

DCP 406 Working Group - Meeting 10

26 July 2022 at 10:00 - Web-Conference

Attendee	Company
Working Group Members	
Brian Hoy [BH]	ENWL
Daniel Mellis [DM]	SSE
George Moran [GM]	Centrica
Karin Cadwallader [KC]	BUUK
Martin Brace [MB]	UKPN
Kyle Smith [KS]	WPD
Kyran Hanks [KH]	Waters Wye Associates
Lee Wells [LW]	NPg
Peter Turner [PT]	NPg
Robert Matta [RM]	SPEN
Simon Vicary [SV]	EDF
Tom Cadge [TC]	BUUK
Vanessa Buxton [VB]	WPD
Code Administrator	
Andy Green [AG] (Technical Secretariat)	ElectraLink
Furqan Aziz [FA] (Chair)	ElectraLink
Mel Kendal [MK] (Technical Secretariat)	ElectraLink
Richard Colwill [RC]	ElectraLink
Apologies	

Dafydd Burton [DB]	Ofgem
David Williams [DW]	SSE

1. Administration

- 1.1 The Working Group reviewed the “Competition Law Guidance” and “Terms of Reference”. All Working Group members agreed to be bound by the Competition Law Guidance for the duration of the meeting and agreed to the Terms of Reference.
- 1.2 An action log has been created and all updates are provided in **Appendix A**.

2. Review Draft Consultation

- 2.1 The Working Group decided to begin the Working Group by drafting the Consultation.
- 2.2 Mk Began to walk the Working Group through the consultation document and asked everyone in attendance to ask questions as and when they come to mind.
- 2.3 The secretariat took an action to confirm who the impacted parties for this consultation should be. The Working Group also agreed that where clauses or paragraphs are called out, the consultation document should call out the specific document the clause/paragraph is taken from I.E the DCUSA document, Ofgem decision document etc.
- 2.4 As the history for this change was several weeks long, it was agreed to condense the most important parts of the Working Groups discussions otherwise the consultation would be a large read. It was also suggested that in section 4, breaking down the change into each of the key areas would be helpful to the reader.
- 2.5 Within the definitions of demand/generator section it was agreed to add in a summary of these definitions as sub headers supported by including the Ofgem direction document as an appendix. It was also agreed to make the questions (especially around the examples used) as open as possible and to invite the respondent to provide rationale to their answers or alternatives if they believed there were options or examples that haven't been considered.
- 2.6 BH noted that adding in the CCCM examples as an appendix would help the reader review the document rather than adding the examples into the consultation document itself.
- 2.7 It was also agreed that the consultation document should cross reference the relevant draft legal text in each section so the reader wouldn't have to switch between the consultation document and draft legal text when reviewing.
- 2.8 The Working Group agreed on actions to redraft legal text, examples and to add in a summary in section 3. The new actions have been captured in the actions in appendix 1 and are numbered 10/06 to 10/09.

- 2.9 For the new CCCM examples, PT agreed to draft wording for the drafting of the new exception within the draft legal text and update the CCCM examples as well as updating the consultation questions in relation to the new examples
- 2.10 It was also noted that as the change had been ongoing for a number of weeks and the changes quite complex, a paragraph giving the reader a summary would be useful. The Secretariat agreed to provide an introduction summary paragraph into the Consultation.

3. Legal Text Drafting

- 3.1 The Working Group moved onto the drafting of the legal text for the remaining 15 minutes.
- 3.2 It was noted that there is some cross over within paragraph 1.16 in the draft legal with DCP 404 so it was agreed that this Working Group would link in with 404 so the legal text for both changes do not undo what the other is trying to achieve.
- 3.3 It was called out that the legal text for the voltage level needed to be reviewed to make the text clearer to understand. MB agreed to review and redraft this part of the legal text.
- 3.4 The time for the Working Group was drawing to an end so they concluded the legal text discussion and moved onto next steps.

4. Agenda Items for Next Meeting

- 4.1 The Working Group discussed the next steps, and the following items were captured:
1. The Working Group to review recently completed actions.
 2. The Working Group to review the draft legal text.
 3. The Working Group to review the CCCM examples.
 4. The Working Group to review the draft Consultation.

5. Any Other Business

- 5.1 The Chair asked the group whether there were any other items of business to discuss.
- 5.2 There were no other items raised.

6. Date of Next Meeting

- 6.1 The next Working Group meeting will be held on 02 August 2022 at 10am.

ACTION 10/01: The Secretariat to email the WG to confirm their representation.

ACTION 10/02: The Secretariat to check the references to the Ofgem Direction/Decision

ACTION 10/03: LW to draft the definitions section within the Consultation.

ACTION 10/04: RM To review the CCCM examples table from BH.

ACTION 10/05: BH to update CCCM table (deleted examples) and provide a rationale as to why these were not carried forward.

ACTION 10/06: BH to draft text for the CCCM examples section of the Consultation.

ACTION 10/07: DW to draft section for high-cost project threshold drafting (cross-referencing to legal text).

ACTION 10/08: The Working Group to review and provide feedback on PT justification relating to the drafting of new exception by cop Thursday 28 July.

ACTION 10/09: PT to draft wording for the drafting of the new exception within the draft legal text and update the CCCM examples by cop Friday 29 July.

ACTION 10/10: PT to update the questions around the new exception within the Consultation.

ACTION 10/11: The Secretariat to provide introduction summary paragraph into the Consultation.

ACTION 10/12: MB to review legal drafting around the voltage level to make it clearer? is it consistent with Ofgem's decision?

ACTION 10/13: RM/KS to confirm internally whether they are happy with the changes to the voltage level.

APPENDIX A

New and Open Actions

Action Ref.	Action	Owner	Update
08/01	The Working Group to review the drafted analysis circulated by LW.	Working Group	Ongoing. Review as part of the Consultation.
08/11	The Working Group to cross-check the example numbers within the CCCM examples document (once finalised).	Working Group	Ongoing.
09/04	RM to cross check the index table within the CCCM document.	Working Group	Ongoing.
09/13	Ofgem to seek further guidance for the intent around the connection boundary.	Ofgem [DB]	Ongoing.
09/14	The Working Group to consider whether we have letters (HV/EHV) or actual voltage level.	Working Group	Ongoing.
09/15	RM to make the necessary changes to the CCCM examples document to ensure consistency between either HV/EHV or voltage.	RM	Ongoing.
10/01	The Secretariat to email the WG to confirm their representation.	Secretariat	Ongoing.
10/02	The Secretariat to check the references to the Ofgem Direction/Decision	Secretariat	Ongoing.
10/03	LW to draft the definitions section within the Consultation.	LW	Ongoing.
10/04	RM To review the CCCM examples table from BH.	RM	Ongoing.

10/05	BH to update CCCM table (deleted examples) and provide a rationale as to why these were not carried forward.	BH	Ongoing.
10/06	BH to draft text for the CCCM examples section of the Consultation.	BH	Ongoing.
10/07	DW to draft section for high-cost project threshold drafting (cross-referencing to legal text).	DW	Ongoing.
10/08	The Working Group to review and provide feedback on PT justification relating to the drafting of new exception by cop Thursday 28 July.	Working Group	Ongoing.
10/09	PT to draft wording for the drafting of the new exception within the draft legal text and update the CCCM examples by cop Friday 29 July.	PT	Ongoing.
10/10	PT to update the questions around the new exception within the Consultation.	PT	Ongoing.
10/11	The Secretariat to provide introduction summary paragraph into the Consultation.	Secretariat	Ongoing.
10/12	MB to review legal drafting around the voltage level to make it clearer? is it consistent with Ofgem's decision?	MB	Ongoing.
10/13	RM/KS to confirm internally whether they are happy with the changes to the voltage level.	RM/KS	Ongoing.

Closed Actions

Action Ref.	Action	Owner	Update
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08/09	WM to check whether example 22 should remain or be deleted if not beneficial.	WM	Closed.
08/12	RM to review the diagram within example 30 of the CCCM examples and wording to explain the mechanism.	RM	Closed.
08/13	RM to review example 31 of the CCCM examples.	RM	Closed.
09/01	MB to make an amendment to example 18 to include an example relating to exception 6.	MB	Closed.
09/02	MB to update the wording for exception 6 within the draft legal text.	MB	Closed.
09/03	PT to draft explanation regarding the new exception within the Consultation (and how it links to the broader policy intent).	PT	Closed.
09/05	PT to contact WM as the owner of the diagram for example 16 and confirm whether this is correct (as well as LW new example diagram).	PT	Closed.
09/06	PT to update LW new diagram (replace the HV board).	PT	Closed.
09/07	MB to remove 21a diagram but leave the revised explanation and check whether table is needed (have all included under 21b as one example) – Also consider whether example 11 needs amending.	MB	Closed.
09/09	DW to update cost table in example 24.	DW	Closed.
09/10	RM to remove references to high cost cap within examples 30/31 and make necessary updates.	RM	Closed.
09/11	Working group to review and confirm the treatment of voltage levels. The default assumption is that if there is a transforming point between the voltage levels then the higher voltage is deemed to be the voltage level above the POC, irrespective of the actual voltage.	Working Group	Closed.

DCUSA

09/12	The Working Group to check if the current hypothesis is correct, does any of the current drafting need further clarity (words within the text or additions to the table etc).	Working Group	Closed.
09/16	The Secretariat to circulate the shared documents for both the Draft Consultation and Draft Legal Text for the Working Group to review.	Secretariat	Closed.