

# DCP 392 Working Group Meeting 16

05 September 2022 at 10:00 - Web-Conference

Attendee	Company
<b>Working Group Members</b>	
Peter Turner [PT]	NPg
Kyle Smith [KS]	WPD
Edda Dirks [ED]	SSE Generation
Simon Vicary [SV]	EDF
<b>Code Administrator</b>	
John Lawton [JL] (Chair)	ElectraLink
Richard Colwill [RC] (Technical Secretariat)	ElectraLink
<b>Apologies</b>	
Charles Deacon [CD]	Renewable Connections
Tom Cadge [TC]	BUUK

## 1. Administration

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- 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.
- 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

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- 2.1 The Chair set out that the purpose of the meeting was to finalise the DCP 392 Legal Text and the Change Report.

## 3. Review of Legal Text

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- 3.1 The Secretariat presented the Legal Text to the group and ran through the comments provided by Gowlings. An updated version can be found as **Attachment 1**. A summary of discussions can be found below:
  - Glossary of Terms – Minimum TRDR Repayment – At the last meeting, the Working Group stated that this should reference regulation 7(5)(a) rather than regulation 9. A comment was added to the Legal Text and shared with Gowing. This has now been updated and an updated version of the legal text can be found in Attachment 1.

## 4. Review of DCP 392 Draft Change Report

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- 4.1 The Working Group reviewed the Change Report. An updated version can be found as **Attachment 2**. A summary of discussions are below.

### Review of DCUSA General Objectives

- The Working Groups views range from positive through to neutral and onwards to negative, but the majority view is that Objective One is not better facilitated. Those that believed it had a positive response cited the correct approach on investments, the counter argument being that the investment may not be able to be recovered through DUoS.
- The Working Groups views range from positive through to negative, but the majority view is that Objective Two is not better facilitated. For those that believed it was positive, it enhanced competition by providing a level playing field for those Transmission customers that impacted the Distribution Network. Those that believed it was negative cited that this change, taken in isolation of wider reforms in the cost for connecting to the distribution or transmission system and the ongoing charges for those connections (TNUoS, DUoS etc.) may have a negative impact on the generation and supply of electricity. It was also noted that this change has the potential to exacerbate other distortions which make it preferable to connect generation to the transmission network rather than levelling the playing field between transmission and distribution connected generators.

- The Working Groups view on Objective Three is neutral. It must be noted that the Working Group suggested that if this CP was supported it would benefit from a licence change.
- The Working Groups views range from neutral through to negative, but the majority view is that Objective Four is not better facilitated. The negative stance stemmed from obligations placed outside of DCUSA are not enforceable. Another view was that duplicating connection charging rules is likely to negatively impact the administration of DCUSA.
- The Working Group view is that there is no impact on Objective Five.
- The majority view of the Working Group taking into consideration Objectives One to Five is that this CP will have a negative impact on the DCUSA General Objectives.

#### Implementation Date

- The proposed implementation date for DCP 392 is 01 April 2023. The rationale for this is to tie in with the Access SCR implementation date and to allow for process changes to accommodate this CP.

## 5. Next Steps & Work Plan

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5.1 The Working Group discussed the next steps, and the following items were captured:

- Secretariat to provide to submit the Change Report to the DCUSA Panel scheduled for 21 September 2022.
- If approved, DCP 392 will be issued out for voting on 23 September 2022.

## 6. Any Other Business

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6.1 The Chair asked the group whether there were any other items of business to discuss, and no items were raised.

6.2 The Chair thanked the Working Group members for their contributions and closed the Working Group.

## 7. Attachments

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- Attachment 1 - DCP 392 Legal Text
- Attachment 2 - DCP 392 Draft Change Report

## APPENDIX A

### New and Open Actions

Action Ref.	Action	Owner	Update
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### Closed Actions

Action Ref.	Action	Owner	Update
<b>13/02</b>	The Secretariat to contact Thomas Cadge and discuss his comments around required capacity. These comments to be share with Gus Wood at Gowlings.	Secretariat	<b>Action closed.</b> <i>The Chair confirmed that he had discussed this with TC and that the comments had been passed to Gowlings.</i>
<b>14/01</b>	Secretariat to review and update actions from last Working Group session as per ED's comments	Secretariat	<b>Action closed.</b> <i>Complete. Updated version of the Working Group 14 minutes can be found as <b>Attachment 1</b>.</i>
<b>14/02</b>	AG and DT to speak with JL re the comments around adding in text to refer to the pending updates to the ECCR	Secretariat	<b>Action closed.</b> <i>This was discussed under the review of the Change Report.</i>
<b>14/03</b>	GW to update legal text based on Working Groups feedback	Secretariat	<b>Action closed.</b> <i>Complete.</i>
<b>14/04</b>	AG and DT to update JL and HP with outcome of Working Groups discussion and changes to legal text and change report	Secretariat	<b>Action closed.</b>

			<i>Complete.</i>
<b>14/05</b>	Secretariat to send out Doodle poll to agree on time and date for the next Working Group session.	Secretariat	<b>Action closed.</b> <i>Complete.</i>
<b>14/06</b>	Secretariat to liaise with the Working Group for DCP 407 and share with this Working Group the speculative development definition.	Secretariat	<b>Action closed.</b> <i>The Chair confirmed that currently, DCP 407 is looking to retain the current definition and to add a scoring system. The Chair noted that he had discussed the matter with Gowlings who advised that the current definition should be used and that a future change could be raised in future if needed.</i>
<b>14/07</b>	Working Group to review and discuss responses to the RFI at the next meeting.	Secretariat	<b>Action closed.</b> <i>This was discussed under the Change Report, and a section was added summarising the responses and the Working Group conclusions. RFI responses can be found as <b>Attachment 2</b>.</i>
<b>15/01</b>	Secretariat to update the Working Group 14 Minutes, to include a missing action regarding reviewing the RFI responses and to clarify that action 14/06 was taken at Working Group meeting 13.	Secretariat	Action closed
<b>15/02</b>	Secretariat to provide Working Group feedback on the Legal Text and to request a clean version.	Secretariat	<b>Action closed</b>
<b>15/03</b>	Secretariat to schedule next Working Group to be held on Monday 05 September between 10am and 12pm, to discuss implementation and the general objectives.	Secretariat	<b>Action closed</b>
<b>15/04</b>	PT to report back at the next meeting, regarding email received concerning DCP 392 impacts on the open networks interactivity.	Secretariat	<b>Action closed</b>