

DCP 406 'Access SCR: Changes to CCCM'

COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

| Company | Confidential/ Anonymous | 1. Do you understand the intent of DCP 406? | Working Group Comments |
|--------------|----------------------------|--|------------------------|
| BU-UK | | Yes. | Noted |
| DRAX | | Yes. | Noted |
| EDF | | Yes. | Noted |
| ENWL | | Yes. | Noted |
| ESP | | Yes. | Noted |
| INA | | N/A | Noted |
| NPg | | Yes. | Noted |
| OPN | | Yes. | Noted |
| SPEN | | Yes. | Noted |
| SSEN | | Yes. | Noted |
| UKPN | | Yes, having been involved in the DCUSA Working Group we have a good understanding of the intent of DCP 406 | Noted |

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| WPD | | Yes, we understand the intent of DCP 406. | Noted |
| <p>Working Group Conclusions:</p> <p>All responders confirmed that they understood the intent of the CP.</p> | | | |

| Company | Confidential/ Anonymous | 2. Are you supportive of the principles of DCP 406? | Working Group Comments |
|--------------|----------------------------|--|------------------------|
| BU-UK | | Yes. | Noted |
| DRAX | | Yes. We believe that the principles of DCP406 should help to address Ofgem's concerns that the current charging arrangements no longer provide an effective signal for network users, and without change, may slow down the roll-out of low carbon technologies (LCTs) across the energy system. It is important that arrangements are clear and transparent for customers in order to help encourage investment and innovation in LCTs. | Noted |
| EDF | | Yes. | Noted |
| ENWL | | Yes. | Noted |
| ESP | | Yes. | Noted |
| INA | | N/A | Noted |
| NPg | | Yes. | Noted |

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| OPN | | Yes. | Noted |
| SPEN | | Yes. | Noted |
| SSEN | | Yes. | Noted |
| UKPN | | Yes, we are fully supportive of the principles of DCP 406 to reduce the overall connection charge faced by those connecting to the distribution network whilst also ensuring that existing protections for bill payers is retained and strengthened. | Noted |
| WPD | | Yes, we are. | Noted |
| Working Group Conclusions: All respondents supported the principles of this change. | | | |

| Company | Confidential/ Anonymous | 3. Out of the options that align with the TCR, do you have a preference for option 1(a) or option 1(b), and why? | Working Group Comments |
|--------------|----------------------------|---|---|
| BU-UK | | 1b – easier to understand and more transparent. | |
| DRAX | | <p>Our preferred option is 1(a) "Original Proposal".</p> <p>As referenced in paragraph 3.42 of Ofgem's final decision, we agree that alignment with the TCR definitions is a logical and consistent way to implement Ofgem's connection charging boundary decision. These definitions have been developed over a significant period of time in an open and deliberative process and, like Ofgem, we believe them to be fit for purpose.</p> | <p>1, Respondent does not believe a new set of definitions is required and any further addition to the TCR definitions. Any changes should only be for clarification and minor.</p> |

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| | | <p>We therefore don't believe it necessary to start on a new set of definitions. Although the definitions were not developed for the explicit purpose of connection charging we believe that any potential additional clarification should be minor.</p> <p>We are not convinced that Non-Final Demand Site certification presents an insurmountable barrier for the purposes of connection charging for a new site because it relies upon an MPAN having been created and registered to satisfy the definition. Our view is it should be relatively straightforward for DNOs to request sufficient, consistent information as part of the connection process to be able to assess the primary purpose of the site.</p> <p>We also believe that some of the concerns raised regarding the potential for 'gaming' if a site such as a windfarm does not provide certification in order to be treated as a Final Demand Site, whilst theoretically possible, could easily be overcome. If such cases were to be identified in practice, in sufficient numbers to make it appropriately material to do so, a party would be able to raise a modification and Ofgem has powers to intervene also. We agree that additional legal text may be needed to provide for a circumstance where the DNO assessment is incorrect or if the customer wishes to dispute the decision.</p> <p>Option 1(b) – Although broadly in line with the direction, this option introduces new terminology rather than reference to defined terms such as Final Demand, Final Demand Site and Non-Final Demand Site and so changes would be required to the relevant parts of the DCUSA.</p> | <p>2, Not convinced that Non-Final Demand Site certification presents an insurmountable barrier.</p> <p>3, Believes there should be a disputes process for customers to challenge the DNO's final decision.</p> <p>4, Believes potential for gaming if no certification easily overcome and that if this practice was identified post delivery of this DCP a separate change could be raised to mitigate the risk.</p> |
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| EDF | | Both options seem to be compliant with the TCR but our preference is for 1(b) it uses the defined terms Final Demand Site and Non-Final Demand Site. | Option 1b preferred |
| ENWL | | Option 1(b) is preferred as it provides the definition (and associated nested definitions) all within the document. Option 1(a) refers to another document and utilises quite a complex definition of Non-Final Demand. Additionally, the definitions in Schedule 32 could change without it being visible to users of Schedule 22. | Option 1b preferred. |
| ESP | | Between these two, we prefer option 1b as it provides greater clarity. | Option 1 b preferred. |
| INA | | As 1(b) provides greater clarity of intent and simplifies the code for customers, it is the preferred option. | Option 1b preferred. |
| NPg | | We consider both options would satisfy the directed requirement. However, out of the two we favour option 1(b) due to the additional clarity provided to the user. We recognise that this risks divergence with Schedule 32 – in relation to the defined terms Final Demand Site and Non-Final Demand Site – and alignment may need to be maintained for future change proposals. | Option 1b preferred. |
| OPN | | No preference | No preference. |
| SPEN | | No preference as both options fail to address the risk that the fairness issue may exist where a site may be considered (e.g.) a Demand Connection for connection charging purposes, but a Non-Final Demand Site for DUoS charging purposes i.e., thereby avoiding upfront and enduring charges. This is particularly evident in example (j) provided in Attachment 2 of the DCP406 consultation. | No preference 1, both options create unfairness as Non-final Demand site could avoid upfront and enduring charges. |

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| SSEN | | Our preference is option 1(b). We think that this allows closer alignment to the intent compared to 1(a). There is more likely to be manipulation of classification of end-use if option 1(a) is preferred | Option 1b preferred. |
| UKPN | | Whilst we agree that both options 1a and 1b comply with the Access SCR Direction, our preference is for option 1b because it introduces additional defined terms that make it more transparent and easier to understand for the customer, without the need to refer to separate documentation. A disadvantage of option 1a is that it relies on a degree of subjective assessment by the DNO designer as to whether a new site should be classed as a Final Demand Site or a Non-Final Demand Site prior to calculating the price of the Connection Offer. This will be difficult to do for greenfield sites and difficult to defend if challenged by the customer. It will also place the DNO and Ofgem in an undesirable position of having to assess the merits of views held by both parties, if such a challenge is taken to determination. In this respect we consider that option 1b provides a more consistent and defensible approach. | Option 1b preferred. Believes 1a is subjective and could place DNO's and Ofgem in a position of having to assess additional cases. |
| WPD | | 1b is simpler for Network Operators and customers to understand. | Option 1 b preferred. |
| <p>Working Group Conclusions: The majority of respondents favoured option 1(b), with only one respondent favouring option 1(a). The Working Group noted the concerns that 1(b) introduces new terminology, rather than reference terms already defined in Schedule 32. The Working Group noted that option 1(b) was created to avoid the need to reference complex terms such as Non-Final Demand Site in another document. The Working Group concluded that as option 1(b) describes what a Final Demand Site and Non-Final Demand Site is using terms already defined in Schedule 32, both options should achieve the same outcome and therefore no 'new' terms have been introduced to the DCUSA.</p> | | | |

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The Working Group concluded that, given the majority of respondents favoured option 1(b), and that both options should give the same outcome in defining a Generation Connection, the Working Group propose to put option 1(b) forward for Party Voting as the option for defining Demand Connection and Generation Connection that aligns with the Access SCR Direction.

| Company | Confidential/ Anonymous | 4. Do you agree that an alternative option (which is not TCR-aligned) is necessary, and do you agree that the option proposed is suitable? If not, please provide your rationale. | Working Group Comments |
|--------------|----------------------------|---|--|
| BU-UK | | An alternative option is not required. | No |
| DRAX | | <p>No. In line with our response to Q1) the TCR definitions have been developed over a substantial period of time and are recognised by connecting customers and industry and so we support 1(a) "Original Proposal".</p> <p>In line with our response to Q3) we believe that some of the potential issues flagged, such as 'gaming' if a site such as a windfarm does not provide certification in order to be treated as a Final Demand Site, whilst theoretically possible, could easily be overcome if encountered in practice.</p> | <p>No, refers to previous answer in Q2 that TCR definitions have been developed over time and are recognised by customers and industry.</p> <p>Believes any potential issues could be resolved if encountered as noted in the respondents answer to Q3</p> |
| EDF | | We consider that an alternative option which is not TCR- aligned is unnecessary. | No |

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| ENWL | | <p>Yes we think it is necessary but would raise two points in relation to the drafting.</p> <p>1. In the list of considerations, the first relates to Electricity Storage only. If the storage was associated with generation as well then it would seem logical that the overall site would also be considered as a Generation Connection. We think this needs to be added to the definition.</p> <p>2. We are unclear on the rationale as to why Electricity Generation for back up purposes only is treated as a Generation Connection. If the generation was connecting behind the meter for the purposes of exporting then this would be treated as a Demand Connection.</p> | <p>1, believes the alternative needs Generation Connection definition updating to include storage associated with generation.</p> <p>2, Unsure why Electricity Generation for back up purposes is only treated as Generation Connection.</p> |
| ESP | | <p>We understand that option 1b may be binary and agree that another option is required which may not necessarily be TCR aligned.</p> | <p>States option 1b may be too binary and agrees an option not TCR aligned is required.</p> |
| INA | | <p>An alternative option is required as Option 1(b) appears to be too binary in nature, given the potential benefit of sites to potentially game their defined status.</p> | <p>As above</p> |
| NPg | | <p>Yes, we agree that an alternative option is needed and that the option proposed is suitable. However, we propose that the definition of Generation Connection in option 3(b) is as follows to add further clarity:</p> <p>“means a connection to a Premises where the primary purpose of that Premises is wholly or mainly Electricity Generation or Electricity Storage and where, in determining the primary purpose of the Premises, we will take into account:</p> | <p>Agrees an alternative is required. Proposes new drafting for Generation Connection in option 3b</p> |

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| | | <p>(i) whether the Maximum Capacity of the connection of the Premises to the Distribution System for export is greater than the Maximum Capacity for import;</p> <p>(ii) whether the owner or occupier of the Premises holds a licence to carry out the activity specified in Section 4(1)(a) of the Act;</p> <p>(iii) whether the owner or occupier of the Premises benefits from an exemption from holding a licence to carry out the activity specified in Section 4(1)(a) of the Act under the Electricity (Class Exemptions from the Requirement for a Licence) Order 2001; and</p> <p>(iv) any other information that may be relevant to determining the primary purpose of that Premises.”</p> | |
| OPN | | Yes, we would agree that alternative options should be considered, and the proposal is suitable. However, all options proposed have drawbacks which mean it is essential to give careful considerations of the risks. | Yes although notes all options have drawbacks. |
| SPEN | | Yes, predominantly as it addresses the concern raised in our response to question 3 above. | Yes. |
| SSEN | | Yes, we agree an alternative is required | Yes |
| UKPN | | We consider it desirable but not necessary for the Working Group to explore multiple alternative options that are not aligned to the TCR. Of all the alternative options that have been included in the consultation, option 3b is our preferred option. However, we still prefer option 1b as option 3b introduces a greater element of subjectivity and therefore a greater risk of an inconsistent approach being applied by DNOs. We do not believe that | States that option 3b introduces a greater element of subjectivity which could lead to inconsistent approaches applied by DNOs |

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| | | this unintended consequence is desirable or in any stakeholder's best interest. | |
| WPD | | Yes, the alternative option is necessary and we agree with the proposed option. | Yes |
| <p>Working Group Conclusions: There are existing fora within the Energy Networks Association (ENA) where DNOs can discuss interpretation and changes to the CCCM can be raised if further clarity is required. The Working Group considered that the risk of a generator not paying for reinforcement - because it can relatively easily satisfy the requirement of a Demand Connection via a binary assessment - represents a more undesirable outcome and not aligned with the Working Groups understanding of Ofgem's policy intent (i.e. the connection boundary for a Generation Connection is intentionally not 'shallow' like for a Demand Connection).</p> <p>The Working Group reviewed the proposed changes by respondents to the drafting of option 3(b) to mitigate risk of different interpretations. The majority of the points raised were incorporated into the revised drafting.</p> <p>The Working Group recognised one respondent's concern that a Customer with an export capacity greater than an import capacity should not be considered by default a Generation Connection. No specific example was provided by the respondent to support this view and the Working Group agreed that this should be retained as a criteria on the basis that it should provide a simple test that the purpose of the site was more export than import. The Working Group noted that the additional of 'any other relevant information' into the list of considerations would give latitude to the DNO/IDNO Party if a real situation arose where it did not seem appropriate to treat the site as a Generation Connection. If such situations did occur, then a CP could be raised to encompass it in the DCUSA.</p> <p>The Working Group concluded that the inclusion of "wholly or mainly" removed the need for Electricity Storage to be explicitly mentioned in the list of considerations and also provided clarity on how Electricity Storage co-located with Electricity Generation would be treated.</p> <p>the Working Group agreed to add clarity as to what a generation licence is by including Generation Licence as a defined term. The Working Group also agreed with the respondent to cater for a scenario where a generator may hold an exemption for needing a Generation Licence and therefore included an additional defined term Generation Licence Exemption.</p> | | | |

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The Working Group also reviewed the inclusion of back up generation as a criteria for defining the primary purpose of a Generation Connection, as commented on by two respondents. The Working Group concluded that back-up that generation should not be a criteria, as it may (e.g.) be connected behind the meter of a Demand Connection.

| Company | Confidential/ Anonymous | 5. Which of these three definitions do you believe is most suitable to meet Ofgem's policy intent and why? | Working Group Comments |
|--------------|----------------------------|--|--|
| BU-UK | | Option 3b fits best with Ofgem's policy and intent, reduces opportunities for gaming. However we don't believe that a customer with an export capacity greater than an import capacity should necessarily be considered a generation connection. | 3b |
| DRAX | | Option 1(a) for the reasons set out in our response to Q3). The original TCR definitions have been developed over a significant period of time in an open and deliberative process and, like Ofgem, we believe them to be fit for purpose. Option 1(a) is in line with Ofgem's TCR decision and will reduce complexity for customers and the need to update definitions. Any definition that is not TCR-aligned risks undermining the SCR objective of improving the uptake of low carbon technologies with potential reduction of consumer benefits. | 1a due to reasons set out in the respondents answer to Q3. |
| EDF | | Option 1(b) is most suitable to meet Ofgem's policy intent as it is compliant with the TCR whilst being consistent with the use of the existing defined terms Final Demand Site and Non-Final Demand Site. | 1b |

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| ENWL | | We think option 3b best aligns with Ofgem's policy intent based on the statement in the decision that it is the primary purpose that should set the definition. | 3b |
| ESP | | We prefer option 3b as it provides a practical approach to consider a range of site characteristics in making a decision as to whether a site should be considered Demand or Generation. | 3b |
| INA | | Option 3(b) appears most suitable as it provides a practical approach to consider a range of site characteristics in making a decision. | 3b |
| NPg | | We prefer option 3(b). We consider this option better achieves policy intent set out in the Access SCR Decision and mitigates the 'fairness' concerns set out in the consultation. | 3b |
| OPN | | All of the proposed options would seem to meet the intent of the policy | No preference |
| SPEN | | Option 3(b) Objective consideration of a site's primary purpose, for the reasons raised in our response to question 3 above. | 3b |
| SSEN | | Option 3(b) as we believe that using the TCR definitions could be in conflict with the policy intent | 3b |
| UKPN | | We believe that option 1b is the most suitable to meet Ofgem's policy intent for all the reasons we have set out in our responses to questions 3 & 4 above. | 1b |

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| WPD | | Whilst not strictly in line with Ofgem's direction, 3b appears to be the most suitable option in that it aligns to the TCR in principle and allows for an assessment of the primary purpose of the site. | 3b |
| <p>Working Group Conclusions: The Working Group believe that it is necessary to present the Authority with options which align with both the Access SCR Direction (i.e. TCR alignment) and Access SCR Decision (i.e. TCR but considering the 'primary purpose' of a site), and therefore remain of the view that it can meet the requirements of the Access SCR Direction via options 1(a) or 1(b), but will offer Ofgem an alternative that is justified by better meeting the Access SCR Decision (i.e. option 3(b)).</p> | | | |

| Company | Confidential/ Anonymous | 6. Can you provide any better options other than the options considered by the Working Group? | Working Group Comments |
|--------------|----------------------------|---|------------------------|
| BU-UK | | No. | Noted |
| DRAX | | Not at this time. | Noted |
| EDF | | No. | Noted |
| ENWL | | Suggested alterations are made above. | Noted |
| ESP | | We have not identified any other options. | Noted |
| INA | | N/A | Noted |
| NPg | | No. | Noted |

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| OPN | | No. | Noted |
| SPEN | | No. | Noted |
| SSEN | | No. | Noted |
| UKPN | | No, having reviewed the content included with this consultation our view is that the Working Group have considered these options carefully and put forward the most suitable proposals. | Noted |
| WPD | | No. | Noted |
| Working Group Conclusions: The Working Group noted that no respondents provided any other options for consideration but that some modifications were proposed. | | | |

| Company | Confidential/ Anonymous | 7. Do you agree with the Working Group that there is a risk that the options for defining Demand Connection and Generation Connection may incentivise a customer to ensure that it satisfies the definition of Demand Connection? If not, please provide your rationale. | Working Group Comments |
|--------------|----------------------------|--|------------------------|
| BU-UK | | Yes we agree. | yes |

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| DRAX | | <p>Whilst we acknowledge that it's theoretically possible that a site such as a windfarm may choose not to provide certification in order to be treated as a Final Demand Site, we believe that it should be evident from the customer's connection details what the Primary Purpose of a site is. Any customers that chose to do so would be subject to ongoing costs such as:</p> <ul style="list-style-type: none"> • Distribution Use of System (DUoS) residual charges; • Transmission Network Use of System (TNUoS) residual charges; • Balancing Services Use of System (BSUoS) charges; and • Policy costs such as Contracts for Difference (CfD) and the Capacity Market (CM) that a Final Demand Site would face. <p>The workgroup analysis shows that the costs above would significantly restrict the numbers of cases where the theoretical benefits of reduced reinforcement costs would exceed these ongoing costs.</p> <p>Customers would also have to intentionally not declare the true primary purpose of their site which could result in potential Ofgem intervention.</p> | <p>Yes although the costs for doing so could significantly restrict how many cases are seen. Also notes customers would have to purposefully mislead on declaration which could result in Ofgem intervention</p> |
| EDF | | <p>Theoretically there is a risk.</p> | <p>Yes</p> |
| ENWL | | <p>Yes, it would appear to be a commercially rational decision for new connections to wish to avoid charges for reinforcement.</p> | <p>Yes</p> |
| ESP | | <p>Yes, customers will seek to maximise their financial benefit and are incentivised to utilise any potential gaps in rules to do so.</p> | <p>Yes</p> |

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| INA | | Yes, where there is a commercial incentive, connecting customers will seek their best position. | Noted |
| NPg | | Yes, in line with the reasons and assessment set out in the consultation. | Noted |
| OPN | | Yes, there is a clear incentive to define a new connection as a Demand Connection. Consideration should also be given to the risk that different parties may be liable for connection costs and ongoing charges for a particular site (e.g. Developer and Operator). | Noted |
| SPEN | | Yes. | Noted |
| SSEN | | Yes. | Noted |
| UKPN | | Yes, we agree that this is a key risk associated with different connection charge boundaries being implemented for Demand and Generation connections. | Noted |
| WPD | | Yes, there is a risk and this risk should be mitigated against. | Noted |
| <p>Working Group Conclusions: 6.5The majority of respondents agreed that an alternative to options 1(a) or 1(b) is necessary.</p> <p>One respondent considered that, for the risk to materialise, the Customer would have to intentionally not declare the true primary purpose of their site, and which could result in potential Ofgem intervention. The Working Group did not agree with this view. The default position is that a customer is deemed to be a Final Demand Site unless it satisfies the criteria of a Non-Final Demand Site.</p> <p>One respondent suggested that the Working Group should consider the risk that different parties may be liable for connection costs and ongoing charges. The Working Group have previously considered this and agree with the implication that, where a party pays for the connection charge but not ongoing</p> | | | |

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DUoS charges etc, it increases the risk that a site (via more than one 'owner') could avoid both upfront and enduring costs. This is particularly a risk associated with options 1(a) and 1(b), where 'primary purpose' is not considered. This risk could be mitigated by changes to Schedule 32.

The Working Group noted the different views of some respondents and acknowledged that all outcomes were theoretical as the new set of circumstances does not yet exist. However, the Working Group considered that it has sufficiently demonstrated that the gaming/fairness concerns are a material risk, as evidenced in the consultation (see also 'Working Group Analysis' section in paragraphs 4.27 to 4.46). The Working Group consider that reliance on a future CP to resolve this issue would not be efficient and that a future CP would almost certainly be needed to address the risk that it has already identified. The Working Group agree that option 3(b) mitigates these risks.

| Company | Confidential/ Anonymous | 8. What mitigations do you consider appropriate and why, and how would any be implemented? | Working Group Comments |
|--------------|----------------------------|--|--|
| BU-UK | | It would be appropriate to ensure the option chosen is one which clearly defines the definition and does not allow interpretations. | Noted |
| DRAX | | <p>In line with our response to Q7), although we acknowledge that it's theoretically possible that generators may attempt gaming, we consider the risk to be low and if this was found to occur in practice, it would be possible to raise a modification and/or for Ofgem to intervene. We therefore don't believe that any mitigations are required and so do not support the potential change of definition of Final Demand Site to include reference to being a Single Site that has needed reinforcement but not paid for it relating to a connection application since 1 April 2023.</p> <p>We agree with the concerns raised by the Working Group about unintended consequences and complexities of potential mitigations to seek</p> | States no mitigations are required due to the reasons outlined in their answer to Q7 |

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| | | <p>retrospective reinforcement contributions, where for example a generator is treated as a Demand</p> <p>Connection for connection charging purposes, but later certifies as a Non-Final Demand Site for use of system charging.</p> | |
| EDF | | If it proves to be a real issue then it could be dealt with through a future DCP. | May require a future DCP |
| ENWL | | We agree that the proposed changes to Schedule 32 should be progressed so that a new connection cannot avoid both connection charges (if applicable) and also residual charges. | Changes to schedule 32 should be made so a new connection cant avoid both connection and residual charges. |
| ESP | | Clear definitions of site status that are not subject to interpretation. | Clearer definition to the site status required so they are not subject to interpretation. |
| INA | | Clear definitions of site status that are not subject to interpretation. | As above |
| NPg | | We consider that option 3(b) offers sufficient mitigations. However, if option 1(a) or 1(b) was used we agree with the working group that a change to Schedule 32 should be introduced to recognise, in determining if a site is a Final Demand Site, whether the Customer contributed to reinforcement in its connection charge. As it is the working group's intention that multiple solutions to deliver the intent of this CP are submitted to the Authority for a decision, any 'package' based on option 1(a) or 1(b) should include the proposed changes to Schedule 32. | <p>If options 1a or 1b used to recognise if the customer contributed to reinforcement if a site is a Final Demand Site in its connection charge.</p> <p>States that changes to schedule 32 are outside of the scope of this DCP.</p> |

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| | | However, we believe that any changes to Schedule 32 are outside of the current scope of this CP, and therefore the DCUSA Panel would need to agree to amending the scope to facilitate it. | |
| OPN | | There will be multiple scenarios where changing the classification of the site is commercially advantageous. Mitigations should reflect the principles of the proposals, and sites which subsequently define as non-final demand should be subject to repayment of appropriate reinforcement costs on an NPV basis. | Noted |
| SPEN | | Implementing the definitions provided in Option 3(b) would largely address our concerns. | Implementing 3b would largely address concerns already raised by the respondent. |
| SSEN | | Any proposed changes to whether the site is deemed final demand or final generation should only be considered if the applicant requests such a change up to the energisation date. Beyond energisation then it's by DNO discretion and under exceptional circumstances only. These circumstances are undefined. | Noted |
| UKPN | | We agree that the mitigation outlined in para 4.45 (c) for the inclusion of an additional criterion of "a Single Site that has needed reinforcement but not paid for it relating to a connection application since 1 April 2023" added to the Schedule 32 definitions is a sensible protection for all DUoS customers. Our rationale is that this will serve to protect DUoS customers from excessive socialised charges in line with Ofgem's direction. | Noted |

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| WPD | | The Access SCR should be applied in a fair and consistent manner so it is important that any unintended consequences are minimised. The mitigations proposed in 4.43-4.45 appear to do this. | Noted |
| <p>Working Group Conclusions: The Working Group recognised that some respondents supported making changes to Schedule 32 to prevent a Customer avoiding both connection charges and residual DUoS charges (and charges others as a result of being a Non-Final Demand Site).</p> <p>The Working Group agreed that, as written, the scope of this CP does not provide for changes to be made to Schedule 32 without agreement from the DCUSA Panel to amend it. Whilst this was not considered a barrier as such, the Working Group agreed that a DNO Party would raise a change to Schedule 32 following the Authority's decision on this CP, if that decision implemented the definition of Demand Connection and Generation Connection in line with option 1(a).</p> | | | |

| Company | Confidential/ Anonymous | 9. Do you believe that the legal drafting delivers Ofgem's Direction (as clarified in Ofgem's letter dated 04 August 2022)? If not, please provide your rationale. | Working Group Comments |
|--------------|----------------------------|---|---|
| BU-UK | | Yes. | Noted |
| DRAX | | Yes. | Noted |
| EDF | | Yes. | Noted |
| ENWL | | <p>We have the following comments on the drafting</p> <p>We think the wording "The definition of Voltage Level is included within the Glossary of Terms" is superfluous as all capitalised terms are defined in the Glossary.</p> | 1, The definition of Voltage Level is included within the Glossary of Terms" is superfluous as all capitalised terms are defined in the Glossary. |

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COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

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| | | <p>The allocation of costs for generation at the same voltage is covered in paragraphs 1.28 to 1.33 so would suggest the range in the text should be 1.17 to 1.33.</p> <p>There is a typo in footnote 2 “braker” should be “breaker”.</p> | 2, Notes some potential typos and changes to the paragraph ranges within the text |
| ESP | | Yes | Noted |
| INA | | N/A | |
| NPg | | In general, yes. However, we have proposed some amendments for the working group to consider which are appended to this response (and set out in response to question 4). We do not believe that the proposed amendments alter the intent. | Notes that they have provided some amendments for consideration in Q4 but broadly agrees with the intent. |
| OPN | | Yes. | Noted |
| SPEN | | Yes. | Noted |
| SSEN | | Yes. | Noted |
| UKPN | | Yes, we agree that the Ofgem letter dated 04 August 2022 from Eleanor Wood, Deputy Director – Market Design, Energy Systems Management and Security has provided the required clarification needed to enable us to confirm that the legal drafting set out in this Change Proposal delivers Ofgem’s Direction. | Noted |

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| WPD | | Yes, | Noted |
| <p>Working Group Conclusions: All respondents who answered this question (11) believe that the legal drafting delivers the requirements set out in Access SCR Direction. One respondents did not provide any comments.</p> <p>The Working Group agreed that 'the definition of Voltage Level is included within the Glossary of Terms' is superfluous as all capitalised terms are defined within the Glossary and therefore deleted it in the revised legal text.</p> | | | |

| Company | Confidential/ Anonymous | 10. Is the inclusion of the table helpful? | Working Group Comments |
|--------------|----------------------------|--|---|
| BU-UK | | Yes. | Noted |
| DRAX | | No. The intent of the table is understood; namely to illustrate the application of the high-cost project threshold when considering reinforcement costs and voltage levels. However, when reviewing the table, it did not clearly articulate these points. | Table does not clearly articulate its mainly to illustrate the application of the high-cost project threshold when considering reinforcement costs and voltage levels |
| EDF | | Yes. | Noted |
| ENWL | | Yes, the costs included in the assessment are different to a connection without the high cost project threshold being triggered so useful to have it set out clearly. | Noted |

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| ESP | | Yes. | Noted |
| INA | | N/A | |
| NPg | | Yes, as it provides additional clarity for customers. | Noted |
| OPN | | Yes. | Noted |
| SPEN | | Yes. | Noted |
| SSEN | | Yes. | Noted |
| UKPN | | <p>With further modifications, the inclusion of the table inserted in paragraph 1.16 of the draft legal text in attachment 3 will be helpful, however in its current format we consider that it has potential to be improved. We therefore recommend that it is modified such that the voltage designation headings e.g., HV, EHV etc be replaced with a column for each standard distribution network voltage e.g. 6.6kV, 11kV, 22kV, 33kV etc. Our rationale for this is based on the new definition of the Voltage Level rule agreed by Ofgem that is included within the legal text under Section 2 Glossary of Terms. We consider that in circumstances where the charges due are in excess of the high-cost project threshold, this modification will provide greater clarity for all stakeholders on the identification of the voltage of assets that are included within reinforcement charges applicable for the Minimum Scheme.</p> | <p>With modifications the table could be helpful</p> <p>Replace the HV, EHV headers with each each standard distribution network voltage</p> |

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| WPD | | Yes. | Noted |
| <p>Working Group Conclusions: The majority of respondents (11) agreed that the inclusion of the High-Cost Project Threshold table is helpful. One respondent commented that the table is not helpful – it was stated that the intent of the table is understood, however, it was not clearly articulated. Another respondent suggested that further modifications were needed for it to be helpful, and set out such changes to be considered by the Working Group.</p> <p>The Working Group discussed reviewing the High-Cost Project Threshold table and agreed to make no further amendments and it will remain within the legal text due to the majority view of the responders supporting it.</p> | | | |

| Company | Confidential/ Anonymous | 11. Do you support the Working Group’s rationale for the changes to Exception 1 and addition of a new Exception 5? If not, please provide your rationale. | Working Group Comments |
|--------------|----------------------------|--|---|
| BU-UK | | We do not agree with the working groups rationale for these changes, we believe that the current approach should apply and the asset should be treated as reinforcement and fully funded by the distributor. | believes that the current approach should apply and the asset should be treated as reinforcement and fully funded by the distributor. |
| DRAX | | Yes. In line with the draft legal text, we agree that the Connection Charge associated with an Enhanced Scheme (where the DNO has decided to design an Enhanced Scheme with assets of a different specification than required by the Minimum Scheme) will be calculated subject to the exclusion of costs | Noted |

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| | | of any additional assets not necessary for the provision of the customer's connection. | |
| EDF | | Yes. | Noted |
| ENWL | | Yes, but the legal drafting needs review. Proving connectivity to the Premises rather than the "connection(s)" may be more appropriate. | States that legal text needs review. proving connectivity to the Premises rather than the "connection(s)" may be more appropriate |
| ESP | | Yes. | Noted |
| INA | | N/A | Noted |
| NPg | | Yes, we support the rationale in the consultation and believe it will provide additional clarity for a Customers. | Noted |
| OPN | | Yes. | Noted |
| SPEN | | Yes. | Noted |
| SSEN | | Yes. | Noted |
| UKPN | | Yes, we consider the revisions support the policy intent of the proposal. | Noted |

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| WPD | | Yes, we support them. | Noted |
| <p>Working Group Conclusions: The majority of respondents (10) support the Working Group's rationale for the changes. One respondent did not support the Working Group's rationale, and one respondent did not provide a comment.</p> <p>The respondent that did not support the changes stated that they believe that the current approach should apply and the asset should be treated as reinforcement and fully funded by the DNO/IDNO Party. The Working Group concluded that these changes were in line with Ofgem's broad policy intent in its Decision but as these were not explicitly identified in the Direction, these should be presented as alternative options for Ofgem to opine on.</p> <p>One respondent that supported the changes suggested that the legal drafting needs additional review, and that referring to proving connectivity to the "Premises" rather than the "connection(s)" may be more appropriate. 6.22 The Working Group accepted the proposed change to the wording of the legal text for Exception 5 in line with ENWL's suggestion.</p> | | | |

| Company | Confidential/ Anonymous | 12. The Working Group has made a number of presentational changes to the CCCM examples, do you support this? If not, please provide reasons why they should not be changed. | Working Group Comments |
|--------------|----------------------------|---|------------------------|
| BU-UK | | Yes. | Noted |
| DRAX | | No comment at this time. | Noted |
| EDF | | Yes, I think the changes add clarity. | Noted |
| ENWL | | Yes. | Noted |
| ESP | | Yes. | Noted |

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| | | | |
|--|--|--|------------------------------------|
| INA | | N/A | Noted |
| NPg | | Yes, as the changes provide additional clarity for a Customers. | Noted |
| OPN | | Yes. | Noted |
| SPEN | | Yes. However we note the reference error in example 15. | Notes there's a typo in example 15 |
| SSEN | | Yes. | Noted |
| UKPN | | Yes, the inclusion of the new examples and the presentational changes to the existing examples are very helpful. | Noted |
| WPD | | Yes, this makes the document consistent in its presentation. | Noted |
| <p>Working Group Conclusions: All responders who answered this question (10) support the presentational changes to the CCCM examples that the Working Group has made. Two responders did not provide any comments.</p> | | | |

| Company | Confidential/ Anonymous | 13. Do you believe that the proposed examples are sufficient to illustrate the key changes being proposed, or do you believe additional examples should be included? If so, please provide details. | Working Group Comments |
|--------------|----------------------------|---|------------------------|
| BU-UK | | Yes we believe the included examples are sufficient. | Noted |

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|-------------|--|---|---|
| DRAX | | No comment at this time. | Noted |
| EDF | | Yes, they are sufficient. | Noted |
| ENWL | | <p>An example to show a generator connection behind the meter to an existing demand customer would be treated as a Demand Connection would be useful.</p> <p>Other comments on the examples</p> <ul style="list-style-type: none"> • The text explaining VA and W could be simplified. • Example 16 is confusing as the text and the diagram do not obviously align or explain the network solution • The title and purpose of examples 17 & 18 differ from the index • The Reinforcement costs in example 17 are inconsistent to the Apportionment % | <p>Notes an example to show a generator connection behind the meter to an existing demand customer would be treated as a Demand Connection would be useful.</p> <p>Other comments on the examples</p> <ul style="list-style-type: none"> • The text explaining VA and W could be simplified. • Example 16 is confusing as the text and the diagram do not obviously align or explain the network solution • The title and purpose of examples 17 & 18 differ from the index • The Reinforcement costs in example 17 are inconsistent to the Apportionment % |
| ESP | | No further examples have been identified for inclusion. | Noted |
| INA | | N/A | Noted |

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| NPg | | Yes, we believe the proposed examples sufficiently illustrate the key changes and encompass the majority of range of issues covered by the CCCM. | Noted |
| OPN | | Yes. | Noted |
| SPEN | | We note that Examples 27 (A new Generation Connection with Fault Level Triggered Reinforcement and transmission works) and 28 (A new Generation Connection with Fault Level Triggered Reinforcement and transmission works) do not apply in Scotland (as 132kV is a transmission voltage). We respectfully request an equivalent is provided that's reflective of the network in Scotland. | Notes examples 27 and 28 does not apply in Scotland |
| SSEN | | Proposed examples are adequate to highlight the proposed changes | Noted |

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| UKPN | | Yes, we believe the changes made to the examples are sufficient to clearly illustrate the key changes to the connection charge boundaries being proposed. | Noted |
| WPD | | They appear to cover all scenarios | Noted |
| <p>Working Group Conclusions: A majority (eight) of the respondents believed that the proposed examples are sufficient to illustrate the key changes being made. Two respondents proposed changes and two respondents made no comment.</p> <p>One respondent stated that an example to show a generator connection behind the meter to an existing demand customer would be treated as a Demand Connection would be useful. They also noted that: (i) the text explaining VA and W could be simplified, (ii) that example 16 is confusing as the text and the diagram do not obviously align or explain the network solution, (iii) that the title and purpose of examples 17 and 18 differ from the index, and (iv) that the Reinforcement costs in example 17 are inconsistent to the Apportionment percentage.</p> <p>The Working Group carried out a review of the CCCM examples proposed by some respondents to ensure that titles, capitalisation and general expressions are consistent throughout the examples. This also included a replacement of all diagrams within the examples to apply consistent formatting.</p> <p>The Working Group agreed to make minor amendments in the text to examples 3, 6, 7, 8, 9, 11, 12, 13, 14, 18, 19 and 20 (numbers refer to the consultation version of examples) to improve clarity without changing the purpose or logic of the examples.</p> <p>The Working Group agreed that example 16 was had conflicting purposes detailed between the summary and body of the CCCM Examples document. This example illustrates the application of a Storage connection and has been redrafted and simplified, as requested by one respondent. The Working Group also considered an example to illustrate generation connected behind the meter of a Demand Connection in line with the request of one respondent but did not progress it.</p> <p>Errors were found in examples 17, 24 and 30 which required amendment to accurately reflect the application of the CCCM. The changes made in these examples did not change the purpose or logic of the example.</p> | | | |

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Another respondent noted that Examples 27 (A new Generation Connection with Fault Level Triggered Reinforcement and transmission works) and 28 (A new Generation Connection with Fault Level Triggered Reinforcement and transmission works) do not apply in Scotland (as 132kV is a transmission voltage) and requested an equivalent is provided that's reflective of the network in Scotland.

The Working Group agreed that examples 27 and 28 required updating with a statement acknowledging the different boundaries between Distribution and Transmission that exist in England, Scotland and Wales.

| Company | Confidential/ Anonymous | 14. Overall, do you agree that the draft legal text delivers the intent of the Ofgem Direction? If not, please provide your rationale. | Working Group Comments |
|--------------|----------------------------|---|------------------------|
| BU-UK | | Yes. | Noted |
| DRAX | | In line with our response to Q3) we support Option 1(a) "Original Proposal" because alignment with the TCR definitions is a logical and consistent way to implement Ofgem's connection charging boundary decision and delivers the intent of the Ofgem Direction. We do not believe that alternative solutions, that are not TCR-aligned are in line with the Ofgem intent. | Noted |
| EDF | | Yes. | Noted |
| ENWL | | Yes, with comments above. | Noted |
| ESP | | Yes. | Noted |
| INA | | N/A | Noted |

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| NPg | | Yes, but we have proposed some changes as referred to in response to question 9. | Noted in the conclusions to question 9 |
| OPN | | Yes. | Noted |
| SPEN | | Yes. | Noted |
| SSEN | | Yes. | Noted |
| UKPN | | Yes, overall, with the subsequent clarifications from Ofgem, we agree that the draft legal text delivers the intent of the Ofgem Direction. | Noted |
| WPD | | Yes. | Noted |
| <p>Working Group Conclusions: The majority of respondents (10) agree that the draft legal text delivers the intent of the Access SCR Direction, but one proposed changes to the text that did not alter the intent. One respondent stated that they believe option 1(a) should be adopted to define Demand Connection and Generation Connection, and that alternative solutions (e.g. option 3(b)) are not in line with the intent of the Access SCR Direction. One respondent did not provide any comments.</p> | | | |

| Company | Confidential/ Anonymous | 15. Do you consider that the proposal better facilitates the DCUSA Charging Objectives? If so, please detail which of the Charging Objectives you believe are better facilitated and provide supporting reasons. | Working Group Comments |
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| | | If not, please provide supporting reasons. | |
|--------------|--|--|-------|
| BU-UK | | Yes we believe that the proposals are better facilitated on charging objective 1 as this is an obligation placed on DNO's by their distribution licence. | Noted |
| DRAX | | <p>Please note that, in relation to each of these DCUSA Charging Objectives, and in line with our response to Q3, our preferred option is 1(a) "Original Proposal". This is in line with TCR definitions that have been developed over a significant period of time in an open and deliberative process and, like Ofgem, we believe them to be fit for purpose.</p> <p>Any definition that is not TCR-aligned risks undermining the SCR objective of improving the uptake of low carbon technologies with potential reduction of consumer benefits.</p> <p>As such, we believe that option 1(a) "Original Proposal" is positive for Charging Objective 1 "That compliance by each DNO Party with the Charging Methodologies facilitates the discharge by the DNO Party of the obligations imposed on it under the Act and by its Distribution Licence".</p> <p>However, we do not believe that the alternative options, which are not TCR-aligned, have a sufficient case made in terms of consumer benefits to be as suitable as the "Original Proposal" to meet Ofgem's policy intent and as such we do not believe that the alternatives can be seen to satisfy Charging Objective 1.</p> <p>We believe that the proposal is positive for Charging Objective 2 "That compliance by each DNO Party with the Charging Methodologies facilitates competition in the generation and supply of electricity and will not restrict, distort, or prevent competition in the transmission or distribution of</p> | Noted |

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| | | <p>electricity or in participation in the operation of an Interconnector (as defined in the Distribution Licences)” because the proposed charging arrangements should help to provide a more effective signal for network users and to help prevent the potential slow-down of the roll-out of low carbon technologies across the energy system.</p> <p>We agree that the proposal is “Neutral” in respect to Charging Objectives 2-4 and has no impact on Charging Objective 5.</p> <p>We disagree that the proposal is negative to Charging Objective 6 “That compliance with the Charging Methodologies promotes efficiency in its own implementation and administration”. The Access SCR Decision has determined that this change compared to the current arrangements is justified. We would therefore regard this as either positive or neutral.</p> | |
| EDF | | <p>Yes,</p> <p>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</p> | Noted |
| ENWL | | <p>Yes, Objective 1 as this change is complying with an Ofgem direction.</p> | Noted |
| ESP | | <p>We agree that the proposal better facilitates DCUSA charging objective 1. and can be considered to have a negative impact on 6. However, given that this proposal has been borne from an Ofgem direction, we do not think this should have a bearing on the proposal being accepted or rejected as this has already been considered by Ofgem during the course of the SCR.</p> | Noted |

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| INA | | N/A | Noted |
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| NPg | | <p>We agree that this CP better facilitates Charging Objective 1 as it has been raised following an SCR and a direction on us to implement it.</p> <p>We do not agree that this CP has a negative impact on Charging Objective 6. Whilst we agree the Access SCR will introduce additional complexities, we believe that the legal text is sufficiently concise and efficient.</p> <p>We do not believe the other Charging Objectives are impacted.</p> | Noted |
| OPN | | We agree with the Working Group's assessment that this change proposal better facilitates Objective 1. | Noted |
| SPEN | | We agree with the assessment provided in items 5.1 to 5.4. | Noted |
| SSEN | | <p>Charging Objective -</p> <p>1) yes, the proposal clarifies the options each DNO is obligated to follow in undertaking their duties in compliance with the act.</p> <p>6) agree with potential negative impact on efficiency to internal processes due to taking into consideration that demand and generation are treated differently.</p> | Noted |
| UKPN | | <p>Yes, we agree that the proposal better facilitates the DCUSA Charging Objectives for the reasons set out below.</p> <p>Charging Objective 1</p> | Noted |

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| | | <p>Implementing the proposals outlined within this consultation will enable each DNO party to be able to comply with the Charging Methodologies and discharge the obligations imposed on it under the Act and by its Distribution Licence by being able to apply a more consistent approach to the identification and pricing of generation and demand applications. Consequently, the proposal promotes a process that will assist DNOs' compliance with standard licence condition 19.</p> <p>Charging Objective 2</p> <p>The implementation of a more clearly defined approach for the identification of generation and demand applications better supports this objective by reducing the risk of any unintended distortion of the pricing treatment of customers applications for connection to our distribution system.</p> <p>Charging Objective 3</p> <p>This DCUSA objective 3 will also be better served by these proposals as a result of the charges levied to customers more accurately reflecting the chargeable costs incurred, or reasonably expected to be incurred, by the DNO Party in its Distribution Business.</p> | |
| WPD | | Yes, as outlined in 5.1 in the DCP 406 consultation. | Noted |
| <p>Working Group Conclusions: The majority (10) of respondents agreed that this CP better facilitates the DCUSA Charging Objectives, however not all agreed that they were in line with the view set out by the Proposer in the consultation.</p> <p>One respondent stated that if option 1(a) was adopted – for defining Demand Connection and Generation Connection – this CP would better facilitate the DCUSA Charging Objectives, otherwise it would not for DCUSA Charging Objective 1. The same respondent did not agree that DCUSA Charging Objective 6 was negatively impacted, which another respondent also stated. One responder did not provide any comments.</p> | | | |

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The change introduces different charging arrangements for a Demand Connection and a Generation Connection and therefore adds more complexity into the assessment of the type of connection so that the appropriate charging regime can be applied; therefore, there is a potentially negative impact in relation to Charging Objective 6. However, the Working Group recognise that the Access SCR Decision has determined that this change compared to the current arrangements is justified.

| Company | Confidential/ Anonymous | 16. Are you aware of any wider industry developments that may impact upon or be impacted by this CP? | Working Group Comments |
|--------------|----------------------------|---|---|
| BU-UK | | No. | Noted |
| DRAX | | Not at this time. | Noted |
| EDF | | No. | Noted |
| ENWL | | No. | Noted |
| ESP | | No. | Noted |
| INA | | N/A | Noted |
| NPg | | <p>We recognise that this CP is one of four CPs raised to implement the Access SCR Decision.</p> <p>BEIS is currently seeking stakeholder views on how the ECCR 2017 should be amended to align with Ofgem's Access SCR decision. We agree with Ofgem's view in its decision that the ECCR legislation needs to be amended to allow</p> | Notes that BEIS is seeking views on ECCR 2017 and how it could be amended to be aligned to the Access SCR decision. |

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| | | the connection charging boundary changes to be implemented from April 2023. | |
| OPN | | Yes. The changes proposed here have a direct impact on Ofgem's proposed network charging SCR. | Yes, Ofgems Network charging SCR |
| SPEN | | No. | Noted |
| SSEN | | No. | Noted |
| UKPN | | At the time of responding, we are not aware of any wider industry developments that may impact upon or be impacted by this CP other than those already identified within this consultation. | Noted |
| WPD | | No. | Noted |
| <p>Working Group Conclusions: The majority of respondents (nine) were not aware of any wider industry developments that may impact upon or be impacted by this CP. One respondent did not provide any comments.</p> <p>One respondent stated that BEIS is currently seeking stakeholder views on how the ECCR 2017 should be amended to align with the Access SCR Decision as the ECCR legislation needs to be amended to allow the Connection Charging Boundary changes to be implemented from April 2023.</p> <p>One respondent stated that the changes within this CP have a direct impact on Ofgem's proposed "network charging SCR" (the Working Group believe this refers to the DUoS charges SCR).</p> <p>The Working Group noted the above impacts on wider industry developments potentially impacted by this CP but made no changes as a result.</p> | | | |

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| Company | Confidential/ Anonymous | 17. Do you agree with the Working Group's proposed implementation date? If not, please provide your rationale. | Working Group Comments |
|--------------|----------------------------|--|---|
| BU-UK | | Yes. | Noted |
| DRAX | | Yes. The implementation date directed in the Access SCR Decision is 1 April 2023 to align with the start of the RIIO-ED2 Price Control Period. | Noted |
| EDF | | Yes. | Noted |
| ENWL | | Yes, but the change will require two charging methodologies to be in use for a period of time. This needs to be considered and the implementation details refined. | Agreed but will require 2 charging methodologies. |
| ESP | | Yes. | Noted |
| INA | | N/A | Noted |
| NPg | | Yes. | Noted |
| OPN | | Yes. | Noted |
| SPEN | | Yes. | Noted |
| SSEN | | Yes. | Noted |

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| UKPN | | Yes, this is the beginning of the RIIO-ED2 period so 1 April 2023 is an entirely appropriate commencement date for this change proposal. | Noted |
| WPD | | Yes as it aligns with the Access SCR implementation date of 1st April 2023. | Noted |
| <p>Working Group Conclusions: All of the respondents that provided a comment (11) agree with the Working Group's proposed implementation date. One respondent did not provide any comments.</p> <p>One respondent raised a concern that the change will require two charging methodologies to be in use for a period of time.</p> <p>The Working Group acknowledged this concern and concluded to enable this, the existing CCCM text will be identified to apply to applications before 1 April 2023. Which ever legal text is approved by Ofgem will be added as new sections 3 and 4. In time, an administrative change will be initiated to remove the transition text.</p> | | | |

| Company | Confidential/ Anonymous | 18. Any other comments? | Working Group Comments |
|--------------|----------------------------|--|--|
| BU-UK | | No. | Noted |
| DRAX | | Any proposal that is not TCR-aligned risks undermining the SCR objective of improving the uptake of low carbon technologies with potential reduction of consumer benefits. | States any proposal none TCR aligned risks undermining the SCR objectives for low carbon tech. |
| EDF | | No. | Noted |

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| | | | |
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| ENWL | | No. | Noted |
| ESP | | No comments. | Noted |
| INA | | N/A | |
| NPg | | Not at this point in time. | Noted |
| OPN | | We would like to raise that the time allowed for this consultation, considering its importance and that it was issued during the holiday period, is too short. This gives limited opportunity for scrutiny of the change proposals, and risks the proposals not being subjected to adequate review. | States the time scale for the consultation gave limited opportunity to scrutinise the change, especially as it covered the summer holiday period. |
| SPEN | | No. | Noted |
| SSEN | | No. | Noted |
| UKPN | | We endorse the proposed changes set out in this consultation and urge Ofgem to approve them at the earliest opportunity. This will enable us to modify our systems, revise processes and train staff in sufficient time to ensure a smooth and efficient implementation of the proposals in readiness for the proposed implementation date. | Noted |
| WPD | | No. | Noted |

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Working Group Conclusions: The Working Group noted the concern regarding the consultation period; however, this is an urgent CP with a deadline for completion provided by Ofgem to which the Working Group had to meet.