

DIF 62 Sub-Group - Meeting 01

14 April 2022 at 10:00 - Web-Conference

Attendee	Company
Working Group Members	
Donna Townsend [DT]	Energy Assets
Frank Welsh [FW]	UK Power Distribution
Ian Chadwick [IC]	UKPN
Kara Burke [KB]	Northern Powergrid
William McKay [WM]	SSEN
Code Administrator	
Andy Green [AG]	ElectraLink
Mel Kendal [MK] (Technical Secretariat)	ElectraLink
Richard Colwill [RC] (Chair)	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 An action log has been created and all updates are provided in **Appendix A**.

2. Purpose of the Meeting

- 2.1 The Chair introduced DT to provide the group with the purpose of the meeting.
- 2.2 DT explained that the understanding is that for the 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.
- 2.3 DNOs ARP tables show that LV circuits are not an input for LV sub-tariffs, and thereby creating a less expensive tariff than LV site specific. This suggests that the Distributor does not own the LV cables.
- 2.4 With this additional clarification, Customers can better understand why they may/may not qualify for an LV sub-tariff.
- 2.5 One member suggested adding in several parameters to ensure better continuity between DNOs and IDNOs in regard to qualifying for an LV sub-tariff as there currently seems to be variation between the two.

3. Review of DIF-62

- 3.1 The Chair opened up the discussion for the Working Group to review the current issue at hand.
- 3.2 One member supported the need for clarification of the term ‘adjacent to’ and provided an example to the group – if there is a building next door but there is a large amount of cable between the two buildings (for example, over 20 meters) then would this still be adjacent as the building is next door, but the cable is technically not?
- 3.3 A consultation to industry regarding this issue was released earlier in the year and the Chair shared the Consultation responses with the group to further aid the discussions.
- 3.4 Responses to the Consultation suggest different approaches, for example, adjacent to could mean attached to the substation or in a room immediately next to (i.e., through a doorway) with a specific length in meters away (i.e., between 3-10 meters of cable).
- 3.5 One member question whether the boundary fence is included within the distance of cable needed which shows another confusion that can apply to the term ‘adjacent to’.
- 3.6 Working Group members agreed that any new applications for an LV sub-tariff would be reviewed under the new changes of ‘adjacent to’ (if they are implemented). It was also agreed that legacy applications will not be re-reviewed, however those on a legacy LV sub-tariff who query this can be re-reviewed and potentially move to a new tariff in good faith.
- 3.7 One member raised a concern that if specific length of metering is included within the new definition of ‘adjacent to’, there could be financial constraints for DNOs. Another member suggested that these constraints would be recoverable through the allowed revenue process.

- 3.8 The Chair suggested drafting an Impact Assessment which could contain a question asking what the potential impacts may be for DNOs, to gain further insight before making any changes.
- 3.9 One member suggested being mindful around including within 'XX' number of meters to be adjacent to, as there is no mention of a specific length of LV cable within the CDCM Model and this is what the tariff is constructed from.
- 3.10 Another member stated that completely excluding a specific number of metering would limit the flexibility with Customers. 'Or as agreed otherwise with the DNOs' could potentially relieve this limitation.
- 3.11 It was also suggested that a definition of 'Supply Point' could be added to provide further clarity – for example, the Supply Point is where the DNO assets end and the Customers assets begin. The Working Group stated that 'Exit Point' is already defined within the Distribution Licences and is defined as 'the point of where electricity flows from the Distribution System to the Customers installation'.
- 3.12 The Working Group agreed that 'Exit Point' would be the correct term to utilise as it is already defined within other documents and will not need to be re-defined. This term would also eliminate any ambiguity around whether this would include the boundary fence or directly from the LV sub-station.
- 3.13 One member stated that it may be worth looking at Distributors G81 documents – G81 documents are obligations placed on the Distributor to produce electrical design standards and specifications and stated that each Distributor will have their own document. Each Distributors G81 may have their own design specifications relating to qualifying for an LV sub-tariff and what they will each oblige by in relation to length of meter etc.
- 3.14 The Chair suggested that the Working Group take an action to review their own G81s (relating to LV sub-tariffs) and discuss this further at the next Working Group meeting prior to looking at the feasibility of creating a new definition of 'adjacent to'. The Working Group agreed this would be beneficial.

ACTION 01/01: The Working Group to review their own G81 documents to aid the creation of a new definition of 'adjacent to' prior to the next meeting.

- 3.15 Once this information has been collated, a more suitable definition can be created. The Chair suggested circulating the new definition to Distributors within an RFI to gain their feedback prior to progressing to a Change Proposal. The Working Group agreed with this stance.

4. Agenda Items for Next Meeting

- 4.1 The Working Group discussed the next steps, and the following items were captured:
1. The Working Group to review their own G81 documents and bring to the next Working Group meeting for further discussion.
 2. The Working Group to create a new definition of 'adjacent to' using the information gathered from the G81 documents.
 3. The Secretariat to create and circulate an RFI to Distributors asking for feedback on the new definition of 'adjacent to' prior to progressing to a Change Proposal.

5. Any Other Business

5.1 The Chair asked the group whether there were any other items of business to discuss.

5.2 There were no other items raised.

6. Date of Next Meeting

6.1 The date of the next meeting has been scheduled for 11 May 2022 at 10am.

APPENDIX A

New and Open Actions

Action Ref.	Action	Owner	Update
01/01	The Working Group to review their own G81 documents to aid the creation of a new definition of 'adjacent to' prior to the next meeting.	Working Group	Ongoing.

Closed Actions

Action Ref.	Action	Owner	Update