

DCP 386 'Sharing Network Information with Owners and Occupiers' Collated Consultation Responses

Company	Confidential/ Anonymous	1) Do you understand the intent of the CP?
Electricity North West	Non-confidential	Yes, we understand the intent of the CP.
Energy Assets Networks Ltd	Non-confidential	Yes
Leep Electricity Networks Ltd	Non-confidential	Yes
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	Yes the intent of the CP is clear.
The Electricity Network Company	Non-confidential	Yes.
UK Power Networks	Non-confidential	Yes
Confidential 1	Confidential	Yes
Confidential 2	Confidential	Yes

Company	Confidential/ Anonymous	2) Are you supportive of the principles of the CP?
Electricity North West	Non-confidential	We are supportive of the general principle and understand the intent.
Energy Assets Networks Ltd	Non-confidential	Yes
Leep Electricity Networks Ltd	Non-confidential	Yes
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	Yes we are supportive of the principles of the CP.
The Electricity Network Company	Non-confidential	We are generally supportive of the change principles.
UK Power Networks	Non-confidential	Yes
Confidential 1	Confidential	Yes
Confidential 2	Confidential	Yes

Company	Confidential/ Anonymous	3) Do you agree that Distributors should be able to disclose the MIC or MEC at a property to the landlord, even if they are not the bill paying customer, without the need for consent by the customer or business with whom the Distributor is providing a connection under the Electricity Act 1989)? If not, please provide your rationale.
Electricity North West	Non-confidential	<p>We currently obtain consent before disclosure of this information.</p> <p>We see no reason why this information would need to be withheld from the landlord of the property.</p> <p>NB: The legal text does not state landlord, it states "the owner/or occupier of the premises or a/the prospective owner or occupier".</p>
Energy Assets Networks Ltd	Non-confidential	<p>Yes, as the perceived owner of the building, the landlord should be entitled to have the MIC/MEC available to them. Where Energy Assets has received a change in MIC/MEC by a tenant, we endeavour to obtain permission (or a Letter of Authority LOA) from the landlord/property owner to ensure they are aware of changes to the MIC/MEC agreement.</p>
Leep Electricity Networks Ltd	Non-confidential	Yes
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	<p>We agree with the proposers view to add terms into the DCUSA and the NTC to clarify that Distributors may disclose the MIC or MEC at a property to a landlord or prospective landlord or customer, even if they are not the current customer. By placing a requirement in DCUSA, with which Distributors have a License obligation to comply, providing information to landlords or a prospective landlord or customer would not be a breach of s105 of the Electricity Act.</p> <p>Currently we store the business details of the premises and request a letter of authority from any other party making the request. In practice how will the DNO confirm that the party making the request is the landlord?</p>
The Electricity Network Company	Non-confidential	Yes, we agree.

UK Power Networks	Non-confidential	Yes
Confidential 1	Confidential	Yes
Confidential 2	Confidential	Yes

Company	Confidential	<p>4) Do you agree that Distributors should be able to disclose the MIC or MEC at a property to the landlord, even if they are not the bill paying customer, without the need for consent by the customer or business with whom the Distributor is providing a connection under the Electricity Act 1989)? If not, please provide your rationale.</p> <p>B) If you agree, how should prospective owners be dealt with? For example, should the Distributor do any checks or is it acceptable that effectively this allows the information to be shared with any interested party? If you think they should do checks what do you think they can do?</p>
Electricity North West	Non-confidential	<p>A) We agree that Distributors should be able to disclose the MIC or MEC at a property to a prospective purchaser of that property.</p> <p>B) We believe that this information should be requested formally with evidence of a legitimate reason for requesting the information. It may be useful for members of the working group to agree what constitutes a legitimate reason e.g. a request from a conveyancer.</p>
Energy Assets Networks Ltd	Non-confidential	<p>To provide evidence of discussions with third parties of the intent to take over and/or move in to the property e.g. commercial estate agents, a LOA from the existing tenant, mortgage/rental agreement. To protect commercially sensitive or personal information, the evidence could be redacted.</p>

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Leep Electricity Networks Ltd	Non-confidential	<p>A) Yes</p> <p>It would be hard to verify a prospective purchaser however we are comfortable that this information should be shared with anybody declaring an interest as a prospective purchaser</p>
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	<p>There may be a precedent in the licence in the definition of Customer in the licence (i.e. any person who is supplied or requires to be supplied with electricity at any premises in Great Britain) and the obligation to provide of MPAS to any Customer.</p> <p>However, we are not clear what practical checks could be carried out to confirm a party is a 'prospective purchaser'. A prospective purchaser would, presumably, have contact details for the owner/occupier and could confirm the MIC or MEC with them.</p>
The Electricity Network Company	Non-confidential	<p>A) Yes, we agree.</p> <p>B) We have no specific comments on how prospective owners should be dealt with. On the basis MIC/MEC does not constitute personal data & sharing of this information would be facilitated via the DCUSA agreement, any 'due diligence' could be explored further in working group. Alternatively the legal text can remain broad to leave individual organisations to determine the business process.</p>
UK Power Networks	Non-confidential	<p>A) Yes</p> <p>It would likely be unfeasible for the DNO to undertake checks on each and every enquiry, and there isn't an obvious source of information which could be provided in all cases. Disclosure of the MIC/MEC to any party interested in acquiring the property would appear to be the right approach.</p>
Confidential 1	Confidential	<p>Yes, accepting that the information can be shared with any interested party. Requiring checks adds a layer of complexity and delay. In addition, the evidence available will likely not be consistent across all scenarios.</p>

Confidential 2	Confidential	Yes, if a person asks for information we should be able to provide it and should not be responsible for carrying out checks of their authenticity, we should take approaches at face value.
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Company	Confidential/ Anonymous	5) Beyond providing details of the MIC and MEC, do you believe that there is any other acceptable information that could be shared? For example, details of the connection where a customer may have a constrained connection.
Electricity North West	Non-confidential	We do not foresee any further information that should be shared.
Energy Assets Networks Ltd	Non-confidential	Yes, if there is a constrained connection or any other characteristics at the property e.g. excessive reactive power that needs to be corrected by the installation of new equipment etc.
Leep Electricity Networks Ltd	Non-confidential	No
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	Consideration could be given to providing information regarding the number of phases, security of supply and any agreed constraints.

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The Electricity Network Company	Non-confidential	No other information identified in scope.
UK Power Networks	Non-confidential	It is likely that following the conclusion of the Access SCR, connections which are constrained will increase in number, as a result it would be entirely logical that this information is shared, along with any other specifics which relate to that particular connection.
Confidential 1	Confidential	Yes. Customers should be aware of any connection constraints in place at the premises.
Confidential 2	Confidential	Ideally we would want to expand this as wide as possible in the spirit of the Energy Task Force Open Data initiative (https://www.gov.uk/government/groups/energy-data_taskforce), however we need to consider that the confidentiality required by s.105 Utility Act does not sit well with modern data sharing expectations of industry participants. Therefore consideration is required as to how far we can expand this without breaching the Utility Act.

Company	Confidential/ Anonymous	6) Do you consider that the proposal better facilitates the DCUSA General Objectives? If so, please detail which of the General Objectives you believe are better facilitated and provide supporting reasons.
Electricity North West	Non-confidential	Yes. General objective 4 in particular will be better facilitated.
Energy Assets Networks Ltd	Non-confidential	Yes, we believe the change proposal better facilitates General Objective 1 as it permits the distributor to provide information on specific connection characteristics to a perspective new owner, tenant or landlord in an efficient manner.

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Leep Electricity Networks Ltd	Non-confidential	Yes, this is supportive of general objective 1 and 4 as detailed in the change proposal
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	<p>We consider that the following General Objective are better facilitated</p> <ol style="list-style-type: none"> 1. The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks. 2. The promotion of efficiency in the implementation and administration of the DCUSA. <p>In addition this will provide greater clarity for owners/occupiers.</p>
The Electricity Network Company	Non-confidential	We agree with the proposer that the change better facilitates DCUSA General Objectives 1 & 4.
UK Power Networks	Non-confidential	DCUSA General Objectives 1 and 4 are better facilitated by this change, as it would make it clear to network operators that the MIC / MEC and other relevant information can be shared. This would ensure that network operators to be more efficient in their operation, it also adds additional clarity to the operation of DCUSA.
Confidential 1	Confidential	<p>The proposal better facilitates object 1 relating to the development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks.</p> <p>Through sharing information relating to the capacity of a given premises with the owner or prospective owner, the stakeholder experience is improved and decisions on whether changes will be required a result of a change in occupancy can be made more quickly.</p>

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Confidential 2	Confidential	Yes. Further to the General Objectives identified on the DCP 386 Change Proposal Form, DCUSA General objective 2 may also apply in that improved data availability may improve competition as generators and suppliers understand what areas of the network offer opportunities for development.
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Company	Confidential/ Anonymous	7) Are you aware of any wider industry developments that may impact upon or be impacted by this CP?
Electricity North West	Non-confidential	We are not aware of any wider industry developments that may impact upon this CP.
Energy Assets Networks Ltd	Non-confidential	No
Leep Electricity Networks Ltd	Non-confidential	No
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	No
The Electricity Network Company	Non-confidential	No

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UK Power Networks	Non-confidential	No
Confidential 1	Confidential	No
Confidential 2	Confidential	No

Company	Confidential/ Anonymous	8) Are you supportive of the proposed implementation date being the first DCUSA release following Authority approval?
Electricity North West	Non-confidential	Yes, this seems a reasonable approach to take.
Energy Assets Networks Ltd	Non-confidential	Yes
Leep Electricity Networks Ltd	Non-confidential	Yes
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	Yes

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The Electricity Network Company	Non-confidential	Yes
UK Power Networks	Non-confidential	Yes
Confidential 1	Confidential	Yes
Confidential 2	Confidential	Yes

Company	Confidential/ Anonymous	9) Do you have any comments on the proposed legal text?
Electricity North West	Non-confidential	See response to Question 3.
Energy Assets Networks Ltd	Non-confidential	No
Leep Electricity Networks Ltd	Non-confidential	No
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern	Non-confidential	No

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Powergrid (Yorkshire) plc		
The Electricity Network Company	Non-confidential	No
UK Power Networks	Non-confidential	No
Confidential 1	Confidential	No
Confidential 2	Confidential	No

Company	Confidential/ Anonymous	10) Do you have any other comments?
Electricity North West	Non-confidential	None.
Energy Assets Networks Ltd	Non-confidential	No
Leep Electricity Networks Ltd	Non-confidential	No
Northern Powergrid on behalf of Northern Powergrid	Non-confidential	The legal text complies with the intent of this proposal however, we are not clear what practical checks could be put in place to confirm a party is either the landlord or a prospective purchaser. If, for example, a letter of authority is required from the occupier then this would defeat the intent of this change proposal.

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(Northeast) Ltd and Northern Powergrid (Yorkshire) plc		
The Electricity Network Company	Non-confidential	No
UK Power Networks	Non-confidential	No
Confidential 1	Confidential	No
Confidential 2	Confidential	No