

*The representative body of the parks industry including  
caravans, chalets, lodges, park homes, tents and  
all types of self catering accommodation.*



## **BRITISH HOLIDAY & HOME PARKS ASSOCIATION LTD**

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### **Consultation on Distribution Connection Use of System Agreement (DCUSA) change proposal (DCP) 124: Third Party Network - National Terms of Connection**

1. Thank you for consulting us on the proposed changes to DCUSA which would add a new section to the National Terms of Connection (NTC) to cover connections between a licensed electricity distributor and a network operated by a licence exempt network.
2. The British Holiday & Home Parks Association was established in 1950 to represent the interests of the owners and managers of residential, holiday and touring parks. 1,875 BH&HPA members currently own and manage 2,891 parks across the UK.
3. Government tourist statistics indicate that in 2012, our industry accommodated 71.26m tourist bednights, some 35% of all holiday tourist bednights during the year. In addition, Government figures confirm that about 160,000 people live in 84,000 park homes which account for 0.38% of the total housing in England.
4. The majority of park businesses are Distribution Exemption Holders (DEHs) who resell electricity to residential and holiday consumers across the park's private network (following the 2002 Ofgem Decision on electricity resale).
5. The overwhelming majority are SMEs and microbusinesses, often a husband and wife team whose understanding of the DCUSA is equivalent to that of any domestic customer. They will be unaware of the definition of - and their status as - a DEH.
6. These park businesses make no profit from reselling electricity and most will lose money on this resale given the costs of maintaining and testing their park electrical system.



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7. The consultation asks for views on the change proposal DCP124. We therefore question whether the proposal is fair or necessary or proportionate so far as park businesses are concerned?
8. It is doubtful the giants of the electricity industry who are framing this proposal have the interests of small park business at heart. The working group concluded that approving DCP124 would lead to 'standard terms for connecting to DEH networks that are *clearly understood by all parties*'. Yet, DCP124 is ludicrously legalistic and complicated and therefore completely unintelligible for small business. It does not appear to have been drawn remotely to reflect the interests of businesses running private networks on a not-for-profit basis.
9. Park owners should not as the result of this process have to lose any income or accept any fresh obligation, yet your consultation cites 'a number of new obligations on DEHs'. We therefore question the justification.
10. We also question what steps are proposed to ensure that microbusinesses are not obliged to sign-up to a 41-page document on faith or incur the expense of legal advice to decipher the jargon. Could guidance, specifically geared to park businesses as DEHs, be published?
11. The consultation states that these park businesses' responsibilities for disconnection and 'de-energisation' are clarified by the agreement. A small business will not understand what 'de-energisation' means, let alone the responsibilities which come with it. (Whilst there is a section giving definitions including that of 'de-energisation', this runs over nine pages and even if they find it, a layman or woman would not understand the definition given.)
12. When working with small business, there is a responsibility to use plain English. This does not appear to have been addressed.
13. In summary, the proposed agreement text is too long, legalistic and written in jargon. It will not be understood by those to whom it is destined and without their understanding, we question its value.
14. We also question the justification of the new obligations proposed.

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