

DCP 388 Working Group - Meeting 12

11 May 2023 at 13:00

Location/ Web-Conference/Teleconference

Attendee	Company
Dave Wornell (DW)	WPD
Lee Stone (LS)	E.ON
Kyran Hanks(KH)	Waters Wye
Edda Dirks (ED)	SSEGen
James Jones (JJ)	SSEN
Giao Le (GL)	SSEN
Lorna Murray (LM)	SPEN
Louise Wardle (LW)	NPg
David Fewings (DF)	Ineco
Marlon McDonald (MM)	Ofgem
Code administrator	
Andy Green [AG] (Technical Secretariat)	ElectraLink
John Lawton (JL) Chair	ElectraLink
Apologies	
Kara Burke (KB)	NPg

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**.
- 1.3 Action 10/02 was closed as the Working Group had considered how the solution for existing and new sites could work and that the feedback would be provided during the legal text review.
- 1.4 Action 11/01 and 11/02 were closed because the self-certificate document and legal had been shared with the Working Group.

2. Purpose of the Meeting / Timeline for Delivery

- 2.1 The Chair explain that the purpose of the Working Group was to review the latest legal text and customer certification document and then, time permitting, review the draft second consultation document.

3. Legal Text review

- 3.1 The Chair began to walk the Working Group through the latest version of the legal text that had been shared and advised that it does incorporate the most recent version of the DCUSA. The Legal text can be found in **Attachment 1- DCP 388 Legal Text Version 4.0**
- 3.2 It was agreed to start the review by understanding some of the clauses in section 6 of schedule 32 as this could help the Working Group to understand what was needed to cater for new connection sites.
- 3.3 After reviewing the above paragraph, the Working Group reviewed the legal text changes made to section 4 of schedule 32, starting with paragraph 4.1A. it was noted that these changes were adequate for existing customers, but more consideration was required for new connection sites.
- 3.4 DW noted that the current legal text didn’t state how distributors would identify and treat mixed demand sites and that if there wasn’t a how, it would be very unlikely this change would gain Authority approval.
- 3.5 It was also noted that if the legal text wasn’t specific on how the process worked, this could lead to distributors following different processes resulting in inconsistent approaches.
- 3.6 LM suggested that it might be useful to draft a process first to identify the areas which needed to be considered rather than getting straight into the legal text. The Working Group agreed with this suggestion and started to identify the relevant areas that needed to be considered.
- 3.7 It was agreed that there needed to be two processes, one for consumption sites and another for capacity sites. It was also agreed that each of the two processes would need to be spilt out to cover customer processes and DNO processes.
- 3.8 For Capacity sites it was agreed the areas for further consideration are below for customer based processes.
 - Completion of customer self-certificate and acceptance.

- Connection agreement tied to capacity site with import and export capacity.
- Use operational metering at the generation asset, at the import asset or both. This to be done with the DNO up front (In excel format for existing sites only?) as part of the initial application.
- Require access to physical operational metering (audits etc)

3.9 The below was agreed as areas that needed further consideration for distributor based processes on capacity sites.

- Check and validate data to prove the sites usage is within what is stated in the self cert doc.
- Inform outcome. Update LLFC if required.
- Data update for forecasting and modelling.

3.10 The below were areas the Working Group agreed required consideration for customer based processes on consumption sites.

- Completion of customer self-certificate and acceptance.
- Import and export MPANs for the site.
- Use operational metering at the generation asset deducted against settlement metering ie sites total minus the generation asset.
- Require access to physical operational metering (audits etc)

3.11 And finally, the below were the distributor based processes for consumption sites.

- Check the EAC is at the expected level. or;
- Check with supplier for the consumption element.
- Update LLFC if re-band triggered.
- Data update for forecasting and modelling.

3.12 The Customer Self-Certificate form can be found in **Attachment 2 Example Certificate**

3.13 Now the Working Group had agreed on the key areas for consideration it was agreed that the next topic should be to review and update the customers self-certification form so the areas identified could be checked off.

4. Review the Customer Self-Certification Form

- 4.1 As the high-level process had been agreed and areas for consideration, several changes were made to the Customer Self Certificate form.
- 4.2 These included making it clear that there was a requirement on the customer to allow access to the metering arrangements on site as LS noted that there were audit requirements that customers would need to adhere to.
- 4.3 It was agreed to split out consumption and capacity sites into there own sections and that for capacity sites, confirmation that 12 months of data (provided in kWh and kVArh) for each of the metering arrangements would be required.

- 4.4 For consumption sites confirmation that 12 months of actual metered data (HH data or readings in kWh) for each of the metering arrangements would be required.
- 4.5 The declaration was also updated to include that The Distributor reserves the right to perform an annual review.
- 4.6 It was agreed to try and produce a clause that could cater for new connection sites where an annual review and reconciliation would take place.
- 4.7 A copy of the updated certificate form can be found in **Attachment 3 Example Certificate v4.0**
- 4.8 DW shared an Excel spreadsheet with the Working Group that he stated could be used to calculate the estimated Final Demand once the Non-Final Demand element had been subtracted. It was noted that this is what the customer could use when completing the Self-Certificate form.
- 4.9 LS noted that a similar approach is followed for settlement metering when audits are undertaken so following the above process would lead to better consistency across distributors.
- 4.10 It was also believed that as the customer self-certificate form would be housed within distributors own websites, it would make sense to have the Mixed Non-Final Demand site calculator in the same place to stop customers having to go to different websites when making the application.
- 4.11 The Working Group agreed that they would revisit this calculator at a later meeting but agreed it would be a useful addition to the process.
- 4.12 This spreadsheet can be found in **Attachment 4 Template for Mixed Non-Final Demand Sites**

5. Next Steps

- 5.1 The Working Group agreed to meet again on 05 June 2023 at 10:00am to review the consultation document, customer certification document and legal text before issuing to parties for views.
- 5.2 It was agreed that the secretariat would update the legal text and share with the Working Group prior to the next meeting on 05 June 2023.
- 5.3 It was agreed that the secretariat would update the consultation document and share it with the Working Group prior to the next meeting on 05 June 2023.

6. Next Meeting – 05 June 2023

- 5.1 The next Working Group to be held on 05 June 2023 at 10:00am

Appendix 1 – Actions Log

New and Open Actions

Action Ref.	Action	Owner	Update
12/01	The secretariat to update the legal text and share with the Working Group before the next meeting.	Secretariat	<i>New action</i>
12/01	The secretariat to update the draft consultation document and share with the Working Group before the next meeting.	Secretariat	<i>New action</i>

Closed Actions

Action Ref.			Update
10/01	Secretariat to remove Section A from the certification document and put section B into tabular form.	Secretariat	Closed.
10/02	Working Group to consider how to best treat new connection sites.	Working Group	Closed
11/01	The Secretariat to circulate the updated Customer Self-Certification Document to the Working Group post-meeting.	Secretariat	Closed
11/02	The Secretariat to circulate the updated draft legal text to the Working Group post-meeting.	Secretariat	Ongoing.