





DCUSA Consultation		At what stage is this document in the process?
<h2>DCP 443:</h2> <h2>Excess Capacity</h2> <p>Date Raised: 09/07/2024</p> <p>Proposer Name: Peter Waymont</p> <p>Company Name: Eastern Power Networks</p> <p>Party Category: DNO</p>		01 – Change Proposal
		02 – Consultation
		03 – Change Report
		04 – Change Declaration
<p>Purpose of Change Proposal</p> <p>To drive the correct customer behaviour regarding exceeding capacity.</p>		
	<p>This document is a Consultation issued to DCUSA Parties and any other interested Parties in accordance with Clause 11.14 of the DCUSA seeking industry views on DCP 443.</p> <p>The Working Group recommends that this Change Proposal should proceed to Consultation.</p> <p>Parties are invited to consider the questions set in section 10 and submit comments using the form attached as Attachment 2 to dcusa@electralink.co.uk by Friday 04 October 2024.</p>	
	<p>Impacted Parties</p> <p>Suppliers/DNOs/IDNOs/CVA Registrants</p>	
	<p>Impacted Clauses</p> <p>Schedules 16/17 and 18</p>	

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Timetable		Contact: Code Administrator  DCUSA@electralink.co.uk  020 7432 3011 Proposer: Peter Waymont  peter.waymont@ukpowernetworks.co.uk  +44 1293 657939
Activity	Date	
Initial Assessment Report	17 July 2024	
Consultation Issued to Industry Participants	13 September 2024	
Change Report Approved by Panel	15 January 2025	
Change Report issued for Voting	16 January 2025	
Party Voting Closes	06 February 2025	
Change Declaration Issued to Parties/Authority	10 February 2025	
Authority Decision	TBC	

1 Summary

What?

- 1.1 To amend the CDCM and EDCM such that excess capacity charges are set in order to incentivise the correct customer behaviours.

Why?

- 1.2 Customer behaviour may be sub-optimal as a result of the existing processes.

How?

- 1.3 To set the daily exceeded capacity charge to give the right messages/cost signals to incentivise/influence customers to not exceed their MIC.
- 1.4 One solution might be using the highest Maximum Demand (MD) in the preceding 12 months, for which we have provided draft legal text. This is how we charged excess capacity for at least 16 years prior to CDCM and EDCM.
- 1.5 Alternatively calculating the exceeded capacity to be double the capacity charge (which is broadly the difference between the two charges when Customer Contributions was utilised) would be an alternative approach.

2 Governance

- 2.1 This CP satisfies the criteria for a Part 1 Matter as it impacts the methodologies.
- 2.2 This consultation is issued for a period of 15 working days. The Working Group will review the responses after this period.

3 Why Change?

- 3.1 Under the CDCM (Schedule 16 of the DCUSA) and EDCM (Schedule 17 and 18 of the DCUSA) sites that are billed on a site specific basis receive capacity charges based on their Maximum Import Capacity (MIC)/Maximum Export Capacity (MEC) and their maximum demand:
 - (a) a capacity charge, pence/kilovolt-ampere(kVA)/day, for Maximum Import Capacity (MIC) and/or Maximum Export Capacity (MEC);
 - (b) an excess capacity charge, pence/kVA/day, if a site exceeds its MIC/MEC.
- 3.2 Excess capacity charges are described in the DNOs' Use of System Charging Statement:

"Where a Customer takes additional, unauthorised capacity over and above the MIC/MEC, the excess will be classed as exceeded capacity. The exceeded portion of the capacity will be charged at the excess capacity charge p/kVA/day rate, based on the difference between the

MIC/MEC and the actual capacity used. This will be charged for the full duration of the billing period in which the breach occurs.”

- 3.3 For designated EHV sites, charged under the EDCM, the capacity tariff and excess capacity tariff are equal.
- 3.4 From the introduction of the CDCM in 2010/11 until 2017/18 the capacity tariff and the excess capacity tariff were equal.
- 3.5 In 2013 DCP 161 ‘Excess Capacity Charges’¹ was raised, with implementation in 2018/19. This removed the Customer Contribution from the excess capacity charge. This had the effect of increasing the excess capacity tariff and introducing a differential between the capacity tariff and the excess capacity tariff.
- 3.6 Ofgem’s Access and Forward Looking Charges Significant Code Review (the Access SCR)² concluded in 2022, resulting in changes to the Connections Charging policy which required a review of the current assumptions used for customer contributions in the CDCM.
- 3.7 As a result of Ofgem’s decision on the Access SCR and following implementation of DCP406/A ‘Access SCR: Changes to CCCM’ the following changes have been made to the connection charging policy:
- **Remove** the contribution to reinforcement for demand connections by introducing a ‘fully shallow’ connection charging boundary. This will involve connecting customers paying for extension assets only.
 - **Reduce** the contribution to reinforcement for generation connections by introducing a ‘shallow-ish’ connection charging boundary. This will involve connecting customer paying for extension assets and a contribution towards reinforcement at the voltage level at point of connection.

Table 1 shows the change from current arrangements, as published in Ofgem’s final decision of the Access SCR:

¹ <https://www.dcusa.co.uk/change/excess-capacity-charges/>

² [Access and Forward-Looking Charges Significant Code Review: Decision and Direction | Ofgem](#)

	Extension assets	Reinforcement assets at connection voltage	Reinforcement assets at connection voltage +1
Current arrangements	Connecting customer pays 100%	Connecting customer pays a proportion of the reinforcement costs	Connecting customer pays a proportion of the reinforcement costs
New arrangements (Demand)	Connecting customer pays 100%	Fully funded by the DNO via DUoS	Fully funded by the DNO via DUoS
New arrangements (Generation)	Connecting customer pays 100%	Connecting customer pays a proportion of the reinforcement costs	Fully funded by the DNO via DUoS

Table 1 – Ofgem’s Access SCR illustration of changes

- 3.8 The change in connection charging policy reflected in the Common Connections Charging Methodology Statement (CCCMS) required a review of the assumptions used for customer contributions in the CDCM.
- 3.9 Following discussions between DNOs at the DCMDG in meetings 61 to 66 during the spring/summer of 2023, it was agreed that all DNOs would reduce the customer contribution inputs to zero for all network levels and customer groups when setting 2025/26 charges and going forwards. Further details can be found in the DCMDG Minutes: [Distribution Charging Methodologies Development Group \(DCMDG\)](#)
- 3.10 The effect of reducing the customer contribution to zero was an increase in the capacity tariff to the same level as the excess capacity tariff, removing the differential between the two tariffs, which can be seen as reducing the incentive for a site to maintain their demand within the constraints of their MIC.
- 3.11 The below table shows an example of current/historical levels of excess capacity charge.

Eastern Power Networks plc LV Site Specific Typical Monthly Capacity Charge		2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
Tariff	Agreed Capacity (p/kVA/day)	3.39	3.14	3.15	3.06	3.40	3.64	3.49	3.65	3.48	4.15	7.41
	Excess Capacity (p/kVA/day)	3.39	3.14	3.15	6.96	7.26	7.56	7.31	7.57	7.33	8.23	7.41
Capacity	Agreed Capacity (kVA)	100	100	100	100	100	100	100	100	100	100	100
	Excess Capacity (kVA)	5	5	5	5	5	5	5	5	5	5	5
Monthly Charge (based on 31 day month)	Agreed Capacity (£)	£105.09	£97.34	£97.65	£94.86	£105.40	£112.84	£108.19	£113.15	£107.88	£128.65	£229.71
	Excess Capacity (£)	£5.25	£4.87	£4.88	£10.79	£11.25	£11.72	£11.33	£11.73	£11.36	£12.76	£11.49
	Total Capacity (£)	£110.34	£102.21	£102.53	£105.65	£116.65	£124.56	£119.52	£124.88	£119.24	£141.41	£241.20

3.12 As a result of this change the proposer has seen the following situations arise:

- a consultant stated “With the capacity and excess capacity charges being the same, there is little incentive for the customers to increase their capacities, especially if there are “costs to do this.”
- a customer emailed to tell the DNO that they will exceed their capacity for two weeks this summer and will be happy to pay the excess.
- dialogue with a customer who stated that as excess capacity charges will be the same as standard capacity charges, a consumer will no longer be charged at a higher rate for exceeding capacity, which is not the incentivizing message the charges should be showing.
- A customer requested a reduction in their capacity on the basis they will pay the excess when they do exceed (this wasn’t agreed to by the Distributor

3.13 Where a customer properly applies for an upgrade in their capacity, they are not allowed to reduce it again for 12 months (Schedule 16 Paragraph 149). This creates a discrimination/disincentive between those who have requested an increase and will pay for at least 12 months as compared to those who exceed their capacity and do not request the increase in Capacity and potentially pay less in 12 months.

3.14 The National Terms of Connection (NTC) give certain rights to the Distributor when a customer exceeds their capacity but in practice this can be a long-winded process, that endures long after the event and leaves the Distributor with no real sanctions.

3.15 Taking an excess capacity is not an agreement to that capacity being available and the NTC still apply to the MIC/MEC.

Question 1 – Do you understand the intent of the CP?

Question 2 – Are you supportive of the principle of the CP?

4 Working Group Assessment

Working Group Assessment

- 4.1 The DCUSA Panel established a Working Group to assess this CP. Meetings were held in open session and the minutes and papers of each meeting are available on the DCUSA website – www.dcusa.co.uk.
- 4.2 The Proposer walked the Working Group through the change and explained that the purpose of this change is to amend the CDCM and EDCM as such that excess capacity charges are set in order to discourage use of capacity in excess of a site's MIC. Customer behaviour may be sub-optimal as a result of the existing processes.
- 4.3 In order to do this, it is proposed that the daily excess capacity charge is set to give the right messages/cost signals to influence customer behaviour.
- 4.4 One solution is to charge excess capacity charges based on the highest MD in the preceding 12 months, for which we have provided draft legal text. This is how some DNOs charged excess capacity prior to the implementation of the CDCM. The other DNOs used other methods, including some that used the method currently implemented in the CDCM, to charge for capacity in excess of the MIC.
- 4.5 The impact of this solution would be that excess capacity charges would change from being billed for one complete month (being the month in which the capacity was exceeded) to being billed for 12 months (being the month in which the capacity was exceeded and the following 11 months). Excess capacity charges will only be levied on the highest exceeded capacity in the preceding 12 months (ie if there is an excess capacity in more than one month then the higher of the two will be billed for 12 months from the date it occurs)
- 4.6 The Working Group also considered what should happen if there is a change in MIC within the 11 months following an exceeded capacity. The Working Group considered that any excess capacity charge will be negated by any change in MIC, which will take precedent from the date it is effected. This is because the exceeded capacity was an excess over a different underlying MIC value and so charging a new increased MIC and an excess could result in double counting, and charging a new reduced MIC with an excess does not recognise that there has been a change in use at the site. The Working Group seeks views on this approach...
- 4.7 The legal text in Section 8 provides the formula for this approach.
- 4.8 The following examples have been included in **Attachment 3 Excess Capacity Worked Examples** in order to illustrate the chargeable capacity and capacity charges under the current methodology and this proposed solution.

Current methodology - charged for the full duration of the billing period in which the excess capacity occurs

- Example 1 – Max Demand Exceeds MIC in one month only

Proposed methodology- based on the highest MD in current month and preceding 11 months

- Example 2 - Max Demand Exceeds MIC in one month only

- Example 3 - Max Demand exceeds MIC in two months, with the MD in the second exceeded month lower than the MD in the first exceeded month
- Example 4 - Max Demand exceeds MIC in two months, with the MD in the second exceeded month higher than the MD in the first exceeded month
- Example 5 - Max Demand exceeds MIC every month, with constant excess capacity
- Example 6 - Max Demand exceeds MIC every month, with variable excess capacity

Examples 7 and 8 illustrate the impact of the Working Group's proposal for resetting excess capacity charges following a change of MIC.

- Example 7 - Max Demand exceeds MIC in one month only, decrease in MIC in subsequent month (note, in these circumstances a reduction in MIC would only be allowed where there has been a change in use or setup on site which is shown to have reduced capacity requirements)
- Example 8 - Max Demand exceeds MIC in one month only, increase in MIC in subsequent month

Alternative approach

- 4.9 The Working Group considered if there are any alternative approaches. One approach would be to reintroduce a differential between the capacity tariff and excess capacity tariff.
- 4.10 This could be done artificially e.g. doubling the excess capacity tariff in comparison to the capacity tariff (which is broadly the difference between the two charges when Customer Contributions was utilised). However, it was noted that whatever solution is proposed needs to be cost reflective and it is not clear how this would be.
- 4.11 The Working Group are seeking views on whether it is appropriate to reintroduce a differential between the capacity tariff and excess capacity tariff and how this could be done in a cost reflective way.

Question 3 – Do you believe that the proposed solution of charging excess capacity charges each month based on the MD in the previous 12 months is suitable? Please provide rationale.

Question 4– Would an alternative process that reintroduces the differential between the capacity tariff and excess capacity tariff be a more suitable solution e.g. by doubling the excess capacity tariff? Is there a cost reflective way to do this? Please provide details and rationale.

Question 5 – Are there any other options that have not been mentioned that would discourage customers from exceeding their MIC? Please provide details

Question 6 – Should a change in MIC, either an increase or a decrease (as in example 7 and 8 above), reset the excess capacity charges? Please provide rationale.

- 4.12 The CP only considered import capacity charges and did not include export capacity charges. The working group are seeking views on whether excess capacity charges for export tariffs should also be considered.
- 4.13 Additionally, the EDCM has a different methodology for calculating capacity charges, which does not result in a differential between the capacity and excess capacity tariffs. The working group is

seeking views on whether this CP should consider the EDCM methodology as well as the CDCM methodology.

Question 7– Should this change include both import and export excess capacity charging? Please provide your rationale

Question 8 – Should this change include EDCM excess capacity charging? Please provide your rationale.

4.14 It was queried whether there would be any potential system changes required for this change. It was noted that there would be system changes required but the scale of these system changes would be dependent on which solution was used:

- Using the highest MD in the preceding 12 months would require changes to the way the billing systems calculate the excess capacity each month, as it would need to look at the MD in the preceding 12 months not just in the current billing period.
- Reintroducing a differential between the capacity and excess capacity tariffs would not require any system changes, as it only changes the value of the tariff to be uploaded into the system.

4.15 The Working Group are seeking views on whether any system changes would be required for the solutions proposed.

Question 9 – What system changes would be required for the proposed solutions, or for any alternative solutions you have suggested? Please provide details.

4.16 It was noted that the point of increasing this charge was to incentivise the correct customer behaviour which would lead to more efficiency and also protect other customers from being impacted by a site exceeding their capacity

4.17 The Working Group would like views from parties as to what the potential customer impacts could be if this CP were to be approved.

Question 10 – Does this change suitably incentivise customers not to exceed their MIC? Please rationale.

4.18 A Working Group member queried if there would be any other unintended consequences of changing the basis of charging excess capacity.

4.19 The Working Group were not aware of any unintended consequences but are seeking views on whether any Party is aware of any unintended consequences of changing the basis of, as this would help to inform the solution.

Question 11 – Are you aware of any unintended consequences of
A-Billing Excess Capacity based on the highest MD over 12 months
B-creating a differential rate for excess capacity.
C- Any alternative solution you have suggested

Please provide details.

- 4.20 One reason for raising this CP is the Proposer's concern that without a stronger disincentive to exceed the MIC, more sites could exceed their MIC in the future, which could have consequences for other customers connected to the network and for Network Planning.
- 4.21 The Working Group considered what the impacts to industry would be if large numbers of customers exceeded their MIC, in terms of reinforcement plans and network services to Distributors.
- 4.22 The Working Group were not clear on what these impacts could be so would like to seek Party views on whether there would be impacts/consequences to short and long-term planning and or services if large numbers of customers continued to exceed their MIC.

Question 12 – Do you have a view on what consequences there could be of customers exceeding MIC, for long-term and/or short-term DNO planning and/or DSO services.

5 Relevant Objectives

Assessment Against the DCUSA Objectives

- 5.1 For a DCUSA Change Proposal to be approved it must be demonstrated that it better facilitates the DCUSA Objectives. There are five General Objectives and six Charging Objectives.
- 5.2 The Proposer considers that the following DCUSA Objectives are better facilitated by this CP:

	DCUSA Charging Objectives	Identified impact
<input checked="" type="checkbox"/>	1. That compliance by each DNO Party with the Charging Methodologies facilitates the discharge by the DNO Party of the obligations imposed on it under the Act and by its Distribution Licence	Positive
<input checked="" type="checkbox"/>	2. That compliance by each DNO Party with the Charging Methodologies facilitates competition in the generation and supply of electricity and will not restrict, distort, or prevent competition in the transmission or distribution of electricity or in participation in the operation of an Interconnector (as defined in the Distribution Licences)	Positive
<input type="checkbox"/>	3. That compliance by each DNO Party with the Charging Methodologies results in charges which, so far as is reasonably practicable after taking account of implementation costs, reflect the costs incurred, or reasonably expected to be incurred, by the DNO Party in its Distribution Business	None
<input type="checkbox"/>	4. That, so far as is consistent with Clauses 3.2.1 to 3.2.3, the Charging Methodologies, so far as is reasonably practicable, properly take account of developments in each DNO Party's Distribution Business	None

<input type="checkbox"/>	5. That compliance by each DNO Party with the Charging Methodologies facilitates compliance with the EU Internal Market Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators; and	None
<input type="checkbox"/>	6. That compliance with the Charging Methodologies promotes efficiency in its own implementation and administration.	None

5.3 The Working Group believes that DCUSA Charging Objective 1 is better facilitated as Condition 7A of the Distribution Licence is concerned with the efficient and economic operation of the total system, and Objective 2 is better facilitated by this change as it would send a strong signal to Customers that where they exceed their capacity they will face higher charges, it would also ensure that the network is more effectively utilised.

Question 13 – Do you consider that the proposal better facilitates the DCUSA Objectives? Please give supporting reasons.

6 Impacts & Other Considerations

Does this Change Proposal impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

6.1 This Change Proposal may impact upon the DUoS SCR but should proceed as it is a relatively simple change that can and should be dealt with now, rather than waiting for the outcome of the DUoS SCR, which may still be some way from being known.

Consumer Impacts

6.2 There are no consumer impacts other than those that have already been mentioned in this CP.

Does this Change Proposal Impact Other Codes?

6.3 The Working Group felt it did not.

Environmental Impacts

6.4 In accordance with DCUSA Clause 11.14.6, the Working Group assessed whether there would be a material impact on greenhouse gas emissions if this CP was implemented. The Working Group did not identify any material impact on greenhouse gas emissions from the implementation of this CP.

Question 14 – Are you aware of any wider industry developments that may impact upon or be impacted by this CP?

7 Implementation

- 7.1 This CP should be implemented on 1 April 2026 as this aligns with the new yearly charging statements.

Question 15 – Are you supportive of the proposal implementation date?

8 Legal Text

- 8.1 The legal text for this CP is provided as Attachment 1.
- 8.2 Amend Schedules 16, 17 and 18 as follows

Schedule 16

153. Where a customer takes additional capacity over and above the MIC without authorisation, the excess will be classed as exceeded capacity. The exceeded portion of the capacity will be charged at the exceeded capacity rate (p/kVA/day). The exceeded capacity will be charged for the duration of the month, and derived as follows:

Exceeded capacity (kVA) = max (0, Chargeable capacity – MIC)

Where:

Chargeable capacity = max (actual capacity utilised in that month or in the preceding 11 months), as set out below

MIC = Maximum Import Capacity

Schedule 17 and 18

- 20.6 For Connectees other than those that have an agreement with the DNO, the terms of which require them, for the purposes of P2/6 compliance, to export power during supergrid transformer (SGT) outage conditions, the exceeded portion of the export capacity is charged at the same rate as the capacity that is within the Maximum Export Capacity. This is charged for the duration of the month ~~in which the breach occurs~~ based on the highest excess in that month or in the preceding 11 months.
- 20.7 For Connectees other than those with DSM agreements, the exceeded portion of the import capacity is charged at the same rate as the capacity that is within the Maximum Import Capacity. This is charged for the duration of the month ~~in which the breach occurs~~ based on the highest excess in that month or in the preceding 11 months.
- 20.8 Sites subject to DSM arrangements would normally pay the DSM-adjusted capacity charge for capacity usage up to their Maximum Import Capacities.
- 20.9 If sites with DSM agreements were to exceed their maximum import capacities, the exceeded portion of the capacity will be charged at a different rate. This will be charged for the duration of the month ~~in which the breach occurs~~ based on the highest excess in that month or in the preceding 11 months. This charge for exceeded capacity (in p/kVA/day) would be determined as follows;

[Exceeded capacity charge in p/kVA/day] = [Import capacity charge p/kVA/day] +
 (([FCP capacity charge p/kVA/day] + ([FCP super-red rate p/kWh] * [Average kW/kVA
 adjusted for part year] * [number of super-red hours connected] / ([days in Charging
 Year] – [Days for which not a customer]))) * (1 - ([chargeable capacity]/ [Maximum
 Import Capacity]))

Where:

The FCP super-red unit rate and FCP capacity charges in the equation above are the charges before any adjustments for DSM have been made.

21.1 Table 21.1 summarises the method of application of import charge components.

Table 21.1 Application of EDCM import charge components

Tariff component	Unit	Application
Import fixed charge	p/day	Applied as a fixed charge.
Import capacity charge	p/kVA/day	Applied to the Maximum Import Capacity.
Exceeded import capacity charge	p/kVA/day	Applied to exceeded capacity for the duration of the month in which the breach occurs based on the highest excess in that month or in the preceding 11 months (except for sites which operates subject to grid code requirements for generation)
Import super-red unit rate	p/kWh	Applied to active power units consumed during the DNO Party's super-red time band.

21.2 Table 21.2 summarises the method of application of export charge components.

Table 21.2 Application of EDCM export charge components

Tariff component	Unit	Application
Export fixed charge	p/day	Applied as a fixed charge.
Export capacity charge	p/kVA/day	Applied to the Chargeable Export Capacity.
Exceeded export capacity charge	p/kVA/day	Applied to exceeded capacity for the duration of the month in which the breach occurs based on the highest excess in that month or in the

		preceding 11 months (except for sites which operates subject to grid code requirements for generation)
Export super-red unit rate	p/kWh	Applied to active power units exported during the DNO Party's super-red time band.

Text Commentary

8.3 This reinforces that the excess capacity change is based on the highest MD in a 12-month period

Question 16 – Does the legal text suitably and clearly delivery the proposed solution? If not, please provide rationale.

Question 17- Do you have any comments on the draft legal text?

8.4 Some members of the Working Group felt that adding a sentence into the legal text to explain the impact of this change was helpful. They suggested adding the following into each of the methodologies “For any individual exceedance, the Exceeded Capacity charge may therefore be due for up to 12 months”. The Working Group seeks views on this approach.

Question 18– Should the legal text explain the impact of this change?

Question 19 – Do you have any comments on the proposed wording regarding the impact?

8.5 . The legal text does not deal with the concept of resetting the excess following a change of MIC. The Working Group seeks views on how this could be accommodated

Question 20– How should the legal text deal with changes in MIC?

Question 21 -Do you have any additional comments for this consultation?

9 Consultation Questions

9.1 The Working Group is seeking industry views on the following consultation questions:

No.	Questions
1	Do you understand the intent of the CP?
2	Are you supportive of the principle of the CP?
3	Do you believe that the proposed solution of charging excess capacity charges each month based on the MD in the previous 12 months is suitable? Please provide rationale.
4	Would an alternative process that reintroduces the differential between the capacity tariff and excess capacity tariff be a more suitable solution e.g. by doubling the excess capacity tariff? Is there a cost reflective way to do this? Please provide details and rationale.

5	Are there any other options that have not been mentioned that would discourage customers from exceeding their MIC? Please provide details.
6	Should a change in MIC, either an increase or a decrease (as in example 7 and 8 above), reset the excess capacity charges? Please provide rationale.
7	Should this change include both import and export excess capacity charging?
8	Should this change include EDCM excess capacity charging? Please provide your rationale.
9	What system changes would be required for the proposed solutions, or for any alternative solutions you have suggested? Please provide details
10	Does this change suitably incentivise customers not to exceed their MIC? Please rationale.
11	Are you aware of any unintended consequences of <ul style="list-style-type: none"> A. Billing Excess Capacity based on the highest MD over 12 months B. Creating a differential rate for excess capacity. C. Any alternative solution you have suggested Please provide details.
12	Do you have a view on what consequences there could be of customers exceeding MIC, for long-term and/or short-term DNO planning and/or DSO services.
13	Do you consider that the proposal better facilitates the DCUSA Objectives? Please give supporting reasons.
14	Are you aware of any wider industry developments that may impact upon or be impacted by this CP?
15	Are you supportive of the proposal's implementation date?
16	Does the legal text suitably and clearly delivery the proposed solution? If not, please provide rationale.
17	Do you have any comments on the draft legal text?
18	Should the legal text explain the impact of this change?
19	Do you have any comments on the proposed wording regarding the impact?
20	How should the legal text deal with changes in MIC?
21	Do you have any additional comments for this consultation?

- 9.2 Responses should be submitted using Attachment 2 to dcusa@electralink.co.uk no later than 04 October 2024.
- 9.3 Responses, or any part thereof, can be provided in confidence. Parties are asked to clearly indicate any parts of a response that are to be treated confidentially.

10 Attachments

- Attachment 1 – DCP 443 Legal Text
- Attachment 2 – DCP 443 Consultation Response Form
- Attachment 3 – DCP 443 Excess Capacity Worked Examples
- Attachment 4 – DCP 443 Change Proposal Form

