

DCP 414 Working Group - Meeting 04

06 January 2023 at 14:00

Location/ Web-Conference/Teleconference

Attendee	Company
Lee Stone (LS)	Npower
Peter Waymont(PT)	UKPN
Chris Ong(CO)	UKPN
Claire Campbell(CC)	SPEN
Pamala Howe(PH)	NPg
Simon Askew (SA)	Business Energy Direct
Simon Yeo(SY)	National Grid
Kara Burke(KB)	NPg
Karl Maryon(KM)	Drax
George Mayon	Centrica
Donna Jamison	Energy Assets
Code administrator	
Andy Green [AG] (Technical Secretariat)	ElectraLink
John Lawton (JL) Chair	ElectraLink
Apologies	
N/A	

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 The actions from this Working Group have been captured in an action log. The action log can be found at **appendix 1**.

2. Purpose of the Meeting / Timeline for Delivery

- 2.1 The Chair explain that the purpose of the Working Group was to review the draft legal text in line with the responses from the first consultation and then finalise the draft second consultation.

3. Review Draft Legal Text

- 3.1 The Working Group started to review the draft legal text that was issued in the agenda pack which contained comments from the Working Group and the drafted version of legal text can be found in **Attachment 1 _DCP414_Legeal_text**.

Definitions

- 3.2 The Working Group began by reviewing the suggestions for 3 new definitions to be added to the legal text.
 - CT
 - Market wide half hourly settlements or MHHS
 - Meter Serial Number
- 3.3 The Working Group agreed with the new definitions suggested and a further definition was added for “BSC Modification P432 “ to replace BSC Modification P272 in schedule 16 part 4 to bring the legal text up to date with the changes that DCP 414 was seeking to make.

Section 2A 19. CHARGES

- 3.4 It was suggested to remove references to advanced meters and replace, in section 2A and throughout schedule 16, with “any other CT Metering Points catered for by MHHS” so the text was broad enough to capture all relevant meter points.
 - 3.5 The Working Group also reviewed the information which the legal text was mandating to be provided.
 - 3.6 SA raised a suggested adding “Meter Serial Number” the first data requirement as not all meter serial numbers are correctly aligned to the MPAN and asking for this could help to identify any anomalies. It was also noted that customers are likely to understand what a meter serial number is rather than an MPAN. The Working Group agreed with this suggestion.
 - 3.7 The below are the items the Working Group agreed as the minimum information customers should be provided if requested
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- Site address information, including MPAN and meter serial number/s;
- Reason for the correspondence,
- Migration date,
- Maximum Import Capacity, or if not already agreed with the Customer, the Company's default value;
- Company's contact details,
- Explanation of the consequences and protections offered, including any amendment to the Maximum Import Capacity and any rebates that may be warranted

Schedule 16 – Common Distribution Charging Methodology

- 3.8 SA suggested removing the word “Demand” from paragraph 179 as the vast majority of these CT metered supplies wouldn't have been assigned to a maximum demand profile and it would be unknown as to whether they were recording demand or not. The Working Group agreed, and this word was removed from the draft legal text.
- 3.9 SA also raised a concern that the text appeared to close the door to customers that may wish to have the MIC revised. The chair explained that this is not the intention of the drafted text and that this process is specific to the transitional protection and certain criteria. Any changes to the MIC outside of this are catered for by the NTC and referenced within schedule 16 para 149 and 150 (see para 181 c).
- 3.10 It was also suggested that there could be banding issues if the distributors don't apply an appropriate default MIC. It was explained that the right to challenge banding would be unaltered and it is catered for by schedule 32 so customers would be able to use that process to challenge if they believed they were not in the correct banding.
- 3.11 It was also explained that the process would allow for increases and decreases and for agreement during migration.
- 3.12 SA confirmed that as these explanations had been given, he was comfortable with the drafting.
- 3.13 The Working Group reviewed the rest of the drafted legal text, and all confirmed that they were comfortable with the drafting.

4. Review 2nd Consultation Document

- 4.1 The Working Group moved on to reviewing the collated consultation response document which can be found in **Attachment 2_DCP_414_ Consultaion2**.
- 4.2 It was agreed to include a footnote and a link to the MHHS Programme to paragraph 1.4 as per a comment from DJ
- 4.3 DJ also suggested adding “contact details as defined in SLC 14 charging statements” to paragraph 1.7 in the how section as this would signpost readers to where some of the contact information the legal text was mandating be shared can be found.
- 4.4 The legal text section of the second consultation document was updated to reflect the changes made to the text by the Working Group at the start of this meeting.

- 4.5 A number of cosmetic changes were also suggested and accepted to make the second consultation document read better but didn't change the intent or context on what the consultation was looking to deliver.
- 4.6 KB also noted that she had some further comments to add and it was agreed that KB would send these comments to the secretariate to consider.
- 4.7 The below set of questions were agreed to be included within the second consultation
1. Which option do you support? Please provide rationale
 2. Where the customer has not agreed a MIC during the 12 month period post migration should the distributor calculate the MIC and notify the customer of the revised value? Please provide rationale.
 3. Do you believe that the MIC Default value should be left to the distributor to determine? Please provide rationale.
 4. Should the CT Metered Customers not covered by P432 be extended the same protection? Please provide rationale.
 5. Should the MIC protection be subject to sunset clause or a defined period after the migration has taken place? Please provide rationale
 6. Do you agree with the Working Group that the communications should be led by the supplier? Please provide your rationale.
 7. Is there any further information that needs to be added to the obligation placed on the supplier? Please provide your rationale
 8. Should the protection offered be a once only protection even though customers may revert back? And are there any unintended consequences Please provide your rationale
 9. Is the additional protection provided in the national terms of connection and the Residual Charges schedules sufficient? Please provide your rationale.
 10. Do you consider that the proposal better facilitates the DCUSA objectives? Please give supporting reasons.
 11. What date do you believe this change proposal should be implemented? Please provide rationale.
 12. Do you have any comments on the draft legal text?
 13. Do you have any further comments on this change proposal?
- 4.8 This concluded the Working Groups review of the second consultation document. It was agreed that the secretariate would tidy up the formatting of the legal text and second consultation documents in readiness for issuing to interested parties.

5. Next Steps

- 5.1 The Working Group agreed to issue the consultation on 10 January and that due to the tight timescales, the consultation window should be for two weeks meaning the deadline to respond would be 24 January 2023 by 17:00pm.

5.2 The Working Group agreed to meet again on 30 January 2023 between 14:00pm and 17:00pm.

6. Attachments

- 6.1 Attachment 1 _DCP414_Legal_text
- 6.2 Attachment 2_ DCP414_Consultation2
- 6.3 Attachment 3_ DCP414_Consultation1_Collated_Responses

7. Next Meeting – 30 January 2023

5.1 The next Working Group to be held on 30 January 2023 at 14:00pm

Appendix 1 – Actions Log

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

Ref.	Action	Owner	Update
4.1	Create a clean formatted version of the legal text ready to be issued with the second consultation.	Andy Green	Open
4.2	Create a clean formatted version of the second consultation document and issue to industry on 10 January 2023	Andy Green	Open
4.3	Kara Burke to send comments and feedback on the second consultation document to the secretariate and the secretariate to consider the suggested amendments	Andy Green	Open

Closed – (Open/Closed Session) or (Board)

Ref.	Action	Owner	Update
1.1	Secretariate to produce a draft consultation and share with the Work Group on 11 November 2022.	Andy Green	Closed
2.1	Secretariate to issue consultation to parties on 14-November.	Andy Green	Closed

3.1	Produce a 2nd consultation document and share with the Working Group prior to the meeting on the 6th January 2023	Andy Green	Closed
3.2	Share the reformatted legal text with the Working Group prior to the meeting on the 6th January	Andy Green	Closed