

DCP 399 Working Group Meeting 02

11 October 2022 at 9:30 - Web-Conference

Attendee	Company
Working Group Members	
Alan Creighton [AC]	NPg
Aneesa Parker [AP]	National Grid ESO
John Orr [JO]	SPEN
Code Administrator	
Richard Colwill [RC] (Chair)	ElectraLink
Hannah Proffitt [HP] (Technical Secretariat)	ElectraLink

1. Administration

- 1.1 The Chair welcomed attendees to the third DCP 399 Working Group (WG) meeting and noted that no apologies had been received.
- 1.2 The group reviewed the “Competition Law Guidance”. All members agreed to be bound by the Competition Law Guidance for the duration of the meeting.
- 1.3 The Chair presented the minutes from the previous meeting, advising they had not received any comments ahead of the meeting. The group agreed that the minutes were an accurate reflection of events. The final version of the minutes is included as **Attachment 1**.
- 1.4 The group discussed the open actions, details of which can be found in **Appendix 1**.

2. Purpose of the Meeting

- 2.1 The Chair set out that the purpose of the meeting was to review the Consultation responses.

3. Review Consultation Responses

1. Do you understand the intent of DCP 399?

- 3.1 All respondents understood the intent of DCP 399.

2. Do you support the principles of DCP 399?

- 3.2 All respondents understood the principles of DCP 399. One respondent requested further information on how NGESO have used the data provided to date and stated they are unsure if lowering the threshold to 50kW will realistically facilitate more market activity.
- 3.3 AP took an action to provide further clarity on how the data is being used and the benefits of lowering the threshold.

02/01 – AP to provide further clarity on how the data is being used currently and the benefits of lowering the threshold.

3. Do you support the intent of this CP to lower the threshold for entries to the ECR from 1MW to 50kW? Please provide your rationale.

- 3.4 A majority of respondents stated they support the intent of lowering the threshold for entries to the ECR from 1MW to 50kW. One respondent stated they were broadly supportive.
- 3.5 One respondent stated they have some concerns that there is limited justification for the minimum threshold being set 50kW, rather than at a higher value. Another stated that they do not think some of the benefits noted in paragraph 4.6 are likely to materialise (such as new builds swapping locations or trading rights) in a relatively nascent market but agree that there are other benefits that could be obtained.
- 3.6 The Working Group noted that this concern would be addressed by action 02/01.

4. Do you have any comments on the proposed legal text amendments?

- 3.7 A majority of the respondents had no comments on the proposed legal text amendments. One respondent stated that “Import Capacity”, “Export Capacity” and “Registered Capacity” are not defined in the DCUSA glossary.
- 3.8 The Working Group discussed and agreed that the legal text should be amended to change ‘Import Capacity’ and ‘Export Capacity’ to ‘Maximum Import Capacity’ and ‘Maximum Export Capacity’ as defined in DCUSA already.
- 3.9 The Chair took an action to review the Embedded Capacity Register (ECR) and to update these terms.

02/02 – Secretariat to review the ECR and to change any instances of ‘Import Capacity’ to ‘Maximum Import Capacity’ and instances of ‘Export Capacity’ to ‘Maximum Export Capacity’.

- 3.10 The Working Group noted that a definition should be added for ‘Registered Capacity’, and that this should point to the definition within the Distribution Code.

02/03 – Secretariat to update legal text to:

- replace any instances of ‘Import Capacity’ to ‘Maximum Import Capacity’ and instances of ‘Export Capacity’ to ‘Maximum Export Capacity’; and
- add a definition for ‘Registered Capacity’ which points to the definition within the Distribution Code.

- 3.11 The consultation response also highlighted the wording “DSR Contract of 50kW or more” and suggested that it is explicitly stated that this is in relation to real power capacity. The Working Group noted that as the units are stated as kW, no further clarity is needed

5. Do you have any comments on the proposed updates to the ECR?

- 3.12 One respondent noted that splitting part 1 across two tabs by size results in a more complicated process to automate population by DNOs, ingestion of data by users and machine readability and introduces opportunities for confusion due to a lack of discoverability. The responder recommend combining into a single tab for all connection sizes which can be filtered or sorted.
- 3.13 The Working Group discussed and agreed to maintain their original position that this should be split.
- 3.14 The responder also suggested that the current template should be replaced with a CSV, metadata and data dictionary in order to support Ofgem’s Data Best Practice principles.
- 3.15 The Working Group noted the comment but agreed that this should form a future change as a consultation will be required.
- 3.16 Finally, the respondent highlighted some typos in the excel spreadsheet, the Chair agreed to update this.

02/04 – Secretariat to correct typos in the excel template - Contents tab ‘addittional’, Lists tab ‘Accepected to Connect’, Definitions part 1 tab ‘irrespective’.

6. Do you agree that the considerations and advice received in relation to the implementation of the ECR with a threshold of 1MW is still relevant with the lowering of the threshold to 50kW? If not, please provide your rationale.

- 3.17 All respondents agreed that the GDPR considerations and advice received in relation to the implementation of the ECR with a threshold of 1MW is still relevant with the lowering of the threshold to 50kW.

7. Do you consider that the proposal better facilitates the DCUSA General Objectives?

If so, please detail which of the General Objectives you believe are better facilitated and provide supporting reasons.

If not, please provide supporting reasons.

- 3.18 All respondents agreed that the proposal better facilitates the DCUSA General Objectives. One respondent raised concerns that the additional resources required to collate the additional information may not be offset by the benefits deliverable by the wider industry. The Working Group note that this would be addressed by their responses to Questions 2 and 3.

8. What resource/ system costs do you anticipate, if DCP 399 is implemented, and the ECR threshold is lowered from 1MW to 50kW?

- 3.19 Respondents provided a range of responses, the Working Group acknowledge that these will be considered in making a decision regarding implementation dates.

9. Are you aware of any wider industry developments that may impact upon or be impacted by this CP?

- 3.20 The majority of respondents noted that they were not aware of any wider industry developments that may impact upon or be impacted by this CP. One response suggested that Grid Code Modification GC0139 and Distribution Code Modification DCRP/MP/20/04 may be impacted.
- 3.21 AC clarified that there should not be any negative interactions, and that they could actually be beneficial.
- 3.22 Another response highlighted an impact to Ofgem's Data Best Practice principles and ensuring this development is supportive of those principles. The Working Group noted that this is covered by their response in Question 5.

10. If this CP is approved, how long after would you be able to complete the new version of the ECR (i.e. would you be able to use it from November 2022 or would more time be needed)? Please provide the reasons for the time needed.

- 3.23 Mixed responses were provided, with timescales ranging between being able to publish data in the following calendar month, to requesting a 3 to 6 month lead time.
- 3.24 The Working Group discussed and agreed that the legal text should be drafted in a way to enable use of the template from the February 2023 DCUSA release, however not mandating use until the June 2023 DCUSA release.

02/05 – The Chair to submit updated legal text to Gowling WLG, highlighting that the legal text needs to be drafted in a way to enable the use of the template from the February 2023 DCUSA release, however not mandating use until the June 2023 DCUSA release.

11. Any other comments?

- 3.25 Three responses provided no further comments. One response noted disappointment at the length of time that has elapsed since the original Change Proposal was drafted and the Consultation document being published. The Chair acknowledged this and noted that this has been due to extra resource being required for the Access SCR DCPs.
- 3.26 Another response highlighted a potential issue with versioning of the ECR template. The Chair took action to update this.

02/06 – The Chair to update the versioning of the ECR template from 3 to 4.

- 3.27 A third response noted the importance of clarity around treatment of sole trader / personal addresses likely to be impacted with the reduction to 50kW so each organisation manages those in a consistent and effective manner. The Working Group note that GDPR advice had been sought within DCP 350, however ultimately it is the responsibility of each DNO to assess.

4. Review Draft Change Report

- 4.1 The Chair agreed to issue a draft Change Report to members following the meeting for review.

5. Next Steps

5.1 The group discussed and agreed on the following next steps.

- The Chair agreed to update the legal text in line with discussions/actions taken at the meeting and to issue this to Gowling WLG to review. The Chair noted that they would highlight that the legal text needs to be drafted in a way to enable the use of the template from the February 2023 DCUSA release, however not mandating use until the June 2023 DCUSA release.
- The Chair agreed to produce an updated draft Change Report and to circulate this to members for review.
- The Chair noted that the Change Report should then be presented to the DCUSA Panel at their November meeting for approval.
- Once approved, the Chair noted that a communication can be issued to Parties to advise them of the change and give advance warning of the implementation and transition period.

6. Any Other Business

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

7. Date of Next Meeting

7.1 No further meetings have currently been scheduled.

8. Attachments

- Attachment 1 - DCP 399 Working Group Meeting 01 - Final Minutes v1.0
- Attachment 2 - DCP 399 Collated Consultation Responses - WG Comments

APPENDIX A

New and Open Actions

Action Ref.	Action	Owner	Update
02/01	AP to provide further clarity on how the data is being used currently and the benefits of lowering the threshold.	AP	New action. <i>This has been provided and included within the Change Report.</i>
02/02	Secretariat to review the ECR and to change any instances of 'Import Capacity' to 'Maximum Import Capacity' and instances of 'Export Capacity' to 'Maximum Export Capacity'.	ElectraLink	New action.
02/03	Secretariat to update legal text to: <ul style="list-style-type: none">• replace any instances of 'Import Capacity' to 'Maximum Import Capacity' and instances of 'Export Capacity' to 'Maximum Export Capacity'; and• add a definition for 'Registered Capacity' which points to the definition within the Distribution Code.	ElectraLink	New action.
02/04	Secretariat to correct typos in the excel template - Contents tab 'addittional', Lists tab 'Accepected to Connect', Definitions part 1 tab 'irrespective'.	ElectraLink	New action.

02/05	The Chair to submit updated legal text to Gowling WLG, highlighting that the legal text needs to be drafted in a way to enable the use of the template from the February 2023 DCUSA release, however not mandating use until the June 2023 DCUSA release.	ElectraLink	New action.
02/06	The Chair to update the versioning of the ECR template from 3 to 4.	ElectraLink	New action. <i>This has been completed and the correct version will be included with the Change Report.</i>

Closed Actions

Action Ref.	Action	Owner	Update
01/01	AP to provide some commentary in relation to the benefits ESO will gain with ECR threshold being lowered to 50kW.	AP	Action closed. <i>New action 02/01 taken.</i>
01/02	Secretariat to produce a draft consultation document and circulate to the members for review.	Secretariat	Action closed. <i>Complete.</i>