

DCUSA DCP 179 Consultation Two Responses – Collated Comments

Company	Confidential / Anonymous	1. Do you have any comments on the updated DCP 179 legal text?	Working Group Comments
British Gas	Non-confidential	No – although as stated below we have a preference for the alternative proposal for paragraph 140c.	Noted
EDF Energy	Non-confidential	No	Noted
Electricity North West	Non-confidential	Our only comment is that the table numbering needs to be reviewed. There are 2 tables which have the same table number (Table 4). Also, 2 new tables have been introduced in paragraphs 74 and 135a which do not have a table number.	The group noted that the DCUSA Schedule table numbering needs to be addressed as a housekeeping change, as a number of tables are incorrectly numbered and cross references need to be maintained.
ELEXON Ltd	Non-confidential	Yes We suggest that clauses 132a and 135a are amended to reflect that the Supplier as Registrant can register HH sites to Measurement Classes C and E and where this is the case that the tariffs associated with these will be applied from the DCP179 go live. We believe that this would then assist in any transitional period should P272 be approved, so that Supplier can migrate the majority of NHH PC 5-8 Metering Systems to HH Measurement Class E (or C where this meets the requirements for 100kW) prior to a P272 go live date of 1 April 2016 or later.	The Working Group agreed to update the legal text to address this area.
Supplier 1	Anonymous	Yes. Revising the text for 140c still doesn't address how a supplier should charge customers correctly for their DUoS and how we are supposed to validate the DUoS bills that we receive as we move towards removing the discrepancy between de-linked and not	It was observed that as 140c stands this is a reasonable point, however, this issue will be addressed if option b is chosen in the next question. The responses to question two from respondents is supportive of option b and progressing option 2 should alleviate these

		delinked	<p>concerns.</p> <p>It was noted that this area will be drawn out in the P300 solution (i.e. the SVAA will be amended to accommodate the values provided).</p>
Northern Powergrid (Northeast and Yorkshire)	Non-confidential	None other than the move to the alternative text for para 140c if there is support for this approach.	Noted
Npower	Non-confidential	The legal text is potentially confusing with regard to how Domestic customers with a demand greater than 100kW are treated, such as in schedule 16 paragraph 132a.	<p>It was observed that in P300 the definition of measurement class E has been changed to remove domestic but measurement class C still includes domestic. It was also noted that there are questions around whether it is possible to settle these customers HH as this will depend on it being possible to get HH data for these customers.</p> <p>It is noted that this is a constrain within the BSC and will need to be addressed under P300.</p> <p>The Working Group adjusted the legal text to permit domestic customers to choose from measurement classes. This choice has been introduced because for domestic customers there is not certainty around access to HH data. The approach chosen by the group will enable domestic customers to opt in, thus address concerns around privacy of data as it will be down to customer choice. It was agreed that this should be captured within the Change Report.</p>
Scottish Power Energy Retail Ltd	Non-confidential	No further comments	Noted
SP Distributi	Non-confidential	We believe that the updated DCP 179 legal text now reflects the	Noted

on / SP Manweb		<p>comments made to the first consultation.</p> <p>We have no further comments.</p>	
UK Power Networks	Non- confidential	No we are happy with the suggested changes. However we would have liked to have seen more clarity in the tariff names as suggested in our response to the previous consultation and still believe that 135a is in the wrong section.	<p>It was noted that the majority of working group members were comfortable with the tariff names. The Working Group agreed not to amend the names. It was observed that a CP could be raised to change these if desired at a future date.</p> <p>The Working Group is now comfortable with the location of 135a as a result of the additional clauses that have been added (moving 135a to become 135b)</p>
WPD	Non- confidential	No	Noted

Company	Confidential / Anonymous	2. What is your preferred approach for the legal text for paragraph 140c with respect to how the aggregated tariffs should be set up where the DNO utilises a form of de-linking?	Working Group Comments
British Gas	Non- confidential	Our preference is for the alternative proposal.	Noted
EDF Energy	Non- confidential	We prefer the alternative proposal as it allows a simple remedy to include de-linking which means the industry will be using one approach.	Noted
Electricity North West	Non- confidential	<p>Our preferred approach is to amend paragraph 140c as per the alternative approach. We agree that this will provide a consistent approach across DNOs.</p> <p>We also believe that this will not impact the DNOs who are currently de-linked. They currently ignore the SSC/TPR combinations and create their own distribution time bands in their billing system. It is</p>	Noted

		<p>not a “do nothing” option for those who are de-linked they still have to notify the SVAA with an SSC/TPR combination otherwise the data will not be received by them. This is catered for in the BSC Modification P300.</p> <p>It therefore makes sense to provide their distribution time bands rather than an unrestricted combination to the SVAA (which is only needed at the start and as and when the distribution time bands are changed having served 15 months notice of such changes) and this will assist suppliers in validating their DUoS bill since they receive the same aggregated data that the bill is based on rather than them having to amend their systems to undertake a further aggregation process to mirror each distributor time bands to aid their validation process.</p>	
ELEXON Ltd	Non-confidential	Whilst ELEXON is neutral on this, adding provisions to cater for de-linking seems to be a pragmatic approach under the circumstances.	Noted
Supplier 1	Anonymous	There needs to be a single rule that suppliers can follow for billing these tariffs right now. At the moment there are two sets of rules making it difficult for suppliers to know how to charge or validate	The Working Group noted that this comment was supportive of moving to one of the options, although which one is not specified.
Northern Powergrid (Northeast and Yorkshire)	Non-confidential	We believe this is an opportunity to move towards a de-linking approach This has been a long standing issue and there is currently an industry working group looking at it. We recognise that it has been identified that there could be difficulty in this area, if there were significant system changes. However this would create an opportunity to feed in to the working group currently set up to review the bigger move and agree a possible migration plan. System changes are sometimes inevitable and should not be seen as a barrier to changes for the better.	<p>It was noted that the respondent is supportive of the alternative proposal.</p> <p>It was suggested that the Distribution Charging Methodologies Forum (DCMF) Methodologies Issues Group (MIG) de-linking group should start to pick up its work again soon (the group is currently waiting for DCP 179 to progress). An Working Group member stated that they would raise this at the next DCMF MIG meeting.</p>
Npower	Non-confidential	We Prefer Paragraph 140c – alternative proposal:	Noted

		<i>140c DNO specific network time bands will be applied to the appropriate SSC/TPR combinations stated in paragraph 140b.</i>	
Scottish Power Energy Retail Ltd	Non-confidential	Scottish power support the alternative Proposal for 140C (<i>Option a</i>). We believe that a unique shared approach across all the DNO's will be better to reduce the complexity of the market.	Noted
SP Distribution / SP Manweb	Non-confidential	<p>We prefer the alternative proposal to Paragraph 140c.</p> <p>As customers migrate to a HH tariff the discrepancy between 'de-linked' and 'non de-linked' billing will reduce until it is effectively removed.</p> <p>If all DNO's set up SSC/TPR combinations for their HH aggregated tariffs which align with their Red, Amber and Green time-bands, the D0242 statement will display the splits of both charges and consumptions.</p>	Noted
UK Power Networks	Non-confidential	We believe that the alternative proposal to the legal text does address the 'de-linking' issue, and this is the option which we would support. Although these changes should only be taken forward as part of this change proposal as long as this will not in any way delay or restrict the other more fundamental changes which DCP179 is looking to implement.	noted
WPD	Non-confidential	No objections to either	<p>Noted</p> <p>The group noted that the majority of respondents supported the alternative proposal. It was agreed that the legal text should be updated accordingly.</p>

Company	Confidential / Anonymous	3. Are there any unintended consequences of the alternative proposal for paragraph 140c?	Working Group Comments
British Gas	Non-confidential	We have not identified any.	Noted
EDF Energy	Non-confidential	Not that we are aware	Noted
Electricity North West	Non-confidential	We are not aware of any unintended consequences.	The respondent highlighted that it should be flagged to the P300 Working Group that within the first DCP 179 an attachment that showed the combinations that the SVAA may be doing based on the timebands. Now that a decision has been made in this area it needs to be made clear to the SVAA that there is not a need to accommodate a restricted arrangement.
ELEXON Ltd	Non-confidential	We do not foresee any. However, we intend that the P300 Workgroup consider this in developing its solution.	Noted
Supplier 1	Anonymous	No comment	Noted
Northern Powergrid (Northeast and Yorkshire)	Non-confidential	None that we are aware of, however we would not want this particular change to hinder the progress of DCP 179 as a whole. So any issues, raised by parties need to be carefully considered.	Noted
Npower	Non-confidential	None that we are aware of at this time.	Noted
Scottish Power Energy Retail Ltd	Non-confidential	We do not perceive any unintended consequences, hence our support of the alternative	Noted

SP Distributi on / SP Manweb	Non- confidential	No.	Noted
UK Power Networks	Non- confidential	At the current time we do not believe there to be.	Noted
WPD	Non- confidential	No	Noted