DCP 412 – Allocation of banding for Targeted Charging Review (“TCR”) Charges for ‘Peaky’ Final Demand Customers

To: Craig Booth

Email: [DCUSA@electralink.co.uk](mailto:DCUSA@electralink.co.uk)

Due Date: 31 July 2024

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| Name: | Click here to enter text. |
| Organisation: | Click here to enter text. |
| Role: | Choose an item. |
| Email address: | Click here to enter text. |
| Phone number: | Click here to enter text. |
| Response[[1]](#footnote-1): | Choose an item. |

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| 1. Do you believe there are any risks of non-compliance against Regulation (EU) 2019/943 if this CP is implemented? If so, please provide your reasoning for your answer. |
| Click or tap here to enter text. |

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| 1. Do you agree with the proposal to re-allocate customers to the next lowest TCR band instead of applying some form of a discount? Please provide your rationale. |
| Click or tap here to enter text. |

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| 1. Do you believe HCULU customers should be able to opt out and be returned to their previous band if the charges in the lower band are higher? Please provide your rationale. |
| Click or tap here to enter text. |

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| 1. Should customers have their eligibility re-assessed at each price control period or more frequently? Please provide your rationale. |
| Click or tap here to enter text. |

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| 1. If the review is performed at the price control period, should customers have to reapply, or should they retain their HCULU eligibility status? Please provide your rationale. |
| Click or tap here to enter text. |

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| 1. If the review is more frequent, do you agree that customers who are no longer eligible for HCULU status should be allocated to their previous charging band? Please provide your rationale. |
| Click or tap here to enter text. |

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| 1. Do you agree that the DNOs should have the ability to review sites where their behaviours have changed in a significant way? |
| Click or tap here to enter text. |

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| 1. Do you agree that customers who change their capacity whilst classed as a HCULU customer will remain on their current band until they are reassessed? Please provide your rationale. |
| Click or tap here to enter text. |

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| 1. Should customers be limited in how many times they can apply for HCULU status over a given period, and if so, what should the limit and period be? Please provide your rationale. |
| Click or tap here to enter text. |

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| 1. Should there be a transitional period of 6 months during which customers who apply for HCULU status would be eligible for retrospective re-banding? Please provide your rationale. |
| Click or tap here to enter text. |

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| 1. Do you agree that customers should be re-banded up to a maximum of 12 months unless they are able to provide data showing that the excessive charges began on 1 April 2023, which would justify that they be re-banded back to that date? Please provide your rationale. |
| Click or tap here to enter text. |

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| 1. Do you agree that customers who request to be re-banded further back than 12 months should first be assessed on the basis of the previous 12 months, as part of a two-step process, and only customers who are eligible based on the previous 12 months will be assessed for further retrospective re-banding? Please provide your rationale. |
| Click or tap here to enter text. |

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| 1. Should sites with insufficient data (i.e., sites with less than 12 consecutive months of data) be required to wait until there is sufficient data in order to be assessed for HCULU eligibility? Please provide your rationale. |
| Click or tap here to enter text. |

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| 1. If sites require 12 months of consecutive data to support becoming a HCULU customer, should those sites with insufficient data, which need to wait until there is sufficient data, be eligible for a backdated re-banding? Please provide your rationale. |
| Click or tap here to enter text. |

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| 1. Should new connection sites be able to apply for HCULU status prior to the first re-allocation under paragraph 6.7 of Schedule 32 or only after the first re-allocation has taken place? Please provide your rationale. |
| Click or tap here to enter text. |

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| 1. Can you think of any other interactions that the Working Group should consider? Please provide your rationale. |
| Click or tap here to enter text. |

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| 1. Do you believe this change will lead to any unintended consequences? If so, can you think of ways to mitigate these? Please provide your rationale. |
| Click or tap here to enter text. |

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| 1. Do you consider that the proposal better facilitates the DCUSA Charging Objectives? If so, please detail which of the Charging Objectives you believe are better facilitated and provide supporting reasons. If not, please provide supporting reasons. |
| Click or tap here to enter text. |

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| 1. Are you aware of any wider industry developments that may impact upon or be impacted by this CP? |
| Click or tap here to enter text. |

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| 1. Do you have any comments on the proposed legal text? |
| Click or tap here to enter text. |

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| 1. Do you have any other comments on this CP? |
| Click or tap here to enter text. |

1. All responses will be treated as non-confidential unless indicated otherwise.

   Anonymous responses will omit the detail of the submitting party, but the content of the response will be provided to the Working Group and published on the DCUSA website.

   Confidential responses will not be published on the DCUSA website but submitted solely to the Working Group for the analysis of the CP. For all other confidentiality requirements please contact the secretariat at DCUSA @electralink.co.uk or 0207 7432 3017 [↑](#footnote-ref-1)