Subject: RE: DCP 384 Charging of Third Party DNO Works to Transmission Connected Users [OFFICIAL]

From: Nadir Hafeez <Nadir.Hafeez@ofgem.gov.uk>
Sent: 12 April 2021 15:14
To: Angelo Fitzhenry <angelo.fitzhenry@electralink.co.uk>
Cc: DCUSA <DCUSA@electralink.co.uk>
Subject: RE: DCP 384 Charging of Third Party DNO Works to Transmission Connected Users [OFFICIAL]

Hi Angelo,

We consider that DCP384 is within the scope of our current Access & Forward Looking Charging SCR. This change proposal looks to implement a set of charging arrangements that are currently under review through our SCR. The following points and questions may help to explain how we have come to this view:

- DCP384 proposal says the cost of the work will be apportioned in accordance with the CCCM.
- The apportionment rules in the CCCM could fundamentally change (or be removed completely) as a result of our SCR.
- Even if some DNOs are currently doing this, would they continue this practice post-SCR?
- Would the rules in the CCCM post-SCR still be an appropriate method of dealing with these costs?

We also have some concerns around implementation. DCP384 proposes implementation to be set as no more than one month after our decision – but the change proposal also identifies close linkage with CMP328, which (if approved) would be implemented *12 months* after our decision. So there could be a situation where a) funding arrangements for a process are in place one year before a process exists (assuming it's approved), or b) something comes into place late 2022, then needs to be reviewed post-SCR in 2023.

Please share the above with the proposer of DCP384 and then let us know how you wish to proceed. I understand that there is provision in DCUSA setting out how to deal with new change proposals that fall within scope of an open SCR.

I look forward to your reply in due course.

Regards, Nadir

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