











DCUSA Consultation		At what stage is this document in the process?
<h2>DCP 375:</h2> <h3>Amendments to the Unmetered Supplies National Terms of Connection</h3> <p>Date raised: 30 September 2020</p> <p>Proposer Name: Donna Townsend</p> <p>Company Name: Energy Assets Networks Ltd</p> <p>Company Category: IDNO</p>		01 – Change Proposal
		02 – Consultation
		03 – Change Report
		04 – Change Declaration
<p>Purpose of Change Proposal:</p> <p>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) and to clean up redundant clauses.</p>		
	<p>The Working Group recommends that this Change Proposal (CP) should proceed to Consultation.</p>	
	<p>Parties are invited to consider the questions set in section 10 and submit comments using the response form provided as Attachment 1 to dcusa@electralink.co.uk by 07 April 2021.</p>	
	<p>DCP 375 has been designated as a Part 1 Matter which means that Authority consent is required.</p>	
	<p>The Working Group will consider the consultation responses and determine the appropriate next steps for the progression of the CP.</p>	
	<p>Impacted Parties: DNOs and IDNOs</p>	
	<p>Impacted Clauses: Various paragraphs within Section 4 of Schedule 2B</p>	

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Timetable		 020 7432 3011
The timetable for the progression of the CP is as follows:		Contact: Code Administrator
Change Proposal timetable:		 DCUSA@electralink.co.uk
Activity	Date	 DonnaTownsend@energyassets.co.uk
Initial Assessment Report Approved by Panel	21 October 2020	 0333 666 2008
Consultation issued to Parties	10 March 2021	Proposer: Donna Townsend
Change Report approved by Panel	21 April 2021	 Tom.Chevalier@PowerDataAssociates.com
Change Report issued for Voting	23 April 2021	 01525 601202
Party Voting Ends	17 May 2021	Proposers Representative: Tom Chevalier
Change Declaration issued to Parties / Authority	19 May 2021	
Authority Decision	23 June 2021	
Implementation	24 June 2021	

1 Summary

What?

- 1.1 Ofgem launched a Market-wide Half Hourly Settlements (MHHS) Significant Code Review (SCR) in 2017. A Code Change Development Group (CCDG) was established to develop, consult on, and recommend solutions for:
- the detailed areas of the Target Operating Model design which the Design Working Group (DWG) and/or Ofgem identified as outstanding when the DWG delivered its final report in August 2019; and.
 - the changes required to relevant industry codes and subsidiary documents developed for each Code by the relevant Code Administrators.
- 1.2 One of the areas where change is required is to the NTC relating to Unmetered Supplies.

Why?

- 1.3 A review of the NTC Section 4 has indicated that there is benefit in progressing with these changes in advance of the SCR formal powers. The review has identified several areas that could be made in advance of the SCR to provide clarity to the current business as usual activities and deliver the change sooner than the SCR. This approach has been discussed with Ofgem.

How?

- 1.4 The obligations are to be amended to make them generic in nature rather than specific to the Non Half-Hourly (NHH) or Half-hourly (HH) market. In addition, some redundant historic clauses are considered for removal together with some housekeeping changes.

2 Governance

Justification for Part 1 Matter

- 2.1 The NTC are agreements between the distributor and the end consumer. It is therefore a part one matter under Clause 9.4.1 of DCUSA:

“9.4.1 - it is likely to have a significant impact on the interests of electricity consumers;”

Next Steps

- 2.2 Following a review of the Consultation responses, the Working Group will work to agree the final detail of the solution for DCP 375 and if appropriate progress to the Change Report phase.

3 Why Change?

Background of DCP 375

- 3.1 As set out in Section 1 above, the MHHS reform package has been in process since 2017 and as part of this process, the CCDG were tasked with identifying the changes required to relevant industry codes and subsidiary documents that would be required in order to enact MHHS. The CCDG identified several areas of the DCUSA which are likely to require amendment as part of a large set of consequential changes to various industry codes, including Section 4 of the NTC.
- 3.2 These changes could be made in due course (as part of the formal SCR), however, to provide clarity to the current business as usual activities and deliver the benefits of change sooner than the SCR, it was proposed that the changes to Section 4 of the NTC could be made advance of the commencement of the formal SCR commencing.
- 3.3 Given the above, DCP 375 was raised to take forward the areas which were identified by the CCDG as requiring amendment because of the proposed MHHS arrangements. Specifically, DCP 375 seeks to amend the obligations in Section 4 of the NTC to make them generic in nature rather than specific to the Non Half-Hourly (NHH) or Half-hourly (HH) market. In addition, some redundant historic clauses are considered for removal together with some housekeeping changes.
- 3.4 It should be noted that Ofgem have been involved in the discussions surrounding the preparation of this change and thus, are aware that it is being progressed as part of business-as-usual activities, which is not expected to impact the work being undertaken by the SCR.
- 3.5 The table on the following pages is an extract containing the relevant information on Section 4 of the NTC from the 'Code Change And Development Group Consultation On Market Wide Half Hourly Settlement (Detailed MHHS Target Operating Model Design, Data Items and Processes)' issued on 17 December 2020¹.

Question 1- Do you understand the intent of DCP 375?

Question 2: Are you supportive of the principles that support this CP, which are to address the elements required for MHHS within Section 4 of Schedule 2B 'National Terms of Connection', prior to the formal SCR process?

¹ <https://www.elexon.co.uk/consultation/code-change-development-group-consultation-on-mhhs/>

Requirement Description	Document Id	Document Section	Nature of change	Type of change	Additional Detail	Unknown Detail	Dependencies / interactions with other changes	Comments	Change Package
UMSDS provided by qualified person	Schedule 2B	Section 4, Para 1.1 definitions and interpretations	Requirement for Parties to secure a UMDS	Insert	MA role replaced by Unmetered Supplies Data Service (UMSDS) in the MHHS TOM.			a new definition to be added and referred to the BSC	To be catered for by a change proposal in parallel with the SCR: Note meter Administrator is being removed from the drafting so no need to be concerned over a sunset clause or adding in UMDS
UMSDS provided by qualified person	Schedule 2B	Section 4, para 4.1.3	Removal of MA Role	Sunset Clause	MA role replaced by Unmetered Supplies Data Service (UMSDS) in the MHHS TOM.	Date by which MA role no longer required.		MA's will evolve to UMDS at different times	
UMSDS provided by qualified person	Schedule 2B	Section 4, para 4.1.3	Requirement for Parties to secure a UMDS	Insert	MA role replaced by Unmetered Supplies Data Service (UMSDS) in the MHHS TOM.	Date by which Parties must secure a UMDS		Assume a deadline will be set by which Parties will have to have secured the Services of a UMDS. The clause may need an OR during transition depending on which type service the UMS is registered with.	
	Schedule 2B	Section 4, para 4.1.5	reference to unmetered supplies certificate and items.					review BSCP	
	Schedule 2B	Section 4, para 5.4	reference to items.					review BSCP	
	Schedule 2B	Section 4, para 7.1	reference to Detailed Inventory					review BSCP	
	Schedule 2B	Section 4, para 7.1.2	reference to item					review BSCP	
	Schedule 2B	Section 4, para 7.1.3	reference to item					review BSCP	
UMSO provided by qualified person	Schedule 2B	Section 4, para 7.3.1	Profiled Unmetered Supply refers to NHH and will not be in the TOM	Sunset Clause	In the TOM all data will be processed by the UMDS using its EM	Date by which NHH arrangements are no longer required.			
	Schedule 2B	Section 4, para 7.3.2	reference to Detailed Inventory					review BSCP	
	Schedule 2B	Section 4, para 7.4	reference to Summary Inventory					review BSCP	
	Schedule 2B	Section 4, para 7.4	reference to Detailed Inventory					review BSCP	
	Schedule 2B	Section 4, para 7.5	reference to Summary Inventory					review BSCP	
UMDS receive summary inventories & CMS control files from the UMSO	Schedule 2B	Section 4, para 7.5	Requirement to be able to receive data from UMSO	Insert	MA role replaced by Unmetered Supplies Data Service (UMSDS) in the MHHS TOM.		para 4.1.3	assume that we add 'or UMDS' twice in this para and let the decision on which one be made in para 4.1.3 by the use of dates	

Requirement Description	Document Id	Document Section	Nature of change	Type of change	Additional Detail	Unknown Detail	Dependencies / interactions with other changes	Comments	Change Package
UMSO provided by qualified person	Schedule 2B	Section 4, para 7.6	Profiled Unmetered Supply refers to NHH and will not be in the TOM	Sunset Clause	In the TOM all data will be processed by the UMSDS using its EM	Date by which NHH arrangements are no longer required.			
UMSO provided by qualified person	Schedule 2B	Section 4, para 7.6.2	Profiled Unmetered Supply refers to NHH and will not be in the TOM	Sunset Clause	No requirement for the calculation of EACs in the TOM	Date by which NHH arrangements are no longer required.			
	Schedule 2B	Section 4, para 7.8	reference to Detailed Inventory						
	Schedule 2B	Section 4, para 7.9	reference to Detailed Inventory						
UMSO provided by qualified person	Schedule 2B	Section 4, para 7.9.2	Profiled Unmetered Supply refers to NHH and will not be in the TOM	Sunset Clause	No requirement for the calculation of EACs in the TOM	Date by which NHH arrangements are no longer required.			
UMSDS calculates SP Level Consumption Data	Schedule 2B	Section 4, para 7.9.3	Requirement to amend data received from Equivalent Meter	Insert	MA role replaced by Unmetered Supplies Data Service (UMSDS) in the MHHS TOM.		para 4.1.3	assume that we add 'or UMSDS' in this para and let the decision on which one be made in para 4.1.3 by the use of dates	
	Schedule 2B	Section 4, para 7.10	reference to Detailed Inventory						
UMSDS provided by qualified person	Schedule 2B	Section 4, para 7.11	Requirement for Parties to secure a UMSDS	Insert	MA role replaced by Unmetered Supplies Data Service (UMSDS) in the MHHS TOM.		para 4.1.3	assume that we add 'or UMSDS' twice in this para and let the decision on which one be made in para 4.1.3 by the use of dates	
	Schedule 2B	Section 4, para 7.12	reference to Detailed Inventory						
	Schedule 2B	Section 4, para 7.12	reference to Summary Inventory						
UMSDS provided by qualified person	Schedule 2B	Section 4, para 7.13.1	Profiled Unmetered Supply refers to NHH and will not be in the TOM	Sunset Clause	No requirement for the calculation of EACs in the TOM	Date by which NHH arrangements are no longer required.			
UMSDS calculates SP Level Consumption Data	Schedule 2B	Section 4, para 7.13.2	Requirement to amend data received from Equivalent Meter	Insert	MA role replaced by Unmetered Supplies Data Service (UMSDS) in the MHHS TOM.		para 4.1.3	assume that we add 'or UMSDS' in this para and let the decision on which one be made in para 4.1.3 by the use of dates	
UMSDS provided by qualified person	Schedule 2B	Section 4, para 10.11	Requirement for Parties to secure a UMSDS	Insert	MA role replaced by Unmetered Supplies Data Service (UMSDS) in the MHHS TOM.		para 4.1.3	assume that we add 'or UMSDS' twice in this para and let the decision on which one be made in para 4.1.3 by the use of dates	
	Schedule 2B	Section 4, para 20.2	reference to UMSO					term to continue, no reference to its removal found. Retained within BSC, S 8.2.14	

4 Working Group Assessment

DCP 375 Working Group Assessment

- 4.1 The DCUSA Panel established a Working Group to assess and refine the DCP 375 solution. The Working Group held one meeting prior to issuing this consultation, with members of the Working Group consisting of representatives from DNOs, IDNOs, a Meter Administrator and an Unmetered Supplies Operator as well as an observer from Ofgem. Meetings were held in open session and the minutes and papers of each meeting are available on the DCUSA website.
- 4.2 The Working Group developed this consultation document to gather information and feedback from market participants on this CP.
- 4.3 During its initial meeting, the Working Group agreed that the following areas of Section 4 of the NTCs should be given consideration as part of the consultation process:
- 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
 - 26. GOVERNING LAW AND JURISDICTION

1. DEFINITIONS & INTERPRETATION

- 4.4 A number of definitions have been deleted or amended, generally because the changes proposed throughout Section 4 mean that some current definitions are no longer fit for purpose and in some cases are rendered obsolete. The table below details which definitions have been impacted as well as the way in which each has been impacted and the rationale behind the proposed change.

Defined Term	Amended / Deleted	Rationale
Agreed Codes	Amended	Removal of unnecessary text to make the definition clearer.
Control Equipment	Deleted	If the removal of Clauses 10.6 to 10.10 proceeds as planned then all references to the term 'Control Equipment' will have been removed, therefore, subject to the removal of Clauses 10.6 to 10.10, the definition of the term 'Control Equipment' will also be deleted.
Equivalent Meter	Deleted	The definition of the term ' Equivalent Meter ' is no longer required as the four references to that term throughout Section 4 of the NTCs are being removed by this CP and therefore it can also be removed.
Estimated Annual Consumption or 'EAC'	Deleted	All references to the term 'Estimated Annual Consumption' or 'EAC' have been removed throughout Section 4 of the NTCs via the amendments proposed by this CP, therefore, this defined term can be deleted.

Defined Term	Amended / Deleted	Rationale
Half-Hourly Trading	Deleted	All references to the term 'Half-Hourly Trading' have been removed throughout Section 4 of the NTCs via the amendments proposed by this CP, therefore, this defined term can be deleted.
Item	Amended	Correction made to terminology used in definition
Meter Administrator	Deleted	All references to the term 'Meter Administrator' have been removed throughout Section 4 of the NTCs via the amendments proposed by this CP, therefore, this defined term can be deleted.
Metering System	Amended	Removes the wording '(being either an Equivalent Meter or a Metering Point subject to Profiled Trading)' as this is used to differentiate between HH and NHH metering arrangements.
Non-Geographic Inventory	Deleted	The only other reference to the term 'Non-Geographic Inventory' has been removed as a consequence of the amendments made to Clause 7.2 of Section 4 of the NTCs, therefore, this defined term can be deleted.
PECU	Deleted	All bar one of the uses of the acronym 'PECU' have been removed from Section 4 of the NTCs, thus it was agreed to spell out in full where it is removed and therefore allowing for the deletion of the term here.
PECU Array	Deleted	The only other reference to the term 'PECU Array' has been removed as a consequence of the amendments made to Clause 10.11 of Section 4 of the NTCs, therefore, this defined term can be deleted.
Profile Class	Deleted	The Working Group agreed with the proposal to remove the definitions for 'Profile Class' and 'Profiled Trading' as a consequence of the amendments made to Clause 7.3.1 and 7.7 of Section 4 of the NTCs. It was noted that this goes to the heart of changes being proposed under MHHS, which moves away from using Profile Classes in the calculation of EACs for Non-Half Hourly settlement arrangements to the use of data from an Equivalent Meter by the proposed Unmetered Supplies Data Service (UMSDS).
Profiled Trading	Deleted	
Unmetered Supplies Procedure	Amended	During their first meeting, the Working Group agreed to amend the definition of the term ' Unmetered Supplies Procedure ' to include the wording 'as amended from time to time' which is in addition to the wording ' <i>and any replacement or substitute BSC Procedure from time to time</i> '. The rationale for making this amendment is that it caters for two procedures being in place for transition period for MHHS which is likely to involve the parallel running of the new TOM services and existing agent functions, allowing for smooth and managed transition between old and new market roles.

Question 3: Do you have any comments on the proposed amendments to the definitions contained in Section 4 of the NTC? If so, then please provide examples or supporting rationale.

3. THE CUSTOMER'S RIGHT TO BE (AND REMAIN) CONNECTED (Clause 3.3 and 3.4)

- 4.5 The Proposer has suggested 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.
- 4.6 The Working Group agreed that it would be useful to understand how such a duplication may have come about, i.e. was it the result of the implementation of a previous change proposal or had it been that way since the text was introduced into the DCUSA. 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.

Question 4: Do you agree with the Working Group that Clause 3.3 and 3.4 appear to be almost duplicates of each other and given this, that Clause 3.3 can safely be removed?

4. THE CUSTOMER'S RIGHT TO BE (AND REMAIN) ENERGISED (Clause 4.1.3)

- 4.7 DCP 375 proposes to amend clause 4.1.3 such that it no longer contains reference to the words 'Half-Hourly' and also to make it more generic by pointing to the Unmetered Supplies Procedure. The Working Group agreed with the proposed approach to make clause 4.1.3 more generic and sought to strengthen this by suggesting an amendment the definition of the term '**Unmetered Supplies Procedure**' to include the wording 'as amended from time to time'. It was noted that the rationale for making this amendment was that it could be future proofed against the changes when MHHS is implemented, thereby removing the need to make changes as part of the formal SCR process.

7. INFORMATION

- 4.8 The Proposer noted that most customer inventories do not include the majority of the requirements set out under Clause 7.1 and had envisaged removing those which are no longer relevant. The below extract is provided for reference and shows the proposed amendments as set out in the initial draft legal text provided by the Proposer:

duplication) the following information (together constituting the Detailed Inventory),
which information shall be set out separately for each Item:

7.1.1 ~~Location (subject to Clause 7.2):~~

~~(A) — the grid reference for the Item, to seven digits easting and seven digits northing (0.1m resolution), using the current edition from time to time of Ordnance Survey scale 1:500;~~

~~(B)(C) the address for the Item (to include road/street name, parish or village name and post code) or adjacent address for the Item (such as x metres north/south/east/west from firm map detail outside or opposite a house number); and~~

~~(C)(D) (where applicable) the reference number displayed on the Item.~~

- 4.9 The Working Group considered the proposed amendments, and a concern was raised with respect to the removal the text in (A) and (B) of sub-clause 7.1.1. Specifically, the concern centred around the fact that whilst it may be that most customer inventories do not include the majority of the requirements, there may still be benefit in being able to obtain the information in some cases. There were views raised in favour of both approaches, with the rationale for retaining based on the premise that it doesn't appear to have created issues to date and so could be retained moving forward.
- 4.10 The Working Group are therefore seeking feedback on whether to keep the existing text or not, specifically for 7.1.1 (A), to the level of granularity currently stipulated and for 7.1.1 (B) whether the additional descriptive locational text is needed.

Question 5: Do you believe that the entirety of 7.1.1 (A) can be removed? Or do you believe that this text should be retained, and if so, are you comfortable with the required granularity (0.1m resolution) using Ordnance Survey scale 1:500), and if not, what level of granularity do you believe is most appropriate?

Question 6: Do you believe that for 7.1.1 (B) the text '*or adjacent address for the Item (such as x metres north/south/east/west from firm map detail outside or opposite a house number)*' can be removed? If not, then please provide the rationale for why not.

- 4.11 DCP 375 proposes to remove sub clause 7.1.3, as it is the Proposers understanding that use of 'Remote Connection Point' as information provided to a Distributor which forms part of the submission of a 'Detailed Inventory' is about 15 years out of date. For clarity, the term '*Remote Connection Point*' is stated as meaning '*whether the Connection Point is remote from the Item or groups of Items connected to the Connection Point, and if so the Connection Point location*'.
- 4.12 With respect to Clause 7.2, the Proposer believes that 'Non-Geographic Inventories' are no longer accepted by distributors and thus consideration should be given to the removal of the text. However, one Working Group member explained that in their view, not all customers are adhering to the requirement to provide 'geographic inventories' and thus, they believe that they still accept 'Non-Geographic Inventories'. An example was given, where prior to new street lighting being connected, housing developers will send a drawing, approved by a local highway authority, showing the column positions and that this is the only location-based information that is provided. It was further explained that following connection, the developers don't necessarily understand that they should be maintaining their inventory of street lighting, as they assume that as it was the distributor who connected the streetlight, it should be the distributor who knows when/where columns are connected.
- 4.13 It was subsequently pointed out that Clause 7.2 of the NTC only allows Customers to provide Non-Geographic Inventories if the Customer was receiving unmetered supplies from a Distribution System prior to 1 April 1998. It was suggested that any customer supplying Non-Geographic inventories past 01 April 1998 would be in breach of the NTC. A Working Group member stated their belief that the provision of a street lighting drawing with sufficient detail of location and installed equipment should satisfy the requirements of Clause 7.1 and constitutes a "Detailed Inventory" if the distributor agrees to accept it.

- 4.14 The Working Group member who provided the example discussed the above suggestion internally and confirmed that they are comfortable that Non-Geographic inventories can constitute a ‘Detailed Inventory’ by other means (such as drawings for street lighting and installed equipment) and as such satisfies the requirements of Clause 7.1. Therefore, the Working Group are seeking feedback from industry on proceeding with the removal of Clause 7.2 from Section 4 of the NTC.

Question 7: Are you comfortable with the Working Group’s decision to remove Clauses 7.1.3 and 7.2, related to ‘Remote Connection Points’ and ‘Non-Geographic Inventories’ respectively? If not, then please provide your rationale.

- 4.15 The intent of the amendments being proposed to Clause 7.3 (now 7.2), is to remove the inconsistency in inventory submission frequency between HH and NHH inventories. To make the text in this area more consistent, it has been proposed to replace the existing requirements with a requirement for Customers to submit inventories within the calendar month that follows on from when any changes occurred to the equipment and obliges customers to maintain an up-to-date inventory. At the same time, the amended text allows for Customers, with inventories that have not had any changes, to merely confirm to the Distributor on an annual basis that there has been “no change” to the inventory. It should be noted that the new Clause still retains the ability for Distributors to agree to an alternative inventory submission frequency.
- 4.16 The Working Group note that the proposed changes to Clause 7.3 (now 7.2) could be considered to potentially have the greatest impact to Customers operating in the NHH market. The impact is with respect to the frequency of submitting a Detailed Inventory following any additions, deletions, or amendment to any Item on an inventory. Specifically, the current arrangements for changes to NHH inventories allows Customers to submit updated inventories once a year as compared to what is being proposed, which is to require Customers to submit updated inventories within the calendar month that follows on from the month in which any changes occurred to the equipment. It should, however, be noted that this submission frequency is in line with the arrangements for Customers operating in the HH market. Therefore, the Working Group would like to understand if industry is comfortable with the proposed approach to align inventory submission frequency requirements across the NHH and HH markets.

Question 8: Are you comfortable with the proposed amendments to Clause 7.3 (now 7.2) which makes changes to the inventory submission frequency to be within the calendar month that follows on from the month in which any changes occurred to the equipment? If not, then please provide your rationale.

- 4.17 The proposed amendment to Clause 7.4 (now 7.3), has been drafted such that it restricts inventory submissions to no more than one per calendar month and makes an allowance for a Distributor to agree for inventories to be backdated.
- 4.18 DCP 375 proposes to delete Clauses 7.5 & 7.6 as the requirements are already covered by BSC Procedure ‘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. The Working Group believed it would be useful to find the relevant references contained in BSCP520 and have therefore provided the below table, which is an extract from BSCP520.

REF.	WHEN	ACTION	FROM	TO	INFORMATION REQUIRED	METHOD
3.2.1	When change(s) to unmetered Apparatus.	Send proposed revised Detailed Inventory to UMSO.	Customer.	UMSO.	Customer's proposed revised Detailed Inventory.	Paper, fax or electronic media, as agreed.
3.2.2	Within 15 WD of 3.2.1.	Validate all Charge Codes and Switch Regimes against the OID and associated spreadsheets. If the proposed revised Detailed Inventory passes validation, agree the inventory and proceed to step 3.2.3. Otherwise reject the inventory and repeat steps 3.2.1 and 3.2.2 as required.	UMSO.	Customer	If validation passed, Customer's Approved Detailed Inventory with agreed EFD. If validation failed, reasons for rejection.	Paper, fax or electronic media, as agreed.
3.2.3	If HH following 3.2.2, when UMSO has agreed amendment to Summary Inventory with Customer, then within 5 WD.	Send revised Summary Inventory details to MA.	UMSO.	MA.	Summary Inventory File and/or CMS Control File as appropriate.	Electronic or other agreed method.
3.2.4	If items exist in the updated Summary Inventory and/or CMS Control File (as appropriate) for which no data on load and switching times have been defined.	Reject updated Summary Inventory and/or CMS Control File (as appropriate), listing invalid Charge Codes and/or Switch Regimes to the UMSO and continue to use or re-apply previous Summary Inventory and/or CMS Control File (as appropriate).	MA.	UMSO.	List of invalid Charge Codes and/or Switch Regimes.	Electronic or other agreed method.
3.2.5	Within 5 WD of receipt or by the EFD.	Input and send copy of Summary Inventory and/or CMS Control File (as appropriate) extracted from the MA System to UMSO and Customer.	MA.	UMSO, Customer.	Report of Summary Inventory and/or CMS Control File content.	Electronic or other agreed method. Paper, fax or electronic media, as agreed.
3.2.6	After 3.2.2 for NHH.	If required request additional MSID(s) per SSC.	UMSO.	LDSO	GSP Group ID, LLF Class Id, Address, Related details	Electronic or other agreed method.
3.2.7		Where appropriate allocate additional MSID(s) per SSC and notify SMRA of MSID data	LDSO	SMRA	MSID, GSP Group Id, LLF Class Id, 1998 TA Indicator (and Metering Point Address is required by MRA) as per BSCP501.	Electronic or other agreed method.
3.2.8		Send MSID(s) to UMSO.	LDSO.	UMSO.		Electronic or other agreed method.
3.2.9		Calculate revised EACs. Complete UMS Certificate. Issue to Customer and Supplier.	UMSO.	Customer, Supplier.	P0207 NHH Unmetered Supply Certificate. P0207 NHH Unmetered Supply	Paper, fax or electronic media, as agreed. Electronic or

REF.	WHEN	ACTION	FROM	TO	INFORMATION REQUIRED	METHOD
					Certificate.	other agreed method.
3.2.10		As required, for any MSID(s) with zero EACs follow de-energisation and Disconnection process as set out in (3.7) and (3.8) respectively. Send to SMRA for any additional listed MSIDs.	Supplier.	SMRA.	D0055 Registration of Supplier to Specified Metering Point.	Electronic or other agreed method.
3.2.11		Where the number of MSIDs appearing on the UMS Certificate has changed, create or remove metering point relationships as appropriate and update MTC if required.	Supplier	SMRA	D0386 Manage Metering Point Relationships. D0205 Update Registration Details	Electronic or other agreed method.
3.2.12		Record details in accordance with BSCP501.	SMRA.			Internal Process.
3.2.13		Where appropriate, send appointment details.	Supplier.	NHHDC. NHHDA.	D0148 Notification of Change to Other Parties. D0155 Notification of new Meter Operator or Data Collector Appointment and Terms. D0153 Notification of Data Aggregator Appointment and Terms.	Electronic or other agreed method.
3.2.14		Send revised split EAC, Profile Class and SSC details for each MSID.	UMSO.	Supplier, NHHDC.	D0052 Affirmation of Metering System Settlement Details.	Electronic or other agreed method.
3.2.15	On receipt of D0052.	Validate D0052.	NHHDC		In accordance with BSCP504 Non- Half Hourly Data Collection.	Internal Process.
3.2.16	If D0052 is invalid.	Send notification of invalid Metering System Settlement details.	NHHDC	UMSO, Supplier	D0310 Notification of Failure to Load or Receive Metering System Settlement Details.	Electronic or other agreed method.

4.19 With respect to Clauses 7.9.2 (now 7.6.2) & 7.9.3, the amendments proposed under DCP 375 are to rationalise the text due to the fact that summary inventories are used for energy consumption calculations in both HH & NHH trading. This removes the differentiation between NHH and HH calculations and instead relies on the Company adjusting the Summary Inventory. In accordance with the following items covered in BSCP520, once the Summary Inventory has been adjusted the Company will in accordance with the table above either:

- At 3.2.3, send the adjusted Summary Inventory to the Meter Administrator to use for HH energy calculations; or
- At 3.2.9 calculate a revised NHH Estimated Annual Consumption (EAC) in accordance with 4.5.1(a).

- 4.20 It should be noted that both of these actions are also covered in paragraph 4.5.4 of the Unmetered Supplies Procedure, which deals specifically with consumption adjustments following an audit.
- 4.21 Clause 7.11 (now 7.8) is related to access and use of data pertaining to electricity taken through any Connection Point, and DCP 375 proposes to remove the last sentence, which states:
- 7.8 *Where the Meter Administrator is not the Company, the Customer shall procure that the Meter Administrator shall comply with the provisions of this Clause 7.11 as if it were the Customer.*
- 4.22 The Proposer notes that although the Company can be a Meter Administrator, none currently undertake that role and it therefore does not make sense for the text to specifically call out 'where the Meter Administrator is not the Company'. The Working Group noted that any Meter Administrator is obliged by BSCP520 to provide any such data to the distributor, inclusive of if a Company were to undertake the role of a Meter Administrator, as they would still have the obligation under BSCP520. Therefore, the Working Group agreed that they were comfortable with the proposal to delete the last sentence.
- 4.23 The amendments made to Clause 7.14 (now 7.10) are intended to remove the distinction between NHH & HH trading and in doing so rationalising the text to refer to the Unmetered Supplies Procedure. Specifically, Clause 7.14 (now 7.10) requires that where an item is re-rated then the energy consumptions are re-calculated accordingly. Re-rating of an item would mean a change to Market Domain Data (MDD). As is set out in the Unmetered Supplies Procedure, both the UMSO (Company) and the Meter Administrator are required, at 1.2.2 (last para.) and 1.2.5 (last para.) respectively, to use the current MDD in their energy calculations. The Working Group did not have any comments on the amendments made to Clause 7.14 and therefore it remains as was proposed in the CP form.
- 4.24 The Working Group would like to understand whether industry is comfortable with the approach taken with respect to the proposed amendments to set out in paragraphs 4.17 to 4.23 above and are therefore seeking responses to the following question.

Question 9: Are you comfortable with the approach taken by the Working Group to amend/remove the items listed below given that they are covered in the Unmetered Supplies Procedure? Specifically, the following:

- Clauses 7.5 & 7.6;
- Clauses 7.9.2 (now 7.6.2) & 7.9.3;
- Clause 7.11 (now 7.8); and
- Clause 7.14 (now 7.10)

10. PLANT AND APPARATUS (Clauses 10.6 to 10.10)

- 4.25 Clauses 10.6 to 10.10 sets out obligations on Distributors and Customers with respect to the failure or malfunctioning of 'Control Equipment', which is equipment that is designed to control the actual pattern of consumption of electricity at a Connection Point. It should be noted that for the purposes of the NTCs, any such equipment can be owned by either the Distributor or the Customer but will be installed on the Distributor's side of the supply terminals. The Proposer has suggested that these Clauses should be removed as they don't believe that any such 'Control Equipment' still exists and therefore, that these requirements and obligations are no longer relevant.

- 4.26 The Working Group discussed the proposal to remove Clauses 10.6 to 10.10 and agreed that it would be prudent to seek industry views as to whether there is any 'Control Equipment' as described in Clauses 10.6 to 10.10 still in use, as if not, then the Working Group intend on proceeding with the removal of the Clauses as part of the final solution for DCP 375.

Question 10: Are you aware if any 'Control Equipment' as described in Clauses 10.6 to 10.10 is still in use? If not, then are you comfortable with the Working Group's proposal to remove those Clauses?

26. GOVERNING LAW AND JURISDICTION (Clause 26.2)

- 4.27 The minor amendment to Clause 26.2 is being made to correct the name associated with company registration number 2906593, from 'Northern Electric Distribution Limited' to 'Northern Powergrid (Northeast) plc'. The Proposed amendment is set out below:

26.2 *If the Connection Point is located in Scotland (except where the Company is Northern ~~PowergridElectric Distribution Limited~~ (Northeast) plc (a company incorporated in England & Wales with company number 2906593) or Electricity North West Limited (a company incorporated in England & Wales with company number 2366949)), this Agreement will be governed by, and interpreted in accordance with, Scots law, under the jurisdiction of the Scottish courts.*

5 Legal Text

DCP 375 Proposed Legal Text

- 5.1 The proposed legal text for this CP has been drafted with the intent of:
- removing wherever possible any irrelevant differences between NHH & HH approaches to unmetered obligations;
 - making (where possible) the requirements related to unmetered supplies more generic in nature;
 - removing some redundant historic clauses; and
 - fixing some minor 'housekeeping' issues identified as part of the review.
- 5.2 The document that contains the draft legal text amendments made by the Working Group acts as Attachment 2 to this consultation.

Question 11: Do you have any further comments on the proposed legal text for DCP 375? If so, then please provide examples or supporting rationale.

6 Code Specific Matters

Reference Documents

- 6.1 It should be noted that prior to this change being officially raised, it was considered by the:
- Code Change and Development Group ([CCDG](#)) (a Working Group formed under the MHHS SCR), and
 - Unmetered Supplies User Group ([UMSUG](#)) (at their meeting in September 2020).

7 Relevant Objectives

Assessment Against the DCUSA Objectives

- 7.1 For a DCUSA Change Proposal to be approved it must be demonstrated that it better meets the DCUSA Objectives. The Proposer of DCP 375 believes that the proposed solution will better facilitate DCUSA General Objective three.

DCUSA General Objectives	Identified impact
1. The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks	None
2. The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent therewith) the promotion of such competition in the sale, distribution and purchase of electricity	None
3. The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences	Positive
4. The promotion of efficiency in the implementation and administration of the DCUSA	None
5. Compliance with the Regulation on Cross-Border Exchange in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	None

- 7.2 The Proposer set out their view that General Objective three is better facilitated as the change pre-emptively supports the MHHS SCR that the Authority is currently undertaking and thus will help to ensure Distributors continue to meet their Licence obligations relating to SCRs.
- 7.3 This change will also help Distributors meet their Licence conditions relating to the ongoing management of other industry codes and in particular, paragraphs 20.4 and 20.5 of Condition 20 'Compliance with Core Industry Documents' which states:

20.4 If a consequential change is required in any Core Industry Document, the licensee must take all reasonable steps to secure, and must not take any unreasonable steps to prevent or delay, the making or implementation of that consequential change.

20.5 For the purposes of paragraph 20.4, a consequential change is any modification that is required to be made to a Core Industry Document solely in order to give full and timely effect to a modification made to that or any other Core Industry Document.

Question 12: Which of the DCUSA General Objectives does DCP 375 better facilitate? Please provide supporting comments.

8 Impacts & Other Considerations

Impacts on other Significant Code Reviews (SCRs) or other significant industry change projects

- 8.1 DCP 375 was raised to support the MHHS SCR by delivering changes to the unmetered supplies section of the NTCs earlier than the planned timelines of the SCR, which would otherwise have needed to be accounted for at a later date.

Impacts on other Industry Codes

- 8.2 The MHHS SCR impacts a number of industry codes but the changes made to the unmetered supplies section of the NTCs point to the BSC in a generic way and therefore, it is believed that no further consequential changes are required to the BSC or other industry codes as a result of DCP 375.

Environmental Impacts

- 8.3 In accordance with DCUSA Clause 11.14.6, the Working Group assessed whether there would be a material impact on greenhouse gas emissions if DCP 375 were implemented. The Working Group did not identify any material impact on greenhouse gas emissions from the implementation of this CP.

Engagement with the Authority

- 8.4 The Authority have been fully engaged with the development of this CP as observers of the Working Group.

Question 13: Are you aware of any wider industry developments that may impact upon or be impacted by DCP 375?

9 Implementation

- 9.1 The benefit of this change is that it can be made in advance of the MHHS SCR. The current timeline for the SCR is that a report would be submitted to the Authority in October 2021. It is anticipated that this change can be made in advance of that even allowing for implementation to be made at a scheduled release. Given the probable timescales needed to conclude the refinement of DCP 375 following this consultation, it is proposed that DCP 375 be implemented on 24 June 2021.

Question 14: The proposed implementation date for DCP 375 is 24 June 2021. Do you agree with the proposed implementation date? If not, then please provide your rationale.

10 Consultation Questions

10.1 The Working Group is seeking industry views on the following consultation questions:

Number	Questions
1	Do you understand the intent of DCP 375?
2	Are you supportive of the principles that support this CP, which are to address the elements required for MHHS within Section 4 of Schedule 2B 'National Terms of Connection', prior to the formal SCR process?
3	Do you have any comments on the proposed amendments to the definitions contained in Section 4 of the NTC? If so, then please provide examples or supporting rationale.
4	Do you agree with the Working Group that Clause 3.3 and 3.4 appear to be almost duplicates of each other and given this, that Clause 3.3 can safely be removed?
5	Do you believe that the entirety of 7.1.1 (A) can be removed? Or do you believe that this text should be retained, and if so, are you comfortable with the required granularity (0.1m resolution) using Ordnance Survey scale 1:500), and if not, what level of granularity do you believe is most appropriate?
6	Do you believe that for 7.1.1 (B) the text 'or adjacent address for the Item (such as x metres north/south/east/west from firm map detail outside or opposite a house number)' can be removed? If not, then please provide the rationale for why not.
7	Are you comfortable with the Working Group's decision to remove Clauses 7.1.3 and 7.2, related to 'Remote Connection Points', and 'Non-Geographic Inventories' respectively? If not, then please provide your rationale.
8	Are you comfortable with the proposed amendments to Clause 7.3 (now 7.2) which makes changes to the inventory submission frequency to be within the calendar month that follows on from the month in which any changes occurred to the equipment? If not, then please provide your rationale.
9	Are you comfortable with the approach taken by the Working Group to amend/remove the items listed below given that they are covered in the Unmetered Supplies Procedure? Specifically, the following: <ul style="list-style-type: none"> • Clauses 7.5 & 7.6; • Clauses 7.9.2 (now 7.6.2) & 7.9.3; • Clause 7.11 (now 7.8); and • Clause 7.14 (now 7.10)
10	Are you aware if any 'Control Equipment' as described in Clauses 10.6 to 10.10 is still in use? If not, then are you comfortable with the Working Group's proposal to remove those Clauses?
11	Do you have any further comments on the proposed legal text for DCP 375? If so, then please provide examples or supporting rationale.
12	Which of the DCUSA General Objectives does DCP 375 better facilitate? Please provide supporting comments.
13	Are you aware of any wider industry developments that may impact upon or be impacted by DCP 375?
14	The proposed implementation date for DCP 375 is 24 June 2021. Do you agree with the proposed implementation date? If not, then please provide your rationale.

- 10.2 Responses should be submitted using Attachment 1 to dcusa@electralink.co.uk no later than, 07 April 2021.
- 10.3 Responses, or any part thereof, can be provided in confidence. Parties are asked to clearly indicate any parts of a response that are to be treated confidentially.

11 Attachments

- Attachment 1 – DCP 375 Consultation Response Form
- Attachment 2 – DCP 375 Proposed Legal Text
- Attachment 3 – DCP 375 Change Proposal Form