

DCUSA DCP 141 Consultation Responses – Collated Comments

Question One	Do you agree with the intent of DCP 141?	Working Group Comments
British Gas	Yes- we support achieving commonality in billing practice	The Working Group noted that the majority of respondents agreed with the intent of the CP.
EDF Energy	Yes	
ENC	Yes	
ENWL	<p>Yes, we agree with the intent and, as written, it effectively provides clarification that <u>where</u> distributors apply the default rate it is applied to the 'existing' settlement class data.</p> <p>Unfortunately the intent does not match the legal text in that changing the clause to mandate billing is in our opinion not within the intent as written i.e. it says:</p> <ul style="list-style-type: none"> • how you will bill invalid settlement classes (applying a default rate),and • what you apply the default rates to (existing settlement class data), but not when you apply such rates. 	<p>The Working Group noted that they did not agree that the intent does not match the legal text.</p> <p>It was discussed by the Working Group that this response implies that they agree with the intent of the CP as asked in the question, but have an issue with the drafting of the legal text.</p> <p>It was highlighted that the intent was to have commonality in the approach to charging and billing.</p>
EON Energy	Yes	
Npowergrid	Yes	
Npower	Yes	
ScottishPower Energy Retail	Yes	
SP Manweb Plc and SP Distribution	Yes	

Ltd's		
SSE Energy Supply Ltd	Yes	
SSEPD	Yes	
UKPN	Yes	
Western Power	No	
Question Two	Do you agree with the principles of DCP 141?	
British Gas	Yes- we support achieving commonality in billing practice	The majority of the responses were supportive of the principles of DCP 141.
EDF Energy	Yes	
ENC	Yes	
ENWL	<p>No</p> <p>Notwithstanding the fact that we believe that this change proposal goes beyond the intent, Schedule 16 is about a common charging methodology and as such provides a common approach as to what tariff to apply should such instances occur which is sufficient for this Schedule. We should not mandate the distributor to charge for such instances. The flexibility to apply the charge or not should be a distributor choice.</p> <p>A Settlement Class combination is made up of LLFC, PC, SSC and TPR. The LLFC is a distributor data item and the PC, SSC and TPR are supplier data items. Discussions between both parties should be undertaken to determine what the correct combination should be and the impacted party should rectify it well in advance of the final settlement run. Default tariffs being applied is fine if the supplier data is inaccurate so that there is an incentive to resolve the issue but the distributor also has a responsibility to ensure accuracy of data as well.</p>	<p>The Working Group noted that the principle behind this CP is to get DNOs to work within the same procedures. It was explained that currently, DNOs can change their approach at any time. It was agreed that Suppliers do not necessarily mind in which way they are billed, but they all want a common approach to be employed.</p> <p>It was also noted that the DCMF MIG Billing sub-group thought that this was the best way forward in order to progress this issue.</p> <p>TP of WPD noted that they did not support this CP because it may be too strong of a solution in order to address a problem which could be relatively small, and that this can't get worse.</p> <p>The Working Group discussed that even though the numbers are small, the impact on Suppliers could be quite significant, as currently Suppliers have to build a bespoke validation system for each DNO. It</p>

	<p>This is also covered in the MRA (clause 28).</p> <p>Over the last few years we have proactively managed our invalid combinations through positive interaction with the supplier community, without charging at the unrestricted rate. This has resulted in significant progress being made in managing down the invalid combination volumes to 260 (two hundred and sixty) out of 2.3 million MPANs (0.011% of sites). We now believe we are in a position to charge because we have processes in place to manage our invalid combinations and discuss with suppliers where we believe their data needs to be amended. Why charge now? It is an incentive to keep the data clean after all the hard work and business expense undertaken by both parties and ensures that we comply with our LC14 statement which unfortunately due to resource constraints the implementation of such a change has been delayed.</p> <p>So if this is a real issue for suppliers we would urge that information is requested from distributors on:</p> <ul style="list-style-type: none"> • the current volumes of invalid combinations; • who amends the data items and why; and • whether they bill for invalids or not; <p>to support a need for such a change. The latter may come from question 6 associated with costs of implementation, but there was a request for information associated with this instigated by the Methodology Issues Group under issue 26, so this information may already have been collated. It would be beneficial for the working group to review such information.</p> <p>With further reasoning provided to other questions within this consultation response we believe that to mandate such a situation is not appropriate.</p>	<p>is going through the validation process (time involved) which takes a lot of work.</p> <p>It was noted that when a new Supplier enters the market, they would have no idea how to build a validation tool; and under the current procedures this validation could change tomorrow if the DNOs change their procedures.</p> <p>It was also agreed that this CP is about a validation issue, not a volume issue.</p> <p>The Working Group noted that this was also an issue for IDNOs.</p>
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EON Energy	Yes	
Npowergrid	Yes	
Npower	Yes	
ScottishPower Energy Retail	Yes	
SP Manweb Plc and SP Distribution Ltd's	Yes	
SSE Energy Supply Ltd	Yes	
SSEPD	Yes	
UKPN	Yes	
Western Power	No	The Working Group comments to this response are listed above within the ENWL response section.
Question Three	Does the CP better facilitate the DCUSA General Objective 2 and Charging Objective 3? Please provide supporting comments.	
British Gas	<p>Yes – General Objective 2 is better facilitated by increasing the commonality of business rules which will promote competition in the market by removing barriers to entry.</p> <p>We also agree with the Working Group's assessment that Charging Objective 3 is better facilitated in the instance where some DNOs do not currently charge for invalid settlement classes.</p>	
EDF Energy	We are in support of this change .This will reduce manual data entry of transactions and therefore will reduce validation errors. And ensures consistency in billing approach across the industry	The Working Group confirmed with EDF that they do support both of the Objectives as listed within the Consultation.
ENC	Yes, we agree with the working groups assessment	

ENWL	<p>The question is limited to just two objectives. This may well be the view of the working group and/or the sponsor of the change proposal but any change should be subject to a challenge against all of the objectives. This was the intent within the minutes, but unfortunately it has not made its way through to the consultation.</p> <p>In answering your specific question and the wider objectives, the answer is yes but not for the reasons indicated by the working group.</p> <p>Charging methodology Objectives:</p> <p>We do not believe that the CDCM charging methodologies are affected. There is no change to the methodology so it is neutral against all of them. The default rate is still the same default rate. The application of the rate is not a methodology issue.</p> <p>On CDCM objective 3, whilst we can understand why this comment is being made, when the data is correctly rectified in the appropriate systems any cross subsidy issue goes away. As long as this is completed within the settlement calendar this is not an issue. Our volumes of data would suggest that such a cross subsidy is not material. Perhaps a further question is required to identify how many invalid combinations are older than 14 months?</p> <p>General objectives:</p> <p>On General objective 2, the working group assessment is that this is better facilitated by improving supplier validation and transparency. We believe that competition is unaffected in that the distributor is sending the same manipulated data to all suppliers affected. We therefore believe that it is neutral. However we understand the concern and believe that it is covered off by general objective 3.</p>	<p>The Working Group noted that you can only meet one of the Charging Objectives if you change the methodology; the methodology will change as it will state that the DNO “shall” use this rate.</p> <p>The Working Group also agreed that ENWL raised a valid point concerning the CP being reviewed against all the Objectives. However, it was highlighted that the question does not preclude any Party from raising points about any of the Objectives, and Parties have done so in the past.</p> <p>CDCM Objective 3 – The Working Group noted that the validation sits within MPAS, and it has been activated for some time. It was explained that the MPANs with invalid combinations cannot be changed or switched to another Supplier until they are rectified.</p> <p>It was highlighted that this process ‘cleans’ going forward, but MPAS cannot make any changes going back past 14 months.</p> <p>The Working Group reiterated that this CP is about a validation issue, not the volume of the problem.</p> <p>It was noted that there may be other possible solutions, but this CP has been raised to address the problem in a certain manner; and that is what should be evaluated within the Working Group.</p> <p>The Working Group noted from the Proposer of the CP, that this is about the way this issue is charged, not at a way to cleanse this data.</p> <p>It was discussed whether or not an RFI would be useful to get the volumes associated with this issue; and it was highlighted again that this CP is not</p>
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	<p>On General Objective 3 we believe that this objective is better facilitated by distributors not manipulating data, hence placing them in breach of the MRA and as such the Distribution Licence. This also causes unjustified validation issues to the suppliers.</p> <p>The rest of the objectives are not affected.</p>	<p>about volumes, but about validation and common charging.</p> <p>The Working Group noted that this is about a consistent approach from DNOs, and that cleansing data is a different issue. The CP will aim to get the validation in place, and a consistent charging method in place.</p> <p>It was also accepted by the Group that it is in the Supplier's means to correct this issue currently; but noted that this does not mean that the Suppliers should not be billed on a consistent approach.</p> <p>-General Objectives-</p> <p>The Working Group noted that within their reply, ENWL thinks that competition is unaffected. However, the Working Group noted earlier discussions that this could affect new entrants to the market and also smaller suppliers which may not have the means to build bespoke systems for the different approaches currently used by DNOs. Therefore, it could be argued that competition is affected.</p> <p>The Working Group noted that this CP will change it from 'may' do something into 'have to' do something. In the view of the Working Group it is not manipulating the data; it is taking the data that is there and applying a rule to it.</p>
EON Energy	<p>Yes. General Objective 2 is better facilitated as Suppliers will be better able to validate incoming invoices from Distributors as there will be a common approach. This was something that was envisaged when the common charging methodology was introduced in that the approach to charging should be common. A common approach makes it more transparent to</p>	

	<p>new market entrants, as at present it is unclear what approach is adopted by Distributors prior to receiving an invoice.</p> <p>Charging objective 3 is better facilitated as not charging as some Distributors currently do is a clear cross subsidisation as others uses will pick up these charges.</p>	
Npowergrid	Yes	
Npower	We believe that DCP 141 will better facilitate the DCUSA General Objective 2 and Charging Objective 3.	
ScottishPower Energy Retail	<p>The proposal will ensure consistency and transparency in the methods used by DNOs to bill invalid Settlements Classes. This will ensure that suppliers receive equal treatment in the case of invalid Settlement Classes regardless of DNO. This will better facilitate competition between suppliers and therefore General Objective 2.</p> <p>Where a DNO decides to not to bill an invalid Settlement Class, there is a risk of under recovery which must be recovered through other customers. Ensuring a consistent treatment of invalid Settlements Classes removes the possibility of a cross subsidy and better facilitates General Objective 3.</p> <p>We note in general that the intent of the CDCM was to introduce a methodology that was common across DNOs. Differences in the interpretation of the methodology have prevented it from being applied in a truly common and consistent fashion. This change helps to move closer to the original intent of the CDCM.</p>	The Working Group noted that the ENA addressed this numerous years back. The Working Group agreed to attach the information as an appendix to the Change Report.

SP Manweb Plc and SP Distribution Ltd's	Yes, the CP ensures consistency of practice across the Industry and facilitates Supplier Validation	
SSE Energy Supply Ltd	Yes	
SSEPD	Yes	
UKPN	Yes	
Western Power	It does not better facilitate any DCUSA or Charging Objectives; in fact it may make general objective 2 worse because the LFC the MPAN presents on in the bills will not be the corresponding tariff it is charged on.	<p>The Working Group noted that if it is an invalid, there won't be an applicable tariff.</p> <p>It was discussed by the Working Group that some DNOs will use the LLFC, some will use the PC, or they may use a default tariff. It was noted that this demonstrates the inconsistencies and difficulties that Suppliers currently face in dealing with the different methods.</p> <p>In effect, the validation tools have to mirror the billing tool.</p>
Question Four	Do you have any comments on the proposed legal drafting of DCP 141?	
British Gas	No	
EDF Energy	No	
ENC	No	
ENWL	<p>Yes, we have the following comments:</p> <ul style="list-style-type: none"> The use of 'shall' instead of 'where' is not justified when measured against the intent of this change proposal; Why are we mandating that only one of the four data items cannot be changed? Surely it is the full invalid combination that should be unaltered. Not all distributors use the LLFC to bill, some use the full 	<p>The Working Group discussed this response and had the following responses to the applicable points.</p> <p>Bullet point 1 – The Working Group noted that they do not agree with this point and this can be referred back to their comments in Question 1 of this Consultation.</p> <p>Bullet point 2 – The Working Group should change</p>

	<p>combination;</p> <ul style="list-style-type: none"> • The description of the 'D0242 - Supercustomer DUoS Daily Statement' is "Supercustomer DUoS charges calculated from settlements data produced at a summary level for Suppliers to validate their Supercustomer DUoS bills", so any change to the data items will affect the summary data within the flow and consequently the validation (a breach of the MRA), • The last sentence is governed by the MRA (as indicated in an earlier response above) and is once again only covering one of the data items, and • The inclusion, for clarity, of not altering the invalid combination so the summary data can reflect that contained in the D0030 is understandable but this is already covered by the MRA so could be deemed superfluous. <p>We must always urge caution when replicating statements from one code to the other in case of change (although in this case any change in that area is doubtful). This sentence should be removed.</p> <p>In light of our comments above and those contained in earlier consultation questions we believe that there is a case for no change here.</p> <p>However if clarity is deemed appropriate then we suggest the following text which then ties in with the clauses on 'billing and payment by settlement class' within the main body of DCUSA:</p> <p>Note 2: Where DNO Parties use a default tariff for invalid settlement combinations these will be charged at the Domestic Unrestricted rates. The invalid settlement</p>	<p>the legal text, agreeing with ENWL, to say that "any of the valid...." This will be changed within the final version of the legal text sent to DCUSA's legal support.</p> <p>Bullet point 3 – The Working Group noted that this was addressed in the last comment.</p> <p>Bullet point 4 – It was noted that the only variable DNOs have control over is the LLFC.</p>
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	<p>combinations containing such charges shall be delivered in Daily Statements in accordance with Clause 20.</p> <p>“Daily Statement” is already a defined term in DCUSA.</p> <p>The first four rows of D0242 – Daily Statement, Group 666 cover LLFC, PC, TPR, & SSC.</p> <p>The use of “delivered” is the same language used within Clause 20.</p>	
EON Energy	No, we believe the current drafting works, subject to DCUSA lawyers review.	
Npowergrid	No	
Npower	No	
ScottishPower Energy Retail	No	
SP Manweb Plc and SP Distribution Ltd's	No	
SSE Energy Supply Ltd	N/A	
SSEPD	No	
UKPN	<p>It would be preferable to include a sentence as to how invalid combinations should be dealt with for portfolio billing such as</p> <p>“Where portfolio data contains invalid combinations, the ‘LDNO HV: Domestic Unrestricted’ fixed and unit charge will be applied as default.”</p>	The Working Group noted that this comment refers to adding clarity to the way this issue will be dealt with in portfolio billing. The Working Group agreed with this comment and will be reflected within the final version of the legal text.
Western Power	No	
Question Five	How will DCP 141 affect your organisation? Please provide	

	supporting comments.	
British Gas	Low impact	
EDF Energy	We are in support of this change .This will reduce manual data entry of transactions and therefore will reduce validation errors. And ensures consistency in billing approach across the industry	
ENC	ENC currently bills invalid combinations using the unrestricted domestic rate, therefore there will be no change to our organisation	
ENWL	We have already approved the implementation of applying the unrestricted rates to invalid combinations and it is expected that this will be applied from the 1 st November 2012. The scope of the change aligns with this change proposal.	The Working Group noted that this response could mean that there will be no impact on the organisation. It was agreed to ask a follow up question for clarity on this matter.
EON Energy	The affects are as a consequence of not implementing this DCP. Without a common defined approach in order to validate invoices received from Distributors, Suppliers face the following issues. They have to either develop separate validation tools for each Distribution Licence held, with no guarantee that these will remain the same as the Distributor can change at any time without any notice. The alternative is to employ more validation staff to manually check each invoice with again no guarantee that the Distributor does not change the way it invoices from month to month. The final alternative is not to validate invoicing something that will result in the many errors we come across not coming to light. When they are discovered, perhaps many years later, this results in re-billing by the Distributor, often without the ability to re-invoice correctly to the end customer.	The Working Group noted that this also affects IDNOs as well and is not only applicable to Suppliers.
Npowergrid	No impact as we already comply with this CP	
Npower	We believe this will make the validation process a lot easier	

	and will also result in fewer queries.	
ScottishPower Energy Retail	We will have greater confidence in how invalid Settlement Classes will be billed and that they are being done in a consistent way regardless of DNO. This will reduce the resource required to validate charges leaving more available to resolve the root causes behind invalid combinations.	
SP Manweb Plc and SP Distribution Ltd's	No Impact – SP Energy Networks already meet the requirements of this CP	
SSE Energy Supply Ltd	If all DNO's use a consistent approach to billing invalid settlement classes, it would enable common validation processes for all invoices.	
SSEPD	No impact	
UKPN	We can deliver this	
Western Power	We will have to update our billing system to store not only the LLFC used for tariffs but also the LLFC used for registrations, which according to this change proposal will be different.	TP of WPD noted there is a common basis to their billing system as in Scottish Power, in theory the change could be done as Scottish Power have indicated within their response that they already meet the requirements of this CP.
Question Six	Will there be any associated costs with implementing DCP 141? Please provide supporting comments.	
British Gas	Any costs are expected to be minimal	
EDF Energy	No	
ENC	No	
ENWL	There will be no other associated costs with this change proposal since we already have processes in place to manage such instances. The only business interaction will be when the Domestic Unrestricted rates change.	
EON Energy	The costs are all associated with NOT implementing this DCP.	

	We estimate the development costs for each bespoke validation for this item to be approximately £2,000. To employ more validation staff £25,000 per annum per Distribution licence.	
Npowergrid	No	
Npower	None that are apparent.	
ScottishPower Energy Retail	We would not have any additional costs as a result of DCP 141.	
SP Manweb Plc and SP Distribution Ltd's	No	
SSEPD	No	
SSE Energy Supply Ltd	Minimal	
UKPN	No	
Western Power	Yes, update to billing system approx. £330k based on other similar changes we have obtained quotes for	TP of WPD noted that it will need to be confirmed with what this figure was based upon. The Working Group noted the comments. TP explained that it will be confirmed whether this was also changes to internal systems as well as the billing systems.
Question Seven	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	
EDF Energy	No	
ENC	No	
ENWL	It was made clear in the first meeting of the expert group (April 2012) that this change proposal would be superfluous	The Working Group noted that the MIG did not

	<p>should 'de-linking' be implemented and as such this change proposal was initially placed on hold.</p> <p>It is our understanding that de-linking seems to be progressing on two fronts. The billing expert group have it on their agenda and believe that it may take some time hence the progression of this change proposal. It is their intention to invite a distributor who is already de-linked to attend the next meeting (yet to be confirmed). The latest information coming out of the Methodology Issues Group (MIG) NHH/HH discrepancy sub group seems to be that they are applying a de-linked solution as well. The intended implementation date being April 2014.</p> <p>For those distributors who currently don't wish to charge, for whatever reason, they should not be forced to change their systems at a cost to the industry and ultimately the end consumer when a change in the same area some 6 months later (both subject to approval) will result in further costs and deliver what is perceived to be the ultimate solution.</p> <p>(De-linking means that the distributor will charge for unit rates based on distributor time bands rather than the settlement combinations).</p> <p>Also, the Balancing & Settlement Code P280 Modification is aiming for an implementation date of April 2014 and the DCP151 Change proposal to facilitate HH Aggregated tariffs is currently out for consultation. Although the date of this change is October 2013 the implementation date is being consulted on and may change to align with P280 and the MIG Sub Group so that we have a number of options available for delivery at the same time all impacting Supercustomer billing. All subject to approval and no guarantee to progress, but does place this change in context with other changes that may impact the same billing system.</p>	<p>place this CP on hold.</p> <p>The Working Group also questioned how long a change should be delayed, in order to await confirmation on other potential changes that may or may not be approved or put forward. It was noted that all changes are judged on their own merits.</p> <p>It was also highlighted that even though some of these will implement new measurement classes, it will not address the issue of invalid settlement classes.</p> <p>It was noted that there are quite a few changes that are coming through in 2014, and that this CP is not a significant shift, and should be implemented as soon as possible as stated within the CP form.</p>
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EON Energy	Yes. There are many DCUSA DCPs that are aimed at improving the billing and subsequent validation processes of Distributors and Suppliers. The majority of costs associated with these are development costs to billing or validation tools. These costs are greatly reduced when more than one change can be undertaken at any time.	
Npowergrid	No	
Npower	No	
ScottishPower Energy Retail	No	
SP Manweb Plc and SP Distribution Ltd's	No	
SSE Energy Supply Ltd	There is the potential that with the introduction of SMART metering invalid settlement classes will not be required any more. However, as full cut-over may not be until 2020 then the benefits gained though this proposal outweighs the finite timescales of use.	
SSEPD	No	
UKPN	No	
Western Power	No	
Question Eight	Do you agree with the implementation date of DCP 141?	
British Gas	Yes. We recognise that adjusting billing systems to accommodate small changes can be costly. We do not believe, however, this should be a reason to either reject the modification or delay the change implementation. DNOs in those circumstances should apply for derogations and seek to implement in an efficient fashion.	The Working Group noted that if any Party has issues with the implementation of the CP, they should apply for derogations to Ofgem.
EDF Energy	Yes	
ENC	Yes	

ENWL	This change proposal should be delayed until April 2014. Should the MIG sub group looking at the NHH/HH discrepancy change suffer delays then this may be progressed in line with our suggested legal text.	
EON Energy	Yes.	
Npowergrid	Yes	
Npower	Yes	
ScottishPower Energy Retail	Yes	
SP Manweb Plc and SP Distribution Ltd's	Yes, SP Energy Networks already meet the requirements of this CP	
SSE Energy Supply Ltd	No - Implementation at the start of a financial year would be better as this would provide consistency throughout the year.	The Working Group confirmed with SSE and noted that they are not opposed to the implementation date; their preference would be the beginning of the financial year.
SSEPD	Yes	
UKPN	Yes	
Western Power	We do not agree with implementing the DCP, however 1 st October 2013 does not allow enough time for change to the billing system to be implemented. Trying to forecast the change in income caused by MPANs moving en mass between tariff charges mid-year rather than a full year may also lead to swings in recovery positions.	<p>The Working Group discussed that the volumes were not that great, as previously noted by other responses, so queried whether this would this lead to large swings/changes in income.</p> <p>The Working Group noted that if there was analysis produced by WPD whether it could be forwarded onto the Working Group.</p> <p>It was also discussed that legal text could be drafted in a way that could carve out the ones that are de-linked, so that if it does goes that way in the future it will address this and won't stop anything in the future from progressing.</p> <p>The Working Group also agreed that by doing this, it</p>

		would address some of ENWL's comments. The Working Group also asked WPD to do analysis to see if this would affect the costs for WPD.
Question Nine	Are there any alternative solutions or matters that should be considered by the Working Group?	
British Gas	No	
EDF Energy	No	
ENC	No	
ENWL	<p>The same information (as mentioned in Question 2) is probably also required with regard to distributors billing distributors for data submitted on the D0314 – 'Non Half Hourly Embedded Network DUoS Report' where such instances also apply.</p> <p>Schedule 16 para 147</p> <p>"The tariff structure for LDNOs will mirror the structure of the all-the-way-tariff, and is dependent on the voltage of connection either LV or HV. The same tariff elements will apply."</p> <p>This clause stops at mirroring the structure and as such does not have the notes (such as note 2) at the end of each table. It seems sensible to apply the same logic here and it would be helpful to understand whether it is being applied or not because the same invalid combinations are being received. The intent is wide enough to ensure that this can be applied. If this is agreed and clarification is deemed appropriate the same clause can follow the LDNO tables.</p>	<p>The Working Group has addressed the first comment earlier, in regard to Portfolio Billing.</p> <p>The Working Group noted the 2nd point was also previously addressed.</p>
EON Energy	No. We believe the MIG working group have already discussed this widely and believe this to be the optimal	

	solution.	
Npowergrid	None that we are aware of	
Npower	None that we are aware of.	
ScottishPower Energy Retail	We noted at the working group that a related issue exists where, in the case of MPANs with multiple TPRs, some DNOs are charging the fixed charge element for each TPR. We believe that this is an overcharge as two fixed charges would not be charged to one MPAN in the case of a valid combination. We believe that an opportunity exists to resolve this issue through an extension of the legal text but acknowledge comments from the working group that this would be better first discussed through MIG as a separate change.	The Working Group noted that this seems to be a different issue, and should be raised as a separate DCP.
SP Manweb Plc and SP Distribution Ltd's	No. However we do appreciate that it can be beneficial to implement Billing and Tariff related changes at the start of a new Regulatory Year such as 1st April.	The Working Group noted this point was covered in a previous question regarding the implementation date.
SSE Energy Supply Ltd	N/A	
SSEPD	No	
UKPN	No	
Western Power	<ol style="list-style-type: none"> 1) MPANs that are on an invalid settlement combination are put on the domestic unrestricted LLFC in MPAS. Reports can then be run via MPAS / ECOES to identify the invalid combinations. Everyone is clear on what LLFC the MPAN is registered and what tariffs it should be receiving. 2) Correct all of the invalid combinations in settlements. This would be a data quality exercise for both suppliers and DNOs as MPAS validation means you can't register new invalid combinations 	The Working Group noted that this has been discussed in previous questions.

	going forward.	
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