

DCP 392 Working Group Meeting 12

20 June 2022 at 10:00 - Web-Conference

Attendee	Company
Working Group Members	
Edda Dirks [ED]	SSE Generation
Joanna Knight [JK]	SSEN
Daniel Mellis [DM]	SSE
Peter Turner [PT]	NPg
Vanessa Buxton [VB]	WPD
Code Administrator	
John Lawton [JL] (Chair)	ElectraLink
Hannah Proffitt [HP] (Technical Secretariat)	ElectraLink
Apologies	
Thomas Cadge [TC]	BU-UK

1. Administration

- 1.1 The Working Group reviewed the “Competition Law Guidance”. All Working Group members agreed to be bound by the Competition Law Guidance for the duration of the meeting.
- 1.2 The Chair presented the minutes of the previous meeting to the Working Group and advised that no comments had been received ahead of the meeting. One member suggested an amendment to the update for action 09/03, adding that they had suggested that qualitative conclusions could be drawn from the data, even if the data itself could not be shared. A redlined version of minutes can be found as **Attachment 1**.
- 1.3 The Working Group noted the items on the actions list from the last meeting. Updates on all actions are provided in **Appendix A**.

2. Purpose of the Meeting

- 2.1 The Chair set out that the purpose of the meeting was to finalise the legal text and the Draft Change Report.

3. Review of Issues & Considerations Log

- 3.1 The Working Group reviewed and discussed the Issues & Considerations Log. An updated version can be found as **Attachment 2**, including summaries of discussions.

4. Finalise DCP 392 Legal Text

- 4.1 The Working Group reviewed and discussed the Legal Text. An updated version can be found as **Attachment 3**. The main points were as follows.

- The Chair noted that the references to 'DNO' had been replaced with 'DNO/IDNO' in line with previous discussions on IDNOs being included in the Schedule. The Working Group agreed.
- The Chair noted that section 2 has been amended in line with previous agreement that the Schedule should form a standalone document. The Working Group agreed.
- The Chair noted that the word 'only' had been removed from section 3.5. The Working Group agreed.
- The Chair highlighted that sections 3.6 and 3.7 had been added at the previous meeting. The Working Group agreed.
- The Working Group agreed to amend section 1 to add 'following the receipt of an NETSO connection offer' and to add a definition of 'NETSO' to the Glossary of Terms.

- 4.2 The Chair noted that comments have been added to the legal text containing questions for the DCUSA legal advisers. The Working Group reviewed these, amended and agreed the wording. A summary of the questions can be found below.

- Will there also be a need for a main body section to be added?
- Concern raised over whether the recovery of the costs can be recovered through DUoS charges to Distribution customers. The approach taken is that this is the case as per the same approach in the CCCM however will this need a Distribution licence change? Please see attached the extract from the A&FLC document where consideration was given to the opposite, i.e. transmission network connections being recovered through DUoS.
- These definitions are taken from the CCCM but the meaning has been changed for this Schedule. Is this an issue since the definitions are for this specific schedule or is best practice to rename them to avoid a simple search creating a misunderstanding? Please find attached the definitions tracked between the CCCM and this Schedule.
- Concern was raised over whether the definition of required capacity benefits transmission customers more than they do in the CCCM for distribution customers.

- Concern raised over whether this is enforceable since the transmission customer is not a party to DCUSA. Suggestions are outside of this CP e.g. CUSC change, BCA or update to the ECCR.
- The Working Group have used the ECCR rules and want to avoid this schedule getting out of alignment so have amended the value to refer to the latest version in ECCR. Is this an issue? If comfortable will need to add in the definition of ECCR. The Working Group are aware that the ECCRs are under review and will likely be in place by April 2023. The current value in the ECCR is £300. This point equally applies to section 6.5.

5. Review of DCP 392 Draft Change Report

- 5.1 The Working Group reviewed and discussed the Change Report. A version updated in line with these discussions can be found as **Attachment 4**.

6. Next Steps & Work Plan

- 6.1 The Working Group discussed the next steps, and the following items were captured.
- Secretariat to circulate the updated legal text to Working Group members following the meeting, and request feedback by COB on Friday 24 June 2022.
 - Secretariat to submit legal text to the DCUSA legal advisers on Monday 27 June 2022 for legal review.
 - Secretariat to issue a doodle poll to members for the next meeting and to invite the DCUSA legal adviser to attend to discuss feedback on the legal text.
- 6.2 An updated version of the Work Plan can be found as **Attachment 5**.

7. Any Other Business

- 7.1 The Chair asked the group whether there were any other items of business to discuss to which nothing was raised.

8. Date of Next Meeting

- 8.1 A doodle poll will be issued following the meeting to finalise the date for the next meeting.

9. Attachments

- Attachment 1 - DCP 392 Working Group Meeting 11_Draft Minutes v2.0
- Attachment 2 - DCP 392 Issues & Considerations Log
- Attachment 3 - DCP 392 Draft Legal Text v1.3
- Attachment 4 - DCP 392 Change Report v0.6 Draft
- Attachment 5 - DCP 392 Work Plan

New and Open Actions

Action Ref.	Action	Owner	Update
09/02	<p>Secretariat to seek clarification from the commenter, on the below.</p> <p><i>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?</i></p>	Secretariat	<p>Action ongoing.</p> <p><i>Post meeting note – Response provided by Harmony Energy attached. To be discussed at the next meeting.</i></p> <p><i>The Chair noted that there would be no such examples as customers are charged in full. The Chair referenced the Impact Assessment within the Change Report.</i></p>
09/03	<p>CD to provide further information on the example within Live Project 2.</p> <p>Further action for Secretariat to liaise with CD regarding the information provided containing Distributor data.</p>	CD	<p>Action ongoing.</p> <p><i>The Chair advised that CD had provided an update, however as this contained Distributor data they were hesitant to circulate.</i></p> <p><i>One member suggested that qualitative conclusions could be drawn from the data, even if the data itself could not be shared.</i></p> <p><i>The Chair agreed to discuss this further with CD and to provide an update at the next meeting.</i></p>

10/01	Working Group to check CMP 328 regarding the process for requesting impact assessments and to check the CUSC on the process for requesting third party connections.	WG Members	Action ongoing.
11/01	Secretariat to contact ENW and ask for clarity on their response to Question 4	Secretariat	<p>Action ongoing.</p> <p><i>ENW response - Our reference to 'ongoing costs' in the Consultation response for DCP 392 was in respect of items such as any costs incurred for things like fault repairs or future improvement works as well as the cost of routine inspection and maintenance programmes. These costs will need recouping and there is no funding mechanism to recoup them from Transmission users, our concern is that it would then fall to DUoS to recoup those funds.</i></p> <p><i>This was circulated to the group to consider alongside their review of the legal text.</i></p>

Closed Actions

Action Ref.	Action	Owner	Update
09/01	DNOs to review whether there are any examples where a T connectee has triggered D works other than a tertiary connection, and to report back at the next meeting.	DNOs	<p>Action closed.</p> <p><i>PT advised that they had found two examples, however that on impact assessment, no resulting work was required. It was unclear if these were a tertiary connection.</i></p> <p><i>VB noted that they had also checked internally and did not have any specific examples.</i></p>

			<i>The group agreed that they were unable to provide any specific examples as there are very few examples of this situation.</i>
11/02	DNO members to consider whether the headroom needs to be considered and whether the current drafting of the formula on CAF is more beneficial to transmission customers than the one to distribution customers ahead of the next meeting on 20 June 2022.	DNO WG members	Action ongoing. <i>The group agreed that this question should be referred to the DCUSA legal advisers. A comment has been added to the legal text for review.</i>