

DCP 399 'Revision to Embedded Capacity Register (ECR) to lower threshold for entries from 1MW to 50kW'

Electrical Installations COLLATED CONSULTATION RESPONSES

| Company | Confidential/ Anonymous | 1. Do you understand the intent of DCP 399? | Working Group Comments |
|--|----------------------------|---|------------------------|
| UK Power Networks | Non-confidential | Yes – to lower the threshold for entries to for generation to 50kW from 1MW currently | Noted |
| UK Power Distribution | Non-confidential | yes | Noted |
| Electricity North West | Non-confidential | yes | Noted |
| Northern Powergrid | Non-confidential | Yes. | Noted |
| ESP Electricity | Non-confidential | Yes. | Noted |
| National Grid Electricity Distribution | Non-confidential | Yes | Noted |
| Working Group Conclusions: All respondents understood the intent of DCP 399. | | | |

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| Company | Confidential/ Anonymous | 2. Do you support the principles of DCP 399? | Working Group Comments |
|---|----------------------------|---|---|
| UK Power Networks | Non-confidential | Yes we support the principles of DCP399 | Noted |
| UK Power Distribution | Non-confidential | Yes | Noted |
| Electricity North West | Non-confidential | Yes | Noted |
| Northern Powergrid | Non-confidential | Yes. | Noted |
| ESP Electricity | Non-confidential | We support the principles underpinning DCP399 but are unsure of the intended outcomes of lowering the threshold to 50kW. While greater access to flexibility has been stated, we are unsure if this alone will realistically facilitate more market activity. Additionally, there has been no supporting material shown how NGESO have utilised the first tranche of the embedded capacity register data or what their plans are if the threshold is lowered. | Further information on how ECR data is being used by ESO has been provided and will be included within the Change Report. |
| National Grid Electricity Distribution | Non-confidential | Yes | Noted |
| Working Group Conclusions: All respondents understood the principles of DCP 399. One respondent requested further information on how NGESO have used the data provided to date and stated they are unsure if lowering the threshold to 50kW will realistically facilitate more market activity. | | | |

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Further information on how ECR data is being used by ESO has been provided and will be included within the Change Report.

| Company | Confidential/ Anonymous | 3. Do you support the intent of this CP to lower the threshold for entries to the ECR from 1MW to 50kW? Please provide your rationale. | Working Group Comments |
|------------------------|----------------------------|--|------------------------|
| UK Power Networks | Non-confidential | Yes – a lower threshold will provide greater market visibility | Noted |
| UK Power Distribution | Non-confidential | yes | Noted |
| Electricity North West | Non-confidential | Yes. This will better deliver the objectives of the DCUSA in respect of providing visibility of data to support the introduction of greater market flexibility. Furthermore, it will also provide greater visibility of existing network flexibility which will aid prospective new connections. | Noted |
| Northern Powergrid | Non-confidential | Yes. We recognise the direction of travel and that there is a desire from industry for the existing 1MW threshold to be lowered, although we have some concerns that there is limited justification for the minimum threshold being set 50kW, rather than at a higher value. | Noted |
| ESP Electricity | Non-confidential | We broadly support the intent of the CP. We do not think some of the benefits noted in paragraph 4.6 are likely to materialise (such as new builds swapping locations or trading rights) in a relatively nascent market but agree that there are other benefits that could be obtained. | Noted |

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| National Grid Electricity Distribution | Non-confidential | Lowering the threshold of the ECR to 50kW will increase the visibility of connections to the distribution network and improve system coordination | Noted |
| <p>Working Group Conclusions: A majority of respondents stated they support the intent of lowering the threshold for entries to the ECR from 1MW to 50kW. One respondent stated they were broadly supportive.</p> <p>One respondent stated they have some concerns that there is limited justification for the minimum threshold being set 50kW, rather than at a higher value. Another stated that they do not think some of the benefits noted in paragraph 4.6 are likely to materialise (such as new builds swapping locations or trading rights) in a relatively nascent market but agree that there are other benefits that could be obtained. This is addressed under Question 2.</p> | | | |

| Company | Confidential/ Anonymous | 4. Do you have any comments on the proposed legal text amendments? | Working Group Comments |
|------------------------|-------------------------|--|------------------------|
| UK Power Networks | Non-confidential | No – we support the wording of the legal text | Noted |
| UK Power Distribution | Non-confidential | No, we think they are appropriate | Noted |
| Electricity North West | Non-confidential | None | Noted |
| Northern Powergrid | Non-confidential | No. | Noted |
| ESP Electricity | Non-confidential | No comments. | Noted |

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|--|------------------|---|---|
| National Grid Electricity Distribution | Non-confidential | <p>"Import Capacity", "Export Capacity" and "Registered Capacity" are not defined in the DCUSA glossary.</p> <p>"DSR Contract of 50kW or more" would benefit from explicitly stating that this is in relation to real power capacity.</p> | <p>Noted</p> <p>WG agree to amend legal text to change 'Import Capacity' and 'Export Capacity' to 'Maximum Import Capacity' and 'Maximum Export Capacity' as defined in DCUSA already.</p> <p>WG agreed to amend legal text to add definition for 'Registered Capacity', pointing to the definition within the Distribution Code.</p> <p>WG noted that as the units are stated as kW, no further clarity is needed.</p> |
| <p>Working Group Conclusions: A majority of the respondents had no comments on the proposed legal text amendments. One respondent stated that "Import Capacity", "Export Capacity" and "Registered Capacity" are not defined in the DCUSA glossary and that "DSR Contract of 50kW or more" would benefit from explicitly stating that this is in relation to real power capacity.</p> <p>The Working Group agreed to amend the legal text and ECR as outlined in the response above in relation to the defined terms, however agreed that there was no need to explicitly state that "DSR Contract of 50kW or more" is in relation to real power capacity as it is implied in the use of kW.</p> | | | |

| Company | Confidential/Anonymous | 5. Do you have any comments on the proposed updates to the ECR? | Working Group Comments |
|-------------------|------------------------|---|------------------------|
| UK Power Networks | Non-confidential | No the updates reflect the general direction of travel in relation to the provision of data | Noted |

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|--|------------------|--|--|
| UK Power Distribution | Non-confidential | No, we think these are appropriate | Noted |
| Electricity North West | Non-confidential | None | Noted |
| Northern Powergrid | Non-confidential | No | Noted |
| ESP Electricity | Non-confidential | No comments. | Noted |
| National Grid Electricity Distribution | Non-confidential | <p>Lowering the threshold to 50kW could result in connections to privately owned supplies being brought into the scope of the ECR, for example sole trader owned businesses or privately owned properties</p> <p>For connections less than 1MW and greater than or equal to 50kW, columns potentially containing personal information (customer name, customer site & address 1, postcode) or location data (easting & northing) could be anonymised as determined by a data triage assessment</p> <p>Splitting part 1 across two tabs by size results in a more complicated process to automate population by DNOs, ingestion of data by users and machine readability but also introduces unnecessary opportunities for confusion due to a lack of discoverability – recommend combining into a single tab for all connection sizes which can be easily filtered or sorted</p> | <p>Noted</p> <p>WG maintain their position that this should be split, as previously agreed. WG note that initially 1MW and above will be more populated. May be more data items in 1MW and below so sensible to split.</p> |

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| | | <p>The existing xlsx template should be replaced with a CSV, metadata and data dictionary in order to support Ofgem's Data Best Practice principles</p> <p>Correct typos in the excel template: Contents tab 'addittional', Lists tab 'Accepected to Connect', Definitions part 1 tab 'irrespective'</p> | WG note this comment but agree that this should form a future change as consultation will be required. |
| <p>Working Group Conclusions: A majority of the respondents had no comments on the proposed updates to the ECR.</p> <p>One respondent noted that splitting part 1 across two tabs by size results in a more complicated process to automate population by DNOs, ingestion of data by users and machine readability and introduces opportunities for confusion due to a lack of discoverability. The responder recommended combining into a single tab for all connection sizes which can be filtered or sorted. The Working Group discussed and agreed to maintain their original position that this should be split.</p> <p>The responder also suggested that the current template should be replaced with a CSV, metadata and data dictionary in order to support Ofgem's Data Best Practice principles. The Working Group noted the comment but agreed that this should form a future change as a consultation will be required.</p> <p>Finally, the respondent highlighted several typos in the excel spreadsheet, these have been updated.</p> | | | |

| Company | Confidential/ Anonymous | 6. Do you agree that the considerations and advice received in relation to the implementation of the ECR with a threshold of 1MW is still relevant with the lowering of the threshold to 50kW? If not, please provide your rationale. | Working Group Comments |
|-----------------------|----------------------------|--|------------------------|
| UK Power Networks | Non-confidential | Yes – it will provide more information | Noted |
| UK Power Distribution | Non-confidential | Yes we do | Noted |

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| Electricity North West | Non-confidential | Yes | Noted |
| Northern Powergrid | Non-confidential | Yes. | Noted |
| ESP Electricity | Non-confidential | Yes, we believe this is still relevant. | Noted |
| National Grid Electricity Distribution | Non-confidential | Yes | Noted |
| Working Group Conclusions: All respondents agreed that the GDPR considerations and advice received in relation to the implementation of the ECR with a threshold of 1MW is still relevant with the lowering of the threshold to 50kW. | | | |

| Company | Confidential/Anonymous | <p>7. Do you consider that the proposal better facilitates the DCUSA General Objectives?</p> <p>If so, please detail which of the General Objectives you believe are better facilitated and provide supporting reasons.</p> <p>If not, please provide supporting reasons.</p> | Working Group Comments |
|-------------------|------------------------|--|------------------------|
| UK Power Networks | Non-confidential | We believe that DCUSA General Objective 1, 2 and 3 are better facilitated by this change proposal. As the provision of robust, transparent data on the number, size, types and location of embedded market participants will help in the development and operation of a more competitive and | Noted |

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| | | economically efficient market. This will help policy makers design “better” policy and drive market developments to deliver the best deal for customers. It will help inform forecasting by the ESO, DNOs, Suppliers and other participants. It will also help investors to reach decisions on location, technology choices, etc. By improving transparency and market knowledge, the GB electricity market can operate more efficiently which will ultimately benefit customers. | |
| UK Power Distribution | Non-confidential | Yes we do | Noted |
| Electricity North West | Non-confidential | Yes. Objectives 1, 2 and 3. | Noted |
| Northern Powergrid | Non-confidential | Yes, we believe that the DCUSA General Objectives 1, 2 and 3 are better facilitated by the proposal, although as mentioned in our response to question 3, we do have some concerns that the additional resources required to collate the additional information may not be offset by the benefits deliverable by the wider industry. We do however recognise that the information needs to be provided on a reasonable endeavours basis and that the reason for the splitting the Register Part 1 in to two parts is to recognise that the Register Part 1 (50kW - <1MW) has less potential to deliver wider benefit than the information in the Register Part 1 (>=1MW) and that it is reasonable, initially at least, for DNOs to focus on that part of the register relating to the higher capacity generation. | Noted, concerns addressed under Questions 2 and 3 above. |
| ESP Electricity | Non-confidential | We agree that this CP would better facilitate objectives A and B. | Noted |

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| National Grid Electricity Distribution | Non-confidential | Yes – general objective 2 Reasoning: increased visibility of embedded assets connected to the distribution system | Noted |
| Working Group Conclusions: All respondents agreed that the proposal better facilitates the DCUSA General Objectives. One respondent raised concerns that the additional resources required to collate the additional information may not be offset by the benefits deliverable by the wider industry. This is addressed by the Working Group responses in Questions 2 and 3. | | | |

| Company | Confidential/ Anonymous | 8. What resource/ system costs do you anticipate, if DCP 399 is implemented, and the ECR threshold is lowered from 1MW to 50kW? | Working Group Comments |
|------------------------|-------------------------|---|------------------------|
| UK Power Networks | Non-confidential | Smaller projects i.e. those below 1MW are generally dealt with at area/office level and are not centrally recorded. Significant time/resources have been employed to extract/gather data from a variety of locations/systems and to verify and record in a consistent format as per the ECR. Actual time and costs have not been formally recorded that it is/will be a requirement to publish the data | Noted |
| UK Power Distribution | Non-confidential | We will have to invest time in data cleansing, but no system cost is as yet involved as the ECR remains an excel spreadsheet. | Noted |
| Electricity North West | Non-confidential | We estimate that after the initial data capture, this will take 3 days per month to verify and update. | Noted |
| Northern Powergrid | Non-confidential | Where information associated with installations between 50kW and 1MW is available in our information systems, the additional resources to | Noted |

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| | | develop the initial expanded version and to maintain this with newly connected plant will be modest. However, where the presence of generation plant is identified via other industry sources, establishing the data set to populate the complete register entry could be resource intensive. | |
| ESP Electricity | Non-confidential | We have not previously captured the data requested at such a granular level at 50kW in a format that is easily recallable on a monthly basis. Doing so, and with the possibility that the information requested in the future may be expanded on, will take a material amount of resource in terms of time to collate the data and expand the scope for sites going forward. | Noted |
| National Grid Electricity Distribution | Non-confidential | This can be absorbed within our current data system and resource availability | Noted |
| Working Group Conclusions: Respondents provided a range of responses, the Working Group acknowledge that these will be considered in making a decision regarding implementation dates. | | | |

| Company | Confidential/Anonymous | 9. Are you aware of any wider industry developments that may impact upon or be impacted by this CP? | Working Group Comments |
|-----------------------|------------------------|---|------------------------|
| UK Power Networks | Non-confidential | Provision of more data can only help to/assist market participants in meeting net zero aspirations | Noted |
| UK Power Distribution | Non-confidential | No | Noted |

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|--|------------------|---|---|
| Electricity North West | Non-confidential | Grid Code Modification GC0139 and Distribution Code Modification DCRP/MP/20/04 | The Working Group agreed that there should not be any negative interactions. |
| Northern Powergrid | Non-confidential | No | Noted |
| ESP Electricity | Non-confidential | None. | Noted |
| National Grid Electricity Distribution | Non-confidential | Yes, Ofgem's Data Best Practice principles and ensuring this development is supportive of those principles. | The Working Group noted that this is covered by their response in Question 5. |
| <p>Working Group Conclusions: The majority of respondents noted that they were not aware of any wider industry developments that may impact upon or be impacted by this CP. One response suggested that Grid Code Modification GC0139 and Distribution Code Modification DCRP/MP/20/04 may be impacted. The Working Group agreed that there should not be any negative interactions.</p> <p>Another response highlighted an impact to Ofgem's Data Best Practice principles and ensuring this development is supportive of those principles. The Working Group noted that this is covered by their response in Question 5.</p> | | | |

| Company | Confidential/ Anonymous | 10. If this CP is approved, how long after would you be able to complete the new version of the ECR (i.e. would you be able to use it from November 2022 or would more time be needed)? Please provide the reasons for the time needed. | Working Group Comments |
|---------|-------------------------|---|------------------------|
|---------|-------------------------|---|------------------------|

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|---|------------------|--|-------|
| UK Power Networks | Non-confidential | We anticipate being able to publish data in the following calendar month i.e. if approval is granted in November we expect to be able to publish on the 10th working day of December. | Noted |
| UK Power Distribution | Non-confidential | We will be able to put it in circulation in line with the recommended implementation date (November 2022) | Noted |
| Electricity North West | Non-confidential | We can deliver a new version by February 2023 | Noted |
| Northern Powergrid | Non-confidential | We agree that a phased implementation would be helpful and support the suggestion that DNOs should be able to use the revised register template from, for example November 2022, and be required to use it several months later, for example from February 2023. | Noted |
| ESP Electricity | Non-confidential | As noted in our response to Q8, we would not be able to complete the new version of the ECR by November. We think a phased approach is sensible but would suggest a 3 to 6 month lead time. | Noted |
| National Grid Electricity Distribution | Non-confidential | NGED will be able to complete the new version of the ECR from November 2022 subject to approval of DCP 399 however, there will of course be a continuing process of data completion with subsequent submissions. | Noted |
| <p>Working Group Conclusions: Mixed responses were provided, with timescales ranging between being able to publish data in the following calendar month, to requesting a 3 to 6 month lead time.</p> <p>The Working Group noted the support for a transition period and agreed that the template should be able to be used from the February 2023 DCUSA release and mandated following the June 2023 DCUSA release.</p> | | | |

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| Company | Confidential/ Anonymous | 11. Any other comments? | Working Group Comments |
|--|----------------------------|--|--|
| UK Power Networks | Non-confidential | We are disappointed at the length of time that has elapsed since the original Change Proposal was drafted and the Consultation document being published. | Noted |
| UK Power Distribution | Non-confidential | No | Noted |
| Electricity North West | Non-confidential | None | Noted |
| Northern Powergrid | Non-confidential | It would be worth confirming whether then revised register template should be version 4 rather than version 3 | This has been amended accordingly. |
| ESP Electricity | Non-confidential | None. | Noted |
| National Grid Electricity Distribution | Non-confidential | Paramount is the clarity around treatment sole trader / personal addresses likely to be impacted with the reduction to 50kW so each organisation manages those in a consistent and effective manner. | The Working Group note they had sought GDPR advice, however ultimately it is the responsibility of each DNO to assess. |
| <p>Working Group Conclusions: Three responses provided no further comments. One response noted disappointment at the length of time that has elapsed since the original Change Proposal was drafted and the Consultation document being published. The Chair acknowledges this and noted that this has been due to extra resource being required for the Access SCR DCPs.</p> <p>Another response highlighted a potential issue with versioning of the ECR template, this has been resolved.</p> | | | |

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A third response noted the importance of clarity around treatment sole trader / personal addresses likely to be impacted with the reduction to 50kW so each organisation manages those in a consistent and effective manner. The Working Group note they had sought GDPR advice, however ultimately it is the responsibility of each DNO to assess.