

DCP 375 Working Group Meeting 01

30 November 2020 at 2pm

Teleconference

Attendee	Company
Working Group Members	
Donna Townsend	Energy Assets
Tom Chevalier	Power Data Associates
Nigel Birchley	Power Data Associates
Ryan Parker	Western Power Distribution
Peter Waymont	UK Power Networks
Observer	
Saskia Barker	Ofgem
Code Administrator	
Dylan Townsend [DT] (Chair)	ElectraLink
John Lawton [JL]	ElectraLink
Natasha Voysey [NV] (Technical Secretary)	ElectraLink

1. Administration

- 1.1 The Chair welcomed the members to the meeting.
- 1.2 The Working Group reviewed the “Terms of Reference”. All Working Group members agreed to be bound by the Terms of Reference for the duration of the development of DCP 375.
- 1.3 The Working Group reviewed the “Competition Law Guidance”. All Working Group members agreed to be bound by the Competition Law Guidance for the duration of the meeting.

2. Purpose of the Meeting

- 2.1 The Chair set out that the main purpose of the meeting was to review the change and discuss any initial thoughts/views on it and discuss next steps under the DCP 375 Working Group and to amend the National Terms of Connection (NTC) relating to unmetered supplies by generalising the language used, especially those relating to terms used within the Balancing & Settlement Code (BSC) as well as to clean up redundant clauses.

3. Background of DCP 375

- 3.1 The Chair asked the proposer TC to provide a background of DCP 375 to the Working Group.
- 3.2 TC provided the Working Group with an overview of the purpose of DCP 375, starting with confirming that DCP 375 is a result of the Code Change and Development Group (CCDG) set up as part of the Market-Wide Half Hourly Settlement (MHHS) programme of work, who identified several areas related to Section 4 of the NTC which could become incompatible when MHHS is implemented. It was noted that this review was part of a larger piece of work being undertaken by the CCDG to review impacted industry codes and identify any consequential changes in order to properly implement MHHS.
- 3.3 TC confirmed that this change is not being treated as one that is formally driven by the MHHS programme of work but as a business-as-usual change and so should not be considered as part of the SCR. It was noted that the ability to sit outside the scope of the SCR is somewhat dependent on development of the Change Proposal being contained within the next 6-9 months, as this is when it is expected that Ofgem will initiate more formal control of the required changes to implement MHHS.
- 3.4 JL added that care should be taken so the amendments to the text that result from this Change Proposal are future-proofed against the changes that are expected to be brought in by the SCR. It was also noted that the redlined text and draft Change Proposal was taken to the Unmetered Supplies User Group (UMSUG) which, although being more of an informal way to gather feedback, most distributors do attend the meeting and no feedback was received at the time.

4. Discussion/Review of Change Proposal 375

- 4.1 The Working Group agreed that it would be prudent to review each of the proposed amendments in the draft legal text that was attached to the Change Proposal. It was noted that this review would flush out any potential issues or points for further discussion as some members flagged potential concerns with some of the proposed amendments.
- 4.2 The review encompassed the following areas within Section 4 of Schedule 2B:
 - 1. Definitions & Interpretation;
 - 3. The Customer's Right to be (and Remain) Connected;
 - 4. The Customer's Right to be (and Remain) Energised;
 - 7. Information;
 - 10. Plant and Apparatus; and
 - 26. Governing Law and Jurisdiction.
- 4.3 During this review, the Working Groups views and comments on the proposed amendments were captured in the draft legal text document, which acts as Attachment 1 to these minutes.
- 4.4 A number of actions were recorded during the meeting and these are set out below in the paragraphs below.

- 4.5 The Working Group discussed the Proposers suggestion that Clause 3.3 and 3.4 of Section 4 of the NTCs appear to be almost duplicates of each other, with the main difference between the two being that Clause 3.3 refers to ‘a particular Item (or a particular type of Item)’ whereas 3.4 refers to ‘a particular piece or type of equipment, appliance or device’. The Working Group agreed with this assessment, and note that the term ‘Item’ means each piece of equipment, appliance or device to which a Charge Code applies under the Unmetered Supplies Procedure and which forms part of the Customer’s Installation and as such, they are effectively saying the same thing. The Working Group thought it would be beneficial to understand how this duplication came about (i.e. whether it was the result of a previous CP or if it had been included from the beginning) and the Secretariat took action to investigate.

ACTION: 01/01 – ElectraLink to investigate the inclusion of Clauses 3.3 and 3.4 in Section 4 of the NTCs to confirm how duplication came about

POST MEETING NOTE: The Secretariat notes that upon reviewing the legal text of DCP 033 ‘Connection Terms’ which introduced Section 4, it was found that it was indeed this CP that introduced Clauses 3.3 and 3.4 and that they have remained unchanged since implementation.

- 4.6 Members discussed the proposed deletion of Clauses 7.5 & 7.6, and noted the Proposers assertion that these can be deleted as the requirements are already covered by the BSC Procedure titled ‘Unmetered Supplies Registered in SMRS’ (BSCP520), with the exception of a reference in the text related to distributors making a charge for provision of a summary inventory to the customer, however it is believed this never occurs.
- 4.7 Similarly, the amendments made to Clause 7.14 (now 7.10) were noted as being to remove the distinction between NHH & HH trading and in doing so the text was rationalised to refer to the Unmetered Supplies Procedure for the specified requirements.
- 4.8 The Working Group believed it would be useful to find the relevant references contained in BSCP520 and the Secretariat took action to locate the relevant references. NB also took an action to assist the Secretariat in describing the correct processes referenced in Section 4 and contained in BSCP520.

ACTION: 01/02 – ElectraLink to find the processes referenced in Clauses 7.5 & 7.6 within BSCP520 and ensure this is included in the draft consultation document.

ACTION: 01/03 – NB to assist the Secretariat in describing the correct processes referenced in Section 4 and contained in BSCP520.

POST MEETING NOTE: Believe correct reference to be in: [BSCP520 Unmetered Supplies Registered in SMRS](#) in the table under paragraph 3.2 ‘Amendment to Inventory’

- 4.9 The Working Group identified a number of items for which they agreed that a specific consultation question should be included within a draft consultation document and the Secretariat took action to include questions for the items specified by the Working Group in their first draft of the consultation document.

ACTION: 01/04 – ElectraLink to ensure that any items flagged in the draft legal text as requiring a specific consultation question are included in the first draft of the consultation document.

5. Next Steps and Work Plan

5.1 The Working Group reviewed and updated the Work Plan and in doing so agreed the next steps. The updated Work Plan acts as Attachment 2 to the minutes and a summary of the next steps is below:

- ElectraLink to draft consultation document based on Working Group discussion during meeting and circulate to Working Group for review. In doing so the Secretariat should ensure that it is drafted in way that is easy to understand, using plain English where possible;
- Working Group to review the consultation document and submit comments to ElectraLink via email;
- ElectraLink updates consultation document and circulates to group for final sign off;
- Working Group to review the consultation document and submit any final comments to ElectraLink; and
- ElectraLink updates consultation document based on final comments received and issues consultation document for a period of four weeks.

ACTION: 01/05 – ElectraLink to complete first draft of consultation document based on Working Group discussion during meeting and circulate to Working Group for review. In doing so the Secretariat should ensure that it is drafted in way that is easy to understand, using plain English where possible.

5.2 Members also discussed who the target audience was for the consultation, agreeing that it is likely to be wider than just Parties to the DCUSA and therefore the Secretariat and Working Group members took the collective action to consider who the consultation should be issued to and how best to ensure it reaches them.

ACTION: 01/06 – Working Group members and ElectraLink to consider who the consultation should be issued to and how best to ensure it reaches them.

6. Any Other Business

6.1 There were no items of AOB, and the Chair closed the meeting.

APPENDIX 1: Actions Log

New and Open Actions

Ref.	Action	Owner	Update
01/01	ElectraLink to investigate the inclusion of Clauses 3.3 and 3.4 in Section 4 of the NTCs to confirm how duplication came about	ElectraLink	
01/02	ElectraLink to find the processes referenced in Clauses 7.5 & 7.6 within BSCP520 and ensure this is included in the draft consultation document.	ElectraLink	
01/03	NB to assist the Secretariat in describing the correct processes referenced in Section 4 and contained in BSCP520.	Nigel Birchley	
01/04	ElectraLink to ensure that any items flagged in the draft legal text as requiring a specific consultation question are included in the first draft of the consultation document.	ElectraLink	
01/05	ElectraLink to complete first draft of consultation document based on Working Group discussion during meeting and circulate to Working Group for review. In doing so the Secretariat should ensure that it is drafted in way that is easy to understand, using plain English where possible.	ElectraLink	
01/06	Working Group members and ElectraLink to consider who the consultation should be issued to and how best to ensure it reaches them.	Working Group members / ElectraLink	