

## DCP 405 'Access SCR: Managing Curtailable Connections between Licensed Distribution Networks'

### COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

Company	Confidential/ Anonymous	1. Do you understand the intent of DCP 405?	Working Group Comments
<b>BU-UK</b>		Yes.	Noted.
<b>EDF</b>		Yes.	Noted.
<b>ENWL</b>		Yes.	Noted.
<b>ESP</b>		Yes.	Noted.
<b>INA</b>		N/A	Noted.
<b>NPg</b>		Yes.	Noted.
<b>OPN</b>		Yes.	Noted.
<b>SPEN</b>		Yes.	Noted.
<b>SSEN</b>		Yes.	Noted.
<b>UKPN</b>		Yes.	Noted.
<b>WPD</b>		Yes.	Noted.

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**Working Group Conclusions:**

All responders confirmed that they understood the intent of the CP.

Company	Confidential/ Anonymous	2. Are you supportive of the principles of DCP 405?	Working Group Comments
<b>BU-UK</b>		Yes.	Noted.
<b>EDF</b>		Yes.	Noted.
<b>ENWL</b>		Yes.	Noted.
<b>ESP</b>		Yes.	Noted.
<b>INA</b>		We support the intention of this change proposal, especially the ability for the embedded networks to offer an alternative solution as we think this will result in IDNOs having the ability to develop technical solutions that will benefit their end customers.	Noted.
<b>NPg</b>		Yes.	Noted.
<b>OPN</b>		Yes.	Noted.
<b>SPEN</b>		Yes.	Noted.
<b>SSEN</b>		Yes.	Noted.
<b>UKPN</b>		Yes.	Noted.

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<b>WPD</b>		Yes.	Noted.
Working Group Conclusions:			

Company	Confidential/ Anonymous	3. The Working Group believe the high-level obligations should be included within Section 2B of the DCUSA, and the technical details included within the BCA – do you agree with this approach?  If not, should a separate BCA document be created? Please provide your reasons.	Working Group Comments
<b>BU-UK</b>		Yes, we agree with this approach that the high-level, common, obligations should be in the main body of the DCUSA and then site specific parameters should be agreed in the BCA.	Noted.
<b>EDF</b>		Yes, this approach seems reasonable.	Noted.
<b>ENWL</b>		We support this approach as IDNOs are obliged through their Licence to comply with the DCUSA.	Noted.
<b>ESP</b>		Yes, this is a concise approach to record obligations and the connection's technical details alike.	Noted.
<b>INA</b>		We agree with the proposal, this is a concise approach to record obligations and the connection's technical details.	Noted.
<b>NPg</b>		Yes.	Noted.

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<b>OPN</b>		We agree with the proposed approach. However, we feel that further work needs to be done to develop consistent processes between the relevant parties, taking into account variability in terms of capabilities and the availability of technology.	Noted.
<b>SPEN</b>		Yes we agree that the obligations should be included in the DCUSA section 2B, and the technical details included within the BCA.	Noted.
<b>SSEN</b>		We agree – any subsequent change to the technical details may not change the principles under which they are provided; so should not necessitate a DCUSA Change Proposal, as would be the case if these technical details were included in Section 2B. The prescriptive presentation of the technical details within the DNO’s bespoke BCA is noted within the legal text, which is also acceptable. We do not believe it necessary to include a separate BCA document in Sect 2B.	Noted.
<b>UKPN</b>		Yes, we agree with the Working Group proposal. This allows specifics of a particular BCA to be reflected while still meeting the high level objectives within the schedule in DCUSA.	Noted.
<b>WPD</b>		Yes, we believe that this is the correct approach to take as it minimises the high-level detail required in the BCA.	Noted.
Working Group Conclusions:			

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Company	Confidential/ Anonymous	4. Do you believe this is the right approach to refer to the new Schedule as implemented by DCP 404 rather than replicating the text within Section 2B? If not, please provide your reasons.	Working Group Comments
<b>BU-UK</b>		Yes, this seems the most appropriate solution to ensure consistency with the new schedule and the intent of it and also to make it easier where future changes to the new schedule are made.	Noted.
<b>EDF</b>		Yes.	Noted.
<b>ENWL</b>		Yes, it simplifies ongoing management of the DCUSA if there are subsequent amendments to the new Schedule.	Noted.
<b>ESP</b>		Yes.	Noted.
<b>INA</b>		Yes, this approach is reasonable.	Noted.
<b>NPg</b>		Yes.	Noted.
<b>OPN</b>		Yes.	Noted.
<b>SPEN</b>		Yes, we agree.	Noted.
<b>SSEN</b>		Yes – there are instances in the DCUSA document (and other industry Codes) where such cross references are made. As long as they are clear, they shouldn't be problematic.	Noted.

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<b>UKPN</b>		Yes, we agree for the reasons given in the consultation particularly that it avoids divergence if this schedule is the subject of future Change Proposals.	Noted.
<b>WPD</b>		Yes, we believe that this is the right approach.	Noted.
Working Group Conclusions:			

Company	Confidential/ Anonymous	5. Do you agree that it is the right approach in relation to Schedule 13, or is there any merit in including specific provision within Schedule 6 (of Schedule 13)? Please provide your reasons.	Working Group Comments
<b>BU-UK</b>		Yes, we do not believe that any further text is required in the template BCA at this stage.	Noted.
<b>EDF</b>		Yes.	Noted.
<b>ENWL</b>		We agree with this approach. There are likely to be a number of different approaches in how IDNOs and DNOs have documented their bilateral relationship and we do not believe it is essential to be prescriptive on how these provisions are documented as the high-level obligations are in Schedule 2B.	Noted.
<b>ESP</b>		Yes, this provides flexibility based on a site's characteristics.	Noted.

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<b>INA</b>		Yes, Schedule 13 provides flexibility based on a site's characteristics.	Noted.
<b>NPg</b>		Yes, we are comfortable that it should be considered on a site-by-site basis.	Noted.
<b>OPN</b>		We agree with the proposed approach.	Noted.
<b>SPEN</b>		Yes, we agree with this approach.	Noted.
<b>SSEN</b>		Yes, it is the right approach to add specific details on a site-by-site basis, under the headings set-out in the new Schedule 6 to the Bilateral Connection Agreement (Schedule 13).	Noted.
<b>UKPN</b>		We agree with this approach. Some of the details required under these sub-headings is likely to be very site-specific.	Noted.
<b>WPD</b>		This is the right approach to have the details explained on a site by site basis.	Noted.
<b>Working Group Conclusions:</b>			

Company	Confidential/ Anonymous	6. Does the legal text proposed deliver the intent of DCP 405? If not, please provide details of where additions should be made.	Working Group Comments
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<b>BU-UK</b>		Yes, it does.	Noted.
<b>EDF</b>		Yes, it seems to.	Noted.
<b>ENWL</b>		Yes.	Noted.
<b>ESP</b>		Yes.	Noted.
<b>INA</b>		N/A	Noted.
<b>NPg</b>		Yes.	Noted.
<b>OPN</b>		Yes.	Noted.
<b>SPEN</b>		Yes, the legal text delivers the intent of DCP405.	Noted.
<b>SSEN</b>		We believe that the legal text does deliver the intent of DCP 405 and that the in doing so meets the requirements set out in Ofgem’s SCR document of May 2022.	Noted.
<b>UKPN</b>		Yes.	Noted.
<b>WPD</b>		Yes, it would appear to.	Noted.
<b>Working Group Conclusions:</b>			

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Company	Confidential/ Anonymous	<p>7. Do you consider that the proposal better facilitates the DCUSA General Objectives?</p> <p>If so, please detail which of the General Objectives you believe are better facilitated and provide supporting reasons.</p> <p>If not, please provide supporting reasons.</p>	Working Group Comments
<b>BU-UK</b>		The proposal facilitates the general objectives as stated in the consultation document.	Noted.
<b>EDF</b>		Yes,  2.The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent therewith) the promotion of such competition in the sale, distribution and purchase of electricity	Noted.
<b>ENWL</b>		Yes, we agree that the proposals better meet objectives 1 – 3 for the reasons set out in the consultation.	Noted.
<b>ESP</b>		Yes, we agree with the proposer’s rationale for why the proposal better facilitates the DCUSA objectives.	Noted.
<b>INA</b>		N/A	Noted.

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<b>NPg</b>		We agree with the Proposer's view that General Objectives 1-3 are better facilitated, and for the reasons set out in the consultation.	Noted.
<b>OPN</b>		We agree that this better facilitates General Objectives 1, 2 and 3 by ensuring that customers have a consistent experience whether they connect to IDNO or DNO networks.	Noted.
<b>SPEN</b>		We agree that the proposal better facilitate DCUSA General Objectives 2 and 3 for the reasons given in the consultation. For DCUSA General Objective 1, we agree that the proposals ensure efficiency and co-ordination, however we do not believe the proposals are economic as they rely on the exceeded curtailment price proposed under DCP404 we do not believe to be appropriate.	Noted.
<b>SSEN</b>		We agree with the Working Group that DCUSA General Objectives 1, 2, & 3 are better met by the introduction of the changes proposed in DCP 405 because (1) it provides an efficient means for DNOs & IDNOs to provide connections and maintain flexibility on their networks; (2) it enables customers connected to the IDNO network to have equitable access to the same options as customers on the DNO network; and (3) it provides the framework for DNOs and IDNOs to efficiently discharge their licence obligations.	Noted.
<b>UKPN</b>		Yes, we agree that the proposal positively impacts objective 1 – the DNOs'/IDNOs' ability to manage their networks efficiently, co-ordinated across the industry, and economically; we believe	Noted.

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		the proposal positively impacts objective 2 – to facilitate effective competition with IDNOs able to offer the same connections as DNOs; and objective 3 where the proposal has positively impacted the DNOs’ and IDNOs’ ability to discharge their licence obligations.	
<b>WPD</b>		Yes, as detailed in 5.1 of the DCP 405 Consultation document.	Noted.
Working Group Conclusions:			

Company	Confidential/ Anonymous	8. Are you aware of any wider industry developments that may impact upon or be impacted by this CP?	Working Group Comments
<b>BU-UK</b>		No.	Noted.
<b>EDF</b>		No.	Noted.
<b>ENWL</b>		No.	Noted.
<b>ESP</b>		No.	Noted.
<b>INA</b>		N/A	Noted.

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<b>NPg</b>		We recognise that this CP is one of four CPs raised to implement the Access SCR Decision.	Noted.
<b>OPN</b>		No.	Noted.
<b>SPEN</b>		Open Networks e.g. Workstream 1A, Product 5 primacy rules which may impact DSOs utilisation of flexibility services.	Noted.
<b>SSEN</b>		No.	Noted.
<b>UKPN</b>		None other than those referenced in the consultation.	Noted.
<b>WPD</b>		No.	Noted.
Working Group Conclusions:			

Company	Confidential/ Anonymous	9. Do you have any comments on the proposed legal text?	Working Group Comments
<b>BU-UK</b>		No.	Noted.
<b>EDF</b>		No.	Noted.

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<b>ENWL</b>		We have no additional comments on the legal text as we have been actively involved in the Working Group.	Noted.
<b>ESP</b>		We note that, as with DCP 404, there are no timescales/processes specified to pass a curtailment request from the upstream network to the IDNO connected customer. We are conscious there will be a range of circumstances which will cause this to vary on a case-by-case basis but note that having this solely noted in the BCA could lead to inconsistent approaches between DNOs.	Noted.
<b>INA</b>		N/A	Noted.
<b>NPg</b>		Not at this point in time.	Noted.
<b>OPN</b>		No.	Noted.
<b>SPEN</b>		None.	Noted.
<b>SSEN</b>		No.	Noted.
<b>UKPN</b>		No.	Noted.
<b>WPD</b>		We believe the legal text covers the proposal of DCP 405.	Noted.
Working Group Conclusions:			

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Company	Confidential/ Anonymous	10. Do you have any other comments on DCP 405?	Working Group Comments
<b>BU-UK</b>		No.	Noted.
<b>EDF</b>		No.	Noted.
<b>ENWL</b>		No.	Noted.
<b>ESP</b>		No comments.	Noted.
<b>INA</b>		While the timelines may not allow for development/agreement under this modification, it is worth noting that there is an opportunity to align BCAs across the incumbent DNOs who tend to vary their approaches to utilising BCAs.	Noted.
<b>NPg</b>		Not at this point in time.	Noted.
<b>OPN</b>		We would like to raise that the time allowed for this consultation, considering its importance and that it was issued during the holiday period, is too short. This gives limited opportunity for scrutiny of the change proposals, and risks the proposals not being subjected to adequate review.	Noted.
<b>SPEN</b>		None.	Noted.
<b>SSEN</b>		No.	Noted.

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<b>UKPN</b>		No.	Noted.
<b>WPD</b>		No.	Noted.
Working Group Conclusions:			