

DCP 411 Working Group - Meeting 07

06 March 2023 at 10:00

Location/ Web-Conference/Teleconference

Attendee	Company
Kevin Woolard(KW)	Centrica
Peter Waymont (PT)	UKPN
Chris Ong (CO)	UKPN
Claire Campbell (CC)	SPEN
Donna Jamison (DJ)	Energy Assets
Edda Dirks (ED)	SSE
Diandra Orodan(DO)	BU-UK
Victoria Birket(VB)	SSE
Kara Burke (KB)	NPg
Tracey Dunne	ENWL
Code administrator	
Andy Green [AG] (Technical Secretariat)	ElectraLink
Craig Booth (JL) Chair	ElectraLink
Apologies	

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 open actions, review the collated consultation responses and review the email received by Power Data Associates.

3. Review Actions

- 3.1 The Working Group agreed to keep action 06/01 open to allow time for distributors to respond as the deadline for DNOs to respond hadn't past yet.
- 3.2 Action 06/02 was kept open as they were gaps in the understanding of this and closing action 06/01 would help to close this action.
- 3.3 Action 03/06 was closed as the Working Group took an action to develop the rationale for focusing on measurement classes C and E.
- 3.4 The Working Group started to review the an email sent by PW which had a process flow chart as part of action 06/04, this document can be found in **Attachment 1 _DCP411 Process_Flow_Chart**.
- 3.5 PW talked the Working Group through the Visio diagram he'd put together showing the process that the legal text will flow though.
- 3.6 ED noted that within the flow chart, in the bottom left of the second page it states 'Company notifies supplier' and asked if this was reflected within the current drafted legal text.
- 3.7 It was noted that the current text doesn't state this, and PW advised that a change to the body text within the DCUSA was needed. PW also noted that this would be included within the connection agreement which is between DNOs and suppliers.
- 3.8 PW confirmed that these changes would need to take place in clause 17.10 and provided the flowing text which could be included *"Where the Company has agreed with the Customer that they will charge Use of System Charges whilst the connection is De-energised, the Company shall notify the User within 10 Working Days."*
- 3.9 ED believed that it would be useful to include the process flow diagram in the Change Report and the Working Group agreed so the Chair took an action to include it.

07/01 The Chair to include the flow diagram within the change report.

- 3.10 The Working Group reviewed Action 06/05. A response had been received but it was unclear to the Working Group what this would mean to IDNOs. DO Agreed to speak to her finance team to gain further clarity and the Chair took an action to confirm with IDNOs and DNOs what any changes or references to national terms of connections would mean to their customers and connection agreements. Action 06/05 was closed and replaced by action 07/02

07/02 DO and The Chair to review what the changes to national terms of connections could mean to DNOs and IDNOs

- 3.11 The Chair noted that actions 06/06 and 06/07 were related and that a response from VB had been received.
- 3.12 PW noted that MHHS may lead to further changes to any legal text drafted as part of this change in the future, especially for CT and HH metered customers. It was noted it would be useful to include within the change report that the national terms of connection section three applies to CT metered customers and is concerned with DUoS charging to cater for any potential future changes
- 3.13 Actions 06/06 and 06/07 were closed.

4. Review PDA emails

- 4.1 The Working Group began by reviewing the emails that had been received on the back of the initial email from Tom Chevalier. This can be found in **Attachment 3_PDA_Email**.
- 4.2 ED noted that there were two points to consider.
- Proportion of de energised sites and
 - Site visits
- 4.3 On the topic of the proportion of de energised sites, ED asked for clarity on the volumes as she was unsure if it the volumes were referencing site visits or volumes for a data cleanse activity or both?
- 4.4 The Chair advised that this hadn't been considered by the Working Group as it the PDA data had been provided as an additional item as part of the consultation and not requested.
- 4.5 VB noted that she had reviewed some of the data and it was also unclear how up to date the data was.
- 4.6 As it was unclear what the data was telling the Working Group and as the Working Group were unclear as to why it was sent it was agreed to review this again when Tom Chevalier, the Working Group member who'd issued the data, was available.

07/03 The Chair to contact Tom Chevalier to ask him to join the next WG meeting.

5. Review Consultation Responses

- 5.1 The Working Group started reviewing the responses to the consultation. The collated responses can be found at attachment **2 DCP 411 Consolidated_Consultation_Responses**
- 5.2 The Chair noted that the Working had got up to question 6 during the last Working Group and agreed to start from there and at the response from NGED.
- 5.3 NGED noted that the change could create resource risk as customers would need to be contacted. They also stated that MPANs would require updating in billing systems. The Working Group acknowledged the risk however it was concluded that as there was no timeframe that these customers would need to be contacted, distributors could control the contact process to mitigate the risks.
- Are there any impacts to consumers (who may differ from the bill payer) in vulnerable situations, or could consumers be put in a vulnerable situation, as a result of charging de-energised sites?**
- 5.4 11 respondents stated that they didn't believe were impacts to vulnerable customers or that change would lead to customers being put into any vulnerability.

- 5.5 One responder noted that CT metering would need to be considered however it would be unlikely that these sites would have vulnerable customers as the large majority would be commercial properties.
- 5.6 Another responder raised that the change may have an impact for sites such as care homes and sheltered accommodation if those customers decided to de energise a portion of the site to save on costs.
- 5.7 The Working Group concluded vulnerable customers wouldn't be impacted by this modification, but the organisation that serves them, which receives no differentiation when the sites are energised.
- 5.8 It was also noted that in the above scenarios no one would be placed into a vulnerable situation as the parts of the site that gets de energised wouldn't be using anyone.

Do you have any comments on the proposed draft legal text? Please provide your rationale.

- 5.9 Five respondents offered no comment.
- 5.10 Three respondents noted that they'd already raised queries on the text in previous questions that have been noted at the previous Working Group meeting.
- 5.11 One respondent stated the term "unreasonable" within the draft text can be open to various interpretations. The Working Group concluded that "reasonableness" is used under the Electricity Act 1989 in relation to disconnections and that there were dispute processes a customer could use within the DCUSA already.
- 5.12 As a final resort customers could refer disputes to the authority.
- 5.13 Another respondent noted that it is unclear what happens in the initial six months that the customer is de energised. The Working Group noted that customers are not currently billed in that period and the proposed change does not apply charges retrospectively.
- 5.14 The same respondent also raised it is unclear how the distributor will contact the customer as they do not hold customer contact details.
- 5.15 The Working Group agreed that the distributor should have been provided with contact details via the D0302 flow and this is what would be used when contacting customers.
- 5.16 One respondent noted that as the distributor would only have limited contact information and given that P272 highlighted that distributors were not best placed to contact customers, the text should state the communications process should be driven by the supplier. In the event the obligation was placed on distributors, suppliers should support distributors as best as possible.
- 5.17 The Working Group concluded that the distributor should have been provided with contact details via the D0302 flow, as per a previous question.
- 5.18 It was raised by the Working that it may not be possible to use the details with the D302 as there are very specific reasons that the contact information can be used for.
- 5.19 KB noted that within the REC it states that distributors could use "The email of the individual to contact in the event of an issue impacting the site or the Metering Point." It also stated this for contact name too.
- 5.20 It was noted that it was unclear what was meant by the term "issue" within this text.

- 5.21 The Chair to take an action to confirm with the REC what information is on the D0302 flow and what was meant by the term “issue” as this would confirm if distributors could use the D0302 data to contact customers.

07/04 The Chair to check with the REC what scenarios the term “issues” covered to clear up if and when the information on the D0302 can be used.

- 5.22 The same responder also noted that the legal text states that the customer will have 30 days to respond and asked, if they didn’t respond would the distributor then have the right to change their capacity to zero. If the customer comes back in the future to say they never received a letter how will this be treated? Another responder raised similar points.
- 5.23 The Working Group noted that in terms of customers not responding this is a common issue across many different processes in the industry. It was noted by PW that as long as there was no returned mail, and it was confirmed with a customer who made contact outside the 30-day window that correct address and contact details are held, then it would be considered that enough effort had been made so usually the capacity wouldn’t be reduced.
- 5.24 It was also noted that the text does allow for distributors to apply discretion in these cases.
- 5.25 The Working Group had now run out of time to continue the consultation response review so moved on to the agreeing next steps.

Next Steps

- 5.26 The Working Group agreed to meet again to continue reviewing the consultation responses
- 5.27 The Working Group agreed to meet again on 30 March 2023 between 10:00am and 13:00pm.

6. Attachments

- **Attachment 1 _DCP411 Process_Flow_Chart.**
- **Attachment 2_DCP 411 Consolidated_Consultation_Responses**
- **Attachment 3_PDA_Email**

7. Next Meeting – 30 March 2023

- 5.1 The next Working Group to be held on 30 March 2023 between 10:00am and 13:00pm.

Appendix 1 – Actions Log

New and Open Actions

Action Ref.	Action	Owner	Update
06/01	Contact DNOs to ask if they actively manage the capacity on the basis of the number of de-energised sites within a population of NHN sites.	Chair	Remain open
06/02	Go back through the minutes of the previous meetings to check for the rationale on limiting the scope to measurement classes C and E.	Chair	Remain open
06/03	Look at DCP 160 to see if there are relevant points related to how networks plan their capacity.	GM	Remain open
07/01	The Chair to include the flow diagram within the change report.	Chair	New action
07/02	DO and The Chair to review what the changes to national terms of connections could mean to DNOs and IDNOs	DO and CB	New action
07/03	Contact Tom Chevalier to ask him to join the next WG meeting.	Chair	New action
07/03	The Chair to check with the REC what scenarios the term “issues” covered to clear up if and when the information on the D0302 can be used.	VB	New action

Closed Actions

Action Ref.	Action	Owner	Update
03/03	Seek clarification on The Electricity Network Company Limited’s response to question 2 of the consultation.	KC	Closed

03/04	Get more information on the rejections for disconnection requests, relating to British Gas's response to question 9 of the consultation.	GM	Closed
04/01	The Chair to carry out further investigation into de-energised sites being included within transmission charges.	The Chair	Closed
04/02	The Secretariat to draft a Consultation document and circulate to the Working Group for review.	The Chair	Closed
06/04	Map the process and circulate this to the Working Group.	PW	Closed
06/05	Seek clarification on this point: <i>After deliberating with the Pricing and Billing Team, we consider that the best approach moving forward, should this Change Proposal be implemented, would be to introduce a 'blanket change' so that all the Suppliers would be treated uniformly. In practice, this would require an addition to the existing contracts.</i>	DO	Closed
06/06	Send information on both CPs to the Chair, for inclusion with the minutes.	VB	Closed
06/07	Add attachments for both CPs in action 06/06 to the minutes.	Chair	Closed