

DCP 411 Working Group - Meeting 08

30 March 2023 at 10:00 - Web-Conference

Attendee	Company
Working Group Members	
Chris Ong [CO]	UKPN
Claire Campbell [CC]	SPEN
David Fewings [DF]	Inenco
Diandra Orodan [DO]	BU-UK
Ian Chadwick [IC]	UKPN
Kara Burke [KB]	NPg
Kevin Woollard [KW]	Centrica
Lorna Mallon [LM]	Scottish Power
Peter Waymont [PT]	UKPN
Tracey Dunne [TD]	ENWL
Victoria Burkett [VB]	SSE
Code Administrator	
Alysson Peña [AP]	ElectraLink
Craig Booth (CB) Chair	ElectraLink
Mel Kendal [MK] (Technical Secretariat)	ElectraLink
Apologies	
Donna Jamieson [DJ]	Energy Assets
Edda Dirks [ED]	SSE Gen
Lee Stone [LS]	EON

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 An action log has been created and all updates are provided in **Appendix A**.
- 1.3 In regard to **Action 06/01**, the Chair informed the Working Group that three responses had been received (UKPN / Scottish Power / National Grid). All three respondents confirmed that they do not currently manage these sites, and provided mixed reviews as to whether they should be included. The Working Group discussed the responses and were supportive of the exclusion of NHH sites.
- 1.4 In regard to **Action 06/03**, the Working Group reviewed the decision for DCP 160 which specified as part of the decision that NHH customers should not pay for notional capacity, in part on the basis that NHH consumers do not have a choice about the capacity that will be allocated to them. It was agreed to include this within the Change Report in support of the decision to exclude NHH sites.
- 1.5 In regard to **Action 07/01**, the Chair presented the diagram to the Working Group for their review. It was agreed to remove the notification to the Supplier if no action is being taken.
- 1.6 In regard to **Action 07/02**, the Chair informed the group that a response was received by National Grid with a number of comments provided within the draft legal text. It was agreed to review these comments alongside the full review of the draft legal text.

ACTION 08/01: The Working Group to review National Grid’s additional comments during the full draft legal text review.

- 1.7 In regard to **Action 07/03**, the Working Group discussed the DPIA, and agreed that a DNO can complete one if they wish to do so, however this should not be mandatory. One member stated that consumer contact data was a SPAA change a while back, with the aim to allow Customer information to be able to be sent to Transports. This was also written into the REC for this to be shared with GTs. Following this, it was also noted that the draft legal text should be reviewed to ensure that it encompasses the contact data being used.

ACTION 08/02: The Secretariat to review the draft legal text to ensure that it encompasses the contact data being used.

2. Purpose of the Meeting

- 2.1 The Chair explained that the purpose of this meeting is to review and discuss the intent of the CP, review the remaining Consultation responses and to discuss the key outcomes and actions captured within the Working Group, and agree next steps.

3. Discuss the Intent of the CP

- 3.1 The Chair opened the discussion of the intent of the CP with Working Group members. The Chair walked through a number of responses received by members of the group relating to potentially moving away from the original solution of DCP 411.

- 3.2 One member stated that specifying the exact steps that must be followed with each Customer could potentially make the solution unmanageable.
- 3.3 Another member stated that there needs to be a deadline for completion (in relation charges for de-energisation) that is consistent across the board.
- 3.4 The Proposer explained that the customers in scope of the CP had been amended following feedback on the first consultation, but that the intent of the CP remained the same.
- 3.5 The Working Group reviewed the original intent of the CP, and after further discussion it was unanimously agreed that the solution is still within the intent of the original scope. There were no objections to continuing with the current solution.

4. Review of Consultation Responses

- 4.1 The Chair presented the remainder of the Consultation responses to the Working Group for further review.
- 4.2 The key points can be found below:
- 4.3 **Question 9**
- 4.4 The Working Group discussed whether a site needs to be energised initially in order for it to be able to be de-energised – members discussed the status of registration of an MPAN and queried whether it would have been registered at the point of de-energisation, or not registered at all. Following this discussion, an action was taken to gain a better understanding of whether an MPAN is registered at the point of de-energisation.

ACTION 08/03: The Secretariat to gain a better understanding of whether an MPAN is de-energised at the point of registration.

- 4.5 Members also discussed what the registration status is within the system as it was confirmed this is not currently covered within the REC. One member stated that the REC will be involved if an MPAN is present; another member stated that there is an MPAN and that there is no energisation status within the registration system prior to trading.
- 4.6 The Chair queried whether a site is naturally de-energised at the point its first traded and members confirmed that this is correct.
- 4.7 Following this discussion, the Secretariat agreed to take an action to have discussions with REC and BSC to check what the status is that is carried through the registration system, and feedback to the Working Group.

ACTION 08/04: The Secretariat to have discussions with REC and BSC to check what the status is that is carried through the registration system, and feedback to the Working Group.

- 4.8 There was a concern raised within the Working Group around DNOs being able to contact sites that have been de-energised for a number of years after registration – the Chair queried whether there should be additional wording added to the draft legal text to counter for this. The Working Group agreed that this would not be a simple task to complete and could make the process more complex due to adding various categories and timeframes.
- 4.9 In regard to one of the responses, one member noted that CT metered sites will become half-hourly settled and the nature of what the DUoS Charges will be are currently unknown – but it is worth noting that there is a current CP (DCP 414 'Transitional Protection for NHH CT Customers affected by

Regulatory Change) that is currently ongoing and may have potential interactions with this change. The Working Group agreed that this should be noted within the Change Report, and the Secretariat agreed to take an action to seek an updated version of the DCP 414 Legal Text to look for these potential interactions.

ACTION 08/05: The Secretariat to seek an updated version of DCP 414 Legal Text to look for potential interactions with this change and note within the Change Report.

- 4.10 One response stated that it needs to be considered how Customers will be treated fairly in situations where some DNOs will contact the Customers and pass charges on, and some will not where they have a choice to do so (as the current wording stated that a DNO ‘may’ contact the Customer). Members discussed this, and one member stated that there is a difference between contacting a Customer after 6 months, and monitoring a Customer without contact for a number of years and are aware of the situation; and therefore, not contacting the Customer should not cause any detriment.
- 4.11 Following this discussion, the majority of the Working Group agreed to leave the wording to state ‘the DNO ‘may’ as opposed to explicitly stating ‘the DNO ‘MUST’.
- 4.12 In regard to the changes made to Schedule 2B ‘*unless otherwise agreed pursuant to schedule 2B section 3 paragraph 12.11(c)*’, it was noted that this also needs to be included within the EDCM.
- 4.13 **Question 10**
- 4.14 One response stated that some modifications may be necessary to the REC to clarify the processes around updating the MPAN status of de-energised and disconnected Customers. The Working Group discussed this, and it was agreed for the Secretariat to check whether there are any changes required to RMP Lifecycle Schedule 29.

ACTION 08/06: The Secretariat to check whether there are any changes required to RMP Lifecycle Schedule 29.

- 4.15 One response suggested that the requirement under the BSC, section ‘s’ for parties to provide information for TNUoS purposes will need to be assessed when the final proposal is drafted – the Working Group stated that a separate change would be required if TNUoS was to include de-energised sites.
- 4.16 **Question 11**
- 4.17 The Working Group noted the responses to Question 11.

5. Discuss Key Outcomes Captured/Actions Required

- 5.1 The Chair opened up the discussions around any key outcomes/actions that have been captured during the meeting.
- 5.2 The key outcomes can be found below:
- *Use of D0139 with the new SVCC code to denote charging status of de-energised site.*
 - *Possibility of performing a data cleanse.*
- 5.3 Use of D0139 with the new SVCC Code
- 5.4 The Chair queried whether the status notification sent to the Supplier would need to be a new flow, or whether the use of the D0139 with the new SVCC code is the right way forward – one member

stated that the simple route would be to use an existing data flow (D0139) with an additional data item as opposed to developing an entirely new flow.

- 5.5 The Working Group reviewed the current data items within the flow and agreed that there would be scope to add an additional data line for the charging status of a de-energised site. In order to implement this change, a REC change would need to be raised. Following this, PW agreed to take an action to reach out to REC regarding the change process and subsequently raise the change to add an additional data item into the current D0139 flow.

ACTION 08/07: PW to reach out to REC regarding the change process, and raise a REC change to implement an additional data item into the current D0139 flow.

5.6 Data Cleanse

- 5.7 One member provided an example where an MPAN was listed as de-energised but was recording usage. It is believed that both the DNOs and Suppliers will need to work together to investigate whether an MPAN is de-energised or disconnected. A data cleanse will make this process easier.
- 5.8 It was mentioned that with the significant number of de-energised MPANs, there should be some sort of data cleanse/activity that needs to be considered; however, it was noted that this data cleanse should not hold up this change and could be carried out in parallel.
- 5.9 The queried whether there is a more appropriate group to raise the potential data cleanse of MPANs that are de-energised as it may be out of scope of this change – one member stated that this could be raised at the Cross Code Steering Group. It was also noted that it may be beneficial to speak with MHHS to see if there are any specific data checks that are performed during a migration (i.e., does it include energisation status?). Two actions were taken to follow up with both MHHS and the Cross Code Steering Group regarding the data cleanse.

ACTION 08/08: The Secretariat to speak with MHHS to see if there are specific data quality checks that are performed during a migration.

5.10 Draft Legal Text Discussion

- 5.11 The Working Group reviewed the additional wording to the draft legal text provided by National Grid.
- 5.12 The key points can be found below:
- *Removal of [If it is not reasonable in the circumstances for the Company to maintain it] from the updated Schedule 2B, Section 3, Paragraph 12.11A.*
 - *Agreed to keep the wording ‘...and notify the Customer accordingly’ from the updated Schedule 2B, Section 3, Paragraph 12.11B.*
 - *Agreed to keep the new paragraph 17.10AA ‘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’ but added ‘of that agreement’ at the end.*

5.13 The Working Group had no further comments on the draft legal text.

6. Agenda Items for Next Meeting

6.1 The Working Group discussed the next steps, and the following items were captured:

1. The Secretariat to draft the Change Report and circulate to the Working Group post-meeting.
2. The Secretariat to circulate the updated draft legal text and Change Report to the Working Group for review post-meeting.

ACTION 08/09: The Secretariat to draft the Change Report.
ACTION 08/10: The Secretariat to draft the Change Report and circulate to the Working Group for review post-meeting.

7. Any Other Business

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

8.1 The next Working Group meeting will be held on 17 April 2023 at 10am.

9. Attachments

- Attachment 1_DCP 411 Workplan

APPENDIX A

New and Open Actions

Action Ref.	Action	Owner	Update
08/01	The Working Group to review National Grid's additional comments during the full draft legal text review.	Working Group	Completed in the meeting
08/02	The Secretariat to review the draft legal text to ensure that it encompasses the contact data being used.	Secretariat	New action
08/03	The Secretariat to gain a better understanding of whether an MPAN is registered at the point of de-energisation.	Secretariat	New action
08/04	The Secretariat to have discussions with REC and BSC to check what the status is that is carried through the registration system, and feedback to the Working Group.	Secretariat	New action
08/05	The Secretariat to seek an updated version of DCP 414 Legal Text to look for potential interactions with this change and note within the Change Report.	Secretariat	New action
08/06	The Secretariat to check whether there are any changes required to RMP Lifecycle Schedule 29.	Secretariat	New action
08/07	PW to reach out to REC regarding the change process, and raise a REC change to implement an additional data item into the current D0139 flow.	PW	New action
08/08	The Secretariat to speak with MHHS to see if there are specific data quality checks that performed during a migration.	Secretariat	New action
08/09	The Secretariat to draft the Change Report.	Secretariat	New action

08/10	The Secretariat to draft the Change Report and circulate to the Working Group for review post-meeting.	Secretariat	New action
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Closed Actions

Action Ref.			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 NHH sites.	Chair	Closed.
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	Closed.
06/03	Look at DCP 160 to see if there are relevant points related to how networks plan their capacity.	GM	Closed.
07/01	The Chair to include the flow diagram within the change report.	Chair	Closed.
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	Closed
07/03	Contact Tom Chevalier to ask him to join the next WG meeting.	Chair	Closed.
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