

## DCP 463

### 'CHARGING NON-CONSUMING DE-ENERGISED CT-METERED SITES COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

| Company                              | Confidential/<br>Anonymous | 1. Do you understand the intent of DCP 463?   | Working Group Comments |
|--------------------------------------|----------------------------|---|------------------------|
| British Gas                          | Non-Confidential           | Yes   | Yes                    |
| National Grid                        | Non-Confidential           | Yes   | Yes                    |
| SP Energy Networks                   | Non-Confidential           | Yes   | Yes                    |
| The Electricity Network Company Ltd. | Non-Confidential           | Yes   | Yes                    |
| SSE Energy Supply Limited            | Non-Confidential           | Our understanding is that the intent of DCP463 is largely the same as that of DCP411, which Ofgem rejected in April 2024, with the main difference being that DCP463 is to apply to CT customers only (whereas DCP411 was to apply to all customers). | Yes                    |
| Diamond Energy Limited               | Non-Confidential           | Yes   | Yes                    |
| UK Power Networks                    | Non-Confidential           | Yes   | Yes                    |

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| Northern Powergrid   | Non-Confidential | Yes, we understand the intent of this DCP. | Yes |
| Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc  | Non-Confidential | Yes  | Yes |
| <p>Working Group Conclusions: Please note that there were two confidential respondents and whilst these confidential responses have been deleted from the response document, the conclusions and summaries for each question will reflect these confidential responses.</p> <p>10 respondents stated they understood the intent of the CP and provided no additional comments.</p> <p>One respondent noted the intent is largely the same as that of DCP 4111, which was rejected by Ofgem. They noted that DCP 463 applies to CT customers only, whereas DCP 411 was to apply to all customers.</p> |                  |  |     |

| Company     | Confidential/Anonymous | 2. Are you supportive of the principles of DCP 463?  | Working Group Comments |
|-------------|------------------------|--|------------------------|
| British Gas | Non-Confidential       | The proposer has drawn comparisons with the Ofgem approved DCP 440 “Consuming de-energised” modification. Whilst we were supportive of DCP 440 on the basis that there was evidence of a customer actually using |                        |

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|                                      |                  | <p>energy at a site and therefore should bear the costs of using the network we do not believe the same argument applies to DCP 463.</p> <p>Where sites are de-energised but not consuming there is often no customer present to pass on charges to and therefore any charges would end up as bad debt which would ultimately be borne by all customers.</p> <p>Our preference would be for a process to be put in place where Suppliers of long term de-energised sites are able to relinquish the “reserved” capacity to the network and for this to be incorporated in any network planning models.</p> |  |
| National Grid                        | Non-Confidential | Yes  |  |
| SP Energy Networks                   | Non-Confidential | In principle yes   |  |
| The Electricity Network Company Ltd. | Non-Confidential | In principle, we support the fact that a customer shouldn't receive reservation of capacity for free, but we have concerns that this solution may create too many distortions and opportunities for gaming (such as disconnecting and reconnecting in quick succession), resulting in the overall process being more inefficient to what is already in place.  |  |
| SSE Energy Supply Limited            | Non-Confidential | As we stated in our response to DCP411, we are supportive of the principle that customers should not be able to open-endedly reserve network capacity they don't require, thereby preventing other network users from  |  |

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|   |                  | accessing that capacity. However, in terms of the proposed approach, in our responses to the two consultations for DCP411, we raised a number of practical issues to consider. We don't consider that this proposal adequately addresses these. |  |
| Diamond Energy Limited  | Non-Confidential | Broadly yes – but with provisos   |  |
| UK Power Networks   | Non-Confidential | Yes   |  |
| Northern Powergrid  | Non-Confidential | No – we do not support the charging of legitimately de-energised sites for the reasons set out in our following responses.  |  |
| Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc   | Non-Confidential | Yes   |  |
| <p>Working Group Conclusions: Four respondents stated they were supportive of the principles of the DCP.</p> <p>Three respondents stated they agree in principle but have concerns, such as the solution creating too many distortions and opportunities for gaming.</p> <p>Four respondents stated they did not agree with the principles. Respondents noted that where sites are de-energised but not consuming there is often no customer present to pass charges on to and therefore any charges would end up as bad debt which would ultimately be borne by all customers. One</p> |                  |   |  |

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respondent suggested a process should be put in place where Suppliers of long term de- energised sites are able to relinquish the “reserved” capacity to the network and for this to be incorporated in any network planning models.

| Company                              | Confidential/<br>Anonymous | 3. Does the Electricity Act (Section 16-23) obligate a distributor to hold capacity as well as maintain the connection assets for De-energised sites? What are these obligations? | Working Group Comments |
|--------------------------------------|----------------------------|---|------------------------|
| British Gas                          | Non-Confidential           | The Electricity Act is unclear as to whether a distributor is obligated to maintain the connection assets for De-energised sites.   |                        |
| National Grid                        | Non-Confidential           | Unaware.  |                        |
| SP Energy Networks                   | Non-Confidential           | The Act does not impose an obligation to reserve capacity indefinitely for de-energised sites.  |                        |
| The Electricity Network Company Ltd. | Non-Confidential           | We are unable to comment on the interpretation of this matter within the Electricity Act, we believe this question should be presented to legal advisors for comment.             |                        |
| SSE Energy Supply Limited            | Non-Confidential           | The proposer should know the answer to this question.   |                        |
| Diamond Energy Limited               | Non-Confidential           | Dont know   |                        |

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| UK Power Networks  | Non-Confidential | <p>We believe that a distributor cannot remove an agreed capacity from a de-energised customer without the agreement of that customer, as stated in the NTC.</p> <p>The Electricity Act 1989 s16.4 requires that the duty to make a connection includes a duty to maintain the connections maintained. Making a connection requires the customer to specify the maximum power they require. Once the connection is made for the maximum power required, it must therefore be maintained. However the distributor may refuse to make a connection if it is not reasonable in all circumstances for them to be required to do so. It therefore follows they are not required to maintain a connection if it is not reasonable in all the circumstances to do so.</p> <p>Regardless of whether the majority of respondents to this question believe that the distributor does (or does not) have obligations to hold capacity this surely requires a legal opinion, could the WG invite Gowlings to a meeting to discuss in order to determine whether the distributor has such an obligation?</p> |  |
| Northern Powergrid | Non-Confidential | <p>Standard practise is that de-energised sites retain their maximum import capacity (MIC) during the period of de-energisation. Largely because we do not hold issue with that.</p> <p>However, it is our opinion that the MIC stated in the connection agreement does not need to be maintained under the Act. In the past we have noted that Ofgem have also stated the same opinion in the draft minutes of meeting 03 of DCP181 on 07 January 2015:</p> <p><i>3.2 Deirdre Bell [Ofgem] advised that Ofgem's interpretation is that the DNO has the obligation to maintain the physical connection but not</i></p>  |  |

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|  |  | <p><i>to maintain the capacity of the connection. There is a difference between the physical connection and the contractual connection.</i></p> <p>Additionally, we believe that it would be imperative to seek legal advice on the interpretation of this section of the Act before we progress with this DCP to get a firm position on this issue.</p> <p>Furthermore, we believe that a de-energised site, after a period of greater than 6-months of de-energisation, loses its right to connection and therefore the MIC, and can be disconnected if the DNO choose to do so.</p> <p>The NTC definition of De-energisation is as below (page 11) and section 5 of the NTC covers de-registration in general.</p> <p><i>“De-energisation” means the deliberate movement of any switch or the removal of any fuse or the taking of any other step whereby no electrical current can flow between the Distribution System and the Customer’s Installation at the Connection Point (and “De-energise(d)” shall be construed accordingly)</i></p> <p>This is under the NTC section 5 paragraph 12.11A</p> <p><i>12.11A: If at any time the Connection Point is De-energised for a continuous period exceeding 6 months, then the Company may (at any time thereafter while the Connection Point is De-energised, and having due regard to all the circumstances) give notice to the Customer that it considers that the connection is no longer required and request that the Customer responds in writing within 30 Working Days. Such notice must refer to the Company’s right to Disconnect the Connection Point if it is not reasonable in all the circumstances for the Company to maintain it</i></p> |  |
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| Southern<br>Electric Power<br>Distribution plc<br>and Scottish<br>Hydro Electric<br>Power<br>Distribution plc | Non-<br>Confidential | <p>S16(4) of the Electricity Act 1989 sets out that:</p> <p>(a) any reference to making a connection includes a reference to maintaining the connection (and continuing to provide the necessary electric lines or electrical plant) - (s16(4)(a)); and</p> <p>(b) any reference to requiring a connection includes a reference to requiring the connection to be maintained (and the continued provision of the necessary electric lines and electrical plant) – (s16(4)(b)).</p> <p>Therefore, where we are obliged to “make a connection” we are subsequently obliged to “maintain the connection” until, per s16(4)(3), “for so long as the connection is required”.</p> <p>Sections 16 – 23 does not appear to discuss what it means to “maintain a connection” nor is the capacity discussed. However, in respect of capacity, it may be helpful to set out how these obligations flow down from the Electricity Act 1989:</p> <ul style="list-style-type: none"> <li>• Under the Act, DNOs are only entitled to operate with an Ofgem granted licence. Standard Licence Condition 21 requires DNOs to have a Distribution Connection and Use of System Code Agreement –DCUSA.</li> <li>• The National Terms of Connection (NTC) form part of DCUSA.</li> <li>• DCUSA requires DNOs to pass these terms to their customers.</li> <li>• The NTC sets out the contractual basis on which we connect, energise, de-energise or disconnect – alongside details of the connection agreement.</li> <li>• Connection agreement /NTC does not appear to allow DNOs to remove a customer’s agreed capacity except with the agreement of the customer.</li> </ul> |  |
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Working Group Conclusions: Seven respondents stated that they either had no comment, were unsure, or stated that the Electricity Act is unclear on this topic.

The remaining respondents provided mixed views, depending on their interpretation of the Electricity Act. One respondent suggested this question is referred to the legal advisers. The Working Group agreed that a representative from Gowlings should be invited to the next meeting to discuss this matter.

| Company            | Confidential/<br>Anonymous | 4. The In the attached table (Attachment 4– DCP 463 Template for Question 4) can you please detail how many MPANs you have on record that are De energised with their total capacity that match the below criteria: <ul style="list-style-type: none"><li>• HH MIC/MEC site; and</li><li>• Was previously energised; and</li><li>• Is traded; and</li><li>• Has been De-energised for greater than 30 working days</li></ul> | Working Group Comments |
|--------------------|----------------------------|--|------------------------|
| British Gas        | Non-Confidential           | See attached confidential table  |                        |
| National Grid      | Non-Confidential           | Am unable to give you the total capacity and am unable to break it down to Measurement Class easily but have given the total consumption each year for which we cannot bill for as the MPANs are de-en.  |                        |
| SP Energy Networks | Non-Confidential           | See attached confidential table  |                        |

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|---|------------------|---|--|
| The Electricity Network Company Ltd.  | Non-Confidential | N/A   |  |
| SSE Energy Supply Limited   | Non-Confidential | We do not wish to provide this information and do not see it as relevant to the DCP.                                |  |
| Diamond Energy Limited  | Non-Confidential | N/A   |  |
| UK Power Networks   | Non-Confidential | We presume this will be anonymised for all respondents by summing responses together. It is provided on that basis. |  |
| Northern Powergrid  | Non-Confidential | See attached.   |  |
| Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc | Non-Confidential | Submitted.  |  |
| Working Group Conclusions See attachment 4 – DCP 463 De-energised site data                 |                  |   |  |

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| Company                              | Confidential/<br>Anonymous | 5. <u>For suppliers only</u> - Are there any existing obligations or processes that you are utilising or could utilise in order to minimise the volume of long term De-energised sites that maintain capacity? Please provide details on these processes that you are or could utilise. | Working Group Comments |
|--------------------------------------|----------------------------|---|------------------------|
| British Gas                          | Non-Confidential           | We visit our long term de-energised sites on an annual basis and attempt customer contact where possible.   |                        |
| National Grid                        | Non-Confidential           | N/A   |                        |
| SP Energy Networks                   | Non-Confidential           | N/A   |                        |
| The Electricity Network Company Ltd. | Non-Confidential           | N/A   |                        |
| SSE Energy Supply Limited            | Non-Confidential           | This is asking about our internal processes and is not relevant to the DCP.   |                        |
| Diamond Energy Limited               | Non-Confidential           | N/A   |                        |
| UK Power Networks                    | Non-Confidential           | N/A   |                        |

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|--|------------------|-----|--|
| Northern Powergrid   | Non-Confidential | N/A |  |
| Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc  | Non-Confidential | N/A |  |
| <p>Working Group Conclusions: Four responses were received to this question. One stated they do not have any specific processes in place. Another stated they did not feel that their internal processes were relevant to the DCP.</p> <p>Two respondents provided details of their processes, including visiting long term de-energised sites annually, attempting customer contact where possible, and monitoring flows and acting on these results.</p> |                  |     |  |

| Company     | Confidential/ Anonymous | 6. <u>For Suppliers only</u> - Are you as a supplier prevented by regulation/legislation from charging capacity to De-energised sites? If so, what is the regulation/legislation that prevents this?   | Working Group Comments |
|-------------|-------------------------|--|------------------------|
| British Gas | Non-Confidential        | In order to charge capacity to a de-energised site we need a valid contract in place with a customer. It is unclear to us if a deemed contract would be valid as the property is de-energised and non-consuming which would not appear to meet Ofgem Guidance on Deemed Contracts (6 <sup>th</sup> November 2023). |                        |

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|  |                  |   |  |
|--|------------------|---|--|
| National Grid  | Non-Confidential | N/A   |  |
| SP Energy Networks   | Non-Confidential | N/A   |  |
| The Electricity Network Company Ltd.                                 | Non-Confidential | N/A   |  |
| SSE Energy Supply Limited  | Non-Confidential | The proposer should know the answer to this question. |  |
| Diamond Energy Limited   | Non-Confidential | N/A   |  |
| UK Power Networks  | Non-Confidential | N/A   |  |
| Northern Powergrid   | Non-Confidential | N/A   |  |
| Southern Electric Power Distribution plc and Scottish Hydro Electric | Non-Confidential | N/A   |  |

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| Power Distribution plc  |  |  |  |
| <p>Working Group Conclusions: Four responses were received to this question.</p> <p>One respondent noted the Proposer should know the answer to the question and two provided no comment.</p> <p>One respondent noted that to charge capacity to a de-energised site they need a valid contract in place with a customer. They felt it is unclear if a deemed contract would be valid as the property is de-energised and non-consuming which would not appear to meet Ofgem Guidance on Deemed Contracts.</p> <p>The Working Group agreed to seek guidance from Gowlings regarding deemed contracts.</p> |  |  |  |

| Company                              | Confidential/<br>Anonymous | 7. <u>For Suppliers only</u> - Do you charge capacity on De-energised sites? | Working Group Comments |
|--------------------------------------|----------------------------|--|------------------------|
| British Gas                          | Non-Confidential           | No, we do not charge capacity on de-energised sites.                         |                        |
| National Grid                        | Non-Confidential           | N/a  |                        |
| SP Energy Networks                   | Non-Confidential           | N/A  |                        |
| The Electricity Network Company Ltd. | Non-Confidential           | N/A  |                        |

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|--|------------------|---|--|
| SSE Energy Supply Limited  | Non-Confidential | This is asking for commercial information from us and is not relevant to the DCP. |  |
| Diamond Energy Limited   | Non-Confidential | N/A   |  |
| UK Power Networks  | Non-Confidential | N/A   |  |
| Northern Powergrid   | Non-Confidential | N/A   |  |
| Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc  | Non-Confidential | N/A   |  |
| Working Group Conclusions: Four responses were received to this question. Three respondents stated they do not, and one stated that they felt the question was asking for commercial information that was not relevant to the DCP. |                  |   |  |

| Company | Confidential/<br>Anonymous | 8. <u>For both Supplier and Distributors</u> -In what circumstances can a traded MPAN be logically disconnected? | Working Group Comments |
|---------|----------------------------|--|------------------------|
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|                                      |                  |   |  |
|--------------------------------------|------------------|---|--|
| British Gas                          | Non-Confidential | We regularly receive rejections from distributors following logical disconnection requests due to them challenging the information we provide and subsequently requesting a physical disconnection at site which requires customer information. At this stage the customer is increasingly likely to have left due to the meter being removed and site often demolished.  |  |
| National Grid                        | Non-Confidential | Safety ie fire, meter bypasses, Cannabis Farm, cable damage or if requested by customer so works can be carried out on site eg asbestos removal/cut out changes.  |  |
| SP Energy Networks                   | Non-Confidential | Supplier must request logical disconnection for de-energised HH MPAN, for Non HH MPAN its basic verification of supplier and site details.  |  |
| The Electricity Network Company Ltd. | Non-Confidential | <p>Circumstances in which a traded MPAN is logically disconnected are as follows: If there has been a duplication, and a supply has two MPANs, and there has been a registration for both. This could be two MPANs raised on either of our two licences, but also if a developer has changed their I/DNO midway through construction and we have already raised MPANs. In the latter case we wouldn't disconnect until we know the other I/DNOs MPAN has been registered.</p> <p>To resolve issues occurring between a supplier registering and getting the meter fit. This is often due to a non-domestic MPAN being registered by a domestic licence, and because the meters haven't been fitted, a change of supply is unable to go through. The supply was never built; this could be to a site replan after the MPANs have been raised and registered.</p> |  |



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|  |                  |   |  |
|--|------------------|---|--|
| SSE Energy Supply Limited  | Non-Confidential | The proposer should know the answer to this question.   |  |
| Diamond Energy Limited   | Non-Confidential | N/A   |  |
| UK Power Networks  | Non-Confidential | A logical disconnection should only be for the removal of an MPAN which is no longer required but where no physical works are needed, such as a customer being on an E10 tariff and then having the secondary MPAN removed following a change.  |  |
| Northern Powergrid   | Non-Confidential | <p>These can be logically disconnected by either the supplier or the DNO when they are either:</p> <ul style="list-style-type: none"> <li>• No longer required (having been superseded by a new MPAN following a change at site).</li> <li>• Where registered/traded in error.</li> <li>• Have been physically disconnected.</li> <li>• Additional MPAN requested by supplier in error.</li> </ul>  |  |
| Southern Electric Power Distribution plc and Scottish Hydro Electric | Non-Confidential | Logical disconnections are usually requested by the supplier via a D0132 flow. These can be for a variety of reasons but generally due to the MPAN being redundant. For instance, in our SHEPD areas where smart Economy 7 meters are being rolled out but the exiting site has two MPANs, one being whole current and the other being a redundant legacy ‘stored heat’ MPAN. Another circumstance would be if an SVA MPAN was moving to CVA. |  |

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| Power<br>Distribution plc  |  |  |  |
| <p>Working Group Conclusions: Ten responses were received to this question. Two provided no comment and the remaining eight respondents provided a variety of circumstances, including the following.</p> <ul style="list-style-type: none"> <li>· If there has been a duplication, and a supply has two MPANs, and there has been a registration for both.</li> <li>· A logical disconnection should only be for the removal of an MPAN which is no longer required but where no physical works are needed, such as a customer being on an E10 tariff and then having the secondary MPAN removed following a change.</li> <li>· MPAN is no longer required (having been superseded by a new MPAN following a change at site).</li> <li>· Where the MPAN has been registered/traded in error.</li> <li>· MPAN has been physically disconnected.</li> <li>· Additional MPAN requested by Supplier in error.</li> </ul> <p>It was noted by the National Grid representative within the Working Group that they had misinterpreted the question as physically disconnected rather than logically disconnected and therefore discounted their provided reason.</p> |  |  |  |

| Company     | Confidential/<br>Anonymous | 9. For Distributors only- What checks do you have in place to ensure that logical disconnection have the correct controls in place and aren't carried out on physically live services. Please provide your rationale. | Working Group Comments |
|-------------|----------------------------|---|------------------------|
| British Gas | Non-<br>Confidential       | N/A   |                        |

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|--------------------------------------|------------------|---|--|
| National Grid                        | Non-Confidential | We have an established process that we are externally audited upon and for which there are SLA's in place (5days to send dataflow) For example; a fault occurs, is reported to our Records team, Records track it and liaise with local Networks teams to either disconnect or de-en & send relevant dataflows. If de-en then local team must inform Records once they re-energise the supply so that dataflows can be sent to advise supplier that MPAN should now be re-energised – this is my understanding but there is a definite process in place for these events. |  |
| SP Energy Networks                   | Non-Confidential | SPEN received disconnection requests from suppliers via industry flows. Once verification checks are completed to ensure that these are secondary MPANS, that's de-energised. As part of the verification SPEN ensures that meters have been removed.<br><br>SPEN separate logical and physical disconnection requests and ensure physical are carried out by qualified engineers.  |  |
| The Electricity Network Company Ltd. | Non-Confidential | Before carrying out the disconnection of a traded MPAN, we will contact the supplier and give them 10 Working Days to raise any objections to ensure there is no customer being billed, we will also not logically disconnect an MPAN that is showing as energised and with a meter registered against it. We will also check our designs to ensure that the plot for the property is not on there.   |  |
| SSE Energy Supply Limited            | Non-Confidential | N/A   |  |

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|---|------------------|--|--|
| Diamond Energy Limited  | Non-Confidential | N/A  |  |
| UK Power Networks   | Non-Confidential | We would check that there was another live and energised MPAN for the same address, we would also ensure that the MPAN which is requested to be logically disconnected was de-energised and had no meter associated.   |  |
| Northern Powergrid  | Non-Confidential | <p>Each disconnection request is reviewed and validated in line with information held in industry and internal systems.</p> <ul style="list-style-type: none"> <li>• No longer required - verify that a valid MPAN exists.</li> <li>• Where registered/traded in error – verify that a valid MPAN exists, new connection to the network not made/created in error etc.</li> <li>• Have been physically disconnected – confirm that we have disconnected from the network.</li> <li>• Additional MPAN requested by supplier in error – verify MPAN requested by supplier and validate request reason</li> </ul> |  |
| Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc | Non-Confidential | Internal discussion ongoing - will update at WG meeting.   |  |

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Working Group Conclusions: Six DNOs responded to this question. Responses included the following.

- Separate logical and physical disconnection requests and ensure physical are carried out by qualified engineers.
- Before carrying out the disconnection of a traded MPAN, Supplier is contacted and given 10 Working Days to raise any objections to ensure there is no customer being billed.
- Check designs to ensure that the plot for the property is not on there.
- Checks that there was another live and energised MPAN for the same address.
- Ensure the MPAN which is requested to be logically disconnected was de-energised and had no meter associated.
- Each disconnection request is reviewed and validated in line with information held in industry and internal systems.
- Where registered/traded in error – verify that a valid MPAN exists, new connection to the network not made/created in error etc.
- Additional MPAN requested by supplier in error – verify MPAN requested by supplier and validate request reason

| Company     | Confidential/<br>Anonymous | 10. <u>For Distributors Only</u> - Does reserved capacity on a De-energised site impact neighbouring sites e.g. if a new site wants to connect, and there is a nearby De-energised site, is this De-energised site's capacity taken into consideration? Please provide details of how and why? | Working Group Comments |
|-------------|----------------------------|--|------------------------|
| British Gas | Non-<br>Confidential       | N/A  |                        |

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|                                      |                  |  |  |
|--------------------------------------|------------------|--|--|
| National Grid                        | Non-Confidential | Yes it would be factored in as to whether the network could uphold the load the new site wanted or whether it needed reinforcement works. We would still treat the de-en site as a live customer unless it's fully disconnected.   |  |
| SP Energy Networks                   | Non-Confidential | Yes, as de-energisation only results in the billing being stopped, it does not reduce any reserved capacity.   |  |
| The Electricity Network Company Ltd. | Non-Confidential | Yes, it will impact other customers, customers can have a contracted capacity so while it may be temporarily de-energised we would still consider the load when assessing network capacity in case the customer re-energises & uses their load. We would, however, consider this on a holistic basis dependent on the network and would not necessarily use the sum on contracted capacity (energised or de-energised) to determine available capacity on the network as we do not believe that this will always lead to the most efficient and economic network development. Ultimately, the deenergised capacity will be considered but it would be considered as part of a wider review of the conditions on the network. |  |
| SSE Energy Supply Limited            | No-Confidential  | N/A  |  |
| Diamond Energy Limited               | Non-Confidential | N/A  |  |
| UK Power Networks                    | Non-Confidential | Where a site has an agreed or reserved capacity, this is considered when reviewing the works required to connect a new site. Even if the site(s) have been de-energised for some time, or yet to be energised the capacity is not offered to any new site.   |  |

## DCP 463

### 'CHARGING NON-CONSUMING DE-ENERGISED CT-METERED SITES COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

|   |                  |  |  |
|---|------------------|--|--|
| Northern Powergrid  | Non-Confidential | No, we do not believe de-energised sites are impacting network decisions in regard to local capacity requests as we believe these decisions are based on the current/recent load in these areas, and not a capacity register based on location.  |  |
| Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc   | Non-Confidential | Yes, the reserved capacity would be taken into consideration. When we carry out power system studies, we apply the full capacities on existing CT metered sites. Hence, even though we can see that they aren't using their capacity, we are contractually obliged to provide it to them if they need it. This causes issues where the next customer wanting to connect have to wait for reinforcement works or we need to provide them with a different Point of Connection (more costly) because of this |  |
| <p>Working Group Conclusions: Six DNOs responded to this question. Five respondents stated it does, providing the following details.</p> <ul style="list-style-type: none"> <li>· It would be factored in as to whether the network could uphold the load the new site wanted or whether reinforcement works were needed.</li> <li>· De-energisation only results in the billing being stopped, it does not reduce any reserved capacity.</li> <li>· The load would be considered when assessing network capacity in case the customer re-energises and uses their load. It would be considered as part of a wider review of the conditions on the network.</li> <li>· When carrying out power system studies, full capacities on existing CT metered sites are applied.</li> </ul> <p>One respondent stated that they do not believe de-energised sites are impacting network decisions in regard to local capacity requests as they believe these decisions are based on the current/recent load in these areas, and not a capacity register based on location.</p> |                  |  |  |

## DCP 463

### ‘CHARGING NON-CONSUMING DE-ENERGISED CT-METERED SITES COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

| Company                              | Confidential/<br>Anonymous | 11. Do you believe that De-energised site should contribute to the DUoS charges where they have capacity reserved? Please provide rationale as to why you believe these sites should or should not contribute to DUoS?  | Working Group Comments |
|--------------------------------------|----------------------------|---|------------------------|
| British Gas                          | Non-Confidential           | <p>We are supportive of the principal of cost reflective charging in the Duos charging methodologies.</p> <p>The majority of long term de-energised CT metered sites are vacant, and we do not have a contract with a customer that we could pass these charges onto. It is therefore unclear to us how charging a Supplier fixed and capacity charges for non-consuming de-energised CT metered sites is fair and how this proposal will free up any capacity on the network. The potential benefit referred to in the consultation is particularly unclear if there are no current reserve capacity constraints on the network.</p> |                        |
| National Grid                        | Non-Confidential           | Yes, they should contribute as they could be preventing other customers from connecting if their capacity is going unused. It would incentivise behaviour to possibly relinquish their reserve.   |                        |
| SP Energy Networks                   | Non-Confidential           | In principle SPEN agree with this. However, in a lot of circumstances de-energisation is requested when a site is vacant, therefore who would be responsible for these charges?   |                        |
| The Electricity Network Company Ltd. | Non-Confidential           | Yes we believe de-energised sites with capacity reserved should contribute to DUoS, as we believe customers shouldn't receive free capacity reservation due to issues outlined in question 10. We believe these sites   |                        |



## DCP 463

### ‘CHARGING NON-CONSUMING DE-ENERGISED CT-METERED SITES COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

|                           |                  |  |  |
|---------------------------|------------------|--|--|
|                           |                  | should contribute to DUoS as long as this is done effectively and avoids distortions.  |  |
| SSE Energy Supply Limited | Non-Confidential | This question is not relevant to the DCP.  |  |
| Diamond Energy Limited    | Non-Confidential | In principle yes – but the obligation to pass through DUoS charges should only be left with a Supplier where the organisation or individual responsible for payment of electricity costs at a site is both identified and solvent. Suppliers cannot manage the risk of absorbing these costs where the electricity bill payer for a site is not known or is bankrupt. To ask them to do so is likely to lead to a substantial risk premium being attached to customer tariffs which is economically inefficient. |  |
| UK Power Networks         | Non-Confidential | A de-energised customer can be energised at any time and the service to them is still maintained, as a result it seems only reasonable that they should pay the fixed and capacity (where applicable) charges for their connection. By not paying any DUoS charges for the connection, not only is this capacity being reserved for free, but all other customers are having to pay for the costs which they are not contributing towards.   |  |
| Northern Powergrid        | Non-Confidential | <p>No, we do not believe de-energised sites should contribute to DUoS. These sites cannot choose to use the networks unless they officially request to be re-energised.</p> <p>We also believe that de-energisation is a useful mechanism that acts as a switch to ‘turn-off’ network charges when the site is not in use but is expected to be required in the future.</p>  |  |

**‘CHARGING NON-CONSUMING DE-ENERGISED CT-METERED SITES**  
**COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS**

|   |                  |   |  |
|---|------------------|---|--|
|   |                  | <p>We also believe it would be difficult to recover costs from abandoned de-energised sites, and that the suppliers would struggle to find out who they needed to charge and may end up having to go through costly legal options to recover their additional costs.</p> <p>Removing this mechanism would mean the only way to avoid network charges for an abandoned site would be a physical disconnection. This would have associated costs and is not a practical nor reasonable approach.</p> <p>Additionally, if these sites were to contribute to DUoS should they then not also contribute to TNUoS? If so - this could lead to incredibly high charges for an abandoned building with no ‘live’ connection to the distribution or transmission networks. If it does not also mean they should pay TNUoS we would be interested in the rationale that they should pay one not the other</p> |  |
| Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc   | Non-Confidential | In principle, yes, because if we are not allowed to remove the capacity (per section 3 of The National Terms of Connection), then these customers should be billed accordingly. Charging a customer for de-energised connections may be a way to drive the customer to relinquish their capacity.   |  |
| <p>Working Group Conclusions: Four respondents agreed that de-energised sites should contribute to the DUoS charges where they have capacity reserved. Rationale included the following.</p> <ul style="list-style-type: none"> <li>· They should contribute as they could be preventing other customers from connecting if their capacity is going unused.</li> <li>· It could incentivise behaviour to relinquish reserve.</li> </ul> |                  |   |  |

## 'CHARGING NON-CONSUMING DE-ENERGISED CT-METERED SITES COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

- Customers should not receive free capacity reservation due to issues outlined in question 10. These sites should contribute to DUoS as long as this is done effectively and avoids distortions.
- A de-energised customer can be energised at any time and the service to them is still maintained so it seems reasonable they should pay the fixed and capacity (where applicable) charges for their connection.
- By not paying any DUoS charges, this capacity is being reserved for free and other customers are having to pay for the costs which they are not contributing towards.

Three respondents stated that in principle they agree, however included the following concerns/comments.

- The majority of long term de-energised CT metered sites are vacant, with no contract with a customer to pass these charges onto.
- Suppliers cannot manage the risk of absorbing these costs where the electricity bill payer for a site is not known or is bankrupt. To ask them to do so is likely to lead to a substantial risk premium being attached to customer tariffs which is economically inefficient.
- It is unclear how charging a Supplier fixed and capacity charges for non-consuming de-energised CT metered sites is fair and how this proposal will free up any capacity on the network.
- The potential benefit referred to in the consultation is unclear if there are no current reserve capacity constraints on the network.

One respondent stated they do not believe that de-energised sites should contribute to the DUoS charges where they have capacity reserved and provided the following reasons.

- These sites cannot choose to use the networks unless they officially request to be re-energised.
- De-energisation is a useful mechanism that acts as a switch to 'turn-off' network charges when the site is not in use but is expected to be required in the future.
- It would be difficult to recover costs from abandoned de-energised sites. Suppliers would struggle to find out who they needed to charge and may end up having to go through costly legal options to recover their additional costs.

## DCP 463

### 'CHARGING NON-CONSUMING DE-ENERGISED CT-METERED SITES COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

- Removing this mechanism would mean the only way to avoid network charges for an abandoned site would be a physical disconnection. This would have associated costs and is not a practical nor reasonable approach.

The above respondent questioned whether, if these sites were to contribute to DUoS, they should also contribute to TNUoS. Noting that this could lead to high charges for an abandoned building with no 'live' connection to the distribution or transmission networks. The respondent asked what the rationale would be to charge them one but not the other.

It was confirmed within the Working Group that TNUoS is not in scope for this change, and that another Party could raise a change regarding this if they felt it was necessary.

One respondent noted that they do not believe that recovering these capacity charges via Supplier billing is a workable solution. Another respondent stated they felt the question is not relevant to the DCP and another provided no comment.

It was noted within the Working Group that the intent of the change is to ensure that customers who wish to connect in a vicinity are not penalised due to another customer who is holding on to capacity and not paying. It was also highlighted that there are other ways this could be addressed other than apply charges, but, as previously highlighted, there could be risks of gaming.

| Company               | Confidential/<br>Anonymous | 12. Do you have any comments on the draft legal text? | Working Group Comments |
|-----------------------|----------------------------|---|------------------------|
| British Gas           | Non-<br>Confidential       | No  |                        |
| National Grid         | Non-<br>Confidential       | None  |                        |
| SP Energy<br>Networks | Non-<br>Confidential       | No  |                        |

## DCP 463

### 'CHARGING NON-CONSUMING DE-ENERGISED CT-METERED SITES COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

|                                      |                  |   |  |
|--------------------------------------|------------------|---|--|
| The Electricity Network Company Ltd. | Non-Confidential | We believe the legal text is appropriate in that it is consistent with the intent of the CP.  |  |
| SSE Energy Supply Limited            | Non-Confidential | We note that it is proposed to alter paragraph 139 of Schedule 16, the CDCM. The current text specifically excludes correctly de-energised HH MPANs from being DUoSCharged. However, the new text does not make any reference to the fact that deenergised are now to be charged, instead relying on the reader inferring this. We don't consider that this is sufficiently clear and suggest that the new legal text explicitly states that de-energised sites are to be DUoS charged, for the avoidance of doubt. |  |
| Diamond Energy Limited               | Non-Confidential | Based on my answer to Q11 and Q15 I think it is insufficient as I think there needs to be a route for Suppliers to pass these charges back to the DNO where the customer at a site is insolvent or cannot be identified. This would need several clauses of legal text that would likely sit outside 16:139.  |  |
| UK Power Networks                    | Non-Confidential | A de-energised customer can be energised at any time and the service to them is still maintained, as a result it seems only reasonable that they should pay the fixed and capacity (where applicable) charges for their connection. By not paying any DUoS charges for the connection, not only is this capacity being reserved for free, but all other customers are having to pay for the costs which they are not contributing towards.  |  |
| Northern Powergrid                   | Non-Confidential | No, not at this time.   |  |

## DCP 463

### 'CHARGING NON-CONSUMING DE-ENERGISED CT-METERED SITES COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

|   |                  |   |  |
|---|------------------|---|--|
| Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc   | Non-Confidential | The legal text needs to be explicit as to who this should apply to and the circumstances. For example, the site may be de-energised for a new fit out and then the capacity will be used again. Is it appropriate to levy DUoS charges under those circumstances and in other scenarios where say it is not within the customer's control? Should exemptions apply? |  |
| <p>Working Group Conclusions: Seven respondents did not provide any comments on the legal text.</p> <p>One respondent stated they believe the legal text is appropriate and consistent with the intent of the DCP.</p> <p>Three respondents provided suggestions for improvements, including the following.</p> <ul style="list-style-type: none"> <li>· The legal text needs to be explicit as to who this should apply to and the circumstances. Is it appropriate to levy DUoS charges in scenarios where it is not within the customer's control, and should exemptions apply?</li> <li>· The legal text should explicitly state that de-energised sites are to be DUoS charged, for the avoidance of doubt.</li> <li>· There needs to be a route for Suppliers to pass these charges back to the DNO where the customer at a site is insolvent or cannot be identified. This would need several clauses of legal text that would likely sit outside 16:139.</li> </ul> |                  |   |  |

| Company | Confidential/Anonymous | 13. Do you consider that the proposal better facilitates the DCUSA Objectives?<br>If so, please detail which of the Objectives you believe are better facilitated and provide supporting reasons.<br>If not, please provide supporting reasons | Working Group Comments |
|---------|------------------------|--|------------------------|
|         |                        |  |                        |

## DCP 463

### ‘CHARGING NON-CONSUMING DE-ENERGISED CT-METERED SITES COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

|                                      |                  |  |  |
|--------------------------------------|------------------|--|--|
| British Gas                          | Non-Confidential | <p>We do not believe this proposal better facilitates any of the DCUSA General objectives.</p> <p>The proposal attempts to pass charges onto Suppliers who will be unable to recover the charges from any customer. This will result in bad debts the costs of which will be recovered from all customers which is inefficient.</p>  |  |
| National Grid                        | Non-Confidential | 1,2,3,   |  |
| SP Energy Networks                   | Non-Confidential | Yes- 1,2,3   |  |
| The Electricity Network Company Ltd. | Non-Confidential | <p>We believe charging objectives 2 and 3 are positively impacted by this change.</p> <p>Charging objective 2 is better facilitated as capacity charges will be charged more fairly as sites which are reserving capacity for free will pay towards this reservation.</p> <p>Charging objective 3 is better facilitated by this change as capacity charges will better reflect the costs incurred in reserving capacity for de-energised non-consuming sites.</p> <p>Charging objective 6 is potentially negatively impacted as the change may result in increased inefficiency due to potential for gaming and tactical disconnections.</p> |  |
| SSE Energy Supply Limited            | Non-Confidential | No   |  |

## DCP 463

### ‘CHARGING NON-CONSUMING DE-ENERGISED CT-METERED SITES COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

|  |                  |   |  |
|--|------------------|---|--|
| Diamond Energy Limited                   | Non-Confidential | <p>I think the proposal better facilitates General Objective 3.1.1 “the development, maintenance and operation by each of the DNO Parties and IDNO Parties of an efficient, coordinated, and economical Distribution System” for the reasons given by the Proposer in paragraph 3.2 of the Consultation document. However I think it fails 3.1.2 “the facilitation of effective competition in the generation and supply of electricity and (so far as is consistent with that) the promotion of such competition in the sale, distribution and purchase of electricity” because of the potential risk left with those Suppliers in receipt of DUoS costs they are unable to pass on.</p> <p>However 6.2 of the Consultation document says the CP should be considered against the Charging Objectives. I think the proposal is neutral against objective 1 as the DNO is compliant now and would be compliant if this CP were approved. I think it is negative against objective 2 for the reason given above for General Objective 3.1.2. I think it is positive against objectives 3 and 4 for the reason given above for General Objective 3.1.1. I agree it is neutral against objectives 5 and 6.</p> |  |
| UK Power Networks                        | Non-Confidential | We believe that DCUSA charging objectives 1, 2 and 3 are better facilitated for the reasons as stated in the consultation.  |  |
| Northern Powergrid                       | Non-Confidential | No, we do not believe it better facilitates the objectives. We believe it leads to less efficiency in the billing processes, particularly for suppliers, and would require costly changes to the DUoS billing system.   |  |
| Southern Electric Power Distribution plc | Non-Confidential | We believe this change better facilitates charging objectives 1, 2 and 3 for the reasons outlined in the change report.   |  |



## DCP 463

### 'CHARGING NON-CONSUMING DE-ENERGISED CT-METERED SITES COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

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| and Scottish<br>Hydro Electric<br>Power<br>Distribution plc   |  |  |  |
| <p>Working Group Conclusions: Four respondents stated they do not believe the proposal better facilitates any of the DCUSA Objectives. One of these respondents noted that this is due to the proposal attempting to pass charges onto Suppliers who will be unable to recover the charges from any customer. This will result in bad debts the costs of which will be recovered from all customers which is inefficient.</p> <p>Four respondents agreed that the proposal better facilitates Charging Objectives 1, 2 and 3.</p> <p>One respondent stated they believe Charging Objectives 2 and 3 are positively impacted, however Charging Objective 6 is potentially negatively impacted due to the potential for gaming and tactical disconnections.</p> <p>One respondent stated they believe the proposal is neutral against Charging Objectives 1, 5 and 6, negative against Charging Objective 2, and positive against Charging Objectives 3 and 4.</p> <p>One respondent provided no comment.</p> |  |  |  |

| Company     | Confidential/<br>Anonymous | 14. Are you aware of any wider industry developments that may impact upon or be impacted by this CP. | Working Group Comments |
|-------------|----------------------------|--|------------------------|
| British Gas | Non-<br>Confidential       | No   |                        |

## DCP 463

### 'CHARGING NON-CONSUMING DE-ENERGISED CT-METERED SITES COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

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|--|------------------|--|--|
| National Grid  | Non-Confidential | DCP440 allows us to bill for de-en non zero sites from 01/04/27. |  |
| SP Energy Networks   | Non-Confidential | No   |  |
| The Electricity Network Company Ltd.                                 | Non-Confidential | Not at this time.  |  |
| SSE Energy Supply Limited  | Non-Confidential | No   |  |
| Diamond Energy Limited   | Non-Confidential | Only as covered in answer to Q11 and amplified in Q15 below.     |  |
| UK Power Networks  | Non-Confidential | No, not at this time.  |  |
| Northern Powergrid   | Non-Confidential | No, not at this time.  |  |
| Southern Electric Power Distribution plc and Scottish Hydro Electric | Non-Confidential | None in our view.  |  |

## DCP 463

### 'CHARGING NON-CONSUMING DE-ENERGISED CT-METERED SITES COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

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|---|--|--|--|
| Power Distribution plc  |  |  |  |
| <p>Working Group Conclusions: Seven respondents advised they were not aware of any wider industry developments that may impact upon or be impacted by this CP. Two respondents provided no comment.</p> <p>One respondent highlighted that DCP 440 will allow billing for de-energised no- zero sites from 01 April 2027.</p> <p>One respondent stated their comments have been addressed through responses to other questions.</p> |  |  |  |

| Company                              | Confidential/<br>Anonymous | 15. Do you have any other comments on DCP 463?  | Working Group Comments |
|--------------------------------------|----------------------------|---|------------------------|
| British Gas                          | Non-Confidential           | No  |                        |
| National Grid                        | Non-Confidential           | None  |                        |
| SP Energy Networks                   | Non-Confidential           | Only concern is around who is responsible for de-energised site and will this be settled.   |                        |
| The Electricity Network Company Ltd. | Non-Confidential           | Whilst we agree, subject to the caveats outlined, that customers should not be able to reserve capacity for free, we think that there should be some more consideration for the options on how much those customers pay. It is not clear from the consultation that there has been a proper debate about the quantum of charges to ensure that charges are cost reflective. |                        |

**‘CHARGING NON-CONSUMING DE-ENERGISED CT-METERED SITES  
COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS**

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|--|--|---|--|
|  |  | <p>The assumption appears to be that those de-energised supply points will still attract a capacity charge and a fixed charge (including residual) equal to what they would attract if they were energised. Fixed and capacity charges are determined, by the standing charge factors in the CDCM, to reflect the contribution to the local assets on the distribution network.</p> <p>There should be some work from the working group to confirm that only the local assets should be funded by the de-energised customers and, on the other side of the coin, that the contribution that they make to the local assets should be 100% of what the value would be if they were energised.</p> <p>We also have a few questions below:</p> <p>When would the charges apply; is there a period where sites could keep the capacity without payment? How can we ensure consistency and fairness across all network operators in applying this? (not just in limited constrained areas which could be seen as unfair).</p> <p>We assume that distributors would charge this DUoS to suppliers and therefore do not believe there is risk of non-payment, however in that event;</p> <ul style="list-style-type: none"> <li>• What happens with late payments and how late would it be to be considered no payment and therefore capacity removed?</li> </ul> |  |
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## DCP 463

### 'CHARGING NON-CONSUMING DE-ENERGISED CT-METERED SITES COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

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|---------------------------|------------------|--|--|
|                           |                  | <ul style="list-style-type: none"> <li>• Will DNOs have the ability to disconnect if payments are not made? (and therefore they don't breach the requirement in the Electricity Act to maintain a connection)</li> </ul>   |  |
| SSE Energy Supply Limited | Non-Confidential | <p>Suppliers will need to recover the charges, even where they cannot charge the party who is responsible for the site. This will lead to an increase to other consumers bills. Also, there will be an increase in risk premiums. The Proposal is likely to see an increase in disconnections and subsequent reconnections for sites that are deenergised temporarily. This will pass costs on to other consumers.</p> <p>There are a large number of de-energised CT Supplies registered at the moment, and many of these have been de-energised for a long period of time. Determining ownership of these supplies is very difficult, and we believe that many of these are now, in fact, disconnected. A data cleanse on the outstanding de-energised MPANs is essential before this change should be considered, and assistance from the DNOs to prove these supplies still exist is vital for this data cleanse</p> |  |
| Diamond Energy Limited    | Non-Confidential | <p>I do not think it is sensible to put forward this change which would mean that all Suppliers face a risk of receiving charges for de-energised sites where they have a customer who is insolvent (or unidentified). I note Ofgem had this concern when deciding to reject DCP411.</p> <p>To address this I would like to suggest that Suppliers should have the right (but not the obligation) to transfer the registration of properly de-energised site MPANs (i.e. that meet the criteria in Q4) to the host DNO or IDNO.</p>  |  |

## DCP 463

### 'CHARGING NON-CONSUMING DE-ENERGISED CT-METERED SITES COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

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|  |  | <p>Although a DNO cannot be a Supplier under its licence, with a truly de-energised site there is no supply going on.</p> <p>The responsibility for billing DUoS at such sites therefore transfers to the DNO and liability for failure to collect also sits with the DNO. This takes away any risk premium that Suppliers may apply to cover this potential eventuality. I am suggesting that the DNO should be able to cover this risk through under-recovery of its regulated revenue - worst case as now the liability for failure to collect from those customers would get smeared across all other DUoS customers. Put simply the DNO has a route to recover its uncollected revenue without applying a risk premium whereas Suppliers would apply a risk premium which may or may not cover the actual costs.</p> <p>This approach would address the issue of Suppliers charging billpayers at a site for DUoS capacity without the DNO receiving that revenue.</p> <p>If there is an issue that with DNOs registering as "Suppliers" for the same MPAN/MPID, or if DNOs do not have the requisite billing systems, the solution could be that each DNO sub-contracts the billing service to an existing Supplier. The difference between this and the status quo is simply that the obligation to find the bill payer and/or liability for failure to collect sits with the DNO not the Supplier. If the customer is unknown and the DNO makes reasonable efforts to find them but fails this surely should pass the reasonableness test of DCP115 and allow the DNO to disconnect the site?</p> <p>Before a Supplier could exercise its right to transfer the MPAN to the DNO in this way it would have to demonstrate the site was truly physically de-</p> |  |
|--|--|--|--|

## DCP 463

### 'CHARGING NON-CONSUMING DE-ENERGISED CT-METERED SITES COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

|   |                  |   |  |
|---|------------------|---|--|
|   |                  | energised (which I assume could be via provision of historic meter reads). And before the site gets re-energised the MPAN would have to be registered back with a Supplier. |  |
| UK Power Networks   | Non-Confidential | No  |  |
| Northern Powergrid  | Non-Confidential | No, not at this time.   |  |
| Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc   | Non-Confidential | We are aware that St Clements have issued a paper (DURABILL HLIA083) regarding DURABILL updates that will be required to facilitate DCP 463                                 |  |
| <p>Working Group Conclusions: Six respondents did not provide any further comments.</p> <p>One respondent highlighted that St Clements have issued a paper (DURABILL HLIA083) regarding DURABILL updates that will be required to facilitate DCP 463.</p> <p>One respondent highlighted that their only concern is who is responsible for de-energised site and will this be settled.</p> <p>One respondent highlighted the issue of Suppliers needing to recover charges, even where they are unable to charge the party responsible for the site. The group agreed this had been discussed above. The respondent highlighted that a data cleanse on the outstanding de-energised MPANs is essential before this change should be considered, and assistance from the DNOs to prove these supplies still exist is vital for this data cleanse.</p> |                  |   |  |

## DCP 463

### 'CHARGING NON-CONSUMING DE-ENERGISED CT-METERED SITES COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

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One respondent asked the following questions, which the Working Group agreed should be referred to Gowlings.

- What happens with late payments and how late would it be to be considered no payment and therefore capacity removed?
- Will DNOs have the ability to disconnect if payments are not made? (and therefore they don't breach the requirement in the Electricity Act to maintain a connection)