

## DCUSA Change Proposal Form

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

Completed forms should be returned to [dcusa@electralink.co.uk](mailto:dcusa@electralink.co.uk) for assessment by the DCUSA Panel. Failure to complete all parts of the form may result in it being rejected by the DCUSA Panel.

- PART A – Mandatory for all Change Proposals
- PART B – Mandatory for Non Charging Methodologies Proposals
- PART C – Mandatory for Charging Methodologies Proposals
- PART D – Guidance Notes

### PART A - MANDATORY FOR ALL CHANGE PROPOSALS

Document Control	
CP Status	Standard
CP Number	DCP 187
Date of submission	2 <sup>nd</sup> August 2013
Attachments	Legal drafting – Appendix A
Originator Details	
Company Name	Npower Ltd
Originator Name	Sasha Pearce
Category	SUPPLIER
Email Address	Sasha.pearce@npower.com
Phone Number	0121 336 5227
Change Proposal Details	
CP Title	Changes to requirements to provide metering data
Impacted parties	DG/DNO/IDNO/Suppliers
Impacted Clause(s)	Clause 29
Part 1 / Part 2 Matter	Part 2
Related Change Proposals	-
Change Proposal Intent	
To clarify what metering data is to be provided free of charge under Clause 29.	
Business Justification and Market Benefits	
<p>Following discussion at the DCUSA Smart Working Issues Group (SWIG), it was identified that the current wording of Clause 29 does not provide DCUSA Parties with absolute clarity on what metering data can be provided/obtained free of charge under this clause.</p> <p>The Smart Energy Code (SEC) will provide for access to certain items of data for Distributors. Given that DCUSA clause 29 also provides for access to data, it will be important to clarify what data can be obtained under the provisions of the DCUSA and when it is appropriate to obtain data via this route.</p> <p>This change proposal aims to ensure that the rights to obtain data within DCUSA do not conflict with the provisions of the SEC once designated and do not introduce confusion into the industry arrangements.</p> <p>Currently Clause 29 makes reference to data required under the Relevant Charging Statements. It is not clear what these data requirements are. The SWIG concluded at its July meeting that this reference is out-of-date, having been included to accommodate arrangements prior to the introduction</p>	

of the CDCM, and is therefore no longer relevant. In addition, given that the content of the Relevant Charging Statements can be changed without the agreement of, or consultation with, DCUSA Users, the inclusion of this reference creates uncertainty within the Agreement.

Going forward, With Smart metering rollout beginning, and the SEC shortly to be designated, it is important that the provisions of Clause 29 are clear.

If accepted, this change should provide greater clarity and prevent disagreement and misunderstanding between Parties over what data can be provided under the terms of this clause 29.

#### **Proposed Solution and Draft Legal Text**

The proposed solution is to amend Clause 29 – see legal drafting in Appendix A attached.

The changes proposed are as follows:

- Amend clause 29.1 to remove the reference to the Relevant Charging Statement.
- Amend Clause 29.4 to specify that this is limited to data which the User is obliged to provide under the MRA and/or the BSC.
- Amend Clause 29.5 to remove the reference to the Relevant Charging Statement.

#### **Proposed Implementation Date**

First DCUSA release following acceptance by Parties.

#### **Impact on Other Codes**

Please tick the relevant boxes and provide any supporting information.

BSC	<input type="checkbox"/>
CUSC	<input type="checkbox"/>
Grid Code	<input type="checkbox"/>
MRA	<input type="checkbox"/>
Other	<input type="checkbox"/>
None	<input checked="" type="checkbox"/>

If other please specify

#### **Consideration of Wider Industry Impacts**

The SEC is expected to give Distributors the right to obtain data from the Data Communications Company. It is not yet clear what data Distributors will be able to obtain and at what cost, if any.

#### **Environmental Impact**

No material impact on greenhouse gas emissions is envisaged as a result of the proposed variation being made.

#### **Confidentiality**

Not confidential.

## PART B – MANDATORY FOR NON CHARGING METHODOLOGIES CHANGE PROPOSALS

### DCUSA Objectives

#### General Objectives:

Please tick the relevant boxes.

- 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
- 4 The promotion of efficiency in the implementation and administration of this Agreement
- 5 Compliance with the Regulation on Cross-Border Exchange in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.

### Rationale for better facilitation of the DCUSA Objectives identified above

This change will provide greater clarity for Parties in interpreting the provisions of Clause 29 of the agreement and will therefore bring greater efficiency in its implementation.

## PART C – MANDATORY FOR CHARGING METHODOLOGIES CHANGE PROPOSALS

### DCUSA Charging Objectives

Please tick the relevant boxes. [See Guidance Note 11]

#### Charging Objectives:

- 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

- 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
- 5 that compliance by each DNO Party with the Charging Methodologies facilitates compliance with the Regulation on Cross-Border Exchange in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.

General Objectives:

- 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
- 4 The promotion of efficiency in the implementation and administration of this Agreement
- 5 Compliance with the Regulation on Cross-Border Exchange in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.

**Rationale for better facilitation of the DCUSA Objectives identified above**

[See Guidance Note 10]

Charging Objectives:

General Objectives:

**Has this issue been discussed at any other industry forums? If so please specify and provide supporting documentation**

**PART D – GUIDANCE NOTES FOR COMPLETING THE FORM**

Guidelines for Working Group Members and Working Group Terms of Reference are available on the DCUSA Website and provide more information about the progression of the Change Process. [www.dcusa.co.uk](http://www.dcusa.co.uk)

Ref	Data Field	Guidance
1	Attachments	Append any proposed legal text or supporting documentation in order to better support / explain the CP.

<b>2</b>	<b>Part 1 / Part 2 Matter</b>	A CP must be categorised as a Part 1 or Part 2 matter in accordance with Clause 10.4.7 of the DCUSA. All Part 1 matters require Authority Consent.
<b>3</b>	<b>Related Change Proposals</b>	Indicate if the CP is related to or impacts any CP already in the DCUSA or other industry change process.
<b>4</b>	<b>Proposed Solution and Draft Legal Text</b>	<p>Outline the proposed solution for addressing the stated intent of the CP. The Change Proposal Intent will take precedence in the event of any inconsistency. A DCUSA Working Group may develop alternative solutions. The plain English description of the proposed solution should include the changes or additions to existing DCUSA Clauses (including Clause numbers).</p> <p>Insert proposed legal drafting (change marked against any existing DCUSA drafting).</p>
<b>5</b>	<b>Proposed Implementation Date</b>	<p>The Change can be implemented in February, June, and November of each year or as an extraordinary release. For Charging Methodology CPs, select an implementation date which takes in to consideration the deadlines for publishing indicative tariffs.</p> <ul style="list-style-type: none"> <li>• Submission of Company indicative tariffs is 31 December of each year.</li> <li>• Final tariffs are published on 1 April of each year.</li> </ul> <p>Please select an implementation date that provides sufficient time for the change to be incorporated into the appropriate charging model and the DCUSA in order to be reflected within the December indicative tariffs.</p> <p>Contact the DCUSA helpdesk for any further information on the releases <a href="mailto:dcusa@electralink.co.uk">dcusa@electralink.co.uk</a>.</p>
<b>6</b>	<b>Consideration of Wider Industry Impacts</b>	Indicate whether this Change Proposal will be impacted by or have an impact upon wider industry developments. If an impact is identified, explain why the benefit of the Change Proposal may outweigh the potential impact and indicate the likely duration of the Change.
<b>7</b>	<b>Environmental Impact</b>	Indicate whether it is likely that there would be a material impact on greenhouse gas emissions as a result of the proposed variation being made. Please see <a href="#">Ofgem Guidance</a> .
<b>8</b>	<b>Confidentiality</b>	Clearly indicate if any parts of this Change Proposal Form are to remain confidential to DCUSA Panel (and any subsequent DCUSA Working Group) and Ofgem
<b>9</b>	<b>DCUSA General Objectives</b>	Indicate which of the DCUSA Objectives will be better facilitated by the Change Proposal.

<b>10</b>	<b>Rationale for DCUSA Objectives</b>	Provide supporting reasons and information (including any initial analysis that supports your views) to demonstrate why the CP will better facilitate each of the DCUSA Objectives identified.
<b>11</b>	<b>DCUSA Charging Objectives</b>	Indicate which of the DCUSA Charging Objectives will be better facilitated by the Change Proposal. Please note that a CDCM or EDCM change may also facilitate the DCUSA General objectives.