DCP 328 Working Group Meeting 28

11 August 2021 at 10:00 - Web-Conference

Attendee	Company
Working Group Members	
Edda Dirks [ED]	SSE plc
David Fewings [DF]	Inenco
Thomas Cadge [TC]	BUUK
Kara Burke [KB]	NPg
Shannon Murray [SM]	Ofgem
Will Ellis [WE]	Leep Utilities
Tom Chevalier [TC]]	Power Data Associates
Derek McGlashan [DM]	Forth Ports
Code Administrator	
Angelo Fitzhenry [AF] (Chair)	ElectraLink
Dylan Townsend [DT] (Technical Secretariat)	ElectraLink
Apologies	
Chris Ong [CO]	UKPN
Lee Stone [LS]	
Donald Preston [DP]	SSEN

1. Administration

1.1 The Secretariat noted the welcome and apologies for this meeting.

1.2 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.

1.3 The Working Group reviewed the minutes from the last meeting and agreed that the minutes were an accurate reflection of the discussions held.

1.4 The Working Group noted the items on the actions list from the last meeting. Updates on all actions are provided in Appendix A.

2. Purpose of the Meeting

2.1 The Chair set out that the purpose of the meeting was to continue to review the responses to the consultation that the Working Group had issued on 04 June 2021.

3. Review of collated consultation responses

3.1 During the review of the consultation responses the following key points were noted:

Question 1:

3.2 This question was seeking views on whether respondents agree with the Working Group to bill the Primary supplier based on gross metered data from the boundary settlement meter for shared metering arrangements in preference to each supplier based on the fully settled solutions suggested in the first consultation.

3.3 A majority of the respondents were supportive of the Working Group proposed approach to bill the Primary supplier based on gross metered data from the boundary settlement meter for shared metering arrangements in preference to each supplier based on the fully settled solutions suggested in the first consultation. It was noted that this CP is based on the current version of DCUSA and therefore any existing sandbox application is out of scope i.e. the Balancing & Settlement Code (BSC) Sandbox identified by one of the respondents. However, any future implemented changes will be taken into consideration as appropriate. An action was taken to consider further a concern raised that historically Data Collector (DC)s were unable to provide this data and the potential impact the Market-wide Half Hourly Settelments has on the DCs providing the data.

ACTION 28/01: Billing the Primary supplier based on gross metered data from the boundary settlement meter. Concern raised that historically DCs were unable to provide this data. Secretariat to explore concerns further.

Question 2 to 8

3.4 Questions 2 to 8 were reviewed at the previous meeting, however a quick run through of the responses drew out the following points:

- Question 2: it was noted that there was a concern raised with respect to Option 2 as there isn't a flag at present to identify private networks. Through the difference metering arrangements with BSC the relationship between the supplier, supplier agents, the distributor and the relevant MPANs should be known.

- Question 3: Secretariat to seek further information in relation to ENWL concern below:

  - *"Any solution that alters the overall charge to a PNO in comparison with an equivalent customer with a single meter is not acceptable. Furthermore, Solution A appears to create a difference in the structure of charges (and potentially the actual PNO customer bill) for fully settled metering arrangements between the CDCM and EDCM, which could lead to distortions in competition or changes in customer behaviour".*

  It was agreed by the Working Group to seek further information to understand their concern.

ACTION 28/02: Secretariat to seek further information in relation to ENWL concern raised in question 3 of consultation.

- Question 3: In relation to a point regarding whether an obligation was created on the DNO to procure the necessary input data (i.e. MICs) for modelling; or on the PNO or their customer to provide it to the DNO, it was noted that it would be expected that the DNO would have all the relevant information but if they did not then they should seek it from the relevant party.

- Question 4: Rebate solution – a request regarding a dispute process should be considered if this is the preferred solution.

- Question 5: Customers that export within the PNO Network: The rationale for no negative rebate will be captured in the change report.

- Question 8: ENWL consultation response:

  "Aggregate DUoS charges should be identical under all scenarios including no competition in supply or a single site/customer. We do not believe this would be achieved by the tariff solution for fully settled metering installations.

  As part of the role of the private network owner, and to enable competition, we suggest PNOs could be asked to identify which customers are on their networks and industry processes could then be put in to place to create pseudo boundary meter data that could be used to bill an appointed supplier DUoS. The benefit of this solution is that it ensures that the DUoS charges to the DNO are the same under all metering arrangements".

An action was taken to seek further information from ENWL, for example, how would this work? How would an appointed Supplier be selected e.g. on a high rise block of flat?

Question 9:

3.5 This question was seeking views on whether respondents preferred solution A or Solution B. The outcome is summarised below:

- Solution A – 2
- Solution B 5
- Not supportive – 2
- No preference – 2
- No response – 1

Question 10:

3.6 This question was seeking views on whether respondents agree with the approach to consider complex site based on the definitions agreed in DCP359.

3.7 The majority of respondents agree with the approach to consider Complex Sites based on the definitions agreed in DCP359.

3.8 The Working Group noted the comment regarding DCP 388 and the potential for Complex Site definition to change and the Working Group will respond within the Change Report.

Question 11:

3.9 This question was seeking views on whether respondents agree with the proposed methodology for calculating residual charges.

3.10 It was noted that the residual charge at the boundary is unknown with regard to fully settled sites with CDCM arrangements. The approach adopted by the Working Group is to pro-rata the residual charge in the same proportion of that of the forward-looking charge.

3.11 The majority of the respondents agreed with the proposed methodology for calculating residual charges. It was noted that the preference of one respondent would be to introduce an IDNO PDCM equivalent arrangement.

Question 12:

3.12 This question was seeking views on whether respondents believed there are any unintended consequences associated with either solution with consideration given to any impact on Independent Distribution Network Operators.

3.13 An action was taken to review the impact assessments to determine whether appropriate consideration was given in regard to impact on LDNO tariffs.

ACTION 28/03: Review the impact assessments to determine whether appropriate consideration was given in regard to impact on LDNO tariffs.

3.14 There was a comment in the consultation stating that it is unclear from the legal text what tariff will be applied to an IDNO where an end customer is connected to the DNO via both an IDNO and private network. An action was taken to review the tariffs to see if there are any impacts.

ACTION 28/04: Review the impact assessments to determine whether there are any impacts where an end customer is connected to the DNO via both an IDNO and private network.

3.15 The collated consultation responses, along with Working Group comments can be found in Attachment 1.

3.16 It was noted that there are quite a few considerations coming out of the consultation for the Working Group. An action log has been created and this can be found in Attachment 2.

4. Any Other Business

4.1 There were no other items raised.

5. Date of Next Meeting

5.1 The date of the next meeting has been scheduled for 24 August 2021.

6. Attachments

- Attachment 1: Collated consultation responses and Working Group comments
- Attachment 2: DCP 328 Action Log

APPENDIX A

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
28/01	Billing the Primary supplier based on gross metered data from the boundary settlement meter. Concern raised that historically DCs were unable to provide this data. Secretariat to explore concerns further.	ElectraLink	
28/02	Secretariat to seek further information in relation to ENWL concern raised in question 3 of consultation.	ElectraLink	
28/03	Review the impact assessments to determine whether appropriate consideration was given in regard to impact on LDNO tariffs.	All	
28/04	Review the impact assessments to determine whether there are any impacts where an end customer is connected to the DNO via both an IDNO and private network.	All	

Closed Actions

Action Ref.	Action	Owner	Update
25/02	SM to review whether there are any approved charging methodologies for Private Networks with fully settled metering.	SM	There are no approved charging methodologies for Private Networks with fully settle metering.
27/01	Secretariat to issue a doodle poll to members to confirm date which has best availability on which to hold the next meeting.	ElectraLink	Closed