

**DCUSA CHANGE DECLARATION**

**DCP 158 and DCP 158A – ‘DNO DUoS re EDNOs’**

**VOTING END DATE: 20 December 2013**

DCP 158 - ‘DNO DUoS re EDNOs’	WEIGHTED VOTING				
	DNO	IDNO	SUPPLIER	DISTRIBUTED GENERATOR	GAS SUPPLIER
<b>CHANGE SOLUTION</b>	Accept	Accept	Reject	n/a	n/a
<b>IMPLEMENTATION DATE</b>	Accept	Accept	Reject	n/a	n/a
<b>RECOMMENDATION</b>	<p><b>Change Solution – REJECT.</b>                      In respect of each Party Category that was eligible to vote, the sum of the Weighted Votes of the Groups in that Party Category which voted to accept the change solution was less than 50% in all Categories.</p> <p><b>Implementation Date – REJECT.</b>                      In respect of each Party Category that was eligible to vote, the sum of the Weighted Votes of the Groups in that Party Category which voted to accept the implementation date was less than 50% in all Categories.</p>				
<b>PART ONE / PART TWO</b>	<b>Part One</b> – Authority Determination Required				

DCP 158A - 'DNO DUoS re EDNOs'	WEIGHTED VOTING				
	DNO	IDNO	SUPPLIER	DISTRIBUTED GENERATOR	GAS SUPPLIER
<b>CHANGE SOLUTION</b>	Reject	Reject	Reject	n/a	n/a
<b>IMPLEMENTATION DATE</b>	Reject	Reject	Reject	n/a	n/a
<b>RECOMMENDATION</b>	<p><b>Change Solution – REJECT.</b>                      In respect of each Party Category that was eligible to vote, the sum of the Weighted Votes of the Groups in that Party Category which voted to accept the change solution was less than 50% in all Categories.</p> <p><b>Implementation Date – REJECT.</b>                      In respect of each Party Category that was eligible to vote, the sum of the Weighted Votes of the Groups in that Party Category which voted to accept the implementation date was less than 50% in all Categories.</p>				
<b>PART ONE / PART TWO</b>	<b>Part One</b> – Authority Determination Required				

<b>PARTY</b>	<b>DCP 158 SOLUTION (A / R)</b>	<b>DCP 158A SOLUTION (A/R)</b>	<b>IMPLEMENTATION DATE DCP 158 (A/R)</b>	<b>IMPLEMENTATION DATE DCP 158 A (A/R)</b>	<b>COMMENTS</b>
<b>DNO</b>					
<b>Electricity North West Ltd</b>	Reject	Accept	Reject	Accept	If DCP158 is approved it would be difficult to achieve the implementation date and would need to seek a derogation due to IT system changes.
<b>Northern Powergrid - Northern Electric Distribution Ltd</b>	Accept	Reject	Accept	Reject	This change proposal was raised to enable DNOs to continue billing DUoS at the boundary with private networks (on an efficient basis) where competition in supply is taking place in respect of end users on the private network. Ensuring market arrangements to facilitate competition in supply on private networks is a legal requirement following a European legal ruling (the Cityworks case). BSC changes have been put in place to ensure that energy settlement is unaffected by the presence of settlement meters at both the DNO/private network boundary and for individual end users. Northern Powergrid supports DCP 158 as proposed as it preserves the commercial relationship between the DNO and the supplier registered at the boundary in respect of DUoS. DCP 158A is an alternative solution raised by Electricity Northwest that would have the DNO billing the end user's registered supplier(s) in respect of the
<b>Northern Powergrid - Yorkshire Electricity Distribution plc</b>	Accept	Reject	Accept	Reject	

					settlement meters on the end user MPANs. Northern Powergrid has concerns about DCP 158A because, while it may be relatively simple to implement, it would have the DNO billing suppliers in respect of customers that are not directly connected to DNO networks. Northern Powergrid believes it is clearer and cleaner to maintain the relationship between the DNO and the supplier at the boundary of private networks so that it can continue to bill DUoS in respect of exit points directly connected to our networks.
<b>Scottish Power - Manweb</b>	Accept	Reject	Accept	Reject	N/A
<b>Scottish Power - Distribution</b>	Accept	Reject	Accept	Reject	
<b>UKPN - Eastern Power Networks</b>	Accept	Reject	Accept	Reject	We support DCP 158 as this is a pragmatic solution that builds on how things are done now.  This solution better facilitates Charging Objectives 2 and General Objective 2 as it provides transparency of the charges levied by the DNO in these circumstances, facilitating competition in Distribution and Supply.  Charging Objective 1 is better facilitated by this change as it provides greater transparency of the charges by the DNO and the impact the charges
<b>UKPN - London Power Networks</b>	Accept	Reject	Accept	Reject	
<b>UKPN - South Eastern Power Networks</b>	Accept	Reject	Accept	Reject	

					have on customers within embedded networks.
<b>Western Power Distribution - East Midlands plc</b>	Accept	Reject	Accept	Reject	N/A
<b>Western Power Distribution - South Wales plc</b>	Accept	Reject	Accept	Reject	
<b>Western Power Distribution - South West plc</b>	Accept	Reject	Accept	Reject	
<b>Western Power Distribution - West Midlands plc</b>	Accept	Reject	Accept	Reject	
<b>IDNO</b>					
<b>ESP Electricity Ltd</b>	Accept	Reject	Accept	Reject	N/A
<b>Supplier</b>					
<b>British Gas Retail</b>	Reject	Reject	Reject	Reject	<p>Whilst we appreciate the aspiration of these changes to put in place a process for more appropriate DUoS charging arrangements for customers embedded within a private network, we believe that the complexity, cost and administrative burden of the proposed solutions are disproportionate. For these reasons we also believe that the proposed solutions are unlikely engage all suppliers and therefore are unlikely to facilitate competition in the supply of electricity.</p> <p>In our response to the first</p>

					consultation, we suggested an alternative solution with minimal impact on industry systems and processes ( <b>The net metering standard DUoS tariff approach</b> ) which we continue to believe would provide a more appropriate solution.
<b>EON</b>	Reject	Reject	Reject	Reject	<p>We cannot support either as better facilitating the DCUSA objectives as we cannot see the case is proven.</p> <p>We are disappointed that the working group do not seem to have sought a Legal view on the option provide by British Gas but have only used a working group view that this is not acceptable. This solution would seem to be the most acceptable from a customer prospective</p> <p>DCP158 has not quantified the full cost to industry by ignoring the costs to implement on third party agents. DCP158 has the disadvantage of requiring too many invoices being sent for one site and the inevitable consequence of errors occurring with lengthy and costly resolution. Both solutions would mean far more development work than envisaged by the working group and do not offer robust long term solutions.</p>
<b>Npower</b>	Accept	Reject	Reject	Reject	Ideally we would prefer an

					implementation date of at least 3 months following Authority decision.
<b>SSE Energy Supply Ltd</b>	Reject	Accept	Reject	Accept	N/A
<b>GDF Suez Marketing Ltd</b>	Accept	Reject	Accept	Reject	N/A