

DCUSA Change Proposal Form

This form is provided in accordance with Clause 10.5 of the DCUSA.

Please return completed forms to DCUSA@electralink.co.uk for assessment by the DCUSA Panel.

Document Control	
CP Status	Standard / Urgent
Date Submitted	20-8-10
CP Number	DCP 072
Version Number	1.0
CP Ref	10/08
Attachments	None

Originator Details	
Company Name	EDF Energy Networks (EPN) plc
Originator Name	Peter Waymont
Category	Distributor / Supplier / IDNO / DG / OTSO / Other (please specify)
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Change Proposal Details	
CP Title	Environmental Assessment of CPs
Impacted parties	Distributor / Supplier / IDNO / DG / OTSO / Other (please specify)
Impacted Clause / Schedule	Section 1C
Authority Consent Required	Yes / No (please give reason) Clause 9 states any changes to this section are Part 1.
Summary of Change	To alter DCUSA change process to reflect Distribution Licence change.
Related Change Proposals	N/A

Change Proposal Intent
<i>Please set out the intent of the CP and the issue it is seeking to address</i>
To ensure Licence compliance by Distributors

Business Justification & Market Benefits
The Distribution Licence will be amended with effect from 31 December 2010 to include a new 9(A) as follows (Para 6 shown for context):

6. The procedures contained in the DCUSA for the making of amendments to the DCUSA must have as their objective the achievement of the matters set out in the following provisions of this Part C.....

(9A) They must ensure that the evaluation required under paragraph 9 in respect of the Applicable DCUSA Objective(s) includes, where the impact is likely to be material, an assessment of the impact of the proposed amendment on greenhouse gas emissions, to be conducted in accordance with any such guidance (on the treatment of carbon costs and evaluation of the impact on greenhouse gas emissions) as may be issued by the Authority from time to time.

Therefore it is not sufficient that the proposal form and working group terms of reference consider the environmental impact as the Licence requires DCUSA itself to state this requirements in it procedures.

The urgency is driven by the date of the licence change.

(Note that in the proposer's view the working group terms of reference should be reviewed and updated if required to reflect this change, if accepted).

Proposed Implementation Date

Please specify and give a reason if proposed date is outside the release schedule (February / June / November)

Before 31 December 2010 due to licence requirement.

Proposed Solution

Please insert proposed change marked legal drafting here. The Change Proposal Intent will take precedence in the event of any inconsistency

Change Clause 10 as follows;

10.4 A Change Proposal must contain the following information:

10.4.1 the name of the Proposer;

10.4.2 the name and contact details of an employee or representative of the Proposer who will act as a principal point of contact in relation to the proposal;

10.4.3 the date on which the proposal is submitted;

10.4.4 a description in sufficient detail of the nature of the proposed variation to the Agreement and of its intended purpose and effect;

10.4.5 a statement of the reasons why the Proposer believes that this Agreement would, if the proposed variation were made, better facilitate the achievement of the DCUSA Objectives than if that variation were not made;

10.4.6 a statement as to which parts of the Agreement the Proposer considers would require to be changed in order to give effect to the proposed variation or as a consequence of that variation;

10.4.7 where the proposed variation would entail the incorporation of wholly new provisions into this Agreement, a statement of whether, in the opinion of the Proposer, those provisions are Part 1 Matters;

10.4.8 a statement of whether the Proposer considers, in the light of the criteria set out in Clause 10.7, that the Change Proposal should be treated as urgent and, if so, its reasons for so considering; ~~and~~

10.4.9 the date from which the Proposer recommends that the proposed variation should have effect- ; ~~and~~

10.4.10 an indication of the impact of the proposed modification on greenhouse gas emissions where the Proposer believes that such impact is likely to be material.

Change Clause 11.20 as follows;

11.20.6 in any case in which the proposal was subject to the Definition Procedure prior to the Report Phase, provide a summary of:

(A) the views of the Working Group as to whether, if the proposed variation were made, the Agreement would better facilitate the achievement of the DCUSA Objectives than if that variation were not made;

(B) any responses received to the consultation process conducted by the Working Group under the Definition Procedure and not marked as confidential, together with a statement of the location on the Website at which such responses can be found; ~~and~~

(C) why the Working Group considers that the proposed variation better facilitates the achievement of the DCUSA Objectives than any alternative variation put forward in accordance with Clause 11.18 or by a respondent to the consultation-

and where a proposed variation and [/or] any alternative variation are likely to have a material impact on greenhouse gas emissions then the evaluation pursuant to Clauses 11.20.6(A) and Clauses 11.20.6(C), in respect of the DCUSA Objectives, shall include an assessment of the quantifiable impact of the proposed variation and any alternative variation on greenhouse gas emissions and such assessment shall be conducted in accordance with any guidance (on the treatment of carbon costs and evaluation of greenhouse gas emissions) that may be issued by the Authority from time to time.

DCUSA Objectives

Please state which DCUSA Objective(s) will be better facilitated by this CP and give supporting reasons

- ~~1. The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks;~~
- ~~2. The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent therewith) the promotion of such competition in the sale, distribution and purchase of electricity;~~
3. The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences; and
- ~~4. The promotion of efficiency in the implementation and administration of this Agreement.~~

DCUSA Objectives for Change Proposals to Charging Methodologies only

Please state which DCUSA Objective(s) will be better facilitated by this CP and give supporting reasons

1. that compliance by each DNO Party with the Charging Methodologies facilitates the discharge by the DNO Party of the obligations imposed on it under the Act and by its Distribution Licence;
2. that compliance by each DNO Party with the Charging Methodologies facilitates competition in the generation and supply of electricity and will not restrict, distort, or prevent competition in the transmission or distribution of electricity or in participation in the operation of an Interconnector (as defined in the Distribution Licences);
3. that compliance by each DNO Party with the Charging Methodologies results in charges which, so far as is reasonably practicable after taking account of implementation costs, reflect the costs incurred, or reasonably expected to be incurred, by the DNO Party in its Distribution Business; and
4. that, so far as is consistent with Clauses 3.2.1 to 3.2.3, the Charging Methodologies, so far as is reasonably practicable, properly take account of developments in each DNO Party's Distribution Business.

Environmental Impact

Please indicate whether you consider that there may be any environmental impact as a consequence of this CP being implemented

No direct impact