

DCP 246 CHANGE DECLARATION**VOTING END DATE: 9 OCTOBER 2015**

DCP 246 - CORRECTION TO UNINTENDED CONSEQUENCE OF IMPLEMENTATION OF DCP 239	WEIGHTED VOTING				
	DNO	IDNO	SUPPLIER	DISTRIBUTED GENERATOR	GAS SUPPLIER
CHANGE SOLUTION	Reject	n/a	Accept	n/a	n/a
IMPLEMENTATION DATE	Reject	n/a	Accept	n/a	n/a
RECOMMENDATION	<p>Change Solution – Reject. For the majority of the Party Categories that were eligible to vote:</p> <ul style="list-style-type: none"> the number of groups in each Party Category which voted to accept the proposal was less than 65% of the total number of Groups in that Party Category which voted; and the sum of the Weighted Votes of the Groups in each Party Category which voted to accept the proposal was less than 65%. <p>Implementation Date – Reject. For the majority of the Party Categories that were eligible to vote:</p> <ul style="list-style-type: none"> the number of groups in each Party Category which voted to accept the implementation date was less than 65% of the total number of Groups in that Party Category which voted; and the sum of the Weighted Votes of the Groups in each Party Category which voted to accept the implementation date was less than 65%. 				
PART ONE / PART TWO	Part Two – Authority Determination Not Required				

PARTY	SOLUTION (A / R)	IMPLEMENTATION DATE (A / R)	WHICH DCUSA OBJECTIVE(S) IS BETTER FACILITATED?	COMMENTS
DNO PARTIES				
SP Distribution plc	Accept	Accept	As included in the change report.	None.
SP Manweb plc	Accept	Accept		
Electricity North West Limited	Reject	Reject	None of the DCUSA Objectives are better facilitated by this change.	The delay of twelve months in implementation remains valid as the original proposal to implement the SLA measures highlighted that significant numbers of meter installations and therefore network interventions would occur at a later time. No change is required as the mass rollout of smart meters is not expected to start until after 1 August 2016.
Northern Powergrid (Northeast) Ltd	Reject	Reject	This change would have a negative impact on General Objective 1 and General Objective 3 due to the impact on allocating resources.	The reason that Northern Powergrid are voting against this change is that we were clear when we voted in favour of DCP239 on in May 2015 that this effective SLA date also moved out to July 2016 as a consequence. We clearly stated this on page two of our response, and to us the consequence was not unintended. We voted for DCP239 as a sensible measure to reduce multiple reporting by Suppliers despite the fact that we lost a measure of forward vision
Northern Powergrid (Yorkshire) Plc	Reject	Reject		

				<p>of Suppliers’ roll-out forecasts. The upside to this is that we extended the start the SLAs by one quarter. We have recently deployed additional contractor resources to support our defect resolution work and our resourcing plans give us a trajectory to achieve the SLAs at new 1 July 2016 date. It seems inequitable to us that having secured the DNOs vote that this known and clearly identified benefit should now be removed.</p>
Southern Electric Power Distribution plc	Reject	Reject	<p>We do not feel that this CP better facilitates any of the DCUSA Objectives.</p>	<p>We agree with the view expressed in paragraph 3.2 of the Change Report that the subject matter of this CP is not universally viewed as an ‘unintended consequence’ of DCP239.</p> <p>Some DCUSA Parties will have voted in support of DCP239 in the reasonable belief that the legal text was intentionally drafted in the form in which it was ultimately approved.</p> <p>In our view this CP should be rejected on the basis that there is dispute concerning the validity of the ‘unintended consequence’ and that in any event it is now unreasonably late to make this Change.</p>
Scottish Hydro Electric Power Distribution plc	Reject	Reject		

Eastern Power Networks	Reject	Reject	None of the DCUSA Objectives are bettered by this change as we believe there are other inconsistencies in the SLA mechanism, as well as those introduced by DCP 239, which are not addressed by this change, making the proposed change ineffective.	The SLA relies on a volume measure of 2% of supplier forecasts provided a given period in advance. We believe this mechanism does not work as originally envisaged due to the content as well as the timing of the supplier forecasts referenced in this part of the text. The DNO's performance against the CAT A & B targets is communicated so performance will be visible.
London Power Networks	Reject	Reject		
South Eastern Power Networks	Reject	Reject		
IDNO PARTIES				
n/a				
SUPPLIER PARTIES				
npower	Accept	Accept	The CP better meets DCUSA General Objective One by ensuring that network issues reported to the network companies are rectified within agreed timescales therefore contributing to the efficiency of the network.	n/a
E.ON	Accept	Accept	We believe that DCUSA objectives 1, 2, 3 and 5 are better facilitated by this change as it rectifies any unintended consequence of DCP239, ensures	n/a

			alignment and network issues reported are rectified within agreed timescales, makes the process more efficient for suppliers and supports the EU requirement to install smart meters	
SSE Energy Supply	Accept	Accept	<p>The change proposal better meets DCUSA General Objective One by ensuring that network issues reported to the network companies are rectified within agreed timescales therefore contributing to the efficiency of the network.</p> <p>The change proposal better meets General Objective Two as the proposal will help Suppliers in managing customer expectations with regard to fault resolution. This will assist those Suppliers who are carrying out meter exchanges to support specific customer propositions and therefore help to improve competition in the electricity supply market.</p> <p>The change proposal better meets General Objective 3 as Licence Condition 21 "The Distribution Code" places obligations on licensees to ensure licencees operate their network in an efficient, co-ordinated and economical manner. The proposed changes will assist network owners in ensuring these obligations are met.</p>	n/a

<p>British Gas</p>	<p>Accept</p>	<p>Accept</p>	<p>Objective 1 – Better Facilitated The CP better meets DCUSA General Objective One by ensuring that network issues reported to the network companies are rectified within agreed timescales therefore contributing to the efficiency of the network.</p> <p>Objective 2 – Better Facilitated The CP better meets General Objective Two as the proposal will help Suppliers in managing customer expectations with regard to fault resolution. This will assist those Suppliers who are carrying out meter exchanges to support specific customer propositions and therefore help to improve competition in the electricity supply market.</p> <p>Objective 3 – Better Facilitated The CP better meets General Objective 3 as Licence Condition 21 “The Distribution Code” places obligations on licensees to ensure licensees operate their network in an efficient, co-ordinated and economical manner. The proposed changes will assist network owners in ensuring these obligations are met.</p> <p>Objective 5 – Better Facilitated The CP better facilitates Objective five by supporting the EU’s requirement to install smart meters.</p>	<p>n/a</p>
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DISTRIBUTED GENERATOR PARTIES				
n/a				

GAS SUPPLIER PARTIES				
n/a				