



Zenobe Response to Consultation to descope the wide-ranging review of Distribution Use of System (DUoS) charges from the current Electricity Network Access and Forward-Looking Charges Significant Code Review (SCR) and take it forward under a dedicated SCR with a revised timescale

1. *Do you agree with our proposal to descope DUoS from the Access SCR and take it forward under a dedicated SCR with revised timescales?*

We agree with the proposal to descope DUoS from the Access SCR and take it forward under a dedicated SCR with revised timescales. We find that this would:

- Expedite reforms to connection boundary and access rights by the end of 2023;
- Provide a vehicle for taking forward DUoS reforms once the Access SCR closes for all areas of scope;
- Enable DUoS options to be considered alongside wider policy priorities.

2. *What are your views on timescales for implementation of DUoS reform? How does this interact with wider market developments and what do we need to take into account?*

We agree that Ofgem should work on DUoS throughout 2022. We appreciate the reasons offered for an implementation date of 2025. However, we would prefer an earlier implementation date (2023 or 2024).

3. *What areas of interactions of DUoS with wider developments in policy/industry do we need to consider in our review?*

Any review must take into account how DUoS charges will affect transport decarbonisation. In particular, the review should consider how to use DUoS as a tool to incentivise demand-side response from EV fleet operators. DUoS should also be designed to encourage time-limited connections, incentivising EV fleet operators to charge at times of low energy demand, benefitting the system as a whole. This would reduce the need for expensive grid reinforcement, reducing the overall DUoS cost.

4. *Have we considered all the impacts of a phased approach to delivering the original scope Access SCR?*

We are not aware of any further potential impacts.

We think that the proposal to reduce the user contribution to reinforcement for generation and remove it for demand should be implemented as the Access SCR closes. This change could then be reviewed as part of the wider review of DUoS, and amended if consequential changes are required in accordance with the final DUoS decision.



5. *Do you have any views on our proposal to retain the scope and governance arrangements of the original Access SCR?*

We agree that the original Access SCR scope and governance arrangements should be retained. This would reduce uncertainty.

We agree that open governance proposals that fall under the broad scope of the SCR but do not interfere with the aims and principles of the SCR should be allowed to proceed.

6. *Do you have any other information relevant to the subject matter of this consultation that we should consider?*

We have no further comments.