DCP 328 Working Group Meeting 22

16 March 2021 at 10:00 - Web-Conference

Attendee	Company
Working Group Members	
Edda Dirks [ED]	SSE plc
Donna Tonsend [DT]	Energy Assets
Thomas Cadge [TC]	BUUK
Lee Wells [LW]	NPg
Kara Burke [KB]	NPg
Dave Wornell [DW]	WPD
Donal Preston [DP]	SSEN
Lee Stone [LS]	E.ON
Will Ellis [WE]	Leep Utilities
David Fewings [DF]	Inenco
Chris Ong [CO]	UKPN
Shannon Murray [SM]	Ofgem
Code Administrator	
John Lawton [JL] (Chair)	ElectraLink
Richard Colwill [RJC] (Technical Secretariat)	ElectraLink
Apologies	
Peter Waymont [PW]	UKPN
Julia Haughey [JH]	EDF
Tom Chevalier [TC]	Power Data Associates
Kathryn Evans [KE]	SPEN

Derek McGlashan [DM]	Forth Ports

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 Laws Guidance for the duration of the meeting.

1.3 The Working Group approved the minutes of the previous meeting as an accurate record.

1.4 An update on the actions can be found in Appendix 1.

2. Purpose of the Meeting

2.1 The Chair set out that the purpose of the meeting was to review and agree the modelling legal text and specification documentation.

3. DCP 328 Modelling Questions

3.1 The Working Group reviewed some comments that had been received from the modellers. Key points from these discussions are detailed below:

- **EDCM Inputs:** The modelling service providers had informed that the dummy values they have used in the past would not be suitable for doing a formal impact assessment. They asked whether the Working Group would be able to share a set of anonymised inputs for the 2022/23 EDCM (LRIC and FCP), including LDNO inputs. After discussion, it was agreed that the DNOs would carry out this assessment themselves and therefore would just require the updated EDCM models from the service providers.

- The Secretariat took an action to update the modelling service providers and request that the modelling work commence. **Post meeting note:** This action has been completed.

- DNO members took an action to determine the approach to EDCM customers for the impact assessment to ensure a consistent approach across all DNOs.

ACTION 22/01: DNOs to determine the approach to EDCM customers for the impact assessment to ensure a consistent approach across all DNOs.

4. Metering Data Legal Text

4.1 The Working Group briefly discussed some alternative proposals that had been raised regarding the calculation of metering data for the differencing metering solution. The proposals are as below:

- Add the sum of the settlement metering data received for MPANs contained within the Licensed Exempt network, rather than creating a pseudo MPAN in order to collect the gross metering data.

- The potential use of LLFCs of in preference to MTCs

4.2 One member raised an issue that Durabill has limitations around not being able to have multi-suppliers on a site. This would need to be considered to determine whether there are any constraints and costs involved.

4.3 After discussion, an action was taken for the Secretariat to engage further with PW and TC and provide some suggested alternative legal text. This will be circulated prior to the next meeting.

ACTION 22/02: Secretariat to provide some alternative metering data legal text regarding differencing metering solution for Working Group review.

5. Licence Exepmt System Rebate Scheme - Legal Text

5.1 JL took an action from the last meeting to draft some legal text setting out the process for providers of Licence Exempt Systems to claim a rebate where the connections within each Licence Exempt System are either Fully Settled or have a Shared Metering arrangement. The proposed legal text can be found below:

A new section to be added to Schedule 16

Part 5 — Licence Exempt System rebate scheme

185. This Part 5 sets out the process for providers of Licence Exempt Systems to claim a rebate where the connections within each Licence Exempt System are either Fully Settled or have a Shared Metering arrangement.

186. The rebate comes into effect on [01 April 2022] and is calculated in accordance with either Paragraph 88E (for NHH settled or HH Aggregate settled users) or Paragraph 88F (for HH Site Specific settled users) of this schedule.

187. For a rebate to be granted, the provider of each Licence Exempt System must contact the Distribution Business and provide sufficient evidence that they meet the criteria of a Fully Settled or Shared Metering arrangements. For the avoidance of doubt there is no rebate available for Difference Metering arrangements associated with a Licence Exempt System.

188. Unless otherwise agreed with the Distribution Business, the rebate will be calculated on an annual basis (1st April - 31st March) and payments made shortly after the end of each year.

5.2 After review, the Working Group confirmed that they were happy with the proposed additional legal text.

5.3 The Working Group discussed whether there should be any inclusion of the rebate scheme in the NTC and it was agreed that it should be added as a question within the consultation document.

6. Consideration of other Change Proposals

6.1 In Ofgem's final decision on DCP 359, published on 30th September 2020, Ofgem outlined the following:

"Under DCP359, customers connected to complex sites and private wires that currently receive a residual charge will continue to do so. DCP328 focuses on private networks; if the proposed solution for DCP328 does not apply to complex sites (that are not part of private networks), we would expect a party to propose a modification to address residual charging for such complex sites. For the avoidance of doubt, nothing in this letter in any way fetters our discretion with respect to DCP328".

6.2 At a previous meeting it was agreed that complex sites connected to a DNO would not be catered for in this CP and therefore a new CP would need to be raised to address this.

6.3 It was noted that consideration was required as to whether there are any changes needed to the TCR definitions to cater for complex sites within the private networks that this change also needs to cater for.

6.4 It was also noted that CMP363 & CMP364: TNUoS Demand Residual charges for transmission connected sites with a mix of Final and non-Final Demand has been raised by NGESO to clarify the TNUoS Demand Residual charging arrangements for transmission connected sites that have a mix of Final and non-Final Demand in the CUSC.

6.5 It is important that DCP 328, the new DCUSA CP looking at complex sites connected to a DNO and the CUSC changes align so that there is not a risk of one or more being rejected by the Authority if the outcomes are different.

6.6 The Secretariat took an action to review all three changes and provide a summary document for review at the next meeting and determination of the best approach to ensure all three modifications align.

Post meeting note

6.7 Attachment 1 provides some Initial thoughts on complex sites and private wires and the issues the other change proposal may have on this CP. The Working Group is asked to review this ahead of the next meeting.

7. Review of Second Consultation Document

7.1 The Working Group reviewed the second consultation document that was circulated prior to the meeting. The latest version can be found in Attachment 2. Key points to those discussions are below:

- Text will be required to articulate the Working Groups views on complex sites and how this CP will align with other CPs.
- Section 3.13 of the consultation document details various issues regarding UoS charging that were raised in the original CP. An action was taken to review these and determine if they are still up-to-date and if so, we will need to articulate within the consultation document how these have been addressed.
- Once we have fully agreed the solutions, we will need to review the "How" paragraphs in Section 1 to ensure the summary is accurate.
- A section is needed to articulate the alternative proposals that have been raised regarding the calculation of metering data for the differencing metering solution.
- The Working Group view is that the rebate will be calculated on an annual basis (1st April - 31st March) and payments made shortly after the end of each year, unless otherwise agreed. There will be a consultation question on this approach.
- Implementation section will need to articulate the need for a derogation.

ACTION 21/03: Secretariat to update consultation document based on discussions and circulate prior to next meeting.

8. DCP 328 Work Plan

8.1 An updated work plan can be found in Attachment 3.

9. Any Other Business

9.1 There were no other items raised.

10. Date of Next Meeting

10.1 The date of the next meeting was confirmed for **Monday, 29 March 2021, starting at 10am.**

11. Attachments

- Attachment 1: Complex Sites and Private Wires
- Attachment 2: DCP 328 Draft Consultation Document
- Attachment 3: DCP 328 Work Plan

DCUSA

New and open actions

Action Ref.	Action	Owner	Update
01/01	ElectraLink to consider approaches to ensure appropriate engagement with private network operators.	ElectraLink	Ongoing and considered at each meeting or consultation circulation
18/01	The Working Group to consider whether Clause 29.5A and 29.5B are required and confirm their preferred approach.	All	It was agreed that this decision can be discussed whilst the modelling work is being completed and therefore will be considered later.
18/05	The Working Group to consider the questions posed in 3.13 (meeting minutes 18) ahead of discussions at the next meeting.	All	Ongoing review
21/01	Working Group to review the questions posed by the modelling service providers and provide feedback by Tuesday, 9 March.	All	Ongoing
21/02	Secretariat to update the draft consultation document ahead of the next meeting.	ElectraLink	Ongoing
21/03	Produce draft legal text to include an additional section in Schedule 16 to cover off the rebate process.	JL	Ongoing
21/04	To review the NTC to see if any text could be introduced regarding the rebate process.	JL	Ongoing
22/01	DNOs to determine the approach to EDCM customers for the impact assessment to ensure a consistent approach across all DNOs.	DNOs	

22/02	Secretariat to provide some alternative metering data legal text regarding differencing metering solution for Working Group review.	ElectraLink	
22/03	Secretariat to update consultation document based on discussions and circulate prior to next meeting.	ElectraLink	

Closed actions

Action Ref.	Action	Owner	Update
17/01	The Secretariat to keep the DCP 328 Working Group up-to-date on the progress of DCPs 358-361 so that if this CP is reconvened appropriate decisions can be made to progress the solution.	ElectraLink	Completed
18/02	The Secretariat to consider the Faster Switching Programme and any impacts this may have on the current draft legal text.	ElectraLink	Completed
18/03	Update the draft legal text to be reflected against the latest approved and yet to be implemented legal text for 16,17 and 18 to be introduced in April 2022	ElectraLink	Completed
18/04	The Working Group to consider options for residual charges for fully settled metering solution and consider whether there is a mechanism needed to deal with surplus residual ahead of the next meeting.	All	Closed
19/02	The Working Group to review the updated legal text in Attachment 1 and 2 and provide comments by Friday, 6th February.	All	Completed
19/03	Secretariat to invite the modelling service providers to the next meeting.	ElectraLink	Completed
19/01	Based on suggested amendments to Schedule 16 in Paragraph 3.6 does the diagram in paragraph 3.7 need amending?	All	Completed

20/01	Working Group to review the draft legal text within Attachments 1 and 2 and provide feedback by Friday, 19th February.	All	Completed
20/02	Working Group to consider the modelling impact assessment volumes so that this can be articulated in the modelling documentation.	All	Completed