Legal Review Considerations

Consultation Response	Consideration	Update
Q3, The Electricity Network Company Limited	*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.*	Ensure included in legal review.
Q3, Renewable Connections	*If an HCC is brought in for demand as intimated in the SCR this will also need to be included in paragraph 4.25.*	Ensure included in legal review.
Q4, Electricity North West	*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.*	Ensure included in legal review.
Q5, The Electricity Network Company Limited	*We do make reference in our later comments on the legal text around the way that these definitions may*	Ensure included in legal review.

	mean transmission connected customers pay less than distribution connected customers.	
Q5, Northern Powergrid on behalf of Northern Powergrid (Northeast) plc and Northern Powergrid (Yorkshire) plc	*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.*	Ensure included in legal review.
Q5, SSE Generation	*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').*	Ensure included in legal review.
Q5, Scottish and Southern Electricity Networks	*Definitions should align with existing definitions where possible.*	Ensure included in legal review.