

**DCUSA DCP 132 Consultation Responses – Collated Comments**

<b>Question One</b>	Do you understand the intent of DCP 132?	Working Group Comments
British Gas	Yes	The Working Group noted that all respondents to the Consultation understood the intent of DCP 132
Electricity North West Ltd	Yes	
Northern Powergrid	Yes	
Npower	Yes	
Smartest Energy	Yes	
SP Distribution, SP Manweb	Yes, we understand the intent of DCP132.	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Yes	
SSE Energy Supply Ltd	Yes	
Western Power Distribution	Yes	
<b>Question Two</b>	Are you supportive of its principles?	

British Gas	Yes	The Working Group noted that all respondents were supportive of the principles of DCP 132. It was further noted that SSE's concerns were in regard to specific tables and not the principles of the CP; these issues will be discussed in detail within those areas.
Electricity North West Ltd	Yes	
Northern Powergrid	Yes	
Npower	Yes we are strongly supportive of the principles of DCP 132	
Smartest Energy	Yes	
SP Distribution, SP Manweb	Yes, we are supportive of its principles.	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Broadly, yes, although we have some concerns about the content of the tables, and these are noted later in this response.	
SSE Energy Supply Ltd	Yes	
Western Power Distribution	Yes	
<b>Question Three</b>	Do you agree that DCP 132 better facilitates the DCUSA General Objectives and DCUSA Charging Methodology Objectives as explained by the Working Group? Please provide supporting comments.	

British Gas	Yes, we agree with the conclusions of the working group.	The Working Group noted that all respondents believed that DCP 132 better supported the General and Charging Objectives as set out by the Working Group.
Electricity North West Ltd	Yes, it better meets the objectives by improving the transparency of charges.	
Northern Powergrid	Yes – We agree with the working group's assessment.	
Npower	Yes consistency between Schedule 15- table 1 and the calculation of CDCM target revenue and the additional detail of underlying assumptions will increase the transparency and predictability of the CDCM revenue and therefore tariffs.	
Smartest Energy	Yes, we believe it will help industry parties manage DUoS prices.	
SP Distribution, SP Manweb	Yes, we agree with the working group's assessment that General Objectives 2 and 3, and Charging Objectives 1 and 2 are better met.	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power	Arguably, it better facilitates General Objectives 2 & 3, along with DCUSA CDCM Objectives 1 & 2, if approved.	

Distribution plc		
SSE Energy Supply Ltd	Yes, for the reasons given in the consultation document.	
Western Power Distribution	Yes, it makes charges more transparent and easier to forecast using published data.	
<b>Question Four</b>	Do you have any comments on the proposed legal text?	
British Gas	No	The Working Group noted that there were no additional comments provided on the legal text by respondents to the Consultation.
Electricity North West Ltd	No Comments	
Northern Powergrid	Not at this time.	
Npower	No	
Smartest Energy	No	
SP Distribution, SP Manweb	None	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	No	
SSE Energy Supply	No	

Ltd		
Western Power distribution	No	
<b>Question Five</b>	Do you feel that Appendix C – Changes to CDCM Model 100 sufficiently explains the changes that will be made to the Model? Please provide supporting comments.	
British Gas	Yes	
Electricity North West Ltd	Appendix C sufficiently explains the changes made to the CDCM model.	
Northern Powergrid	<p>Yes.</p> <p>The only minor thing to note is the header row for the new table in the 'CDCM revenues' sheet should start with the table number to be consistent with the rest of the model (i.e. the header should be '1001 - CDCM target revenue calculations').</p>	The Working Group discussed this point, and noted that this was a presentational issue. It was explained that these issues will be recorded and when the final model is issued these presentational/formatting issues will be rectified.
Npower	Yes a clear list of changes to the model is provided which is sufficient as the changes are to provide additional detail of the inputs and do not fundamentally change the functionality of the model.	
Smartest Energy	Yes – changes link correctly to updated charging	

	model	
SP Distribution, SP Manweb	Yes	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	It seems to adequately list the changes. However, we note that the "new DCP 135 table" is referred to twice, and assume that this should now read "new DCP 132 table".	The Working Group agreed with this point, and it should have referred to DCP 132; the document will be updated and reissued for inclusion in the Change Report.
SSE Energy Supply Ltd	Yes	
Western Power Distribution	Yes	
<b>Question Six</b>	Are you aware of any wider industry developments that may impact upon or be impacted by this CP? If so, please give details, and comment on whether the benefit of the change may outweigh the potential impact and whether the duration of the change is likely to be limited.	
British Gas	No	
Electricity North West Ltd	No.	
Northern Powergrid	There are a number of CDCM related changes being considered at the moment but none that we believe	

	would have a material impact on this proposal.	
Npower	None that we are aware of	
Smartest Energy	No	
SP Distribution, SP Manweb	None	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Our comments on this DCP are based upon consideration of its potential impacts on DUoS Tariffs in isolation. The cumulative/net effect of all DCPs currently being considered has not been modelled; therefore making an assessment of the combined impact on DUoS tariffs is difficult. Our opinions in this document are provided on that basis, and we urge that DCP's are progressed with some caution until these cumulative/net impacts can be modelled and assessed for each of the 14 LDSO Areas.	The Working Group noted that this CP does not affect DUoS tariffs, so there will not be any impacts to mention.
SSE Energy Supply Ltd	No	
Western Power Distribution	No	
<b>Question Seven</b>	Are you supportive of the proposed implementation date of 1 November 2012 (to allow for the population of indicative charges for 2013/14)?	
British Gas	Yes, this would also facilitate the use of the new Schedule 15 table for the November DCUSA forecast.	The Working Group noted that all respondents were supportive of the implementation date of DCP 132.
Electricity North	Yes	

West Ltd		
Northern Powergrid	Yes.	
Npower	Yes	
Smartest Energy	Yes	
SP Distribution, SP Manweb	Yes, we are supportive of the implementation date of 1 November 2012.	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	If the revised CDCM model has been tested and approved for use, it should be possible to implement this CP on 1 <sup>st</sup> November 2012.	The Working Group noted this comment.
SSE Energy Supply Ltd	Yes	
Western Power Distribution	Yes	
Question Eight	Are there any alternative solutions or matters that should be considered by the Working Group?	
British Gas	Not in our opinion.	The Working Group noted that there were no other solutions given by respondents.
Electricity North West Ltd	No.	ENWL raised the question whether or not there would be any effects on the Annual Review Pack from this CP. The Working Group noted that any issue(s) that would arise from this CP would be documented and raised with ElectraLink to be made before the ARP is re-



		issued and published on the DCUSA website.
Northern Powergrid	Not that we are aware of at this time.	
Npower	None that we are aware of	
Smartest Energy	No	
SP Distribution, SP Manweb	None	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	No	
SSE Energy Supply Ltd	No	
Western Power Distribution	No	
Question Nine	Do you have any other comments regarding DCP 132?	
British Gas	No	
Electricity North West Ltd	No.	
Northern Powergrid	The knock-on impacts on the annual review pack need to be considered.	This issue was raised by ENWL previously and was discussed by the Working Group. All effects to the ARP will be documented and

		issued to ElectraLink for inclusion in the ARP before re-issue.
Npower	No	
Smartest Energy	No	
SP Distribution, SP Manweb	None	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Both the CDCM Revenues table in the CDCM model and revised DCUSA Schedule 15, Clause 35A DNO Revenue table have input fields for Excluded Services (i.e. "Other 1", "Other 2", and "Other 3"). These are not relevant in calculating the CDCM Target Revenue and so should be removed, or a clause introduced specifying that provision of these inputs by the DNO is optional.	<p>The Working Group noted that this may not be a relevant field for SSE; however depending upon the treatment, could be relevant to other DNOs.</p> <p>The Working Group noted that it would be prudent to include a note in the legal text which says these are only used if DNOs recover these costs through UoS charges.</p>
SSE Energy Supply Ltd	No	
Western Power Distribution	No	