

DCP 446 Working Group Meeting 01

17 December 2024 at 13:00 - Web-Conference

Attendee	Company
Working Group Members	
Brian Sweeney [BS]	UK Power Networks
Donna Jamieson [DJ]	IDCSL
Drew Johnstone [DJ]	Northern Powergrid
James Devriendt [JD]	UK Power Networks
John Anderson [JA]	E (Gas and Electricity)
Liam Sweeney [LS]	Ofgem
Mark Mclean [MM]	SP Energy Networks
Mark Rose [MR]	UK Power Networks
Monique Pereira [MP]	Indigo Networks
Peter Waymont [PW]	UK Power Networks
Shaun Longstaff [SL]	National Grid
Victoria Burkett [VB]	SSE Energy Supply Limited
Will Collins [WC]	Ofgem
Code Administrator	
Craig Booth [CB]	ElectraLink (Chair)
Hannah Proffitt [HP]	ElectraLink (Secretariat)
Richard Colwill [RC]	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 once the minutes have been approved.

Apologies

- 1.2 No apologies were received ahead of the meeting.

Competition Law Guidance and Terms of Reference

- 1.3 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.

Action Log

- 1.4 An action log will be used for this Working Group when actions arise.

2. Purpose of the Meeting

- 2.1 The Chair set out that the purpose of the meeting was to review DCP 446 and to consider the next steps.

3. Overview of DCP 446 ‘Emergency Disconnections’

- 3.1 The Proposer, MR advised that the change seeks to support the DNO in the process of recovering reasonable costs from connected parties or their agents who drive the need for an emergency disconnection or de-energisation.
- 3.2 MR advised that they are looking to introduce clear wording in the National Terms of Connection to cover all emergency disconnection and de-energisation scenarios and to enhance the cost reflectivity, avoiding the socialisation of these costs. MR noted that they are looking to implement in a way to support cost recovery.
- 3.3 MR clarified that the change is not for Suppliers to introduce or manage and does not seek to change the approach DNOs have towards deciding whether a disconnection or de-energisation is required. MR confirmed that this would not be mandatory for all DNOs to follow.
- 3.4 MR outlined some examples of situations, such as cannabis farm disconnections, demolition sites, fires, floods or road traffic accidents where they have to go out immediately and disconnect the supply. MR presented pictures of some examples.
- 3.5 DJ asked for clarity on what the current process is, and whether any of the costs are currently being recovered, particularly in cases where it is clear who is at fault. MR noted that they are actively doing this for cable damage jobs at the moment, and are looking to develop more for this area.

- 3.6 JD clarified that if it is the same party wanting the connection as wanted the disconnection, they would recover those costs there, however if it is not the same party it can be very difficult to recover the cost. JD noted that this is what is driving the Change Proposal and that having wording in DCUSA to support recovering those costs will be beneficial.

4. Review and Discussion of Change Proposal

Legal Text

- 4.1 The Working Group reviewed the suggested legal text and agreed some amendments.
- 4.2 A summary of discussions are below.
- The Chair advised that they had received the following query ahead of the meeting. *‘Should the proposed changes to 6.3 of Sections 3 and 4 of the NTC also be applied to 5.7? Given that Paragraph 7 of Section 2 doesn’t differentiate between the method of cutting off the flow, it may be prudent to extend the scope to Emergency Disconnections and De-Energisations and repeat the changes intended for 6.3 in 5.7 as well.’* The Working Group agreed.
 - Members discussed the possibility of amending the definition of ‘Customer’ instead of the specific paragraphs, however decided this would be out of scope as the definition is in other areas.
 - One member considered whether removing ‘were the result of the Customer’s, acts or omissions’ from 6.3 would weaken the argument. The group decided that it actually strengthens the argument as proving the act or omission is often difficult.
 - The group agreed to add ‘or at the request of a competent authority’ to 5.7 and 6.3.
 - Members discussed that in theft and legal cases, it is often hard to identify who is responsible and acknowledged that these costs often need to be written off as bad debt. Members agreed that recording this will be a benefit so it can be reported to Ofgem. Members discussed that illegal activity is covered under the theft obligations in the Retail Energy Code (REC).
 - Members agreed to add ‘that were not directly caused by us’ to paragraph 7, to avoid any charges being put on customers if the issue was caused by the network.
 - One member raised a possible scenario in which a Supplier’s agent attends a site and does something that results in the need for an emergency disconnection. The member questioned whether the Supplier would be invoiced for this. Members discussed this and agreed that it is out of scope of this change.
 - The group considered whether reconnections should be included but agreed it should not as it should be the company’s decision whether to facilitate the reconnection or go down the connections route.

Consultation

- 4.3 Based on discussions, the Working Group agreed to include the following questions in the consultation alongside the standard questions.
- Do you agree that DNOs/IDNOs should be able to recover costs as a result of de-energising or disconnecting the supply and should DNOs/IDNOs be able to recover costs for disconnecting a supply for safety reasons, legal reasons or both? Please provide your rationale.
 - Are there any other reasons for emergency disconnections or de-energisations that DNOs/IDNOs should be able to recover costs for? Please provide your rationale.
- 4.4 Regarding the DCUSA General Objectives, the Working Group agreed to include the following paragraph *'The change will support DNOs in the recovery of costs directly from customers needing emergency disconnection or de-energisation as opposed to socialisation of these costs across all users of the distribution system and discourage unsafe practices by passing on the costs of emergency work, which would be more expensive than planned work.'*

5. Review/Update Work Plan

- 5.1 The Chair agreed to draft the consultation and to issue to Working Group members for review, alongside the legal text. Members agreed for the consultation to be issued on 02 January 2025 with responses due on 24 January 2025.
- 5.2 The Working Group will next meet on Monday 03 February 2025 at 10am to review responses.

6. Any Other Business

- 6.1 No other business was raised.

New and Open Actions

Action Ref.	Action	Owner	Update

Closed Actions

Action Ref.			Update