DCUSA

Request for DCUSA Party feedback by 5pm, 18 January 2022

DIF 62: Additional Clarification for correct application of the LV Sub Site Specific Tariff

1. Purpose of this Document

1.1 The purpose of this document is to seek Party feedback on the current DCUSA wording in relation to application of the LV Sub Site Specific Tariff. To respond to the questions posed in Section 5.1 of this document, please complete the RFI response form found in Attachment 1.

2. Summary

2.1 DIF 62 'Additional Clarification for correct application of the LV Sub Site Specific Tariff' was raised on 10 January 2022 (see Attachment 2) and discussed at a DCUSA Standing Issues Group (SIG) on 28 January 2022. The SIG meeting consisted of DNO, IDNO and Supplier members.

2.2 The circumstances under which an LV Sub Site Specific Tariff can be accurately applied are defined in Schedule 16, Clause 141 of DCUSA. In particular, it notes the following:

Note 3: LV Sub applies to customers connected to the DNO Party's network at a voltage of less than 1 kV at a substation with a primary voltage (the highest operating voltage present at the substation) of at least 1 kV and less than 22 kV, where the current transformer (CT) used for the customer's settlement metering is located at the substation. For these purposes, 'at the substation' means:

a) *an HV/LV substation with the metering CT in the same chamber as the substation transformer; or*

b) *an HV/LV substation with the metering CT in a chamber immediately adjacent to the substation transformer chamber.*

2.3 The proposer of DIF 62 states their understanding is that for LV Sub site specific tariffs, the end customer is responsible for the operation and maintenance of the LV circuits beyond the CTs and metering which would be installed at (or adjacent to) the substation supplying their property. However, when discussing this application with their end customers or contractors, they often query where it states that the customer owns the LV circuit for LV Sub tariffs.

2.4 After discussion, the members of the Working Groups understanding of the above Clause was as below:

- LV Sub depends on where the CTs are located and not where the metering is located.
    - Must be either in the substation or "immediately adjacent". This term isn't defined, and the SIG members would be keen to understand how DNOs and IDNOs interpret this.
- The customer is not using a significant amount of LV network, so it is excluded from the charges for LV Sub customers.
- From a DUoS charging perspective, the charge is up to the CTs so for this purpose the ownership of the cable after that point is irrelevant.
- The exit point and the ownership boundary (DNO/BNO) are not always in the same place (although in most cases they would be)

2.5 SIG members are keen to seek Party feedback in relation to DIF 62 and have posed the following questions detailed in Section 3.

3. Feedback Request

3.1 The SIG is keen to seek DUSA Party views on the following:

1. With respect to this issue, have you experienced queries from customers/Suppliers relating to the application of the LV sub site specific tariff regarding physical arrangements (i.e., LV cable ownership and boundaries)?
2. With respect to the wording "immediately adjacent", how does your organisation interpret and apply this (i.e., do you have a standard definition or is each site assessed individually and if so, how)?
3. Are there any other issues experienced when dealing with customers/Suppliers regarding the application of the LV sub tariff?
4. Do you believe that the legal text within the DCUSA requires amendment to remove any ambiguity and ensure consistency of application of the LV sub site specific tariff? If so, please can you provide suggestions for amendments?
5. With respect to the ownership of the LV cables, as a distributor, do you or the customer own the LV cables or is there mix? In either circumstance does this alter your application of the LV sub site specific tariff?

3.2 Please respond to the above questions by completing the consultation response form found in Attachment 1.

4. Attachments

4.1 Attachment 1: DIF 62 RFI Response Form

4.2 Attachment 2: DIF 62: Additional Clarification for correct application of the LV Sub Site Specific Tariff