

DCP 389 Working Group Meeting 02

09 July 2021 at 10am - 1pm
Web-conference (MS Teams)

Attendee	Company
Working Group Members	
Chris Barker	Electricity North West
Chris Ong	UKPN
Claire Campbell	SP Energy Networks
Dave Wornell	WPD
Andrew Colley	SSE Generation
Giao Le	SSEN
Helen Tsang	EDF Energy
James Jones	SSEN
Kara Burke	Northern Powergrid
Karl Maryon	Haven Power
Lee Stone	E.ON
Lee Wells	Northern Powergrid
Mark Jones	SSE Business Energy
Ryan Roberts	Energy Potential
Thomas Cadge	BUUK Infrastructure
Ryan Farrell	Northern Powergrid
Code Administrator	
Dylan Townsend [DT] (Technical Secretariat)	ElectraLink
John Lawton [JL] (Chair)	ElectraLink
Apologies	
Company	
Edda Dirks	SSE Generation
Lorna Mallon	ScottishPower Energy Retail

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 Law Guidance for the duration of the meeting.
- 1.3 The Working Group reviewed the minutes of the last meeting and subject to some amendments, agreed that they were an accurate record of proceedings. The Working Group reviewed the actions log and an update and all actions can be found in appendix 1 below.

2. Purpose of the Meeting

- 2.1 The Chair set out that the purpose of the meeting was to review the draft consultation document and draft legal text document with the intent to issue out the consultation shortly thereafter.

3. Working Group Review of DCP 389 Draft Consultation

- 3.1 It was noted that the draft consultation document had been circulated prior to the meeting and that the Chair and a Working Group member had both provided comments/suggestions in advance of the meeting and therefore the Working Group were reviewing the version containing those comments/suggestions.
- 3.2 The Working Group reviewed and updated the draft consultation and the document containing these amendments acts as attachment 1 to these minutes. During their review of the document, a number of key points were discussed, and some actions were recorded and these are detailed in the paragraphs below.
- 3.3 One Working Group member explained that the numerical examples provided in section 3 for the exceptional circumstances process are a little hard to follow and suggested that it may be helpful to set the examples out in tabular or diagrammatical form. It was noted that this may better enable the Working Group and readers of the consultation to:
 - be clearer about the defect;
 - be clearer about how the proposed solution works;
 - test the existence of the defect and the benefits of the solution against a wider range of scenarios;
 - be clearer on whether the proposed solution is better than the status quo in all (plausible) scenarios.
- 3.4 The Working Group agreed to the suggestion and LW noted that as the Proposer, he was happy to share a spreadsheet containing the examples which should be easier to follow as compared to just text on a page. It was noted that an initial version was circulated during the meeting, which was reviewed by the Working Group, who agreed that it should be added as an attachment to the consultation. Following some suggested improvements by members of the Working Group, LW agreed to make some updates to the spreadsheet and circulate to the Working Group post meeting.

ACTION: 02/01 – LW to update the spreadsheet of examples as agreed during the Working Group meeting and circulate to members for final review.

- 3.5 The Working Group also agreed that a reference to the spreadsheet which is to be included as an attachment to the consultation should be added to section 3 and the Secretariat took an action to add the reference.

ACTION: 02/02 – ElectraLink to add paragraph the sets out that a backing spreadsheet for the examples in section 3 has been provided to assist in interpreting those examples.

- 3.6 One Working Group members had some concerns around the way question 4 in the draft consultation had been drafted, specifically as it appeared to state that the materiality test for both exceptional circumstances and new sites would be the same. The member noted that it was their understanding that there is a key difference between the two areas in terms of the proposed reference value to be used (in terms of the MIC/volumes) and that although there is a reference in brackets to the +/-50% threshold, the question could be confusing, so they proposed to clarify the question and to add a separate question, referring specifically to the reference value to be used for the 'new site' solution. It was noted that the initial question had been drafted as follows:

Question 4: Are you comfortable with the proposal to apply the same materiality test as for exceptional circumstances (i.e. the change must be greater than $\pm 50\%$) to the Allocation review for 'new' sites (including existing sites with no data)?

- 3.7 This suggestion was discussed by the Working Group, with the Proposer noting that as it stands the materiality test is the same for MIC and non-MIC but is proposing that it is not, for the exceptional circumstances. The Proposer went on to explain that if used for the new review, they were comfortable reverting to the 'current' process given there is not MIC at the time of allocating the site otherwise the site would not be in the review. It could be a bit clearer that the proposal is to use the existing test only, which would be used to compare to the assumption used to allocate the site. Therefore, the Proposer suggested the following question:

Question 4: Are you comfortable with the proposal to apply the existing materiality test as for 'Exceptional Circumstances' for the 'Annual Allocation Review' (i.e. the change in MIC/annual consumption must be greater than $\pm 50\%$ of the assumption used to allocate the Final Demand Site initially)? Please provide your rationale for your response.

- 3.8 It was noted that a number of small items were picked up by the Working Group during their review for which the Secretariat took actions to resolve. The Secretariat confirmed that an updated version of the draft consultation would be circulated for the Working Group to review.

ACTION: 02/03 – ElectraLink to update draft consultation document based on Working Group discussion during meeting and circulate to Working Group for review.

4. Working Group Review of DCP 389 Draft Legal Text

- 4.1 It was noted that the draft legal text document had been circulated prior to the meeting and that the Chair and a Working Group member had both provided comments/suggestions in advance of the meeting and therefore the Working Group were reviewing the version containing those comments/suggestions.

- 4.2 The Working Group reviewed and updated the draft legal text and the document containing these amendments acts as attachment 1 to these minutes. During their review of the document, the Working Group agreed to the following updates.
- 4.3 It was agreed to update paragraph 6.3 to create sub-paragraphs (a) and (b) similar to paragraph 6.2 which should make the paragraph easier to read and understand. Following on from this it was noted that sub-paragraph (a) referred back to the relevant text in paragraph 4 (as it states “in accordance with paragraph 4.1”) but that the new sub-paragraph (b) contained no such reference. Therefore, the Working Group agreed to include a reference back to the relevant text in paragraph 4, by adding “in accordance with paragraph 4.2” to the end of new sub-paragraph (b).
- 4.4 It was also agreed to update paragraph 6.10 to remove the following: “, and the provisional LLFC Id which will be assigned to the MPAN with effect from 1 April 2022”, as shown below:
- 4.5 “..., identifying the Old Charging Band and New Charging Band to which each such MPAN has been allocated, the LLFC Id which is assigned to the MPAN, ~~and the provisional LLFC Id which will be assigned to the MPAN with effect from 1 April 2022.~~”
- 4.6 It was noted that as the process relates to an ‘Annual Review’ there isn’t a need to provide a provisional LLFC ID assigned to an MPAN.

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 3 to the minutes and a summary of the next steps is below:
- ElectraLink to updated draft consultation document based on Working Group discussion during meeting and circulate to Working Group for review;
 - Working Group to conclude review by midday, Wednesday, 21 July;
 - Consultation to be issued on 21 July for a period of 15 Working Days; and
 - Next meeting to be held on Thursday, 19 August 2021, between 10am and 1pm, for the purpose of reviewing the responses to the consultation.

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
02/01	LW to update the spreadsheet of examples as agreed during the Working Group meeting and circulate to members for final review.	Lee Wells	
02/02	ElectraLink to add paragraph the sets out that a backing spreadsheet for the examples in section 3 has been provided to assist in interpreting those examples.	ElectraLink	
02/03	ElectraLink to update draft consultation document based on Working Group discussion during meeting and circulate to Working Group for review.	ElectraLink	

Closed Actions

Ref.	Action	Owner	Update
01/01	ElectraLink to explore if the word 'ownership' had been discussed in the documentation related to DCP 358/360 and report back to the Working Group.	ElectraLink	Completed
01/02	ElectraLink to ensure that the word 'ownership' is not referenced in the consultation other than to highlight the fact that it was erroneously included in the Change Proposal form and that the group had agreed that it shouldn't have been included and therefore does not appear in the consultation.	ElectraLink	Completed
01/03	ElectraLink to draw out the various options under consideration for CMP336 which is currently with the Authority for decision in the consultation document for DCP 389.	ElectraLink	Completed
01/04	ElectraLink to draw out the fact that it is proposed to use the 50% threshold for the process set out as part of this change and include a question on the topic so as to gather views from industry.	ElectraLink	Completed
01/05	ElectraLink to complete first draft of consultation document based on Working Group discussion during meeting and circulate to Working Group for review.	ElectraLink	Completed