

# DCP 388 Working Group - Meeting 11

07 March 2023 at 09:30 - Web-Conference

Attendee	Company
<b>Working Group Members</b>	
Chris Barker [CB]	ENWL
Chris Ong [CO]	UKPN
Dave Wornell [DW]	WPD
Giao Le [GL]	SSEN
James Jones [JJ]	SSEN
Kyran Hanks [KH]	Waters Wye
Lee Stone [LS]	EON
Lorna Murray [LM]	SPEN
<b>Code Administrator</b>	
Alysson Peña [AP]	ElectraLink
Andy Green [AG] (Chair)	ElectraLink
Mel Kendal [MK] (Technical Secretariat)	ElectraLink
<b>Apologies</b>	
Edda Dirks [ED]	SSE Gen
Donna Jamieson [DJ]	Energy Assets
Kara Burke (KB)	NPg

## 1. Administration

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- 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 An action log has been created and all updates are provided in **Appendix A**.

## 2. Purpose of the Meeting

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- 2.1 The Chair explained that the purpose of this meeting is to review and discuss the Customer Self-Certification Document, Draft Legal Text and Draft Consultation within the Working Group and agree next steps.

## 3. Review Customer Self-Certification Document

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- 3.1 The Chair presented the Customer Self-Certification document to the Working Group for further review. Amendments were made live during the meeting, and updates can be found as **Attachment 1**.
- 3.2 The key points can be found below:
  - LM mentioned that the opening paragraph talks about metering that records the import associated with any final demand component separately from metering the records the export associated with any non-final demand component on site – in regard to this, LM queried how this will work with operational metering. This was discussed and agreed that it may prove more difficult with settlement metering and there does not appear to be a requirement for this. It was agreed that the simplest way is to use import and export only.
  - The Working Group discussed the removal of the ‘Technology Type’ from Section A of the Certificate as this was initially used to look at default values (which are no longer needed), but to keep in ‘Capacity’. After further discussion, it was agreed to leave this in Section A for now, but to make a note and remove, if necessary, further down the line.
  - Members discussed the Regulation links provided within the footnotes of Section A, and agreed to have these links remain in the document as these could be beneficial and easy access for Customers.
- 3.3 Once reviewed, the Working Group members were happy with the information in the Customer Self-Certification document at present.
- 3.4 The Secretariat agreed to take an action to circulate the updated Customer Self-Certification Document to the Working Group post-meeting.

**ACTION 11/01: The Secretariat to circulate the updated Customer Self-Certification Document to the Working Group post-meeting.**

## 4. Review Draft Legal Text

4.1 The Chair presented the Draft Legal Text to the Working Group for further review. Amendments were made live during the meeting, and updates can be found as **Attachment 2**.

4.2 The key points can be found below:

- The Working Group agreed to include both Registrant and Customer references within Paragraph 4.1A.
- It was agreed to change 4.1A (a)(i) to state *‘the average Maximum Import Capacity over the most recent **12-month period** for which data is available, where the data is within the most recent 24 months; or if not available...’* and 4.1A (a)(ii) to state *‘other available information that is appropriate for a similar site to best estimate the expected Maximum Import Capacity of the Final Demand Site...’* from the original 24 months of data. It was also noted that the terminology may need to be aligned with MHHS.
- The Working Group referred to the DCUSA document in regard to allocating charging bands – it was agreed to take the wording from Section 4 of the DCUSA (where it refers to final demand site that is half-hourly settled) and agree to draft additional wording for a non-final demand site that is not half-hourly settled.
- Members discussed whether timescales need to be included within Paragraph 4.2 (final demand that is non-half hourly settled), and agreed that timescales would not need to be included as they would not be eligible. After further discussion, it was agreed to remove Paragraph 4.2 (b) regarding final demand site that is non-half hourly, as including this will make this change more complex and this can be reassessed further down the line.
- In regard to Paragraph 5B.2 (c) *‘addition of removal of technology type on site’*, it was noted that this should remain within the draft legal text for now but may need to be revisited if this is agreed to remove from the Customer Self-Certification document at a future date.
- Included (d) Changes to MIC and/or MEC under Paragraph 5B.2 as this will cover all site changes.
- It was agreed to not add timescales into Paragraph 5B.3.
- There were mixed views in regard to Mixed Demand site allocations to a charging band, where it was not agreed whether bands should be reallocated (up or down) – it was agreed that a Consultation question should be asked to seek wider industry feedback around this. An example question could be *‘should a Customer’s Mixed Demand Site eligibility change if the Site’s non final demand proportion changes? Could this create inconsistencies with how Sites are re-banded?’*.
- In regard to Paragraph 5B.6, the Working Group queried whether the following points of *‘the Registrant may be eligible for a rebate (applied from the date on which the DNO/IDNO Party received the necessary certification under Paragraph 5B.1)’* would be needed within the draft legal text and made a note to check this and see whether this should be removed. Following these discussions, it was agreed that the whole of Paragraph 5B.6 should only reference *‘where re-classification under Paragraph 5A.2 applies’*.
- The Chair informed the Working Group that the draft legal text has been updated to incorporate industry changes since the last time it was reviewed (i.e., MHHS, Access SCR).

4.3 After further discussion, the Working Group were happy with how the draft legal text looks at present.

- 4.4 The Secretariat agreed to take an action to circulate the updated draft legal text to the Working Group post-meeting.

**ACTION 11/02: The Secretariat to circulate the updated draft legal text to the Working Group post-meeting.**

## 5. Review Draft Consultation

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- 5.1 The Chair presented the Draft Consultation to the Working Group for further review.

- 5.2 The agreed draft Consultation questions can be found below:

- Do you understand the intent of the CP?
- Are you supportive of the principles that support this CP?
- Do you agree with the approach suggested by the Working Group to utilise the customer self-certification process and then an annual review and reconciliation process for new customers? Please provide rationale.
  - It was noted that an approach has not yet been agreed yet. This question may need to be amended to provide more context once an approach has been agreed.
- How long after the self-certificate process should the review take place. i.e. monthly, quarterly or annually Please provide rationale.
- When should the reconciliation take place from? Please provide rationale.
- Do you agree that the customer self-certification form should be located within the LC14 statements. If you believe it would be more appropriate being located elsewhere, please provide details of where and why.
- Do you have any comments on the customer self-certificate form?
- Do you have any comments on the draft legal text?
- Do you consider the solution better facilitates the DCUSA objectives? Please give supporting reasons.
- What date do you believe this change proposal should be implemented? Please provide rationale.
- Do you have any other comments?

- 5.3 Prior to reviewing the draft Consultation and questions any further, it was agreed that an approach should be further discussed and agreed first prior to developing any further Consultation questions. The Working Group agreed with the approach to developing the solution first.

- 5.4 The Working Group agreed to continue with the current open action (**ACTION 10/02**) to consider how to best treat new connections sites to discuss further at the next meeting.

## 6. Agenda Items for Next Meeting

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- 6.1 The Working Group discussed the next steps, and the following items were captured:
1. The Secretariat to circulate both the Customer Self-Certification document and updated Draft Legal Text to the Working Group post-meeting.
  2. The Working Group to consider how to best treat a new connection to review at the next meeting.

## 7. Any Other Business

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- 7.1 The Chair asked the group whether there were any other items of business to discuss.
- 7.2 There were no other items raised.

## 8. Date of Next Meeting

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- 8.1 The next Working Group meeting will be held on 11 May 2023 at 10am.

## 9. Attachments

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- Attachment 1\_DCP 388 Customer Self-Certification Document
- Attachment 2\_DCP 388 Draft Legal Text

## APPENDIX A

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### New and Open Actions

Action Ref.	Action	Owner	Update
10/02	Working Group to consider how to best treat new connection sites.	Working Group	<b>Ongoing.</b> <i>28/03/2023 – WG to continue to consider potential solutions.</i>
11/01	The Secretariat to circulate the updated Customer Self-Certification Document to the Working Group post-meeting.	Secretariat	<b>Ongoing.</b>
11/02	The Secretariat to circulate the updated draft legal text to the Working Group post-meeting.	Secretariat	<b>Ongoing.</b>

### Closed Actions

Action Ref.			Update
10/01	Secretariat to remove Section A from the certification document and put section B into tabular form.	Secretariat	<b>Closed.</b>