

DCUSA CHANGE REPORT	
CHANGE PROPOSAL	DCP 010 - Notification and publication of rota load block alpha identifier
DATE OF ISSUE	21 February 2008
ISSUED TO	DCUSA Contract Managers Ofgem
PARTIES ENTITLED TO VOTE	All Supplier, DNO and IDNO Parties
RETURN DEADLINE (Voting End Date)	06 March 2008 – DCUSA@electralink.co.uk

1 PURPOSE

- 1.1 This document is issued in accordance with Clause 11.20 of the DCUSA. The Change Report details DCP 010 - Notification and publication of rota load block alpha identifier. The voting process for the proposed variation and the timetable of the progression of the Change Proposal (CP) through the DCUSA Change Control Process is set out in this document.
- 1.2 Parties are invited to consider the proposed amendment attached and submit votes using the form attached as Appendix F to dcusa@electralink.co.uk by 06 March 2008.

2 BACKGROUND

- 2.1 DCP 010 was raised by E.ON UK on 12 October 2007. The CP was considered by the DCUSA Panel at its meeting on 17 October 2007. The Panel determined that the CP was a non-urgent change that should be progressed through the Definition Procedure. The Panel agreed that the CP should be progressed as a part one matter as it is likely to have significant impact on the interests of electricity consumers but noted that the impacted Clauses are contained within part two of the agreement.
- 2.2 The DCUSA Panel established a Working Group DCP 010 to consider the Change Proposal. The Panel noted that the CP proposed an implementation date of November 2008 and recommended that the Working Group consider whether the timetable could be reduced.
- 2.3 The Working Group held 3 meetings to consider DCP 010 and evaluate it against the applicable DCUSA Objectives.¹
- 2.4 The content of this Change Report was approved by the Panel on 20 February 2008.

3 SUMMARY OF DCP 010

Raising Party	E.ON UK
CP Status	Standard (non urgent)
Change Synopsis	This CP seeks to create an obligation on DNO parties to publish annually the alpha identifier of the rota load block for all the customers in their network areas either associated with an MPAN or post code. The supplier parties would then be obligated to place alpha identifier on the electricity bills that they send to their customers, and that this information is published in a consistent style and location on the bill.
Parties Impacted	Distributors, Suppliers, IDNOs

¹ The papers and minutes of all Working group meetings are available on the DCUSA Website – www.dcusa.co.uk

Part 1 / Part 2	Part 1
Authority Consent	Required
Proposed Implementation	June 2008

4 DCP 010 WORKING GROUP

4.1 The DCP 010 Working Group comprised the following members:

- Glenda Simons – The Electricity Network Company
- Glenn Sheern – E.ON UK
- Jacqueline Gehrman – Scottish Power Energy Retail
- John Lawton – Electricity North West Ltd
- John Lees – RWE Npower
- Kevin Woollard – British Gas
- Lorraine Reddington – Central Networks
- Nigel Nash – Ofgem (Observer)
- Peter Waymont – EDF Energy Networks
- Rosie McGlynn – EDF Energy Customers (Chair)

4.2 The Working Group met 3 times to assess and develop the CP. The minutes of the meetings are attached as Appendices A, B and C.

4.3 At the first meeting on 23 November 2007 the Working Group approved its Terms of Reference (Appendix D) and assessed the CP.

4.4 The Working Group considered that the provision for rota disconnections is included in the Electricity Supply Emergency Code (ESEC) which sets out the procedure the government may take to deal with an electricity supply emergency. The ESEC also sets out the actions which parties may be required to take in order to deal with such an emergency.

4.5 The rota disconnections process is designed to enable an equal share of demand across the country with the protection of certain customers in an emergency situation. The process divides areas of the country into blocks which can be disconnected as needed to reduce demand.

4.6 The ENA has concluded that the most practical solution is to find a mechanism to reduce the number of customers requiring personal assistance down to an exception level. The proposal set out in DCP010, to put the alpha identifier on each customer bill / invoice, would allow media communications to be focused on telling customers where to look on their

bill rather than trying to communicate the identifier directly to customers. If the alpha identifier is printed in a standard place on each bill it will allow newspapers etc to communicate the information clearly.

5 DCP 010 CONSULTATION

- 5.1 The Working Group agreed that DCP 010 should be issued to all Parties for consultation for a period of two weeks. In addition to the requirement to assess the CP against the DCUSA Objectives, the group agreed that the consultation should seek feedback on the following areas:
- The implementation time needed by Suppliers to ensure that the block alpha identifiers can be printed on to all bills;
 - How suppliers envisage the obligation being fulfilled for non domestic or multi site customers;
 - Whether parties envisage any issues with the process for specific customer or bill types (e.g. pre-payment customers, online bills);
 - Whether the description of the proposed position (front of bill, top third of page, square box) is sufficient; and
 - Whether any customer groups should be excluded from the requirement (e.g. special needs).
- 5.2 The DCP 010 Consultation was issued to all DCUSA Contract Managers on 13 December for a period of 12 Working Days. 10 responses were received by the closing date of 7 January 2008. The consultation responses are attached as Appendix D.

6 WORKING GROUP CONCLUSIONS

- 6.1 The Working Group reviewed the consultation responses at its meeting on 10 January 2008. The group noted that all of the responding Parties were supportive of the proposed change solution.
- 6.2 The group noted that 100% of respondents felt that the proposed amendment better facilitates the DCUSA objectives and that the majority of respondents indicated that Objectives 3.1.1 and 3.1.3 were better facilitated by the proposal as follows:

Objective 3.1.1 - The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated and economical Distribution Networks

- Placing a joint obligation onto Distribution Business's and suppliers facilitates the efficient management of any rota disconnection event;
- Developing a co-ordinated approach by all DCUSA parties to a potentially significant market issue will facilitate enhanced Industry focus and customer awareness;
- Introducing the ability of network operators to work together in managing load issues and through the efficient, co-ordinated and economic

management of customer phone calls and ensuring a consistent approach to the publication of block alpha identifiers information on supplier bills will ensure a degree of certainty for consumers and businesses in appropriate emergency supply situations.

Objective 3.1.3 - the efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences

- Delivering an economic and practical solution to the issue of providing customers with their alpha block id for use during a rota disconnection event;
- Enhancing the DCUSA to better meet the Licence requirement for the Agreement to provide for arrangements and procedures in respect of the activities of system demand control;
- By providing such information to a wider audience in advance of any emergency provision so that Customers understand which Rota Block they belong to should such a notice be served; and
- Reducing the number of calls that Distributors and Suppliers may receive from Customers enquiring about which Rota Block they belong to when the scenario occurs.

- 6.3 The Working Group noted that Suppliers had indicated that following the initial implementation they would require between 1 and 3 months to publish the data on customer bills. The Working Group agreed that the drafting would need to provide a carve-out to allow Suppliers to develop their own processes for some customer types. Members agreed that the drafting should not be too prescriptive but should ensure that the majority of customers were covered by the obligation. The Working Group concluded that the drafting should be flexible enough to require the publication of the identifier on all standard bill types but allow Suppliers to use reasonable steps to communicate in all other cases.
- 6.4 The Working Group noted only one respondent did not feel that the description of the position of the Alpha Identifier was sufficient and recommended that the DCUSA should prescribe that the identifier "must be directly under the address lines, so it can be easily and uniformly found by all customers". The Working Group agreed that there does need to be standard position for the information but concluded that the requirement to publish the identifier on the front top third of bill would provide adequate information for DNOs to answer customer enquiries and for enough detail to be published via national communications in the event of an emergency.
- 6.5 The Working Group noted that all but one respondent supported the implementation date although some parties had indicated that they may require derogations for particular customer types in the first instance. The group considered that the responses from Suppliers had indicated that a June implementation was achievable for the majority of customers and in many cases work had already commenced. The group noted the view put forward by DBERR that the work should not be delayed and accepted that a small number of derogations may be received from Suppliers initially. The Working Group concluded that the implementation date of 26 June 2008 was appropriate and achievable.
- 6.6 6 Parties had indicated that they would incur costs to implement the change but that in many cases work was already being undertaken and that all Parties were supportive of the proposal. The Working Group concluded that given the nature of the CP and the industry drivers to take the change forward the benefits of implementing the CP outweighed the potential cost to Parties.
- 6.7 The Working Group met again on 04 February 2008 to resolve the following matters:
- Definitions;
 - The categorisation of the CP as a Part One Matter;
 - Interpretation of the 40 Working Day Requirement;
 - Format and location of Data Items; and
 - Misallocation of post codes to Load Blocks.
- 6.8 The Working Group concluded that Load Block and Alpha Identifier should be defined within Schedule 8 of the DCUSA and that the definitions should also make reference to the Electricity Supply Emergency Code. Members

agreed that the drafting should use a consistent wording for the use of terms such as Invoice, Bill, Statement etc and following legal advice agreed to define the word 'Bill' in the drafting.

- 6.9 Members agreed that the CP should be categorised as a Part One matter and that Clause 9.5.3 of the DCUSA should be updated accordingly.
- 6.10 The Group agreed to ensure that there was no ambiguity around the interpretation of the 40 Working Days requirement. The group agreed that the intent of the drafting is that after the 40 Working Days period has elapsed Suppliers will include the relevant data on the next Bill to be issued to the customer.
- 6.11 The Working Group agreed that the definition and format of data items should be included within the legal text as follows: "In an electronic format showing each relevant postcode followed by the applicable Alpha Identifier".
- 6.12 The working group also considered the potential for the misallocation of post codes to Load Blocks and the unavoidable nature of such misallocations due to shortcomings of the current technologies. The group agreed that the intent of the proposal is for Suppliers to publish such information as provided by the DNO's and that Suppliers will not take on either an explicit or implicit obligation to validate such data.

7 PROPOSED AMENDMENT AND LEGAL DRAFTING

- 7.1 The proposed amendment to the DCUSA in support of DCP 010 has been drafted by Wragge and Co and agreed by all members of the Working Group.
- 7.2 The proposed amendment is attached as Appendix F.

8 TIMETABLE

- 8.1 In accordance with Clause 12.4 of the DCUSA the Panel has determined a 10 Working Day voting period.
- 8.2 The timetable for the progression of the Change Proposal is set out below:

Date	Activity	Purpose	Responsibility
21 February	Change Report Issued	Change Report issued to all Parties for 10 WD	Secretariat
06 March	Voting End Date	Last date for submission of votes	Parties
07 March	Change Declaration	Outcome of voting published to Parties and Authority	Secretariat
16 April	Authority Determination	Authority to accept / reject CP following recommendation from Parties	Ofgem

26 June	DCUSA Release	DCUSA updated to reflect CP drafting (if approved by Authority)	Secretariat
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Appendices:

- A. DCP 010 Working Group Meeting Minutes
- B. DCP 010 Working Group Meeting Minutes
- C. DCP 010 Working Group Meeting Minutes
- D. DCP 010 Working Group Terms of Reference
- E. DCP 010 Consultation Responses
- F. DCP 010 Legal Drafting
- G. DCP 010 - Voting Form