

### **DCUSA DCP 109 Consultation Responses – Collated Comments**

<b>Question One</b>	<b>Do you understand the intent of DCP 109 and are you supportive of its principles? Provide supporting comments.</b>
British Gas	We understand the intent and are supportive of its principles. Ofgem have approved the EDCM for Demand and therefore it should now be incorporated into DCUSA.
Electricity North West Ltd	Yes, we understand the intent and support the principles.
ESP Electricity	ESPE understand the intent of the CP and are supportive of its principles. We understand that the implementation of the EDCM (Import) Methodology for April 2012 and its inclusion in the DCUSA is a licence obligation.
GDF Suez Energy UK	Yes, having a common charging methodology will make it easier for the Supplier to understand/forecast and price/bill the DUoS charges.
SP Distribution / SP Manweb	Yes, we understand the intent of DCP 109 and are supportive of its principles.
UK Power Networks	UK Power Networks understand the intent of this DCP and are also supportive of its principles
Western Power Ltd	Yes
<b>Question Two</b>	<b>Does the proposal better facilitate the DCUSA general and charging methodology objectives<sup>1</sup> (please specify which)?</b>
British Gas	The proposal better facilitates the DCUSA general and charging methodology objectives relating to the efficient discharge by each of the DNO Parties and IDNO Parties of the obligations imposed upon them by their Distribution Licences.
Electricity North West Ltd	We agree that the proposal better facilitates the DCUSA general and charging methodology objectives.
ESP Electricity	ESPE believes both the following objectives are better facilitated as the inclusion of the EDCM into DCUSA is an obligation under the DNO's licence.

<sup>1</sup> As set out in Appendix D – Consultation response form

	<p>General:</p> <p>3. The efficient discharge by each of the DNO Parties and IDNO Parties of the obligations imposed upon them by their Distribution Licences.</p> <p>Charging:</p> <p>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.</p>
GDF Suez Energy UK	Charging: 3
SP Distribution / SP Manweb	We believe that the proposal better facilitates 1, 3 and 4 of both the DCUSA general and charging methodology objectives.
UK Power Networks	For both the general and charging objectives it is the view of UK Power Networks that objectives 1, 3 & 4 are better facilitated by this proposal, whereas objective 2 is neutral to the changes (as generator charges are not yet part of the arrangements under EDCM).
Western Power Ltd	Yes
<b>Question Three</b>	<b>Do you consider that the proposed drafting effectively discharges Licence Condition SLC 20A.11 which requires the DNOs to incorporate the EDCM for import charges into the DCUSA?</b>
British Gas	Providing there has been no material change to the scope or intent of the CMG and Ofgem approved drafting then the proposed drafting will discharge licence condition SLC 20A.11.
Electricity North West Ltd	Yes
ESP Electricity	Yes, ESPE believes the drafting effectively discharges the relevant licence conditions.
GDF Suez Energy UK	Yes
SP Distribution / SP Manweb	Yes, we consider that the proposed drafting effectively discharges Licence Condition SLC 20A. 11, which requires DNOs to incorporate the EDCM for import charges into the DCUSA.

UK Power Networks	Yes
Western Power Ltd	Yes
<b>Question Four</b>	<b>Do you consider that the proposed drafting properly reflects the methodology approved by Ofgem in December 2011?</b>
British Gas	The drafting presented as DCP 109 has been modified from the approved Ofgem methodology. The working group considers that this has better aligned it with the existing DCUSA text and the consultation states that the amendments seek to reflect the DCUSA defined terms and correct minor typographical errors. It would have been helpful to have included a change tracked version of the methodology showing the changes made from the Ofgem approved version. Whilst in broad terms we are comfortable that the drafting seems to align with the Ofgem approved methodology, we have not been able to verify that the changes made by the working group do not alter any aspect of the Ofgem approved methodology since we don't know what those changes were.
Electricity North West Ltd	Yes
ESP Electricity	Yes, ESPE believes the proposed drafting reflects the Ofgem-approved methodology.
GDF Suez Energy UK	Yes
SP Distribution / SP Manweb	Yes, we agree that the proposed drafting reflects the methodology approved by Ofgem in December 2011.
UK Power Networks	Yes
Western Power Ltd	Yes
<b>Question Five</b>	<b>Do you support the Working Group's view that no consequential changes are required to the CDCM in order to implement the EDCM?</b>
British Gas	Yes
Electricity North West Ltd	Yes
ESP Electricity	Yes ESPE support the WG's view.

GDF Suez Energy UK	Yes
SP Distribution / SP Manweb	Yes, we support the Working Group's view that no consequential changes are required to the CDCM in order to implement the EDCM. However, we believe that housekeeping changes are required and should be considered at a future date, for example, the removal of the HV sub tariff and associated inputs.
UK Power Networks	UK Power Networks are in agreement that no consequential changes are required to the CDCM at this stage prior to implementing EDCM, however it should be noted that some house keeping changes to the CDCM, such as the removal of HV Sub (from volumes as an example) should be considered at a future time.
Western Power Ltd	Yes
<b>Question Six</b>	<b>Are there any other matters that should be considered by the Working Group?</b>
British Gas	No
Electricity North West Ltd	The Group should consider whether the spreadsheet model can be amended so that the tariff rates are to the correct number of decimal places. This does not have any materiality, but correcting it should reduce the possibility of errors in the future.
ESP Electricity	ESPE do not believe there are further matters for the WG to consider.
GDF Suez Energy UK	<p>In the draft charging statements from the DNOs, Demand Side Agreements have been proposed. As Suppliers, we have some concerns about these agreements: What will the time notifications be for us to react to the reduced demands? How will the reduced DUoS charges be applied? (EDF previously had agreements whereby they applied a lower unit charge when the customer reduced their demand between Nov and Feb each year.)</p> <p>Also, are the Super Red time bands likely to change and will these always be in line with "peak losses" time bands? Additionally are they likely to introduce excess reactive power import charges in the future?</p>
SP Distribution / SP Manweb	None
UK Power Networks	Not at this time.
Western Power Ltd	No