

DCP 442 Working Group - Meeting 06

21 January 2025 at 13:00 - Web-Conference

Attendee	Company
Working Group Members	
Edda Dirks [ED]	SSE Gen
Lee Wells [LW]	NPg
Michael Allison [MA]	SSE
Monique Pereira [MP]	Indigo Networks
Sven Hoffmann [SH]	National Grid
Tracey Taylor [TT]	ENWL
Code Administrator	
Craig Booth [Chair] (Chair)	ElectraLink
Mel Kendal [MK] (Technical Secretariat)	ElectraLink
Apologies	
Gavin Stewart [GS]	SSE

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 Working Group reviewed the previous meeting minutes and agreed them to be an accurate reflection of the discussions held.
- 1.3 An action log has been created and all updates are provided in **Appendix A**.

2. Purpose of the Meeting

- 2.1 The Chair explained that the purpose of this meeting is to review and finalise the pros and cons table, draft Consultation and review the draft legal text within the Working Group and agree next steps.

3. Review and Finalise Pros and Cons Table

- 3.1 The Chair invited the Working Group to review the updated Pros and Cons document alongside ED's discussion note and agree next steps. The discussion note was presented live on screen, and this can be found as **Attachment 1**.
- 3.2 The Chair invited the Working Group to review feedback provided offline by both ED and LW.
- 3.3 The key updates can be found below:
- 3.4 ED circulated a document with a number of additions which are suggested to enhance the proposal.
- 3.5 ED suggested that the proposal could include measures that would align with the recommendations of the Energy Data Taskforce (EDTF) which was commissioned in 2018 by the Government, Ofgem and innovate UK to develop an integrated data and digital strategy that helps unlock the opportunities of a modern, decarbonised and decentralised Energy System. ED also noted that the EDTF's work is now being continued via the Modernising Energy Data – GOV.UK initiative.
- 3.6 The key recommendations set out by the EDTF are set out below:
- *Data visibility*
 - *Infrastructure and Asset Visibility*
 - *Operational Optimisation*
 - *Open Markets*
 - *Agile Regulation*
- 3.7 ED suggested that the Working Group consider including the following four proposals within the Consultation, following the EDTF's recommendations:
- *Add an alternative option of the Flexible Connection.*
 - *Add a requirement that DNOs publish a collation of the individual curtailment reports.*
 - *Amend Schedule 2D, paragraph 6.8, to increase the reporting frequency of the Flexibility Market Price Statement.*
 - *Add a requirement that DNOs publish a quarterly statement listing the various types of connection agreements they have contracted for.*
- 3.8 The Chair opened up the above suggestions to further comments by the rest of the Working Group – a number of members suggested that although it may be worth seeking additional opinions via Consultation, the above suggestions seem out of scope of this change.
- 3.9 The Proposer's view was to go ahead with the proposal as set out, and that any additional suggestions should be raised as a separate change as they do not deliver the intent of the proposal. It was also noted that the historical data that would be needed for the suggestions above does not exist.
- 3.10 Following the above discussion, ED suggested drafting a document (based on the suggestions provided above) including a number of Consultation questions for the Working Group to review and seek wider industry feedback as next steps. ED stated they are comfortable with the Consultation noting these are the suggestions of one Working Group member as opposed to the Working Group. The proposer believes that if the above suggestions are considered out of scope by the majority of

the Working Group, it will not make sense to ask Consultation questions on something that does not deliver the intent.

- 3.11 The Working Group reviewed the intent of the change, and it was noted that the intent is restrictive – the proposer stated that this was intentional.
- 3.12 In terms of next steps, the Chair suggested three potential ways of moving forward taking both views into account:
- Option 1 – Include an outline of both views within the Consultation and seek feedback as to whether wider industry agree with the Working Group that the suggested additions are out of scope.
 - Option 2 – Both views are articulated within an attachment to the Consultation, however it will be noted that the suggestive additions will not be progressed any further due to the majority view of the Working Group that they are out of scope of this change.
 - Option 3 – Include the discussions as an attachment to the Consultation with a conclusion that the suggested additions will not be taken forward; however, take the suggested additions to an alternate forum (i.e., the SIG) for wider industry members to discuss and provide feedback on with the potential of another Party raising an additional change if the desire is there.
- 3.13 Members discussed the above and the majority agreed that option 3 (providing wider industry with both views and the outcome of the discussions as an attachment but taking the discussions to the SIG for further views and next steps) would be the most appropriate way forward.
- 3.14 ED was comfortable with moving forward with Option 3, noting the Proposer’s comment that there is an ‘additional comments’ section within the Consultation document for wider industry to provide feedback if they wish to do so.
- 3.15 Although comfortable with this option, ED did suggest that they believe that the first of the four suggestions (add an alternative option of the Flexible Connection) is a variant of the original proposal and is minded taking this forward as an add-on to the proposal. The proposer stood by his opinion that this would require a change to the intent of the original proposal and does not deliver the current intent of the proposal.
- 3.16 After further discussion, a number of Working Group members discussed and agreed that the current number of alternate solutions may need to be re-reviewed and withdraw those that do not meet the intent of the scope. It was noted that any withdrawn solutions will be explained within an attachment to the Consultation with reasons as to why they were not chosen to be progressed further.

4. Review and Finalise Draft Consultation

- 4.1 The Chair presented the draft Consultation on screen for the Working Group to further discuss. This can be found as **Attachment 2**.
- 4.2 The key points can be found below:

- 4.3 Following the above discussions, the Chair separated the additional options considered out of scope by the Working Group into a separate table within the Consultation.
- 4.4 The Working Group agreed to add the alternate option proposed by ED into the 'out of scope' table of options (as option 4). This was drafted live during the meeting and can be found below:

Option	For	Against
Option 4 - Flexible Connection with the same Customer reporting requirements as a Curtailable Connection.	<ul style="list-style-type: none"> This would improve the current 'Flexible Connection' arrangements by making them more transparent for the Customer. Retains a key benefit of the Enduring Curtailable Connection. Simple. Transparent. 	<ul style="list-style-type: none"> The data is not available for all existing Flexible Connections. Creates an obligation that not all DNOs can currently comply with. Creates a need to develop the ability to get the data (or rely on reasonable endeavours).

- 4.5 ED agreed to update and finalise the wording for the table offline for the Working Group to review.

ACTION 06/01: ED to update and finalise option 4 of the 'out of scope' table of options offline for the Working Group to review.

- 4.6 The Chair amended the current Consultation questions to now reflect the two separate tables of the options that have been considered in scope of this change and those that are considered out of scope.
- 4.7 In regard to paragraph 4.23 of the draft Consultation, it was agreed that more clarification needs to be added with further description of the options presented. LW agreed to take an action to provide additional wording for paragraph 4.23 offline for the Working Group to review.

ACTION 06/02: LW to provide additional wording for paragraph 4.23 of the draft Consultation for the Working Group to review.

- 4.8 In regard to paragraph 1.9 of the draft Consultation, it was suggested that all bullets are reworded to present as impracticalities as that would be more suitable for what this section is trying to portray. LW agreed to take an action to reword the introduction paragraph to 1.9.

ACTION 06/03: LW to reword the introductory wording for paragraph 1.9 of the draft Consultation for the Working Group to review.

5. Review and Finalise Draft Legal Text

- 5.1 The Chair presented the draft legal text on screen for the Working Group to further discuss. This can be found as **Attachment 3**.
- 5.2 The Working Group was comfortable with the draft Legal Text as it currently stands and provided no further comments.

6. Work Plan and Agree Next Steps

- 6.1 The Working Group discussed the next steps, and the following items were captured:
- ED to update and finalise option 4 of the 'out of scope' table of options offline for the Working Group to review.
 - LW to update wording to both paragraphs 1.9 and 4.23 of the draft Consultation.

7. Any Other Business

- 7.1 The Chair asked the group whether there were any other items of business to discuss.
- 7.2 There were no other items raised.

8. Date of Next Meeting – 06 February 2025

- 8.1 The next Working Group meeting will be held on 06 February 2025 at 1pm.

9. Attachments

- Attachment 1_DCP 442 Discussion Note
- Attachment 2_DCP 442 Draft Consultation
- Attachment 3_DCP 442 Draft Legal Text
- Attachment 4_DCP 442 Work Plan

APPENDIX A

New and Open Actions

Action Ref.	Action	Owner	Update
05/01	The Secretariat to cross check TT's notes alongside the recording of the previous meeting and update paragraph 3.14 as necessary.	Secretariat	Ongoing. <i>Circulated for review.</i>
05/02	The Secretariat to cross check the recording of the previous meeting and update paragraphs 3.24/3.25 as necessary.	Secretariat	Ongoing. <i>Circulated for review.</i>
05/03	The Secretariat to check the recording of the previous meeting to clarify whether the sentence in paragraph 5.1 was added in error.	Secretariat	Ongoing. <i>Circulated for review.</i>
06/01	ED to update and finalise option 4 of the 'out of scope' table of options offline for the Working Group to review.	ED	New Action.
06/02	LW to provide additional wording for paragraph 4.23 of the draft Consultation for the Working Group to review.	LW	New Action.
06/02	LW to reword the introductory wording for paragraph 1.9 of the draft Consultation for the Working Group to review.	LW	New Action.

Closed Actions

Action Ref.			Update
04/01	TT to seek whether a bespoke forecast of curtailment is to be provided by the DNO was previously codified or not.	TT	Closed. <i>No further clarification provided.</i>

05/04	The Secretariat to include the Pros and Cons narrative within the draft Consultation for the Working Group to review.	Secretariat	Closed.
05/05	ED to review and update option 5 with the benefits of this solution for the Working Group to review at the next meeting.	ED	Closed.
05/06	The Secretariat to circulate a clean version of the updated Actions document for the Working Group for further review and comment offline.	Secretariat	Closed.
05/07	The Secretariat to circulate the draft Consultation to the Working Group for further review and comment offline.	Secretariat	Closed.
05/08	The Secretariat to circulate the updated draft legal text to the Working Group for further review and comment offline.	Secretariat	Closed.