

DCP 388 - AMENDMENTS TO FACILITATE APPROPRIATE RESIDUAL CHARGING FOR SITES WITH A MIX OF FINAL AND NON-FINAL DEMAND

To: **Dylan Townsend**

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Response ¹ :	Non-confidential

1. Do you understand the intent of the CP?

Yes.

2. Are you supportive of the principles that support this CP, which is to maintain alignment between distribution and transmission connected sites that have a mix of final and non-final demand?

Yes, the ADE agrees.

3. Do you believe that option 1, where a customer certifies that a certain amount of their demand is 'Non-Final Demand' which is then deducted from the total of the site is a viable solution and should be developed further? If so:

- what information do you believe that a customer should be asked to provide in such a certificate?
- do you believe that a right should be granted to DNOs/IDNOs so as to be able to conduct assurance processes and what type of assurance processes do you think should be carried out?

Please provide your rationale

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

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

Confidential responses will not be published on the DCUSA website but submitted solely to the Working Group for the analysis of the CP. For all other confidentiality requirements please contact the secretariat at DCUSA@electralink.co.uk or 0207 7432 3017

The ADE considers that the customer should provide the capacity and volumes of non-final demand final demand and if necessary, the type of generation.

The DNO/IDNO should have the right to audit.

4. Do you support option 2, which is to develop an agreed proportion of import capacity/consumption of generator that would be used to determine the non-final demand element on a mixed-use site? If so,

- Do you have any ideas as to how the Working Group could determine the appropriate percentage for each type of generation; and
- Do you believe that this solution can be applied to both MIC and non-MIC sites?

The ADE supports further exploring this option but does not have views on how the percentages for different generation types could be estimated.

5. Do you believe that option 3 whereby a Customer would need to utilise or install additional metering which would show how much demand is 'Non-Final Demand' which is then deducted from the total of the site is a viable solution and should be developed further? If so,

- Do you have a view on what process could be designed to allow the customer or a sites registrant to provide the metering data to the DNO/IDNO directly?

The ADE does not support this option.

6. Do you support option 4, which is based on finding a solution using a settlements process which may be similar to that which was developed for P375? If so,

- Do you have any thoughts as to what the Working Group should factor in when developing this solution further?

The ADE supports developing this solution further.

7. Are you aware of any wider industry developments that may impact upon or be impacted by this CP?

No.

8. Do you have any further comments on DCP 388?

No.
