

**Legal & Regulatory**  
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14<sup>th</sup> October 2013

James Veaney  
Head of Distribution Policy  
Smarter Grids and Governance

Dear James

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

This is the non-confidential response from British Gas on DCP 124: Third Party Network – National Terms of Connection.

We agree with the responses in the voting declaration of both suppliers SSE and Eon.

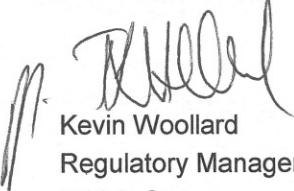
The change report alludes to the fact that the CP may have an impact on Suppliers but does not expand on this requirement. The report states

*“The Working Group has indicated that the CP may have an impact on Customers and also upon Suppliers in terms of their fulfilment of the Balancing and Settlement Code (BSC) obligations relating to settlement metering points within a private network. The CP clarifies that the NTC applies terms to Customers who are directly connected to the Licensed Distributor’s system, and as an aside Suppliers may need to consider the contract terms that they have with settlement metered Customers who are indirectly connected via private networks.”*

We agree that a co-ordinated full industry solution is required to Third party access to Private Networks.

We have reviewed the proposed legal drafting and whilst we agree that this is legally robust we believe the drafting is overly complex and we believe that the average domestic customer would struggle to follow its intent or understand it’ impact on them.

Yours sincerely



Kevin Woollard  
Regulatory Manager  
British Gas