DCP 394 Working Group Meeting 05

22 February 2022 at 14:00 - Web-Conference

Attendee	Company
Working Group Members	
Colette Baldwin [CB]	Gemserv
David Jones [DJ]	Alt Han Co.
Finn Davies-Clark [FDC]	SSE
Frank Bertie [FB]	NAPIT
Geoff Huckerby [GH]	Power Data Associates
George Barnes [GB]	Utilita
Irmeen Khan [IK]	Alt Han Co.
Jonathan Elliott [JE]	Certsure
Kevin Liddle [KL]	NPg
Kevin Woollard [KW]	Centrica
Scott McLaughlin [SM]	Scottish Power Energy Networks
Paul Morris [PM]	UK Power Networks
Paul Abreu [PA]	Energy Networks Association (ENA)
Richard Brady [RB]	Western Power
Richard Hill [RH]	British Gas
Lee Stone [LS]	EON
Code Administrator	
Richard Colwill [RC] (Chair)	ElectraLink
Hannah Proffitt [HP] (Technical Secretariat)	ElectraLink

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 Updates on all actions are provided in **Appendix A**.

1.3 The group reviewed the minutes from the previous meeting held on 03 February 2022. Members approved the minutes as a fair and accurate representation of events.

2. Purpose of the Meeting

2.1 The Chair set out that the purpose of the meeting was to:

- Discuss the options surrounding DCP 390 and DCP 394,
- Discuss the alternative solution for DCP 394; and
- Discuss the DCP 394 provision of information.

3. Options for DCP 390 and DCP 394

3.1 PA advised that he had met with the Distribution Network Operators (DNOs) to discuss the two DCPs and how they could work with the Proposer of DCP 394 to reach a better solution for customers and industry. PA presented a paper to members outlining the outcomes of these discussions and possible options for merging DCP 390 into DCP 394.

3.2 PA noted that the DNOs have provided the following recommendations.

- DCP 394 should specify a Safe Isolation Provider (SIP) of last resort that will meet customer requirements for a safe isolation where no SIP party volunteers to satisfy a request.
- DCP 394 should require that the SIP of last resort publishes their process for obtaining a safe isolation giving clear information of likely timescales as a minimum.

3.3 KW (the Proposer of DCP 394) highlighted that the 10 Working Day (WD) Service Level Agreement (SLA) DCP 390 sought to introduce was a key barrier to some Suppliers agreeing to the change. KW noted that if this was removed, the change could be in a better position to progress. PA confirmed that they are suggesting the specific SLA is removed but that the legal text states that timescales must be reasonable, and that Suppliers must make their processes clearly available online so that expectations are clear.

3.4 CB asked whether they are proposing DCP 394 is expanded to include the SIP of last resort. KW noted that when DCP 394 was raised, the scope was broad and is therefore flexible.

3.5 KW highlighted the following two phases/options for the DCP 394 solution outlined in the paper.

- Option 1 - Supplier Led SIP Activity Option - The proposal would be considered for implementation on the basis that all SIP activity would be Supplier-led. This option would offer a faster implementation timescale as all parties involved are already DCUSA parties.

- Option 2 – Metering Equipment Manager (MEM) Led SIP Activity Option – The proposal would be considered that allows for SIP activity to take place led by independent MEMs without the involvement of any Supplier party. This option would be more complex to achieve and would take longer to implement due to the need for MEM parties to accede to DCUSA and sign up to the relevant legal obligations and liabilities.

3.6 PA noted that option 1 would expand current provisions within DCUSA, that currently allow these types of activities in specific circumstances. PA noted that option 1 was proposed as a potentially faster option as Suppliers are already DCUSA parties.

3.7 LS asked for clarity on the role of a SIP of last resort. PA advised that this refers to the party ultimately obligated to provide the isolation, if a customer is unable to get anyone to do the work for them. Currently this is not clear in DCUSA.

3.8 One member asked whether Suppliers would be able to opt out. KW clarified that Suppliers would not be obligated to work on other Suppliers' metering points, however that they would need to allow it to be carried out on their meter points.

3.9 The group discussed the two options and agreed that they could consult on both. The Chair noted that the consultation will need to include legal text to ensure respondents are clear on the change. The group agreed that the timeline and critical path need to be established

3.10 CB questioned whether it was necessary to merge DCP 390 and DCP 394 as they seem to cover two issues. PA noted that Ofgem pointed to a conflict between the two in their letter and suggested that it is possible they would reconsider if the SLA aspect was removed from DCP 390. LS agreed that DCP 390 is more urgent and could go through faster alone.

3.11 KW noted that his preference is that the two DCPs are progressed together and that they can go back to Ofgem with one solution that Parties agree on. KW noted that if they are progressed separately, there is a risk that Ofgem still reject DCP 390. PA agreed, however noted that the proposer of DCP 390 would need to make a decision on the way forward.

Action 01/05: PA to feedback discussions to the Proposer of DCP 390 to enable a decision on the way forward.

3.12 SM suggested that DCP 400 is reviewed carefully to ensure that there are no similar conflicts. The Chair noted that the initial invite to join the DCP 400 Working Group (WG) had been circulated and that the first meeting would likely be held in early March. The Chair confirmed that the first item on the agenda will be a discussion on DCP 394 vs DCP 400. DJ confirmed that a paper would be circulated ahead of this meeting outlining the differences between the two DCPs.

4. DCP 394 Alternative Solution

4.1 The Working Group agreed they had discussed this in the previous agenda item.

5. DCP 394 Provision of Information

5.1 The Chair presented the communications matrix to the group outlining that it sets out the relationships between affected Parties and the necessary communications.

5.2 LS highlighted the SIP to Supplier and SIP to Distributor notification of de energisation and re energisation, and noted that the current data flows only allow notification of the calendar day they occur and therefore would need to be amended to be more granular if they were to be useful in this situation.

5.3 The Chair updated the matrix according to the groups feedback. The latest version can be found in Attachment 2.

5.4 The group discussed the possible mechanisms for the communications. It noted that the Secure Data Exchange Portal (SDEP) could be more flexible than amending data flows and allows messages to be sent to all Suppliers. CB noted that she is currently investigating this.

5.5 CB noted that it is unclear at this stage how complicated using data flows would be as the issue is surrounding who can send and receive the flows rather than changing the flows themselves.

5.6 The group agreed that one mechanism needs to be agreed on and noted that they are unsure moving everything into SDEP is within scope of the change. The group agreed to continue discussions at the next meeting.

6. Review Draft Consultation

6.1 The Chair advised that the discussions held at the meeting would assist in drafting the consultation document. The Chair agreed to prepare a draft document for review at the next meeting.

7. Next Steps

7.1 The Working Group agreed for the next meeting to be held on Friday 11 March 2022 between 11am and 2pm. The purpose of this meeting will be to:

- Discuss DCP 390,
- Discuss the timeline and critical path for DCP 394,
- Discuss the provision of information for DCP 394; and
- To review the draft consultation.

8. Any Other Business

8.1 The Chair asked the Working Group if there was any other business, to which nothing was raised.

9. Date of Next Meeting

9.1 The date of the next meeting has been scheduled for Friday 11 March 2022 at 11am.

Attachments

Attachment 1 - DCP 394 Working Group Meeting 04_Final Minutes v1.0

Attachment 2 - DCP 394 Comms Matrix

APPENDIX A

New and Open Actions

Action Ref.	Action	Owner	Update
04/01	Chair to work with CB to draft a matrix including all possible communications needed within the DCP 394 solution.	Chair	**Action closed.** *Matrix discussed under agenda item 5.*
04/02	PA to provide an overview of the proposed alternative solution. Secretariat to issue this for Working Group review once completed.	PA/ Chair	**Action closed.** *Overview was circulated on 09 February 2022.*
04/03	Chair to organise meeting for KW and KL to discuss next steps for DCP 390.	Chair	**Action closed.** *Discussed under agenda item 03.*
04/04	Chair to consider when the DCP 394 consultation can be released, with consideration to REC modifications.	Chair	**Action ongoing.** *Timeline still under consideration.*
04/05	Secretariat to draft a consultation document for review at the next Working Group.	Secretariat	**Action ongoing.**
01/05	PA to feedback discussions to the Proposer of DCP 390 to enable a decision on the way forward	PA	**New Action.**