

SCHEDULE 7 – EVENT LOG: CONSULTATION RESPONSES

Question 1: Do you ever refer the Event Log? If “Yes” please detail in what instances you refer to the Event Log

PARTY NAME	YES / NO	COMMENTS
CE Electric	No	N/A
Central Networks	No	N/A
E.ON UK	Yes	It can sometimes be an easy reference guide to parties obligations.
EDF Energy Networks	Yes	I referred to the event log when the DCUSA steering group was considering it, to determine the extent to which we were following it. The original event log was derived from one DNO's version and so may not have reflected all DNO's activities, particularly as to which non-data flow transmissions were acceptable. It should be noted that there are inconsistencies and errors in the current event log, which have been there since the start. For instance it quotes dataflows as means of communicating specific data which the quoted dataflow does not contain, it does not quote dataflows in some instances where messages are in practise given by that means, it quotes wrong dataflows and it contains a list of dataflows which do not reference DCUSA clauses that seem to have been added as an afterthought.
Electricity North West	No	Prior to DCUSA the event log was populated based on a bi-lateral agreement between the supplier and the distributor. Its development was at the time of the market being fully open in 1998. As indicated within this consultation document it is a table identifying the means of communication where a clause indicates that this takes place. However at the time of DCUSA it is one distributors view with a get out clause (Schedule 7, Para 3) should it be different. This makes it meaningless. Most of the content is linked to electronic communication which at the time (1998) was new to the industry so it was helpful to understand what data flow was being sent for each instance. This data is held within the data transfer catalogue and the BSC documents. The clauses of DCUSA and the associated industry code documents are what are used rather than this table. Having looked at this event log there are at least ten comments that I can

		make over inaccuracies and note numerous events that are not captured.
Npower	No	N/A
Scottish Power	No	N/A
SSE Energy Supply Limited	No	N/A
SP Dist/SP Manweb	No	N/A
The Electricity Network Co	No	N/A
Western Power	Yes	We refer very rarely to the Event Log. The last instance we can remember was about two years ago. The reason was a discussion with a Supplier about how to send D0135 flows (safety report) which was not covered in the BSC

Question 2: Do you believe the Event Log (Schedule 7) is required or, given that it simply provides a tabular summary of the DCUSA Obligations relating to communication between parties, could it be removed from DCUSA? If "Required" please detail the perceived benefits of retaining the Event Log

PARTY NAME	REQUIRED / NOT REQUIRED	COMMENTS
CE Electric	Not required	Remove from DCUSA
Central Networks	Not required	N/A
E.ON UK	Not required	All these obligations are described elsewhere. What is in Schedule 7 is in some cases inaccurate, and it is an administrative burden to keep this schedule up to date.
EDF Energy Networks	Not required	I perceive no benefits. The event log should be removed for four reasons; i) most of the communications are data flows described in the MRA or arise from processes described in the BSC. Why restate those? Schedule 7 para 2 already states that those must be adhered to. Any others are common sense (e.g. if there is a safety issue then a phone call is better than a letter) or have evolved through best practise. Imposing solutions to these may leave smaller parties facing high implementation costs. In addition, Schedule 7 para 3 already states that the parties may agree alternatives to the event log so a lot of work could be done to improve it and parties could agree alternatives instead.

		<p>ii) it is an administrative burden to manage and due to its reflection of BSC, MRA etc. will always be playing catch up with any changes elsewhere in the industry. Maintaining the event log takes time and resource but adds no value if it restates obligations already held elsewhere.</p> <p>iii) retaining it means it will need to be amended fundamentally to recognise the differences in "user" as between schedule 2A and 2B, particularly as communications required under section 2B are likely to be specifically excluded from the BSC or MRA</p> <p>iv) section 2B demonstrates that we can survive without it.</p>
Electricity North West	Not required	<p>The benefits of its removal are that we would not need to update this schedule not only for DCUSA changes but also if industry code documentation changes. This is an administrative burden on DCUSA and does not better facilitate the following DUCSA objectives - "the promotion of efficiency in the implementation and administration of this Agreement".</p> <p>We would also not need to undertake any further development work e.g. if the event log is taken to its ultimate conclusion it would also need to cover off each section inclusive of Section 1. We would end up with a schedule which would be significantly increased and repeating what is already in the document. In Section 1, if you open this up to the communication methods between Panel members, DCUSA secretariat, Proposer, Authority and Party Members, there are 80 instances before Clause 12. I do accept that the DCUSA clauses do not specify in all instances the means of communication, but this allows for flexibility. Where key data is via electronic transfer this is picked up in other codes and bi-laterally (e-billing).</p>
Npower	Not required	N/A
Scottish Power	Required	We believe the log helps tie DCUSA and its obligations back to other industry codes. We feel this would be of benefit to new market entrants and also as an easy look up tool.
SSE Energy Supply Limited	Required	It no doubt serves as a useful look up table for participants and ought to remain in some capacity for information.
SP Dist/SP Manweb	Not required	N/A
The Electricity Network Co	Not required	N/A

Western Power Distribution	Required	We think the event log should be retained, but limited to flows that are not covered by other agreements. Although it may not be referred to very often, how would a new Supplier or Distributor know the default transmission method if it is not specified anywhere?
----------------------------	----------	--

Question 3: If you believe the Event Log is required, please detail how you believe the Event Log should be updated and maintained going forward.

PARTY NAME	COMMENTS
CE Electric	The event log is simply a listing of the possible transmission methods for the different messages suppliers and DNOs send to each other. We believe that this is covered by the entry process for suppliers as part of the tests they carry out. We also think that the maintenance of the log is an unnecessary overhead.
Central Networks	N/A
E.ON UK	N/A
EDF Energy Networks	The event log is not required. However if it is to be updated and maintained it should be done so in a timely manner at a cost that is lower than the benefit it delivers.
Electricity North West Limited	<p>If you believe the Event Log is required <u>retained</u>, please detail how you believe the Event Log should be updated and maintained going forward.</p> <p>There needs to be a two stage approach:</p> <p>Firstly there needs to be a working group set up to update the current drafting.</p> <p>Within this group they need to agree:</p> <ul style="list-style-type: none"> ✓ what the event log is to cover i.e. the whole agreement or just specific sections. I would suggest that once this is known, sections should be allocated to different champions to produce the draft. We need to deal with this in bite size chunks otherwise the task will be too daunting dependant upon the scope; and ✓ what is the definition of 'event'. There are many ways in which we write the document where information is requested, and in some instances where we take action on receipt of

	<p>information e.g. circulate, notify, send, receive, provide, de-appoint, appoint etc. Once the draft is produced and reviewed it needs to be consulted upon prior to any implementation.</p> <p>Secondly, the handling of change both to DCUSA and from external codes needs to always consider whether this schedule is affected. It will be inevitable that we will not address every change that impacts DCUSA due to other codes changes.</p>
Npower	N/A
Scottish Power	The Event Log should refer to clauses in DCUSA and tie them back to a DTC flow or BSCP (not specific clauses). Very few flows are removed so simply stating the flow should be enough. Likewise, simply stating the BSCP without drilling down to the specific area would cut down on the need to keep updating the Log.
SSE Energy Supply Limited	The best way would be to ensure the schedule is updated as and when any changes are made (managed centrally) and/or by feedback from members at regular intervals during the year.
SP Dist/SP Manweb	N/A
The Electricity Network Co	N/A
Western Power Distribution	Perhaps by annual review. Any housekeeping changes would be made under DCP process. Changes should be few and far between and may be considered with other housekeeping changes.