Company	Confidential/ Anonymous	1. Do you understand the intent of DCP 392?
The Electricity Network Company Limited	Non-confidential	Yes, we understand the intent of the change proposal
Electricity North West	Non-confidential	Yes, we understand the intent.
ESP Electricity	Non-confidential	Yes
Harmony Energy Ltd	Non-confidential	Yes. Although I am struggling to see what scenarios there are other than a tertiary connection that would result in D works being triggered. Can the working group provide any examples of where a T connectee has triggered D works other than a tertiary connection? In our view this proposal is too narrow and whilst we agree the charging situation experienced by tertiary connections doesn't seem fair, there are also other scenarios to address and we feel it may be more beneficial to review it from a whole system perspective ie the situation in reverse where D connections are triggering new SGT's and having to pay in full, which is equally anti-competitive. The tertiary connection is already taking the benefit of lower extension asset costs by utilising an existing sole use asset that has been paid for either in full by the DNO or via exit charges over decades. Does the tertiary connection pay a proportion of these costs back to the DNO for the use of these assets? Can the working group provide any real life examples of the commercial implications of connecting a tertiary connection, in particular any refunds on the costs of SGT's back to DNO's and how the UoS charges are changed when the site becomes multiuser? Is there a significant change in the DNO's boundary charges? Does this have an impact on D customer's DUoS charges? It would seem from the Live Project 2 scenario that the tertiary connection is triggering 30.5km of 132kV reinforcement. I can't seem to reconcile why a tertiary connection would alter the load flows on a 132kV circuit and cause reinforcement. Can the working group provide more detail on this example as it seems to be relevant to the justification of this CP? The CP would require the DNO's to fund the majority of the works through a CAF calculation even though the connecting party is not connecting to their network. Can the working group confirm where

		the funding will come from for the DNO contributions and as per answers to other queries will the revised rules allow those DNO's to an eligible person (first comer) and recover costs from subsequent comers whether they on the T or D network?
Northern Powergrid on behalf of Northern Powergrid (Northeast) plc and Northern Powergrid (Yorkshire) plc	Non-confidential	Yes.
Renewable Connections	Non-confidential	Yes, as co-proposer the intent is to provide parity treatment in the capital funding of required reinforcement to the distribution system whether this results from a first connection to the distribution system OR transmission system.
SSE Generation	Non-confidential	Yes, we do.
Scottish and Southern Electricity Networks	Non-confidential	Yes.
Anonymous	Anonymous	Yes
Question 1 Summary		

Company	Confidential/ Anonymous	2. Are you aware of any legal, regulatory or licence obligation which would allow, or disallow DNOs to fund works on the distribution system that are triggered by a transmission connecting customer through the DUoS charges?
The Electricity Network Company Limited	Non-confidential	We are not in a position to give a definitive view of whether the regulatory framework allows or disallows DNOs to fund these costs. This is because we think the funding of such costs falls outside the scope of the existing legal, regulatory and licence obligations placed on distributors. We believe such works are outside the scope of sections 16 to 23 of the Electricity Act 1989, outside the scope of the charging obligations in the licence, and therefore outside the scope of connection charging

		methodology. Therefore we don't believe that the legal, regulatory or licence conditions give clarity one way or the other on whether such specific costs are allowed or not allowed. Distributors have an obligation to operate an economic and efficient distribution system. It is not clearly demonstrated that such connections to the transmission system are always consistent with such obligations and it follows, therefore, that funding of such works by the distributor may not be consistent with these obligations. Also, it is not clear that such connections are always in the interest of consumers, particularly if they have to fund works to the transmission system (through TNUoS) and works to the distribution system through DUoS. However, under the DNO price controls, DNOs submit their business plans for proposed works. Ofgem will determine which works should or should not be funded as part of the price control process. We believe that it is within the gift of the DNO to include this funding in their price control business plans but note that it is highly unlikely that they will have done so for RIIO-ED2 so we believe that these costs could require price control re-openers. Given that there is no statutory obligation for DNOs to undertake such works (only a contractual one in CUSC), it would be unreasonable to mandate that DNOs undertake such works without an appropriate mechanism to recover the costs. Whilst we believe that it is within Ofgem's vires to allow the DNO to fund these costs and to recover them from DUoS customers through their price control though price control re-openers, there is no obligation for Ofgem to do so. Such a decision would need to be weighed in relation to Ofgem's statutory duties in relation to consumer protection, facilitation of competition and delivering net zero at lowest overall cost
Electricity North West	Non-confidential	We are unaware of any legal, regulatory or licence obligations that would allow such work to be funded by DUoS customers. The current connection charging arrangements are detailed in the CCCM which is contained in DCUSA as a schedule merely to provide open governance. The obligations stem from Standard Licence Condition 13, supported by Section 16 of the Electricity Act and the ECCR. All these relate to connections to the distribution system and therefore these provisions do not extend to connections to the Transmission network. We would consider this sort of work to be covered under Directly Remunerated Services and therefore charged in full to the party requesting them.

		We would need explicit agreement from Ofgem that this could be funded through DUoS charges but has not been treated as such in the current price control ED1 or in ED2. Also, as the connection is a transmission connection, it is unclear what ongoing relationship will be established between the transmission user and the distribution network or if there will in fact be any. Further consideration is required between the ongoing costs for the medium and longer term to cover on-going maintenance; capitalised O&M could be utilised, otherwise, there would be no recovery of those costs. We note Ofgem has reviewed the treatment of Transmission costs associated with distribution connections and indicated in its minded to position as part of the Access SCR that these would continue to be charged in full to the connecting customer. This proposal seems to be at odds with that principle. As the Access SCR is not yet complete, the timing of this change seems inappropriate as it could result in conflicting approaches. Consequently, we consider this change would be better assessed against the context of the Access SCR once determination has been made or in ED2. Overall therefore we agree the issue this change is seeking to address does merit exploring though we believe it preferable that Ofgem needs to be heavily involved in leading the policy options given the material consequences for current and future customers, similar in materiality to those in current charging SCR's.
ESP Electricity	Non-confidential	We are not aware of any other obligations not already discussed at workgroup for which legal views were sought.
Harmony Energy Ltd	Non-confidential	No. Although we think there are some significant conflicts of interests with tertiary connections and their affects (known and unknown) on the technical and commercial parameters between of the NG/DNO's exit point. Are there any legal constraints within the GSP bilateral agreements that could affect this CP?
Northern Powergrid on behalf of Northern Powergrid (Northeast) plc and Northern Powergrid (Yorkshire) plc	Non-confidential	Standard licence condition ("SLC") 14 of the electricity distribution licence requires the licensee to have in place a Connection Charging Statement, which must set out the basis on which charges will be made for the provision of connections to the licensee's distribution system. SLC14.16 states that connection charges relating to the matters specified for the Connection Charging Statement are to be set at a level that will enable the licensee to recover…(a) the appropriate proportion of the costs directly or indirectly incurred in carrying out any works for the extension or

		reinforcement of the licensee's Distribution System, or for the provision and installation, maintenance, repair, replacement, disconnection, or removal following disconnection, of any electric lines or electrical plant'. Consequently, SLC14.16 only contemplates matters that are "specified for the Connection Charging Statement" and, therefore, relate to connections to the licensee's distribution system. There is no connection to the licensee's distribution in this scenario and we believe that the way in which SLC14 is framed and, therefore, Ofgem's intention was for the contributions to be made by customers connected to the distribution system via DUoS charges to relate only to connections to the distribution system. The provisions of the Electricity (Connection Charges) Regulations 2017 ("ECCR") may operate to mitigate some of that cost.
Renewable Connections	Non-confidential	Ofgem needs to provide clarity on this point, following scrutiny of the DNO business plans. DNOs do include spend in their business plans to involve "collaboration with the transmission network operator", business plan guidance includes measures to require DNOs to submit "whole system" investments intended to lower overall costs to consumers – these sorts of works could encompass this. Transmission operators are permitted to invest for the benefits of distribution customers (via Mod Apps/Project Progressions etc), so a similar situation should be possible in reverse. If DNOs can prove efficient investment to the regulator, in terms of a whole system approach, they should be allowed to include this into their Totex and recover via output charges for subsequent connections that make use of this capacity or via uncertainty mechanisms. With the continued growth in demand for new generation connections and the Energy Strategy intimating allowable investment ahead of need, it seems like this should be possible.
SSE Generation	Non-confidential	In the context of the proposals on cost allocation for transmission connectees triggering distribution works, we are not familiar with the legal framework which governs how DNOs can spend their allowed revenue. We consider that DNOs and Ofgem are better placed to establish the legal position on this issue. However, if the legal framework does not allow DNOs to fund (through DUoS charges) works which have been triggered by transmission connectees, then it seems to us that the first part of this proposal, which covers cost allocation matters, would be null and void.

		Similarly, if the legal framework is silent on the matter, it may need to be clarified before this proposal can be taken forward.
Scottish and Southern Electricity Networks	Non-confidential	We do not believe that DNOs currently have the facility to include costs for works on the distribution system that are triggered by a transmission connecting customer through DUoS charges. This scenario was not envisaged or accounted for when the Connection Charging Methodology was implemented.
Anonymous	Anonymous	No
Question 2 Summary		

Company	Confidential/ Anonymous	3. Do you agree that the instances outlined in paragraph 4.25 should be excluded from the proposed CAF? If not, please provide your rationale.
The Electricity Network Company Limited	Non-confidential	Yes, we agree that, as a minimum, these costs should be excluded from the proposed CAF and should be treated as extension assets, i.e. the cost of the works charged in full. These instances are excluded from the CAF within the CCCM and, as such, their exclusion for works triggered by transmission connections is reasonable. We think that the CAF should also not apply to connections which may be considered speculative under the definitions which currently exist in the CCCM. It is true that there may be limited circumstances where these can be applied but where a distribution connection is deemed to be speculative then that customer would be required to fully pay for the reinforcement that their connection is causing. This principle ought to apply to transmission connected customers. However, given that such works fall outside the scope of the Act, SLC 12 to15A and connection charging methodology (covering connections to the distribution system) we feel it is inappropriate to consider the charging of such works on the same basis as though they were connections under such provisions. No evidence is provided to justify equivalence of treatment, particularly since that following the completion of the works transmission connecting party will have no contract with the distributor and no liability for or future DUoS charges
Electricity North West	Non-confidential	Based solely on the intent of this Change Proposal, this seems a reasonable approach.

ESP Electricity	Non-confidential	Yes
Harmony Energy Ltd	Non-confidential	These seem to be similar rules to a D connection, so seem reasonable. However, we need to ensure that T customers are held to the same milestones as D customers. The recent removal of milestones and queue management principles by NGESO is concerning. Slow and No moving T projects could have an impact on DNO's reinforcement plans and cause unnecessary spending (bad for customers). How will the T customer contract directly with the DNO so that they are liable for cancellation charges? Maybe like a reverse BEGA or they place securities so the T customer is liable for cancellation charges to the DNO if they terminate? This point links back to our view that a whole system review on new connections needs to take place as soon as possible to make sure there is synergy and a level playing field across D and T boundaries.
Northern Powergrid on behalf of Northern Powergrid (Northeast) plc and Northern Powergrid (Yorkshire) plc	Non-confidential	Yes, we agree that the instances outlined in paragraph 4.25 can be excluded because: • This DCP does not refer to a connection application to the distribution system where these terms may apply; and • For distribution connections, these terms are covered elsewhere in the Common Connection Charging Methodology ("CCCM") and are not related to CAF.
Renewable Connections	Non-confidential	Yes. If an HCC is brought in for demand as intimated in the SCR this will also need to be included.
SSE Generation	Non-confidential	Yes, we do.
Scottish and Southern Electricity Networks	Non-confidential	As further detailed in our response to Question 4 below, we consider that this overall proposal requires to be considered at a wider industry level. We have no comment at this stage on the specific details of the proposed cost apportionment factor.
Anonymous	Anonymous	Agree
<u>Question 3 Summary</u>		

Company	Confidential/ Anonymous	4. Do you agree with the proposal to introduce cost apportionment for Distribution works triggered by Transmission connections? Please provide your rationale.

The Electricity Network Company Limited	Non-confidential	No, we do not agree with the proposal to introduce cost apportionment factors for works triggered by Transmission connections. We do not believe that the case for such treatment has been made by this change proposal. We recognise that distribution connection customers are currently subject to the cost apportionment of any reinforcement works which are triggered by their connections whereas transmission connection customers would be liable for the full cost of distribution reinforcement works and that this disparity may, on the face of it, give reason to think that this inequality is having a negative impact on competition in the generation of electricity. It is not true to say that different treatment necessarily means anti-competitive so we do not believe that the case has been sufficiently made to introduce the CAF for transmission connected customers. Notwithstanding the barrier of distribution connection charges we understand that many customers will still choose to connection to the Transmission system rather than the distribution system and it is difficult to understand, that being the case, what issue this change proposal is seeking to remedy. It is generally understood that connections to the transmission system will face a different set of costs, determined by a different set of charging methodologies to those connected at the distribution system and we do not believe that resolving this issue will singularly level the playing field.
Electricity North West	Non-confidential	We agree in principle that the fair allocation of costs is a desired outcome, but we do not believe this to be a fully worked up proposal. There is significant risk to Distribution users as their potential liability may be to fund the works on an ongoing basis, when the works are being used and were needed by transmission users, particularly as there doesn't appear to be a mechanism for ongoing costs.
ESP Electricity	Non-confidential	Yes, where the Distribution works triggered by transmission connections could feasibly result in benefits to the distribution customer base (as current reinforcement work prompted by some distribution connections), we think it is prudent to introduce cost apportionment.
Harmony Energy Ltd	Non-confidential	In principle yes, however in practice consideration will need to be given to queue management and how queue positions are formed. Reverse interactivity could occur and there needs to be a formal mechanism to account for this.
Northern Powergrid on behalf of Northern Powergrid (Northeast)	Non-confidential	We disagree with this proposal for the reasons stated in our answers to Q2 and Q6.

plc and Northern Powergrid (Yorkshire) plc		
Renewable Connections	Non-confidential	Yes, currently one class of customers is treated at a disadvantage to another. Notwithstanding different charging mechanisms, as we move towards a whole system approach we should treat the system in its entirety, particularly as connection boundaries are becoming more aligned at D and T. At present we have a situation where a connection at the D/T boundary (such as a tertiary) could have a similar impact on the D system as a direct connection to a 132 kV circuit breaker at the same GSP (as in our worked example at a highly constrained GSP), whereas the former will face a much larger capital cost to connect. A similar situation could arise where a connection is offered on a shared NGET owned 132 kV bar, which could have the same impact on the D system as a connection on DNO-owned 132 kV infrastructure in the same geographic location. The former will face a higher financial penalty, which creates a distortion. For business models that rely on developing sites to sell on, initial Capex costs are a larger barrier to entry and provide a stronger price signal than enduring costs, which could favour the D system. However a connection to the T system (say a tertiary) could provide benefits on connection boundary (under the current set up), access to ESO markets and timeliness of connection, but will be penalised by unfair Capex costs.
SSE Generation	Non-confidential	We do not agree that cost apportionment arrangements should apply to transmission connectees triggering distribution works. Based on the examples provided in the consultation document, it is not clear whether the distribution works that the transmission connectees triggers differ or would be the same if that user connected at distribution level. If the required works were less under a distribution level connection, with lower costs, then that would seem to be the more economic and hence preferable connection option. If the required works (and costs) were the same, then the connectee could chose to connect at distribution level, at a lower cost to themselves, under the existing arrangements, without the need for the proposed change. We are not in favour of a solution which might incentivise connections which trigger higher-cost works to the distribution networks which would then have to be borne by DUoS payers (assuming the DNO funding regulatory framework

		permits this in the first place – see q.2), and ultimately by the end consumer. We acknowledge that there are many other factors which affect a connectee's investment decision besides connection charges, and these may, in aggregate, make the projects in the examples more viable even when connected at transmission level instead of the distribution level. We consider that connectees have a choice of the level at which they wish to connect which facilitates rather than undermines competition.
Scottish and Southern Electricity Networks	Non-confidential	We understand the issue that this proposal is seeking to address, and in general, we consider that a customer's charge should be proportionate to the benefit they receive as a result of the works, with appropriate safeguards for wider customers where costs are exceptionally high (for example the high cost cap that applies in distribution charging arrangements). Whilst we consider there to be merit in further exploring how to address this issue, we do not believe that the current proposal is fit for purpose. Indeed, there is a risk that this could create further differences between the connection charging arrangements. We note that this significant policy change has not been accounted for under Ofgem's Access SCR which is due to be implemented in April 23, and we are unclear how this proposal fits with these new connection charging arrangements. The reverse scenario, i.e. where distribution connections trigger transmission works, has been considered under the Access SCR. Ofgem's conclusion on this was that the existing position whereby the triggering customer pays in full would remain pending a wider review of TNUoS. Our view is that if this issue is to be considered, a DUCSA modification is not the appropriate mechanism for this to be progressed and we would instead recommend the forthcoming DUoS and TNUoS reviews as a more appropriate route.
Anonymous	Anonymous	We can see the merit in proportioning costs for Distribution works triggered by Transmission connections. However, we believe that to agree to the change requires a whole system view which takes account of the cross boundary relationships between the parties and should be bi-directional. Therefore any agreement to proportion costs should be applicable irrespective of whether it is for a Transmission connection triggering Distribution works, or a Distribution Connection triggering Transmission works. At present the proposals only account for a one-way solution to charging.
<u>Question 4 Summary</u>		

Company	Confidential/ Anonymous	5. Do you agree with the proposed definitions? If not please provide alternatives and your rationale for your suggestion/s.
The Electricity Network Company Limited	Non-confidential	We have no further suggestions for the definitions and believe that they achieve the intent of the change proposal in respect of applying the cost apportionment factors to transmission connections. We do make reference in our later comments on the legal text around the way that these definitions may mean transmission connected customers pay less than distribution connected customers.
Electricity North West	Non-confidential	We have not commented as we have concerns that the proposed approach will not meet the desired aims.
ESP Electricity	Non-confidential	Yes
Harmony Energy Ltd	Non-confidential	*No response provided*
Northern Powergrid on behalf of Northern Powergrid (Northeast) plc and Northern Powergrid (Yorkshire) plc	Non-confidential	Yes we agree with the proposed definitions. We note that the term 'Systems Connection Point' is defined in the proposed schedule but is defined in DCUSA. It may be clearer to include the DCUSA definition.
Renewable Connections	Non-confidential	Yes.
SSE Generation	Non-confidential	The majority of the defined terms are already used elsewhere in the DCUSA (in particular Schedule 22) but are defined differently in the new Schedule. We are concerned that this could lead to confusion amongst industry parties and wonder whether the terms can be renamed to avoid this risk (e.g. by using a suffix 'a', or 'Sched. X').
Scottish and Southern Electricity Networks	Non-confidential	We have no comment at this stage on the specific definitions within the proposal, except that these should align with existing definitions where possible.
Anonymous	Anonymous	Agree
<u>Question 5 Summary</u>		

Company	Confidential/ Anonymous	6. Do you agree with the application of the principle of the ECCRs to transmission connections triggering distribution works? Please provide your rationale for your response.
The Electricity Network Company Limited	Non-confidential	We think that it is entirely reasonable for customers who benefit from assets which were previously installed to facilitate an earlier customer's connection to be required to pay a contribution to those assets. We agree with the assessment of the working group that this need be restricted, legally, to subsequent transmission connected customers as the framework in the ECCRs for distribution connections cannot be extended by this schedule. We question whether the DNO is going to automatically know whether assets which are installed on the transmission network will utilise the headroom which was created by the initial connectee and would also question how, if a DNO does know, they will be able to apportion the costs for the new connectee as they might not be able to isolate the new connection's contribution to capacity or fault level at those assets effectively.
Electricity North West	Non-confidential	ECCR is designed to equalise the timing impact of the costs of connection so that the first customer to connect is neither advantaged or disadvantaged. We agree with the principle but are concerned that the mechanism that has been proposed is not adequate. ECCR is in secondary legislation, enacted by primary legislation; changes to the legislation would be required to give DNOs the rights to charge any subsequent connections that make use of assets paid for by another connection customer or by the DNO, and to place obligations on that subsequent connecting customer to pay. We are unsure why this proposal, as scoped, is only within DCUSA as this will not convey the necessary powers and obligations to make the approach work. We do not believe that the second and third comers transmission customers can be charged under the existing framework, therefore existing distribution customers would always fund the works. We therefore feel that it is not a complete solution at this point.
ESP Electricity	Non-confidential	Yes, we agree with this principle as it would treat transmission and distribution customers on an equitable basis.

		We would question whether the de-minimis values in the ECCR are fit for purpose to pre-empt any potential scenarios where the triggered distribution works may be materially higher/lower when triggered by transmission connections.
Harmony Energy Ltd	Non-confidential	Yes, in principle. See answer to Q12. Can the working group confirm if this will be retrospectively applied if the CP is implemented?
Northern Powergrid on behalf of Northern Powergrid (Northeast) plc and Northern Powergrid (Yorkshire) plc	Non-confidential	We disagree with the proposal to apply the principles of the ECCR to transmission connections triggering distribution works. The ECCR refer to a person obtaining, or who has obtained, a first connection or a second connection to the distribution system under S16(1) of the Electricity Act 1989 or otherwise entered into an arrangement with an electricity distributor or an independent connection provider for the making of the connection. Consequently, the ECCR does not and is not intended to apply to connections to the transmission system. The ECCR contains a number of legal obligations on both the distributor and the “second comer”. Two of those obligations worth noting are: • Clause 7 Demanding a reimbursement payment: subject to certain conditions the relevant electricity distributor must demand a reimbursement payment from the person obtaining the second connection; and • Clause 8 Obligation to make a reimbursement payment: subject to certain conditions a subsequent contributor must pay the amount demanded to the relevant electricity distributor within the time specified in the demand. Whereas a DNO would have to comply with the obligation in DCUSA to demand a reimbursement payment from the transmission customer (as the equivalent to the “first comer” and similar to clause 7 of the ECCR), the transmission customer would be under no legal obligation to make that reimbursement payment to the distributor (which the “second comer” is obliged to do under clause 8 of the ECCR). Consequently, there is no legal basis on which a DNO would be able to enforce the proposed provisions in the event of non-payment. Such a scenario would simply frustrate the intent of the proposed changes as non-payment is likely to be widespread.

		Furthermore, the DNO will not have a relationship with the transmission customer so a distributor/transmission/transmission process would have to be developed, which is not currently part of the Connection and Use of System Code. Following Ofgem's Access Significant Code Review (the "SCR") decision, BEIS will be carrying out a statutory review of the ECCR, which may result in changes to align the ECCR with the SCR. If Parliament had intended the ECCR to operate in the way proposed, it would have framed the ECCR accordingly in 2017 but it did not do so. Details of any changes following the SCR are not expected until early 2023 so BEIS' review presents the opportunity for interested parties to lobby for the ECCR to be extended to transmission connections in place of DCP 392.
Renewable Connections	Non-confidential	Yes, however this point needs to be resolved via changes to secondary legislation in the current BEIS review. "First connection" must relate to anywhere on the system, not just the distribution system. This will then allow DNOs to recover the incremental investment in New Network Capacity that is over and above the Required Capacity by virtue of set ratings of equipment. It is clear that there is pent-up demand for distributed generation and demand growth in the market, for which the capacity will be used in the next 10 years, so DNOs would be able to feel comfortable investing in these works – this would negate the concerns raised in question 2. The application of ECCR principles to recover costs from T customers is sound in terms of fairness, however the DNO/ESO will need to keep a record of this (this could be improved via CMP328) and will need to invoice the subsequent T party in-line with a clause in the contract after the Distribution Impact Assessment, this may also need to be reflected in the ESO contract, perhaps with an addition to the CUSC. Though I appreciate it would not have the legal obligation of an ECCR, so again the scope of this legislation should be expanded.
SSE Generation	Non-confidential	We agree with the ECCR approach being applied in a way where a subsequent transmission connectee who benefits from distribution system works paid for by previous transmission connectees should contribute to the costs that those previous comers incurred. However, see also our response to q.7
Scottish and Southern Electricity Networks	Non-confidential	Please see our response to Question 4 above. Whilst we agree with the principle of customers paying their fair share towards works on the distribution system, our view is that a DCUSA modification is not the appropriate way to implement this.

		As the current arrangements are prescribed in primary legislation under the ECCR, we consider that any changes or extension to this arrangement should be captured at the same level.
Anonymous	Anonymous	We do not agree with the application of the principle of ECCRs due to the lack of legal basis for recovering contributions from second connections. In addition, it would create a disparity between second connections who are distribution system connected and those who are transmission connected. Refer to question 7 for more detail.
Question 6 Summary		

Company	Confidential/ Anonymous	7. Does DCUSA provide the legal basis for DNOs to require subsequent transmission customers to pay for costs associated with previous works? Please provide your rationale for your response.
The Electricity Network Company Limited	Non-confidential	Customers connecting to the transmission system have no contractual relationship with distributors through DCUSA. Therefore, we don't believe that the DCUSA provides a basis for the DNO to be able to charge subsequent transmission connected customers as those customers are unlikely to have a direct contractual relationship with the DNO through other routes. It is difficult to see how a transmission connected customer would be required to pay towards those costs and what levers the DNO might have to be able to ensure that they do pay. We believe that this issue may be easier to enforce and administer if the same intent is dealt with through a CUSC change proposal as this considers the contractual relationships between all parties concerned, i.e. transmission, distribution and connecting party and could, therefore, place the necessary obligations on each of those parties for new connections to the transmission system.
Electricity North West	Non-confidential	No, the clauses that this change is proposing to insert within DCUSA belong in legislation, as described in Question 6.
ESP Electricity	Non-confidential	We have not sought a legal view on this at this moment.
Harmony Energy Ltd	Non-confidential	*No response provided*

Northern Powergrid on behalf of Northern Powergrid (Northeast) plc and Northern Powergrid (Yorkshire) plc	Non-confidential	No, DCUSA does not provide any basis (legal or otherwise) for the DNOs to require subsequent transmission customers to pay for the costs associated with previous works on the distribution system. Our rationale is set out in answer to Q6. The DCUSA cannot place any obligations on anyone who is not a party to the DCUSA.
Renewable Connections	Non-confidential	See second paragraph above, this could be resolved by contractual terms.
SSE Generation	Non-confidential	We share the concern raised by other industry parties that the DCUSA may not be an appropriate legal vehicle for cost recovery arrangements to be applied to transmission system users. As we understand it, the DCUSA can only oblige DCUSA parties to comply with its requirements (in this case, the DNOs and DCUSA parties who are DUoS payers) but not non-DCUSA parties (i.e., transmission system connectees). As such, there seems to be a possibility that transmission system connectees may not abide by the new arrangements. For instance, 'second comers' may not pay the reimbursement which might be due to 'first comers'.
Scottish and Southern Electricity Networks	Non-confidential	CMP328 has been approved by Ofgem. This modification sets out that the DNO's customer will be the ESO and therefore all charges for distribution works triggered by the transmission connection will be passed to the ESO to pass to their customer(s) as they deem appropriate.
Anonymous	Anonymous	No. Whilst we recognise the merit of applying the principles of ECCR, we do not see that there is a sufficient legal basis to require payment from a second connection. For Distribution connections as the "second comer", these are governed by the Electricity (Connection Charges) Regulations 2017. A condition for these regulations to apply is that there is a connection between distributions systems or between premises and the distribution system. A transmission connection does not fulfil this criteria therefore a first connection is not made and the distribution connection customer is not required to make payment. For transmission connections as the "second comer", they cannot be governed by the Electricity (Connection Charges) Regulations 2017 since they are specific to distribution systems. There is no

		legislation which covers this scenario and we do not believe a schedule provides a sufficient legal basis to require the payment to be made. We considered whether we could instead make it a contractual requirement through a third party works or tertiary connection offer but recognise that some second connections will not require an offer from the DNO where capacity headroom has been made available through a previous connection.
Question 7 Summary		

Company	Confidential/ Anonymous	8. Will this process treat transmission customers and distribution customers on the same basis? Please provide your rationale for your response.
The Electricity Network Company Limited	Non-confidential	No, transmission operators are subject to different licences to distribution operators. Transmission licensees have different connection charging and use of system methodologies to distribution licensees. We do not believe that this process will result in transmission and distribution customers being treated on the same basis. The legislative framework for transmission and distribution is different and we do not believe that this change proposal is able to bridge the difference between the legislative framework For example, if a transmission connecting customer utilises capacity which was installed as a result of a connection to the distribution network then they will not be charged for this work whereas a subsequent distribution connection could, subject to the provisions of the ECCR, be required to make a payment in respect of those assets installed. This means that transmission connected customers will get cheaper connections (in the context of the payment to the distribution system) to the electricity network where they are a subsequent connection than distribution connected customers do. This is true irrespective of whether the works for the first connection customer were paid for in whole by that customer or in part by the DNO.
Electricity North West	Non-confidential	As currently scoped there is potential for costs to be unfairly socialised, as we do not believe that the second and third comers transmission customers can be charged under the existing framework, therefore existing distribution customers would always fund the works.

ESP Electricity	Non-confidential	Yes, we believe this change will treat both types of customers on an equitable basis.
Harmony Energy Ltd	Non-confidential	No. Unless you review the charging rules in the opposite direction and for all scenarios. Currently D projects are being hit with full costs of new SGT's (£17m plus) which is having a significantly larger impact than the scenario trying to be resolved by this proposal.
Northern Powergrid on behalf of Northern Powergrid (Northeast) plc and Northern Powergrid (Yorkshire) plc	Non-confidential	No, this process will not treat transmission customers and distribution customers on the same basis. Currently different connection charging boundaries exist at transmission and distribution. Transmission is classed as shallow where distribution is currently shallow-ish. Ofgem's SCR proposals will not change this position because the transmission boundary is not being changed and the proposed distribution boundary will still not align them. Furthermore, Ofgem's boundary proposals will not treat demand and generation customers on the same basis. The former being shallow and the latter being shallower.
Renewable Connections	Non-confidential	In terms of Capex, the thrust of the Mod, yes.
SSE Generation	Non-confidential	As per our response to q.4, we are not in favour of a solution which might incentivise connections at transmission level which trigger higher-cost works to the distribution networks, the costs of which would then partially be borne by DUoS payers (assuming the DNO funding regulatory framework permits this in the first place – see q.2), and ultimately by the end consumer. This could lead to a distortion across the transmission and distribution network boundaries.
Scottish and Southern Electricity Networks	Non-confidential	This process would more closely align the charging arrangements for transmission connecting customers with the current charging arrangements for distribution connecting customers. However, as explained in our response to Question 4 above, distribution connection charging arrangements are due to change significantly from April 23 under Ofgem's Access SCR.
Anonymous	Anonymous	Not in its current form. For Cost Apportionment Factor, distribution customers would continue to incur 100% of the cost of transmission works as new transmission connection charges whilst transmission customers will benefit from a proportional contribution to both the Distribution and Transmission works. For applying the principles of ECCR, distribution customers would not be subject to this new schedule and the criteria under the ECCR 2017 are not met. Therefore there remains a disparity in that

		distribution connection customers would not be required to make a refund payment towards previous works triggered by a transmission connection a second transmission connection would be asked to make a contribution.
Question 8 Summary		

Company	Confidential/ Anonymous	9. Should this Schedule be classed as 'other matters which are outside of the scope of the CCCM' and be included within the DNO's Connection Charging Methodology, or should there be a separate standalone document that can be referred to on the DNO website? Please provide your rationale in support of your preferred approach.
The Electricity Network Company Limited	Non-confidential	We think that this schedule should be included as a separate document to be published on the DNOs website on the basis that it will be much clearer for prospective customers (both distribution and transmission connected). We think it is inappropriate to confuse arrangements set out to meet obligations set out in the licence with charging arrangements that fall outside the scope of the licence.
Electricity North West	Non-confidential	Neither of these approaches creates the appropriate obligations. The CCCM sits in DCUSA but is effectively there to provide open governance. It is not enacted by DCUSA but is enacted by Standard Licence Condition 13 which effectively flows from obligations under section 16 of the Electricity Act. Having a standalone schedule, classed as 'other matters which are outside of the scope of the CCCM' could potentially mean it is outside the scope of the DCUSA.
ESP Electricity	Non-confidential	We believe that this Schedule should be a separate standalone document. This can futureproof against any unforeseen connection arrangements by making changes more flexible.
Harmony Energy Ltd	Non-confidential	If it is to be implemented then as other matters is fine.
Northern Powergrid on behalf of Northern Powergrid (Northeast) plc and Northern	Non-confidential	No because we don't agree with this proposal. The governance arrangements are not clear how this would work in practice. With the exception of section 6 of the CCCM document covering a DNO's "Specific Connection Charging Methodology", and

Powergrid (Yorkshire) plc		governed by Ofgem, the remaining sections are not subject to any formal industry governance and place no obligation on DNOs.
Renewable Connections	Non-confidential	As this relates to investment on the distribution system, the DNO's Connection Charging Methodology seems to be a suitable place for this.
SSE Generation	Non-confidential	We are concerned that either option may not have the powers to oblige non-DCUSA parties (such as subsequent transmission connectees) to comply with the provisions (such as to make a cost contribution for previous works).
Scottish and Southern Electricity Networks	Non-confidential	If this proposal were to be implemented, our view is that it is sensible to keep connection charging arrangements in one document. This also ensures one point of reference for customers.
Anonymous	Anonymous	There should be a separate document which relates to the treatment of cross boundary Distribution/Transmission works or a requirement to link the cross boundary relationship between the DNO and TNO methodologies. Neither can wholly accommodate the requirements of both types of customer in their current form.
Question 9 Summary		

Company	Confidential/ Anonymous	10. Do you believe that IDNOs should be included within the new schedule? If not, please provide your rationale.
The Electricity Network Company Limited	Non-confidential	No, we believe that IDNOs should be excluded from the requirements of this schedule as the regulatory arrangements which govern IDNO connection charging and use of system charging are significantly different from the DNO. In our opinion it would be the responsibility of each IDNO to develop its own methodology at the point where such a methodology was required.
Electricity North West	Non-confidential	There is no reason that, in principle, IDNO's would be excluded as IDNO assets may be impacted, for example, where an IDNO may require a Grid connection themselves.
ESP Electricity	Non-confidential	We believe that currently IDNOs should not be included. IDNOs should have the opportunity to determine the relevant charging methodology based on circumstances relevant to their networks.
Harmony Energy Ltd	Non-confidential	If the DNO's have it then yes the IDNO's should too. IDNO's are already entering the new GSP market and transacting directly with National Grid, so should be bound by the same rules as DNO's.

Northern Powergrid on behalf of Northern Powergrid (Northeast) plc and Northern Powergrid (Yorkshire) plc	Non-confidential	Yes, in the event this proposal goes ahead, because IDNOs are required to comply with the DCUSA by SLC20 of their distribution licences. Consequently, IDNOs must comply with all relevant schedules in the DCUSA.
Renewable Connections	Non-confidential	In the interests of fairness, it would make sense for the same procedure to be applied to IDNOs – though their opportunity to recover revenue for the extra capacity may be more limited, they are able to advertise themselves in a competitive market for connections. Ofgem's approval of IDNO charging methodologies should include an allowance for this.
SSE Generation	Non-confidential	In principle, we do think that IDNOs should face the same obligations as DNOs, but we have no specific comments on this matter.
Scottish and Southern Electricity Networks	Non-confidential	If this proposal were to be implemented, we consider that is should also apply to IDNOs as licenced network operators.
Anonymous	Anonymous	IDNOs should be included. Users should not be treated differently based on a decision as to who owns the constructed assets.
<u>Question 10 Summary</u>		

Company	Confidential/ Anonymous	11. If this Schedule applied to IDNO's should an obligation be placed upon them regarding the visibility of this charging schedule? If so, suggested wording would be appreciated.
The Electricity Network Company Limited	Non-confidential	N/A
Electricity North West	Non-confidential	It may be more appropriate for IDNO's to comment on this question at this stage.
ESP Electricity	Non-confidential	If IDNOs are bound by the schedule, giving visibility is a reasonable requirement.
Harmony Energy Ltd	Non-confidential	*No response provided*

Northern Powergrid on behalf of Northern Powergrid (Northeast) plc and Northern Powergrid (Yorkshire) plc	Non-confidential	We are not clear as to how an obligation can be placed upon IDNOs regarding the visibility of this charging schedule when it appears that the proposed 'visibility' refers to sections that are not subject to formal industry governance. Given that DCP 392 refers to customers applying for a transmission connection, consideration should be given to NGETESO making this issue visible.
Renewable Connections	Non-confidential	I would assume that IDNOs should make their charging schedules clear to affected customers.
SSE Generation	Non-confidential	We agree that if IDNOs were to fact the same obligations as DNOs, stakeholders should have public access to these in the same way as for DCUSA obligations.
Scottish and Southern Electricity Networks	Non-confidential	Yes.
Anonymous	Anonymous	Yes.
<u>Question 11 Summary</u>		

Company	Confidential/ Anonymous	12. Do you have any comments on the proposed legal text?
The Electricity Network Company Limited	Non-confidential	We think that the definitions and formulae used mean that transmission connected customers may pay less than distribution connected customers under the Security CAF. The numerator for the Security CAF is the Required Capacity which is defined as the increase in capacity from the existing Systems Connection capacity. This may be lower than the required capacity of the connection whereas, for a distribution connected customer, the numerator is the required capacity for the individual customer or development. Although we recognise that the incremental capacity requirement will drive the reinforcement this is also true of distribution connected customers, but their total required capacity is taken into account when determining the contribution towards the reinforcement. We think that it would be equitable for the total capacity requirements of the connection customer to be used for the numerator in the Security Level CAF.

		Similarly, we would question whether it is correct to use the incremental fault level contribution rather than the total fault level contribution at the appropriate point on the distribution system.
Electricity North West	Non-confidential	No comments on the legal text at this early stage.
ESP Electricity	Non-confidential	No comments
Harmony Energy Ltd	Non-confidential	I'm not sure if the following scenarios are covered by the legal text: Where a T customer pays in full for D works they would be eligible for repayments under the second comer rule from subsequent T customers. Would they also be eligible for second comer payments from subsequent D customers? Where the first T customer has only paid a proportion of costs under the CAF rules, are there provisions for the DNO to recover a proportion of the costs from subsequent T **and** D customers via second comer rules? Where a D customer triggers reinforcement in full, can the DNO apply the second comer rule to a subsequent T customer in order to recover a contribution for the first D comer? Where a D customer has triggered reinforcement and CAF applied, can the DNO apply the second comer rules to a subsequent T customer and recover the proportional contribution?
Northern Powergrid on behalf of Northern Powergrid (Northeast) plc and Northern Powergrid (Yorkshire) plc	Non-confidential	Ofgem's SCR decision covers the Connection Boundary and will significantly change the CCCM, on which the proposed schedule is based. Should this change be approved, Ofgem's decision could result in an inconsistent approach. Our concerns about applying the principles of the ECCR are set out in our answer to Q6.
Renewable Connections	Non-confidential	No, provided in workgroup.
SSE Generation	Non-confidential	We share the concern raised by other industry parties that the DCUSA may not be an appropriate legal vehicle for addressing the two issues covered by this proposal. The DCUSA can only oblige DCUSA parties to observe its requirements (in this case, the DNOs and DUoS payers) but not the non-DCUSA parties (in this case, transmission system connectees).

Scottish and Southern Electricity Networks	Non-confidential	We have no comments on the proposed legal text currently.
Anonymous	Anonymous	No
Question 12 Summary		

Company	Confidential/ Anonymous	13. Do you believe that the DCUSA General objectives are better facilitated by this CP? Please provide your rationale.
The Electricity Network Company Limited	Non-confidential	We maintain that the CP falls outside the scope of DCUSA and therefore outside the scope of DCUSA objectives. Notwithstanding this, we do not believe that any of DCUSA's general objectives are better facilitated by this change proposal. We do not believe that the competitive concerns have been sufficiently elaborated by this change proposal for a proper assessment to be undertaken of the impacts of this change proposal. We also note that this change proposal, deliberately, seeks to only consider the upfront distribution capital costs of connections to the network. In considering the DCUSA objectives in the round we believe that it is important to consider the impact that this change proposal will have on distribution connected generation and we believe that other barriers may well exist for distribution connected generation such that this change may not level the playing field but further distort it for generation of electricity.
Electricity North West	Non-confidential	The consultation advises that the working group agreed this change should be measured against the DCUSA General Objectives not the Charging Objectives. We do not believe that the DCUSA General Objectives will be better facilitated by this change as they relate to connections to the distribution network, and not a transmission network connection.
ESP Electricity	Non-confidential	Yes. It will contribute to effective competition.
Harmony Energy Ltd	Non-confidential	*No response provided*
Northern Powergrid on behalf of Northern Powergrid (Northeast)	Non-confidential	*1 The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks. No, this is about cost sharing. As this change is about providing DUoS funding to offset the cost of a transmission connection it has no impact on the*

plc and Northern Powergrid (Yorkshire) plc		*development, maintenance and operation of an efficient, co-ordinated, and economical Distribution Networks.* *2 The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent therewith) the promotion of such competition in the sale, distribution and purchase of electricity. No, as this refers to the distribution of electricity and not a transmission connection.* *3 The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences. No, the distribution licence does not include obligations relating to connections to the transmission system.* *4 The promotion of efficiency in the implementation and administration of the DCUSA.* No, because transmission connections are not covered by either the DCUSA or the ECCR.
Renewable Connections	Non-confidential	Yes, as it removes an existing distortion that provides preferential treatment to distribution customers over transmission, which represents developments in the business as the scale and types of connections evolve. This has a positive effect on Charging Objections 1-4. The proposal also will support efficient development and cross-system co-ordination of networks, if DNOs are having to invest, they may consider running the network differently or implementing flexibility to avoid some of the capital cost. This also helps competition between distribution and transmission allowing a more level playing field. As such it meets General Objectives 1-4.
SSE Generation	Non-confidential	GO 1 – DNO/IDNO obligations to run an 'ECE' network – potentially negative Should it be shown that the legal framework does not allow DNOs to fund, through DUoS charges, works which have been triggered by transmission connectees, then the proposal would result in DNOs/IDNOs not operating an 'ECE' network. GO 2 – effective competition - neutral We do not feel that the case has been made that the status quo prevents effective competition, nor that the proposal facilitates it. GO 3 – DNO/IDO obligations as per their licence – we have no comment. GO 4 – efficient DCUSA implementation – potentially negative Should it be shown that the DCUSA is not an appropriate vehicle for imposing obligations on non-DCUSA parties, then the DCUSA cannot be implemented for some elements of the proposal. GO 5 – compliance with EU regs – we have no comment.

Scottish and Southern Electricity Networks	Non-confidential	We do not consider a DCUSA modification to be the appropriate route to progress this proposal. Please see our responses to Questions 4 and 6 above.
Anonymous	Anonymous	No. The proposed change results in inconsistent charging since transmission customers would benefit from a proportional approach for all works and would be asked to make a refund payment towards works triggered by a previous transmission connection, whilst distribution customers would not benefit from a proportional approach for all works and would not be required to make an ECCR payment as the criteria cannot be met.
Question 13 Summary		

Company	Confidential/ Anonymous	14. Are you aware of any wider industry developments that may impact upon or be impacted by this CP?
The Electricity Network Company Limited	Non-confidential	Yes, we believe that Ofgem's Access SCR will have significant implications on the way that connection charges are calculated for distribution connection customers and could, therefore, have implications for the solution proposed in this change proposal. We also note that there may be requirements, under the Access SCR, for customers connecting to the distribution system to have a curtailable connection whilst reinforcement to facilitate their connection requirements is underway. There may be a need, once the decision for the Access SCR is published, to take into consideration the ability of distributors to curtail transmission connected customers (via the ESO). We are also aware that Ofgem has previously raised concerns over the charging treatment of generators connecting to the tertiary windings at GSPs and that such charging of connections should be the subject of wider consideration to ensure that they are in the broader interest of consumers.
Electricity North West	Non-confidential	We believe the Access SCR may cause an impact as noted in Question 2 above. We expect the connections charging boundary to change and therefore what types of reinforcement are subject to cost apportionment. We cannot therefore see how this change is unaffected by the Access SCR proposals. ED2 load related funding and policy may be impacted. The impacts of this change are not currently within the ED2 final business plans submitted to Ofgem.

ESP Electricity	Non-confidential	We are not aware of any wider developments with a bearing on this CP.
Harmony Energy Ltd	Non-confidential	*No response provided*
Northern Powergrid on behalf of Northern Powergrid (Northeast) plc and Northern Powergrid (Yorkshire) plc	Non-confidential	Ofgem's SCR decision covers the Connection Boundary and will significantly change the CCCM, on which the proposed schedule is based. Should this change be approved, Ofgem's decision could result in an inconsistent approach.
Renewable Connections	Non-confidential	CMP328 – The process for distribution impact assessments ECCR review – this should be expanded to include all connections to the system SCR – shallower connection boundaries for distribution; the existing shallow connection boundaries for transmission – both should extend through the whole system FSO/Energy Strategy – allowing for holistic whole-system planning and pre-emptive investment in the network, which should support this. TCA Charges – 100% charging of TCA to distribution customers is the unfair analogue of this in reverse and should also receive the same treatment. An analogous emerging issue in the industry which is a barrier to development. CUSC – second comer charges to subsequent T customers
SSE Generation	Non-confidential	The linkages with CMP328, which is with Ofgem for decision, have been outlined in the consultation document. Wrt Ofgem's Access reforms, once Ofgem's final decision is known, we would like to understand whether the charging boundary reforms changes to be made would apply only to distribution connected users or whether they would also affect the cost allocation proposals made in this CP.
Scottish and Southern Electricity Networks	Non-confidential	Please see our response to Question 4 above in relation to Ofgem's Access SCR and TNUoS review. In addition to this, given that the process for RIIO-ED2 is well underway, with DNO Business Plans already submitted, if the proposed change was to be implemented it would not align with RIIO-ED2 timescales.

		We also note that this change could influence the Queue Management process. NGESOs and DNOs would potentially require an amalgamated queue per GSP to effectively manage the progress of connections to ensure works triggered were completed in a timely manner.
Anonymous	Anonymous	No
Question 14 Summary		

Company	Confidential/ Anonymous	15. Do you have any other comments on this CP?
The Electricity Network Company Limited	Non-confidential	We recognise that the CMP 328 working group considered that the methodology for charging for works to the distribution system was out of scope of that modification. However, we still believe that the correct legal, regulatory and contractual relationship governing the parties which are impacted by this change proposal properly sits with the CUSC. The legal advice provided at the outset of this change proposal confirmed that the DCUSA is capable of containing the charging methodology by which distributors will calculate charges to transmission connected customers. However, we question the rationale of this approach when there is already a code that governs the relationship between the affected parties. We think that, where possible, code governance needs to be rational and simple, and we do not believe that this change proposal placing the legal text within the DCUSA is either rational or simple. CUSC sets out the contractual framework and obligations on users (including distributors) seeking connection to the transmission system We believe the contractual arrangements and relationships under CUSC are as follows: 1. Users (including distributors) contract with the transmission operator for connection to the transmission system through the provisions in CUSC and the relevant bilateral connection agreement (BCA). The BCA, among other things, sets out the specific characteristic of the connection to the transmission system. 2. Where a party seeks a new connection to the transmission system, the transmission operator will assess the impact that such connection will impact on the transmission

		system. Where such connection may impact on the connection to another user, the transmission operator asks the relevant user to undertake an impact assessment. 3. The distributor as a user assesses the impact of such change to its connection characteristics and assesses the nature of and the costs of modification works to facilitate the new characteristics. 4. The distributor provides the transmission operator with the costs of the works it would have to undertake, who then passes on the costs to the user seeking connection. The user is then required to pay the distributor the relevant expenses as set out by CUSC. (CUSC abdicates the transmission operator from any liability for paying compensation for such modification works). We have previously submitted two papers to the working group setting out our concerns around DCUSA being the appropriate vehicle for such change, along with consideration of the change itself. This consultation provides no new evidence to challenge or change the views we expressed in those earlier papers. In considering responses to this consultation we think it is appropriate to consider the views of those papers and for the working group to provide responses to those arguments.
Electricity North West	Non-confidential	We do not believe this is a complete solution and we are not convinced that the DCUSA is the correct Code for this process.
ESP Electricity	Non-confidential	No further comments.
Harmony Energy Ltd	Non-confidential	I appreciate this is out of the scope of this CP but maybe there is a requirement for Ofgem to review the CBA of tertiary connections and any conflict of interests in particular where National Grid are preventing DNO's from applying ANM at GSP's where there are contracted tertiary connections
Northern Powergrid on behalf of Northern Powergrid (Northeast) plc and Northern Powergrid (Yorkshire) plc	Non-confidential	Under the DCUSA, the Panel must refuse the referral of a Change Proposal that it considers to fall within the scope of a Significant Code Review and that is submitted during the relevant Significant Code Review Phase. We do not understand why DCP 392 was not refused pending completion of the SCR by Ofgem as we believe that DCP 392 will change the distribution/transmission charging boundary and changes to the transmission charging boundary are not being considered under the SCR.

Renewable Connections	Non-confidential	It is imperative this is implemented as soon as possible, with the reverse also being implemented for TCA charges being passed through 100% to distribution customers. Shallow connection boundaries should pass through the whole system as the system no longer works in its individual silos. Ofgem need to provide comfort and/or direction to DNOs that they can use DUoS money to fund these works and engage government to reform ECCR to allow DNOs to recover these costs from second comers. The Energy Strategy, FSO and new Networks Commissioner is to look at the whole system holistically and bring forward investment ahead of need – works like these are a prime candidate for a whole system view. The trajectory of demand for additional network capacity is only upwards, so DNOs should be confident they can recover their investment, if not by ECCR then by subsequent output allowances/DUoS from subsequent connecting parties utilising this capacity. More renewable generation on the system can provide a net benefit to the consumer in the long run.
SSE Generation	Non-confidential	This proposal covers two separate issues. As can be seen from our answers to the previous questions, we do not support the solution to the first issue. However, we are in favour of the solution to the second issue, albeit the DCUSA may not be a legally binding vehicle for this. These circumstances mean that we are not able to support the proposal.
Scottish and Southern Electricity Networks	Non-confidential	No other comments to make currently.
Anonymous	Anonymous	We believe that the consideration should be expanded to take account of the cross boundary arrangements. Where a distribution customer triggers works on the transmission system, are these to be considered NGC exit works or new transmission connection charges? The latter requires significant contribution to the costs from a distribution customer whilst under this proposed arrangement a transmission connected customer will benefit from cost apportionment on both the distribution and transmission works. The charging methodologies should take account of both distribution and transmission customers triggering works on the whole system so that all customers benefit from a fair approach.
<u>Question 15 Summary</u>		

Company	Confidential/ Anonymous	16. Do you agree with the implementation date? If not, please provide an alternative date and your rationale to support it.
The Electricity Network Company Limited	Non-confidential	If this change is approved, then we would agree with the implementation date.
Electricity North West	Non-confidential	We do not agree with the implementation date. Next scheduled release or within one month of Authority Consent, whichever is sooner is not enough time to review and complete the resulting system/process amendments, together with any subsequent legislative changes.
ESP Electricity	Non-confidential	Yes
Harmony Energy Ltd	Non-confidential	*No response provided*
Northern Powergrid on behalf of Northern Powergrid (Northeast) plc and Northern Powergrid (Yorkshire) plc	Non-confidential	We disagree with this proposal. However, the significant impact of Ofgem's SCR decision will need to be factored into any implementation plan in the event that the proposal proceeds because of the inconsistency between the proposed CCCM and this schedule.
Renewable Connections	Non-confidential	Yes, as soon as possible as this is a live and extant issue.
SSE Generation	Non-confidential	As we do not support the proposal as a whole, we also do not support its implementation. If it were to be implemented, we have no comment on the proposed approach to the implemented date.
Scottish and Southern Electricity Networks	Non-confidential	As detailed in our previous responses, we consider that this proposal requires wider industry review and therefore we do not support the proposed implementation date.
Anonymous	Anonymous	No, more work is required to ensure fairness across all customer types to ensure this is a two-way arrangement for completeness.
<u>Question 16 Summary</u>		