

DCP 433 Working Group Meeting 04

18 April 2024 at 14:00 - Web-Conference

Attendee	Company
Working Group Members	
Victoria Burkett [VB]	SSE
Robert Mottershead [RM]	Sedulity Energy Ltd
Edda Dirks [ED]	SSE Generation
Chris Barker [CB]	ENWL
Michael Hewitson [MH]	Trident Utilities
Babatunde Olukotun [BO]	NGED
Donna Jamieson [DJ]	IDCSL
Ryan Farrell [RF]	NPg
Chris Ong [CO]	UKPN
Lorna Murray [LM]	SPEN
James Jones [JJ]	SSE
Code Administrator	
Craig Booth [CB] (Chair & Secretariat)	ElectraLink

1. Administration

Recording

- 1.1 The Chair asked members if they were comfortable for this Working Group to be recorded. No members objected to this request. The purpose of this recording is purely to aid the Technical Secretariat in producing an accurate report of the meeting. The recording will be deleted after 15 Working Days.

Competition Law Guidance and Terms of Reference

- 1.2 The Working Group reviewed the “Competition Law Guidance”. All Working Group members agreed to be bound by the Competition Law Guidance for the duration of the meeting.

2. Purpose of the Meeting

- 2.1 The Chair set out that the purpose of the meeting was to review the draft change report and legal text.

3. Previous Minutes and Actions

- 3.1 The Working Group reviewed the draft minutes of the previous meeting. No changes to the draft minutes had been made.
- 3.2 Action 03/01: The Chair had reached out to Peter and obtained clarification on the UKPN response, which would be discussed as part of the consultation responses review. This action was closed.
- 3.3 Action 03/02: The Chair confirmed that response had been circulated and included in the draft change report. This action was closed.
- 3.4 Action 03/03: The Chair confirmed the legal text drafts had been circulated. This action was closed.
- 3.5 Action 03/04: The Chair confirmed the draft change report had been circulated. This action was closed.

4. Change Report Review

- 4.1 The Working Group reviewed the draft change report.
- 4.2 The Working Group discussed the UKPN responses that clarification had been sought on.
- 4.3 The Working Group discussed that, following the MHHS migration, the DUoS Tariff ID can't be backdated further than the MHHS migration date, but the footnote states to follow the DCUSA guidelines. It was discussed that if there are systems and operational constraints that stop updates going back 14 months, these may need to be considered as well. It was suggested that the legal text could be amended to refer to the “RF settlement window” instead of a hard coded 14 months, which may future proof the legal text.
- 4.4 The Working Group considered the complexity of the above change to the legal text and the time required to make the appropriate changes in the legal text to cover it, against the timeline the

change was required to be progressed against, and determined that this would need to be picked up by a future Change Proposal when the need arose.

- 4.5 The working group also considered that as the change from 14 months to 4 months is significant, it would be beneficial to have this fully assessed under a separate Change Proposal. The Working Group noted that paragraph 6.11 would need to be amended in the future for any changes to the settlement rules.
- 4.6 The Working Group discussed CO's email (see attachment 1) regarding potentially banding all sites with insufficient data to band 1, to prevent the need for backdating at all. The Working Group agreed that the proposal has some merit in simplifying the issue, ensuring that nobody would ever over pay (and conversely may create other risks that need to be explored), but that it is out of scope of this Change Proposal.
- 4.7 The consultation responses document and draft change report were updated accordingly to reflect the above outcomes.
- 4.8 The Working Group discussed the SSE response seeking clarification on why the use of aggregated data beyond 14 months was problematic.
- 4.9 The Working Group discussed that, within the 14 months it is adjusted within the billing runs, which updates settlement automatically. When outside of 14 months, nothing can be settled and everything becomes a manual MPAN by MPAN adjustments, resulting in manual invoices and rebates, potentially covering multiple Suppliers over the course of the activity. This would represent a significant workload for network operators. It was also noted that the aggregated data cannot be disaggregated to get to a single site's data – the DNO has to construct this manually, which is unlikely to match what formed part of the aggregated data.
- 4.10 The consultation responses document and draft change report were updated accordingly to reflect this feedback.
- 4.11 The Working Group discussed the draft legal text and determined that, with some amendments to add clarity around how the amendment would be completed and splitting paragraph 6.11 into two new paragraphs for additional clarity, the alternative draft legal text proposed by SPEN would be taken forward.

5. Next Steps

- 5.1 The Chair stated he would send the draft legal text to Gowlings for review, in preparation for the next meeting.

Action 04/01: Chair to send the draft legal text to Gowlings for review and circulate the draft change report to the Working Group.

- 5.2 The next meeting will be held on 2 May 2024, 10:00am to 12:00pm, to finalise the draft change report and legal text.

6. Any Other Business

- 6.1 No other business was raised.

7. Attachments

- 7.1 Attachment 1 - CO Email RE DCP 433 'Limitation for backdating of rebates and charges under Schedule 32'

New and Open Actions

Action Ref.	Action	Owner	Update
04/01	Send the draft legal text to Gowlings for review and circulate the draft change report to the Working Group.	Chair	New Action

Closed Actions

Action Ref.	Action	Owner	Update
01/01	Secretariat to request files from DNOs and aggregate data in readiness for the next working group.	Secretariat	Closed
02/01	The Secretariat to contact the proposer for DCP 433 to gain approval on adding in additional context to the change proposal.	Secretariat	Closed
02/01	Chair to correct the minutes.	Chair	Closed
02/02	Chair to draft first version of the consultation and issue this to the Working Group for review as soon as possible, by no later than 15 March.	Chair	Closed
02/03	Chair agreed to check whether it was possible to retrospectively change the status of a Change Proposal.	Chair	Closed
03/01	Reach out to Peter Waymont regarding the UKPN response.	Chair	Closed
03/02	Summarise the response to the proposed alternative solutions and circulate this to the Working Group	Secretariat	Closed
03/03	Circulate the proposed alternative draft legal text for comparison with the current draft legal text.	Secretariat	Closed
03/04	Circulate a draft change report in advance of the next meeting.	Secretariat	Closed