

DCP 392 Working Group Meeting 06

12 January 2022 at 13:00 - Web-Conference

Attendee	Company
Working Group Members	
Charles Deacon [CD]	Renewable Connections
Edda Dirks [ED]	SSE Generation
Joanna Knight [JK]	SSEN
Gwen MacIntyre [GM]	SSEN
Tom Cadge [TC]	BU-UK
Peter Turner [PT]	NPg
Vanessa Buxton [VB]	WPD
Simon Vicary [SV]	EDF
Code Administrator	
John Lawton [JL] (Chair)	ElectraLink
Hannah Proffitt [HP] (Technical Secretariat)	ElectraLink
Apologies	
Dafydd Burton [DB]	Ofgem

1. Administration

- 1.1 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.
- 1.2 The Secretariat presented the minutes of the previous meeting held on 20 December 2021 to the group and asked members if they had any comments or feedback.
- 1.3 ED asked that clarification is added to the following bullet point in section 3.2 as this is currently unclear.

- *The Working Group agreed that 'minimum scheme' should not be a defined term as it states that the Distribution Assessment should always be the minimum scheme as default.*

- 1.4 ED noted that 'minimum scheme' is a defined term, whether it is included in the legal text as lower case or in capitals. The Chair clarified that the decision made at the previous meeting was to leave the term in lower case within the legal text and not to include the definition.
- 1.5 ED questioned whether, if the term is defined within other schedules, there could be a risk that readers could take this to mean the same thing. The Chair noted that if the term is in lower case there should not be any issues. Where a defined term such as Minimum Scheme is only used in a Schedule it is only relevant to that schedule and no others.
- 1.6 The Chair suggested that to avoid any misunderstanding a full stop is included after 'defined term' and that the rest of the bullet point is removed. The group agreed.
- 1.7 ED also highlighted that the minutes reference the consultation response deadline being extended but do not specify when this will be extended to. The Chair noted that this is yet to be agreed and will form part of the consultation document review.
- 1.8 An updated version of the previous minutes are included as **Attachment 1**.
- 1.9 The Working Group noted the items on the actions list from the last meeting. Updates on all actions are provided in **Appendix A**.
- 1.10 Regarding action **05/03**, the WG agreed to close this and the Chair took a new action to refer to Ofgem regarding whether it is appropriate for DUoS funding to be used.

ACTION 06/01: Chair to refer to Ofgem as to whether it is appropriate for DUoS funding to be used.

2. Purpose of the Meeting

- 2.1 The Chair set out that the purpose of the meeting was to review the draft legal text and draft consultation document that were circulated prior to the meeting.
- 2.2 The Chair noted that comments had been received on the consultation document and that these would be presented for discussion.

3. Review of Draft Legal Text

- 3.1 The Working Group reviewed a clean version of the current legal text and made several redlined amendments. An updated version can be found as **Attachment 2**.
- 3.2 Key Points of Discussion:
 - One member asked whether TRDR should this be spelt out. The group agreed that the convention within these schedules is not to do this but it can be located in the defined term definitions.

- Regarding section 4.4, a member asked whether this means that the DNO is responsible for rebates or whether it is down to the transmission system to recover. The Chair notes that this is clarified in section 6.1.
- The Chair highlighted sections 4.7 and 4.8 and advised that work needs to be done to develop the formulas and definition wording. The group discussed and agreed that, rather than amending the formulas, the definitions should be amended instead. Regarding the definitions the Chair noted that examples need to be considered on the current process where these instances occur to the boundary connection between the distribution network and the transmission network rather than at the transmission customers connection before these can be re defined. Members took an action to consider such instances. This may resolve a number of the outstanding actions (03/04, 04/01, 05/01 and 05/04).

ACTION 06/02: Working Group members to consider what the definitions should be in paragraph 4.6 based on current process.

- Regarding section 4.9, the question was raised as to whether 'existing connection' should be changed to 'distribution system'. The group agreed not to amend this as it is clarified in the next sentence.
- Regarding section 5.7(b), the Chair asked whether members had agreed to remove this or leave it in. VB suggested this should remain due to legacy considerations. The group discussed and agreed to leave this in.
- Regarding sections 6.1 and 6.2, the group discussed and agreed to remove 'or Customer'.
- Within the Glossary of Terms section, the group agreed for 'Customer' and 'Distribution Assessment' to be removed.

3.3 The Chair highlighted that the formula and definitions under section 4 are a key aspect of the text and urged the Working Group to consider these ahead of the next meeting.

4. Review of Draft Consultation Document

4.1 The Working Group reviewed the draft Consultation document and accepted and rejected several redlined suggested amendments. An updated version can be found as **Attachment 3**.

4.2 Key Points of Discussion:

- The Working Group reviewed and discussed section 1 and made clarificatory amendments to wording.
- Regarding 2.2, the Working Group agreed not to amend the wording as they were comfortable that it reflected the views of the proposer rather than the Working Group.
- Regarding 2.3, the Chair noted that the Working Group will need to agree the period of the consultation once they have completed both the legal text and consultation document.
- Members discussed sections 3.3 and 3.4 and agreed that this could be reviewed again once clarification has been sought from Ofgem regarding DUoS funding.

- Regarding section 4.1, the group agreed to include Supplier, Generators and developers to the list of part types included in the Working Group list.
- The Working Group agreed for the wording of the second paragraph of section 4.4 to be amended slightly to add clarity that it related to a Working Group member's opinion.
- Members reworded question 4, to ensure it was not a leading question.
- Members agreed to add a footnote with a link to the Electricity (Connection Charges) Regulations 2017 in section 4.30.
- The Working Group agreed to add an additional question above question 6 asking responders whether they agree with the application of the principle of the ECCRs to transmission connections triggering distribution works.

5. Next Steps

5.1 The Working Group discussed the next steps, and the following items were captured:

1. The Secretariat agreed to issue a doodle poll suggesting dates for the next meeting. Dates to be in the week commencing 31 January.

6. Any Other Business

- 6.1 The Chair asked the Working Group whether there were any other items of business to discuss.
- 6.2 There were no other items raised.

7. Date of Next Meeting

7.1 The date of the next meeting is to be confirmed.

8. Attachments

- Attachment 1_DCP 392 Working Group Meeting 05_Draft Minutes v2.0 (Redlined)
- Attachment 2_DCP 392 Legal Text_Clean_12012022 Working Group Comments
- Attachment 3_DCP 392 Draft Consultation_12012022 Working Group Comments

APPENDIX A

New and Open Actions

Action Ref.	Action	Owner	Update
03/04	The Working Group to redefine the definitions within the definitions table of the legal text that is currently used within the application of the CAFs.	Working Group	Ongoing.
04/01	The Working Group to seek information internally around potential examples that can be provided within the legal text of this CP (or can they be adapted from the current examples within the CCCM)?	Working Group	Ongoing.
05/01	CD to seek further information from the DNO system planners around what figure they use in DNO impact assessments (in relation to fault level/thermal).	CD	Ongoing. Work on the formula ongoing.
05/04	CD to seek legal perspective internally regarding the DUoS money questions.	CD	Ongoing. CD awaiting responses
05/05	GM/PT to re-word Q7 of the Consultation document relating to how the remaining DNO costs should be recovered from Transmission connected customers and bring back to the Working Group for further review.	GM / PT	Ongoing.
06/01	Chair to refer to Ofgem as to whether it is appropriate for DUoS funding to be used.	Chair	New action.
06/02	Working Group members to consider what the definitions should be in paragraph 4.6 based on current process.	Working Group	New action.

Closed Actions

Action Ref.	Action	Owner	Update
05/02	The Secretariat to circulate the questions regarding DUoS money to PT.	ElectraLink	Action closed.
05/03	PT to seek further information regarding the DUoS money questions to the ENA Connections COG.	PT	Action closed. PT raised this at the COG. COG pushed back stating they would expect the WG to resolve this matter ahead of the consultation being issued. JL took a further action to refer to Ofgem regarding whether it is appropriate for DUoS funding to be used in this way.