

# DCP 404/405 Working Group - Meeting 12

08 August 2022 at 09:00

Location/ Web-Conference/Teleconference

Attendee	Company
Edda Dirks	SSE Generation
Wendy Mantle	SPEN
Lee Wells	NPG
Peter Turner	NPG
Kyran Hanks [KH]	Waters Wye
Ross Thompson	UK Power Networks
Code Administrator	
Andy Green [AG]	Electralink
Dylan Townsend [DT]	Electralink

## 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 Chair gave high level overview of terms of reference and confirmed everyone had read the ToR and CLG
- 1.3 Chair explained the roles of the chair and Tech sec and requested to use hand’s up function if someone wishes to speak or to use chat box in Microsoft teams.
- 1.4 The Working Group agreed that as the meeting was set up with short notice there’d not been adequate time to review the minutes so they would be reviewed outside this Work Group and feedback provide is required.

## 2. Purpose of the Meeting / Timeline for Delivery

2.1 The Chair explained that the purpose of this meeting is to review and discuss the DCP 404 and DCP 405 draft consultations and draft legal text within the Working Group and agree next steps. The Chair advised that he believed the legal text was almost

### 3. Review & Discussion of DCP 404 and 405 draft consultations and legal text

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- 3.1 The Work Group agreed to start on reviewing the DCP 404 legal text first. DT noted that there were 2 comments on the legal text but noted that the Work Group would walk through the whole legal text line by line and discuss the comments when the Working Group reached that part of the session.
- 3.2 ED requested that a consultation question is asked around her query which was the 2015 regulation does not refer to a "curtailable end date" It was also queried if "Agreed Date" is a defined term by ED. The Chair and PT stated that they believed this to be the case. It was called out that this may not cover reinforcement however so a specific consultation question and some legal steer would be required to explore if "Agreed Date" was enough to accommodate the "Curtailable End Date".
- 3.3 It was also noted that Gowlings would also review post consultation and advise if any new definitions would be needed. ED confirmed that answered her query.
- 3.4 The Working Group discussed Appendix B and if it was needed and if it was clear enough to someone reading the consultation that hasn't been involved in the change. PT observed that it may not make sense to someone who isn't familiar with the national terms. PT agreed provided some additional text to paragraph 1.5 of the legal text to refer specifically to section 3 and CT metering.
- 3.5 The Chair suggested amending the wording in paragraph 1.11 from "a separate change has been raised" to include DCP 405 so the reader could easily understand what the separate change was. The Working Group agreed to this suggestion.
- 3.6 It was also agreed to update paragraph 1.12 to reference DCP 406 as the specific change.
- 3.7 The Working Group moved on to discussing the consultation for DCP 404. The Chair informed the Working Group that some small cosmetic changes had been made and that the sub headers that the Working Group had asked for at the last Working Group had also been added. DT quickly then summarised the consultation document to the Working Group and then invited everyone to comment/feedback.
- 3.8 Question 9 of the consultation was amended slightly to be clearer that the authority can give direction to the DNO's/IDNO's to not follow curtailment limit methodology if evidence could be provided as to why the methodology couldn't be followed. Paragraph 4.15 was also updated to give context of this as it leads into question 9.
- 3.9 ED called out that the document needs to be updated to be consistent as at times it refers to DNO's and other times the consultation references network operators or distributors. DT advised this would be aligned to be consistent and that there will be a wider review to make sure that the consultation document is consistent throughout.
- 3.10 The Working Group agreed with the Chairs suggestion to add into paragraph 4.2 some context that the Working Group did initially consider 50% to be the threshold for markedly higher but revised that down to 20% so the reader would understand that other options were considered and why 20% was the final agreed figured.
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- 3.11 Consultation question 9 was updated to ask if the responder agreed that 20% was an appropriate value for 'markedly higher'.
- 3.12 The Chair proposed to the Working Group if questions 14,15 and 16 could be merged into 1 overarching question. RT believed that they are separate issues, so they do need to be asked. LW also noted that we have a number of questions already in the consultation (29 so far) so maybe having 14-16 as a question 14 a,b and c and then condensing them down to try and make the consultation easier to consume would be helpful.
- 3.13 ED noted whilst she agreed that condensing the questions down would be helpful, the challenging timelines meant that there wouldn't be time for the Working Group to go into too much detail when reviewing the current draft consultation. It was also noted that it would be better to have a detailed consultation rather than risk removing questions that may get raised after the consultation is issued.
- 3.14 It was agreed that a question around market flexibility prices would be required. The legal text was added into this section to provide context as to what it was, and the Chair took an action away to draft a question around the timing that the market flexibility prices needed to be updated.
- 3.15 The Work Group agreed to remove paragraphs 4.37 and 4.38 around obligations as the obligations had already been covered earlier on in the consultation.
- 3.16 LW noted that there weren't any questions on measuring curtailable limits or curtailable reporting. DT advised that some questions could be derived however paragraph 4 of the legal text covers these things so adding in a generic question into section 3 would be needed. The Chair took an action to create a generic question for measuring curtailable limits.
- 3.17 The Working Group also agreed a short section around reporting requirements would be needed within the consultation, so the Chair took an action to add in some text for reporting requirements into the consultation document. It was agreed that section 4 would be best placed for this to fall into within the consultation document.
- 3.18 As time was running out the Chair quickly went over some simple changes to the consultation for DCP 405. DT noted that he was going to refer to the specific DCP where the draft document mentions "a separate change".
- 3.19 It was agreed to remove "Connection Point" from the defined terms and where Connection Points mentioned changed this to "entry point or an exit point.
- 3.20 Time for this Work Group had expired so the Chair brought the call to a close.

## 4. Agenda items for next meeting

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- 4.1 Chair notes the session next week is scheduled for a bank holiday so would we need to replace the

## 5. Any Other Business

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- 5.1 Chair asks if there's any other A.O.B?
- 7.2 There were no other items raised so chair closes the meeting

## 6. Next Meeting – NA

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8.1 The Working Group will review the updated consultation document and provide feedback via email before it is issued to industry. N further Working Group meetings agreed at this time.

## Appendix 1 – Actions Log

### New and Open Actions – (Open/Closed Session) or (Board)

Ref.	Action	Owner	Update
01/01	Update the consultation document to include the new questions agreed on the 08-08-2022 Call	Secretariat	New action
01/02	Provide some additional text to paragraph 1.5 of the legal text to refer specifically to section 3 and CT metering.	Peter Turner	New action
01/03	Ensure terminology is consistent throughout the legal text and consultation document	Secretariat	New action
01/04	Create a new consultation question to confirm the window that the market flexibility process will be amended.	Secretariat	New action
01/05	Create a new consultation question around measuring curtailable limits	Secretariat	New action
01/06	Add in some text for reporting requirements into the consultation document.	Secretariat	New action