

**DCUSA DCP 182 Consultation responses – collated comments**

<b>Company</b>	<b>1. Do you understand the intent of the CP?</b>	<b>Working Group Comments</b>
E.ON	Yes	Noted
Electricity North West Limited	Yes	Noted
Northern Powergrid	Yes	Noted
ScottishPower Energy Retail Ltd	Yes	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Yes	Noted
SP Manweb & SP Distribution	YES	Noted
UK Power Networks	Yes	Noted

Western Power Distribution plc.	Yes	Noted
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Company	2. Are you supportive of the principles established by this proposal?	Working Group Comments
E.ON	No. A supplier still needs to retain the right to send a disconnection notice in respect of a logical disconnection. This change would remove that ability.	The Working Group agreed that the proposal is not removing the right of a supplier to send a disconnection. Under MAP 21 they are still able to send a D0132 for a disconnection, but don't have to. For further clarification, the Working Group agreed that the following sentence should be added at the end of clause 25.16 in the legal text - 'For the avoidance of doubt, there is still the ability for the supplier to send a logical disconnection request'.
Electricity North West Limited	Yes	Noted
Northern Powergrid	Yes	Noted
ScottishPower Energy Retail Ltd	Yes – full supportive	Noted
Southern Electric Power Distribution plc and Scottish	Yes. In our view, this proposal would remove unnecessary data flows and administrative overheads.	Noted

Hydro Electric Power Distribution plc		
SP Manweb & SP Distribution	YES	Noted
UK Power Networks	Yes	Noted
Western Power Distribution plc.	Yes	Noted

<b>Company</b>	<b>3. Are there any unintended consequences of this proposal?</b>	<b>Working Group Comments</b>
E.ON	Yes. the legal text needs an indemnity inserting from the company to the user against all costs, demands, claims, expenses, liability, loss, or damage caused as a consequence of Company disconnecting a premise. This is missing from the new process and therefore leaves the responsibility unclear.	The Working Group is in agreement that it is right to remove section 25.15 of DCUSA. The reasoning behind this is because there is no indemnity from the supplier side because it is a distributor-led disconnection.
Electricity North West Limited	None	Noted
Northern Powergrid	No	Noted

ScottishPower Energy Retail Ltd	No	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	There are no obvious unintended consequences of this proposal in our view.	Noted
SP Manweb & SP Distribution	NO	Noted
UK Power Networks	No	Noted
Western Power Distribution plc.	None Identified	Noted

Company	4. Do you consider that the proposal better facilitates the DCUSA objectives?	Working Group Comments
E.ON	We do not believe any objectives are better facilitated as sending a notice has no impact on the maintenance and operation of a network. In fact it may have an adverse effect as the ability of a User to request a logical	Noted

	disconnection has been removed and therefore Distributors may believe they have connection points existing that are no longer there.	
Electricity North West Limited	<p>We believe that this proposal better facilitates objective four as it aligns the DCUSA with the MRA obligations regarding Disconnections. Without such a change an increase in the administrative burden in handling enquiries regarding governance issues may occur.</p> <p>We believe the other objectives are neutral.</p>	Noted
Northern Powergrid	<p>General Objective One is better facilitated as the duplication of Disconnection Notices leads to inefficiencies in terms of superfluous D0132 dataflow and the administrative burden associated with these. The removal of this requirement will lead to a consistent and standardised approach that is more efficient.</p> <p>General Objective Four is better facilitated as duplication of Disconnection Notices leads to inefficiencies in terms of superfluous D0132 dataflow and the administrative burden associated with these. The removal of this requirement will lead to a consistent and standardised approach that is more efficient.</p>	Noted
ScottishPower Energy Retail Ltd	4 – agree with Working Group as this is closing off a redundant requirement	Noted
Southern Electric Power Distribution plc and	This proposal better facilitates objectives 1 and 4	Noted

Scottish Hydro Electric Power Distribution plc		
SP Manweb & SP Distribution	YES	Noted
UK Power Networks	General Objective 4 is bettered by improving the efficiency of administration.	Noted
Western Power Distribution plc.	The proposal better facilitates General Objective one as it will remove a superfluous message flow from the disconnections process leading to a more efficient process.	Noted

Company	5. Do you have any comments on the proposed legal text?	Working Group Comments
E.ON	Only as above.	Noted
Electricity North West Limited	<p>We do not see any value with changing the existing wording in Clauses 25.19B and 25.19C as amending it to the new wording suggests the sending of the data but not necessarily what data is held in the system.</p> <p>The Green Deal CP was a Department of Energy and Climate Change (DECC) led CP and the legal text was provided by DECC after their consultation, therefore it is DECC's legal text published in DCUSA. To amend the Green Deal legal text we believe there would need to be a</p>	Working Group members agreed that they did not need to amend the as suggested by the respondent.

	<p>detailed justification to do so.</p> <p>In our opinion it should be left alone and is probably outside the intent of DCP182.</p> <p>We also believe it would be cleaner to remove the definition for 'Disconnection Notice' in Schedule 2B as this meets the intent of DCP182.</p> <p>When you consider Clause 25.16 it states the User may request a Disconnection on behalf of the customer therefore do not see any reason for removing the text '<del>for the Registrant on behalf of the customer</del>' from clause 6.1.</p> <p>The following legal text could be considered for Clause 6.1 and 6.2 if the 'Disconnection Notice' definition is removed;</p> <p><b>Amend DCUSA Clause 6 of Schedule 2 as follows:</b></p> <p>6.1 The Customer (or the Registrant on behalf of the customer) shall be entitled to send to the company a <del>Disconnection Notice</del> request to Disconnect a Connection Point, providing an explanation for why there is no reasonably foreseeable future use <del>for the Connection Point</del>, and specifying the date on which the Disconnection is required.</p> <p>6.2 Unless the Company reasonably considers that it is not permitted to Disconnect the Connection Point in accordance with the Act or the Electricity Distribution Licence, and unless agreed otherwise following the receipt of a <del>Disconnection Notice</del> request in accordance with Clause 6.1, the Company shall (on, or as soon as reasonably practicable after, the date specified in the Disconnection Notice) remove the Connection Equipment from the Property. The Customer acknowledges that it may not be practicable to remove the equipment on the</p>	
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	date specified, or for some time thereafter. The Customer shall pay to the Company forthwith upon demand an amount equal to the reasonable costs and expenses incurred by the Company in removing the Connection Equipment.	
Northern Powergrid	No	Noted
ScottishPower Energy Retail Ltd	No	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	No	Noted
SP Manweb & SP Distribution	NO	Noted
UK Power Networks	The legal text attached to the consultation refers to changes to the Definitions in Schedule 2B and to Clause 6 of Schedule 2. It is unclear quite what is intended here. Section 3 and Section 4 of Schedule 2B both contain similar text. Clarification is required as to whether the intent is to change one or both sections.	The Working Group agreed to contact UKPN to ask for expansion of the last two sentences in order to understand the issue UK Power Networks is trying to raise.



Western Power Distribution plc.	No	Noted
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<b>Company</b>	<b>6. Are there any alternative solutions or matters that should be considered?</b>	<b>Working Group Comments</b>
E.ON	As described	Noted
Electricity North West Limited	No	Noted
Northern Powergrid	No	Noted
ScottishPower Energy Retail Ltd	No	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	No. The proposed solution appears to align DCUSA and the MRA in the most efficient way.	Noted
SP Manweb & SP	NO	Noted

Distribution		
UK Power Networks	No	Noted
Western Power Distribution plc.	No	Noted

<b>Company</b>	<b>7. Are you supportive of the proposed implementation date of the first release after Authority approval? If not, please provide your rationale.</b>	<b>Working Group Comments</b>
E.ON	Yes	Noted
Electricity North West Limited	Yes	Noted
Northern Powergrid	Yes	Noted
ScottishPower Energy Retail Ltd	Yes – full supportive	Noted
Southern Electric Power Distribution plc and Scottish	Yes	Noted

Hydro Electric Power Distribution plc		
SP Manweb & SP Distribution	YES	Noted
UK Power Networks	Yes	Noted
Western Power Distribution plc.	Yes. This will align the DCUSA with the MRA process at the earliest opportunity.	Noted

<b>Company</b>	<b>8. Please state any other comments or views on the Change Proposal.</b>	<b>Working Group Comments</b>
E.ON	This is already covered.	Noted
Electricity North West Limited	None	Noted
Northern Powergrid	n/a	Noted
ScottishPower Energy Retail Ltd	n/a	Noted

Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Nothing to add at this time.	Noted
SP Manweb & SP Distribution	As this was raised by SP Energy Networks I fully believe that the removal of the requirement for Suppliers to send a Disconnection Notice will lead to a standardised approach which is more efficient.	Noted
UK Power Networks	N/a	Noted
Western Power Distribution plc.	No other comments	Noted