

# DCP 399 Working Group Meeting 03

22 February 2023 at 13:00 - Web-Conference

Attendee	Company
<b>Working Group Members</b>	
Steve Halsey [SH]	UKPN
Aneesa Parker [AP]	National Grid ESO
John Orr [JO]	SPEN
Philip Lawson [PL]	National Grid Electricity Distribution
<b>Code Administrator</b>	
Richard Colwill [RC] (Chair)	ElectraLink
Hannah Proffitt [HP] (Technical Secretariat)	ElectraLink
<b>Apologies</b>	
Alan Creighton [AC]	NPg
Donna Jamieson [DJ]	Energy Assets Networks

## 1. Administration

- 1.1 The Chair welcomed attendees to the third DCP 399 Working Group (WG) meeting and noted that apologies had been received from AC and DJ.
- 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.

## 2. Purpose of the Meeting

- 2.1 The Chair set out that the purpose of the meeting was to consider the GDPR requirements for lowering the ECR to 50kW and to determine best next steps.

### 3. Review of GDPR considerations

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- 3.1 The Working Group discussed the ramifications of lowering the ECR threshold to 50kW in relation to GDPR and publication of individual data. Consideration was given in relation to publishing the data in full against the interests of the data subjects whose personal data will be published.
- 3.2 Whilst it was acknowledged by the Working Group that providing the full data set provides credibility to the data and could help with validation if perhaps a known big site was missing, it was noted that a majority of the larger sites will not identify an individual and therefore the additional benefits will still be realised. It was noted that with the smaller sites the data, used for example by National Grid, would likely be aggregated and therefore the exact location becomes less important than for sites above 1MW.
- 3.3 The Working Group agreed to take an approach of presuming any entry under 1MW is an individual unless it can be positively confirmed to be otherwise. When ensuring an individual cannot be identified by the published data, the following was agreed:
- Anonymise the following fields:
    - Customer Name
    - Customer Site
    - Address Line 1
    - Address Line 2
  - Retract the last 2 letter of the postcode (ie SW4 7)
  - Location (X and Y Coordinate) – change the last two digits to 00. This is because this needs to remain a six-digit number to avoid system issues.
- 3.4 The Secretariat took an action to draft the necessary legal text in relation to the principles agreed above. The Secretariat also took an action to produce a draft Change Report and circulate to Working Group members for review.

#### Post Meeting Note

- 3.5 The draft legal text is with the DCUSA legal advisors and will be circulated to the Working Group once reviewed.

03/01 – Draft the necessary legal text and submit to DCUSA legal advisors for review.

03/02 – Produce draft Change Report and issue to Working Group for review.

### 4. Any Other Business

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

### 5. Date of Next Meeting

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- 5.1 No further meetings have currently been scheduled.

## APPENDIX A

### New and Open Actions

Action Ref.	Action	Owner	Update
03/01	Draft the necessary legal text and submit to DCUSA legal advisors for review.	Secretariat	
03/02	Produce draft Change Report and issue to Working Group for review.	Secretariat	

### 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>
02/01	<b>AP to provide further clarity on how the data is being used currently and the benefits of lowering the threshold.</b>	AP	
02/02	<b>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'.</b>	ElectraLink	

02/03	<p>Secretariat to update legal text to:</p> <ul style="list-style-type: none"> <li>• replace any instances of 'Import Capacity' to 'Maximum Import Capacity' and instances of 'Export Capacity' to 'Maximum Export Capacity'; and</li> </ul> <p><b>add a definition for 'Registered Capacity' which points to the definition within the Distribution Code.</b></p>	ElectraLink	
02/04	<p>Secretariat to correct typos in the excel template - Contents tab 'addittional', Lists tab 'Accepected to Connect', Definitions part 1 tab 'irrespective'.</p>	ElectraLink	
02/05	<p>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.</p>	ElectraLink	
02/06	<p>The Chair to update the versioning of the ECR template from 3 to 4.</p>	ElectraLink	