection is subject to a flexible connection arrangement e.g. Active Network Management (ANM) during system normal conditions. Change field header to "Flexible Connection [Yes/No]"</p>	Revised name and explanation of the field.	The field in the current ECR is used to indicate whether the DER is an ANM connection. The Proposal allows all flexible connection arrangements to be indicated. The Alternative Proposal clarifies this requirement.
Last Updated	<p><b>Existing</b> Date on which item was last updated in the register.</p> <p><b>Proposal</b></p>	Clarification that this relates to the date on which any field in the entry was last updated.	Clarification that this relates to the date on which any field in the entry was last updated.

ECR Field	Description	Nature of Change	Why Change
	<p>None</p> <p><b>Alternative Proposal</b> Date on which entry was last updated.</p>	This field may be best positioned as the first or last field.	
Date Connected	<p><b>Existing</b> Date Project connected to the network.</p> <p><b>Proposal</b> None.</p> <p><b>Alternative Proposal</b> Date the connection is provided in the case of a new connection or date the new equipment is connected in the case of an existing connection.</p>	Clarification that the date relates to the date of connection rather than energisation or commissioning.	Clarification that the date relates to the date of connection rather than energisation or commissioning.
Accepted to Connect Generation Capacity (MVA):	<p><b>Existing</b> This is the total additional generation that is accepted to connect at the site expressed in MVA.</p> <p><b>Proposal</b> None.</p> <p><b>Alternative Proposal</b> This is the generation that is not already connected, but has been Accepted to Connect, expressed in MVA.</p>	The use of the word 'additional' is misleading as the field also applies to new customer site where there is no existing generation.	Clarification of field explanation.
Export Capacity (MW)	<p><b>Existing</b> This is the total additional MW export capacity permitted as per the connection agreement.</p> <p><b>Proposal</b> None.</p> <p><b>Alternative Proposal</b> This is the permitted export from generation that is not already connected, but has been Accepted to Connect, expressed in MW as per the connection agreement.</p>	The use of the word 'additional' is misleading as the field also applies to new customer site where there is no existing generation.	Clarification of field explanation.



ECR Field	Description	Nature of Change	Why Change
Export Capacity (MW)	<b>Change</b> “Export Capacity (MW)” to “Export Capacity (MW)” –add closing bracket	Editorial.	Editorial.
Export Capacity (MVA)	<p><b>Existing</b> This is the total additional MVA export capacity permitted as per the connection agreement.</p> <p><b>Proposal</b> None.</p> <p><b>Alternative Proposal</b> This is the permitted export from generation that is not already connected, but has been Accepted to Connect, expressed in MVA as per the connection agreement.</p>	The use of the word ‘additional’ is misleading as the field also applies to new customer site where there is no existing generation.	Clarification of field explanation.
Import Capacity (MW)	<p><b>Existing</b> This is the total additional MW import capacity permitted as per the connection agreement.</p> <p><b>Proposal</b> None</p> <p><b>Alternative Proposal</b> This is the permitted import arising from equipment that is not already connected, but has been Accepted to Connect, expressed in MW as per the connection agreement.</p>	The use of the word ‘additional’ is misleading as the field also applies to new customer site where there is no existing generation.	Clarification of field explanation.
Import Capacity (MVA)	<p><b>Existing</b> This is the total additional MVA import capacity permitted as per the connection agreement.</p> <p><b>Proposal</b> None</p> <p><b>Alternative Proposal</b> This is the permitted import arising from equipment that is not already connected, but has been Accepted to Connect, expressed in MVA as per the</p>	The use of the word ‘additional’ is misleading as the field also applies to new customer site where there is no existing generation.	Clarification of field explanation.

ECR Field	Description	Nature of Change	Why Change
	connection agreement.		
Date Accepted	<p><b>Existing</b> Date customer contracted with GBSO/DNO/IDNO.</p> <p><b>Proposal</b> None</p> <p><b>Alternative Proposal</b> Date the Customer accepts the connection offer from the DNO/IDNO.</p>	Clarification. DCUSA relates to connections with distribution rather than transmission system operators.	Consistency with DCUSA scope.
Field Tag	<p><b>Existing</b></p> <p><b>Proposal</b> Remove field completely</p> <p><b>Alternative Proposal</b> None</p>	Remove field.	It is proposed that this item is removed as it does not add any value.
Distribution Service Provider (Y/N)	<p><b>Existing</b> Does the resource provide services to a DNO?</p> <p><b>Proposal</b> None</p> <p><b>Alternative Proposal</b> Indicates whether a service is provided to the DNO.</p>	Re-phrasing the explanation to be customer facing rather than providing guidance for populating the register.	To be more customer focussed.
Transmission Service Provider (Y/N)	<p><b>Existing</b> Does the resource provide services to the ESO or a TO.</p> <p><b>Proposal</b> None.</p> <p><b>Alternative Proposal</b> Indicates whether a service is provided to the ESO or a TO.</p>	Re-phrasing the explanation to be customer facing rather than providing guidance for populating the register.	To be more customer focussed.

ECR Field	Description	Nature of Change	Why Change
Reference	<p><b>Existing</b> A unique reference to link to the Providing Services tab.</p> <p><b>Proposal</b> None.</p> <p><b>Alternative Proposal</b> Unique reference to the service provided by the Service Provider.</p>	There is no 'Providing Services' tab.	Avoid referencing a tab not included in the ECR.
<p>Connection Queue Management Position (Existing)</p> <p>In a Connection Queue (Y/N) (Proposal)</p>	<p><b>Existing</b> Queue position of customer in relation to the linked reinforcement works.</p> <p><b>Proposal</b> This field indicates whether the "Accepted to Connect" resource is part of a connection queue.</p> <p><b>Alternative Proposal</b> Indicates whether the "Accepted to Connect" equipment is in a connection queue.</p>	Revised name and explanation for the field.	This field currently used is to indicate the Connection Queue Management Position. As the actual queue position will change frequently, the Proposal is to capture whether the "Accepted to Connect" DER is in a Connection Queue. The Alternative Proposal is to refer to the equipment at a Customer Site rather than the resource.