



DCUSA CHANGE REPORT

DCP 182 – REMOVAL OF DISCONNECTION NOTICE

Executive Summary

DCP 182 seeks to remove the requirement for a Disconnection Notice in accordance with Clause 6.1 of the DCUSA agreement (D0132) (Request for Disconnection) Notice from the Supplier to Distributor.

This document presents the Change Report for DCP 182 and invites respondents to vote on the proposed change.

1 PURPOSE

- 1.1 This document is issued in accordance with Clause 11.20 of the DCUSA, and details DCP 182 – ‘Removal of Disconnection Notice’. The voting process for the proposed variation and the timetable of the progression of the Change Proposal (CP) through the DCUSA Change Control Process is set out in this document.
- 1.2 Parties are invited to consider the proposed amendment (Attachment 1) and submit their votes using the Voting form (Attachment 2) to dcusa@electralink.co.uk by **13 February 2015**.

2 BACKGROUND AND SUMMARY OF DCP 182

- 2.1 DCP 182 has been raised following approved change proposals under the Master Registration Agreement (MRA):
- MAP CP 0173¹ - this change introduces a new procedure to standardise the disconnections process, namely the MRA Agreed Procedure for Disconnections (MAP 21²); and
 - DTC CP 3382³ - this change implements data flow changes to support the MRA Agreed Procedure for Disconnections processes.
- 2.2 As a consequence of MAP CP 0173 and DTC CP 3382 physical disconnections (Bulk (more than one MPAN) and Individual MPAN) will become Distributor led. In reality this means the disconnection notice has been replaced by a request for disconnection that is most likely be sent for logical disconnections (redundancy of an additional MPAN, not requiring physical works).
- 2.3 DCP 182 intends to remove the requirement for a Disconnection Notice (D0132-Details of Disconnection of Supply) from the Supplier to Distributor within the DCUSA agreement.

¹ MAP CP 0173 - The MRA Agreed Procedure for Disconnections

² <http://mrasco.com/mra-products/mra-agreed-procedures>

³ DTC CP 3382 - Notification of Physical Disconnections - <http://mrasco.com/change-proposals/change-tracker/84?cpid=15789>

2.4 At present there is an “entitlement” under DCUSA Section 2A, Clause 25 and Schedule 2B, Section 3 and 4, Clause 6.1 for the Customer (or the Registrant on behalf of the customer) to send a Disconnection Notice to the DNO Company requesting a Disconnection to be carried out. This requirement is based on the need for the Supplier to advise the Distributor in order that the work can be arranged and is in effect a Supplier-Led Disconnection notified by use of a D0132 Flow. It is considered that the entitlement for Suppliers to send a Disconnection Notice to Distributors should be removed.

2.5 The proposal is to amend/remove the relevant text within:

- Section 1A, Definitions and Interpretations
- Section 2A, Clause 25
- Schedule 2B, Section 3 Definitions & Interpretation
- Schedule 2B, Section 4 Disconnection

3 WORKING GROUP

3.1 The DCUSA Panel established a Working Group to assess DCP 182. This Working Group consists of DNO, Supplier, Master Registration Agreement (MRA) and Ofgem representatives. Meetings were held in open session and the minutes and papers of each meeting are available on the DCUSA website – www.dcusa.co.uk.

3.2 The Working Group considered that where the Distributor notifies the Supplier that the Distributor will be disconnecting a premise, there is no need for the Supplier to send a D0132 dataflow in return requesting the Distributor to disconnect the premises. This CP seeks to remove the superfluous D0132 dataflow and administrative burden of this duplication of work.

3.3 Members noted that as a result of CP 0173 there is a new MRA Agreed Procedure (MAP) 21 document. MAP 21 removes the mandatory requirement for the Supplier to send a D0132 ‘Details of Disconnection of Supply’ dataflow.

- 3.4 MRA Issue Form(MIF) 146 'Unmetered Supply (UMS) Disconnection Process'⁴ was raised to consider removing this requirement for the Supplier to send a D0132 dataflow in respect of UMS. The Group noted that the procedures are governed under the Balancing & Settlement Code (BSC).
- 3.5 Members considered that the D0132 dataflow will only be required when:
- (a) the Supplier receives the call from the customer for a physical disconnection and, with the customer's agreement, will send the D0132 flow to the DNO to notify them of the details of a customer who has enquired about a physical disconnection.
 - (b) the Supplier requests a logical disconnection.
- 3.6 The Working Group discussed the fact that the proposed legal text may make changes to the Green Deal legal text which was incorporated in the 24 January 2013 DCUSA release. The Working Group agreed to check with the DCUSA Legal Advisor whether permission would need to be sought from the Department of Energy and Climate Change (DECC) for these changes. The DCUSA Legal Advisor confirmed that permission would not be needed.

4 DCP 182 CONSULTATION

- 4.1 The DCP 182 consultation was issued on 22 October 2014 and eight responses were received.
- 4.2 A summary of the responses received, and the Working Group's conclusions are set out below. The full set of responses and the Working Group's comments are provided in Attachment 5.

Question 1 - Do you understand the intent of the CP?

- 4.3 The Working Group noted that all eight respondents understood the intent of the CP.

Question 2 - Are you supportive of the principles established by this proposal?

- 4.4 The Working Group noted that seven of the respondents were supportive of the

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http://mrasco.com/staticfiles/document_download.php?document_id=3335&session=0sv5c3inumtkqjkvu4bademq93

principles established by this CP.

- 4.5 One respondent felt that this change would remove the right to send a disconnection notice in respect of a logical disconnection. 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 to reinstate some text concerning logical disconnections.

Question 3 – Are there any unintended consequences of this proposal?

- 4.6 The Working Group noted that seven of the respondents expressed the opinion that there were no unintended consequences of this proposal.
- 4.7 One respondent felt that the legal text for this change needs the insertion of indemnity from the company to the user against all costs, demands, claims, expenses, liability, loss, or damage caused as a consequence of a Company disconnecting a premise, because the legal text proposed leaves the responsibility unclear. The consensus of the Working Group was that it was right to remove references to indemnity in sections 25 of DCUSA. The reasoning behind this is because there is no indemnity from the Supplier side because it is a distributor-led disconnection.

Question 4 – Do you consider the proposal better facilitates the DCUSA objectives?

- 4.8 The Working Group noted that seven respondents agreed that the proposal better facilitates the DCUSA objectives. The following table provides a breakdown on which Objectives respondents specifically mentioned as being better facilitated:

DCUSA General Objectives	No. Of Respondents that agree it is better facilitated
Objective 1	3
Objective 2	0
Objective 3	0
Objective 4	5
Objective 5	0

- 4.9 One respondent expressed the opinion that the DCUSA objectives are not better facilitated because sending a notice has no impact on the maintenance and operation of a network, and believes that the CP may have an adverse effect as the ability of a User to

request a logical disconnection is removed and therefore Distributors may believe they have connection points existing that are no longer there.

Question 5 – Do you have any comments on the proposed legal text?

- 4.10 The Working Group noted that six respondents had no comments on the legal text.
- 4.11 One respondent expressed the opinion that they did not see any value with changing the existing wording in Clauses 25.19B and 25.19C because amending it to the new wording suggests the sending of the data but not necessarily what data is held in the system. The respondent also believes it would be cleaner to remove the definition for 'Disconnection Notice' in Schedule 2B as this meets the intent of DCP182, and proposed legal text for Clause 6.1 and 6.2 if the 'Disconnection Notice' definition is removed. The Working Group agreed that they did not need to amend the legal text for DCUSA, as suggested by the respondent.
- 4.12 One respondent felt that the amended legal text attached to the consultation was unclear and that Section 3 and Section 4 of Schedule 2B both contain similar text. Therefore, the Working Group amended the text.

Question 6 – Are there any alternative solutions or matters that should be considered?

- 4.13 The Working Group noted that seven respondents identified no alternative solutions or matters and that one respondent felt that they had already expressed their views on this issue in previous questions.

Question 7 – Are you supportive of the proposed implementation date of the first release after Authority approval? If not, please provide your rationale.

- 4.14 The Working Group noted all respondents were supportive of the proposed implementation date.

Question 8 – Please state any other comments or views on the Change Proposal.

- 4.15 The Working Group noted all respondents did not have any other comments or views on the CP.

5 ASSESSMENT AGAINST THE DCUSA OBJECTIVES

- 5.1 The Working Group considers that the following DCUSA Objective is better facilitated by DCP 182.

General Objective One - The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Network

- 5.2 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.

General Objective Four - The promotion of efficiency in the implementation and administration of this Agreement

- 5.3 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.

6 DCP 182 - LEGAL DRAFTING

- 6.1 The draft legal text has been reviewed by the DCUSA Legal Advisor and is provided as Attachment 1.
- 6.2 This draft legal text differs slightly from the legal text that was part of the consultation. Following a review of the consultation responses, references to indemnity were removed from the legal text. The Working Group also agreed that the original text of Clause 25.19B was fit for purpose, and minor amendments were made on the advice of DCUSA Legal Advisors to improve the clarity of the legal text.
- 6.3 The draft legal text removes the requirement for a disconnection notice by removing the definition of a 'Disconnection Notice' in Clause 1.1 in DCUSA Section 1A and by removing the paragraphs on the disconnection procedure in section 2A, Clauses 25.15, 25.15.1 and 25.15.2, and the paragraphs on the conditions around the use of disconnection notices, Clauses 25.18 and 25.19. References to disconnection notices were also removed from Clauses 25.19A and 25.20.

- 6.4 In Clause 25.16 the ability of a User to act on behalf of a third party was added and that Companies (Subject to Clause 25.7) disconnect a metering point in accordance with the MRA or shall 'Disconnect the Metering System'.
- 6.5 Clause 25.17 was amended as a consequence of revised procedure in Clause 25.16.
- 6.6 Clause 25.19A was amended to allow a Company with a Meter Point relating to a Green Deal Premises to 'Disconnect the Metering Point' if they are entitled to in accordance with Condition 12.9A of the Distribution Licence.
- 6.7 In Clause 25.19C references to indemnity were removed because there is no indemnity from the supplier side because it is a distributor-led disconnection.
- 6.8 In Clause 1.1 in sections 3 and 4 of Schedule 2B the reference to the Registrant was removed; and in Clause 6.1 the reference to the Registrant on behalf of the customer was also removed.

7 ENVIRONMENTAL IMPACT

- 7.1 In accordance with DCUSA clause 11.14.6, the Working Group assessed whether there would be a material impact on greenhouse gas emissions if DCP 182 were implemented. The Working Group did not identify any material impact on greenhouse gas emissions from the implementation of this Change Proposal.

8 ENGAGEMENT WITH THE AUTHORITY

- 8.1 Ofgem has been fully engaged throughout the development of DCP 182 as a member of the Working Group.

9 IMPLEMENTATION

- 9.1 The implementation date proposed for DCP 182 is 1 April 2015. The Working Group has selected this date based on the expected timescales to progress the CP.

10 PANEL RECOMMENDATION

10.1 The Panel approved this Change Report at its meeting on 21 January 2015. The Panel considered that the Working Group had carried out the level of analysis required to enable Parties to understand the impact of the proposed amendment and to vote on DCP 182.

10.2 The timetable for the progression of the CP is as follows:

Activity	Date
Change Report issued for voting	23 January 2015
Voting closes	13 February 2015
Change Declaration	17 February 2015
Authority Determination	24 March 2015
DCP 182 Implemented	1 April 2015

11 NEXT STEPS

11.1 Parties are invited to consider the proposed amendment (Attachment 1) and submit their votes using the Voting form (Attachment 2) to dcusa@electralink.co.uk by **13 February 2015**.

11.2 If you have any questions about this paper or the DCUSA Change Process please contact the DCUSA by email to dcusa@electralink.co.uk or telephone 020 7432 2840.

ATTACHMENTS

- Attachment 1 – DCP 182 Legal Text
- Attachment 2 – Voting Form
- Attachment 3 – Change Proposal
- Attachment 4 – Consultation Document
- Attachment 5 – Collated Consultation Responses