

DCUSA DCP 203 Consultation responses – collated comments

Company	1. Do you agree with the intent of DCP 203?	Working Group Response
Electricity North West	No we do not agree with the intent of DCP 203 as we believe it will result in a reduction in the cost reflectivity of Use of System tariffs.	<p>The Working Group reviewed and noted the comment. It was explained that any reduction in cost reflectivity would be offset by an improvement in administration of inter-distributor billing, which in turn reduces customer costs. It was highlighted that the response received from GTC to this question explains the situation in detail, the response is:</p> <p><i>We believe DCP 203 will go some way to reducing the additional burden that EDNO UMS customers, (Street Lighting Authorities (SLA) customers in particular) face as a result of having their inventory items connected to an EDNO network. This additional administration exists only to enable the host DNO to bill the EDNO for the use of its distribution system (i.e. inter-distributor billing), a bill which often, for the EDNO's largest UMS customers, amounts to no more than a few hundred pounds per customer per annum. Currently for most EDNO UMS customers the annual inter-distributor charge is less than £100.</i></p>
ESP Electricity Ltd	Yes	
GTC	Yes, BU UK supports the intent of DCP203. We believe DCP 203 will go some way to reducing the additional burden that EDNO UMS customers, (Street Lighting Authorities (SLA) customers in particular) face as a	

	<p>result of having their inventory items connected to an EDNO network. This additional administration exists only to enable the host DNO to bill the EDNO for the use of its distribution system (i.e. inter-distributor billing), a bill which often, for the EDNO's largest UMS customers, amounts to no more than a few hundred pounds per customer per annum. Currently for most EDNO UMS customers the annual inter-distributor charge is less than £100.</p> <p>If the same network extension was adopted by the host DNO there would be no impact on the LA other than a requirement to update their existing inventory. This requirement has the potential to put EDNOs at a disadvantage over the host DNO for new development sites as almost all developers are required to complete a Section 38 agreement with the LA; the current arrangements make this process significantly more difficult if the developer awards the site to an EDNO. DCP203 will not remove this issue, although it will reduce the burden on EDNO LA customers to some extent but reducing the number of additional MPANs required, although extra MPANs will still be required. We believe that the best way to resolve this issue is to allow the customer to trade its inventory under the host DNO's MPAN regardless of whether the network extension is adopted by the Host DNO or another EDNO.</p>	
Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire)	<p>We agree with the original intent of this change to rationalise LDNO UMS charges in so far as it seeks to reduce potentially unnecessary administrative costs, whereas the currently proposed solution appears to add additional complexity rather than rationalising the number of tariffs.</p>	

plc		
SSEPD and SSE Hydro	No	The Working Group noted the response, but highlights that no reasoning was given for the Working Group to consider.
SP Distribution / SP Manweb	Yes	
UK Power Networks	Yes	

Company	2. Do you agree with the principles of DCP 203?	Working Group Response
Electricity North West	<p>No. We believe this DCP will result in the wrong tariff being applied to some UMS customers and consequently will result in a cross subsidy between groups of customers.</p> <p>It will also potentially discriminate between LDNOs by applying lower tariffs to LDNOs where the majority of the UMS connections are HV compared to those where the majority of UMS connections are LV. This will provide an LDNO with a majority of HV connected UMS customers with a competitive advantage and therefore distort competition between distributors.</p>	<p>Paragraph 1 – The Working Group discussed this point, and do not believe there would be a cross-subsidy in relation to this CP being implemented. It was agreed that ElectraLink would write to ENWL for more information/clarification on this point.</p> <p>Action: ElectraLink</p> <p>Post Meeting Note: ENWL Response</p> <p><i>I believe a potential cross subsidy exists as an IDNO UMS customers are allocated to a tariff based on the predominance of the voltage of connection for its UMS customers. Consequently, some of the UMS customers will be allocated to a tariff that is too high or too low as the assumed voltage of connection for applying the tariff to those customers will be different to the actual voltage of connection. This will result in too much or too little</i></p>

		<p><i>revenue being recovered from these customers which will need to be allocated elsewhere and can be viewed as a cross-subsidy.</i></p> <p>The Working Group agreed to review and include the information regarding the rationale for using the proxy within the Change Report.</p> <p>Action: NF and ElectraLink</p>
ESP Electricity Ltd	Yes	
GTC	Yes	
Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	<p>We are aware that there is an industry issue of unnecessary costs to customers and potential barriers to competition arising from potentially unnecessary administrative costs. Reducing the number of tariffs needs to be carefully considered together with the inevitable reduction in cost-reflectivity. We understand from the change proposal form that costs applied by meter administrators (MAs) and suppliers can be high; reducing the number of MPANs required is one way to go about dealing with this and may make a small improvement. However, we feel this will not affect the underlying issue of allegedly high MA and/or supplier charges.</p>	<p>The Working Group agreed with the response and noted that the implementation of this CP would reduce the charges but not remove them entirely.</p> <p>The Working Group agreed to attempt to quantify the charges/impacts of these changes; if it can be successfully accomplished it was agreed to include this information within the Change Report.</p> <p>Action: NF and ElectraLink</p>
SSEPD and SSE Hydro	No. Please see below.	The Working Group noted the response.
SP Distribution	Yes	

/ SP Manweb		
UK Power Networks	Yes	

Company	3. Do you have any comments on the proposed legal text? Provide supporting comments.	Working Group Response
Electricity North West	We do not agree with the principles underlying the proposed legal text.	The Working Group reviewed and noted the comments within the response.
ESP Electricity Ltd	No additional comments.	
GTC	No, we support the text as drafted.	
Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	The legal text does not align with the consultation document in paragraph 6.1. It is stated in the consultation document that "the determining factor for the LDNO discount will be based on the upstream LDNO/DNO boundary connection level of the majority of all NHH domestic LDNO connections" whilst the legal text states "the EDNO shall apply a Line Loss Factor Class Id that reflects the voltage of connection of the EDNO's Distribution Systems that provides the majority (i.e. more than 50%) of non-half hourly connections made to the EDNO's Distribution Systems." We believe if this solution is taken forward the approach outlined in the consultation document of using domestic customer counts is more appropriate than that in the legal text,	<p>Paragraph 1 - The Working Group agreed with this response, and will amend the legal text accordingly before being submitted to the DCUSA legal advisors. Action: NF and ElectraLink</p> <p>Paragraph 2 – The Working Group discussed the point within this paragraph and agreed to examine ways to improve/clarify the legal text regarding moving away from the status quo arrangements, or staying with them. Action: NF and MH</p>

	<p>subject to our response to question nine.</p> <p>Furthermore, we are uncomfortable with the legal text stating that “unless the EDNO notifies the DNO Party otherwise” a single discount will be applied. We would like to see this amended to ensure that the dialogue between EDNO and DNO takes place regardless of which option the EDNO chooses i.e. to provide clarity of the arrangements for both parties.</p>	
SSEPD and SSE Hydro	No	
SP Distribution / SP Manweb	No	
UK Power Networks	<p>We do not believe that changing Schedule 19 achieves the desired outcome.</p> <p>Schedule 19 merely describes a process (which itself is not changing). We believe that changes are required to the methodologies (Schedules 16-18). At present these state that the LDNO DUoS charges are based on the voltage of connection. To apply these changes to Schedule 19 in isolation would result in inconsistency and indeed conflict with schedules 16-18. This could ultimately result in charging that is not compliant with the methodology.</p> <p>By way of example, it may be preferable to open para 147 of Schedule 16 with “unless otherwise specified below” and then to asterisk each of the UMS categories in para 147 and then insert underneath the tables in para 147 the text proposed by the Working Group at</p>	<p>The Working Group reviewed and noted the comments within this response and agreed to amend the legal text accordingly, from the suggestions within Paragraphs 2 and 3, before being submitted to the DCUSA legal advisors.</p> <p>It was also noted that instead of energised MPANs it should read energised domestic MPANs; this will need to be reflected throughout the legal text.</p> <p>Action: NF and MH</p>

	<p>their para 6.1 of Schedule 19 as the reference to which the asterisks refer. Note that the text proposed by the Working Group needs to include reference to this being NHH UMS only and that the counts should be based on energised NHH non-UMS customers (in order to provide the validation under Q10).</p> <p>An alternative would be to carve out the UMS lines from Tables 8 and 9 in para 147 of Schedule 16 and insert into an additional Table – with associated changes to the wording of any impacted paragraphs.</p>	
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Company	4. The Working Group considers that DCUSA General Objective 1 and 2 are better facilitated by DCP 203; do you agree with this opinion? Please provide supporting comments on this and any other DCUSA General or Charging Objective you feel is impacted by DCP 203.	Working Group Response
Electricity North West	We do not agree that DCUSA General Objectives 1 and 2 would be better met as a result of this change proposal. This change proposal will distort competition between distributors and place perverse incentives on IDNOs to increase the number of UMS connected customers where the boundary voltage with the DNO is higher to reduce their DUoS bill.	The Working Group reviewed this response and noted that the impact assessment provided within the consultation documents demonstrated that this CP would be very unlikely to place a perverse incentive on the IDNO; furthermore the connection is led by the IDNO customer (Local Authority or street-lighting authority) and not the IDNO itself.
ESP Electricity Ltd	We feel that General Objective 1 is better facilitated as the additional admin burden imposed on LDNOs to facilitate inter-distributor billing would be greatly	

	<p>reduced - reducing the number of MPANs required for said billing leads to a more efficient and co-ordinated distribution network. We feel that General Objective 2 is also better met as reducing the number of MPANs required of the LDNO also reduces the additional admin costs borne by the customer. This has led to difficulties with adoption of LDNO networks in the past. As this issue is exclusive to LDNOs we agree with the WG's assessment that this change promotes competition by reducing a potential barrier to competition.</p>	
GTC	<p>Yes</p> <p>General Objective 1: We agree with the assertion in the consultation document. The current approach adds complexity with margin benefit to cost reflectivity in our view.</p> <p>General Objective 2: We agree with the assertion in the consultation document although would caution that this solution on its own is unlikely to solve the Section 38 highways adoption issues highlighted in the consultation as a SLA could still argue that its costs increase as additional MPANs will still be required even if DCP203 goes ahead. As stated previously we believe that the fact that a developer has opted to award the network extension to an IDNO should not have an avoidable detrimental impact on the SLA. This impact would be avoided if the SLA could trade the EDNO connections under the host DNO's MPAN. That said, there is still value in progressing DCP203 on the basis of removing the complexity of inter-distributor billing for UMS connections.</p> <p>General DCUSA Charging Objective 3: We agree with</p>	

	the assertion in the consultation document.	
Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	<p>We can see that there is a slight improvement against objective one, with cost reductions seen for the LDNO leading to perceived improved efficiency, as well as potential reductions for the end customers if reduced MA and supplier charges are passed on. As per our response to question two, we believe that there may be other ways to achieve this end which should be explored by the working group.</p> <p>We agree with the assessment against objective two; however we also agree that there is a potentially detrimental impact against charging objective three. We agree with the assertion that the negative impact against charging objective three needs to be considered in relation to the improvement against general objective two. The impact assessment shows that the extent of the detrimental impact on charging objective three is minimal. The impact assessment does not quantify the improvement against general objective two. As stated in our response to question two, as a DNO we do not have visibility of the administrative costs which the proposal is seeking to reduce, but assuming the reduction is likely to be as significant as we are lead to believe, then the detrimental impact to charging objective three may well be justifiable.</p>	<p>The Working Group agreed to attempt to quantify the charges/impacts of these charges; if it can be successfully accomplished it was agreed to include this information within the Change Report.</p> <p>Action: NF and ElectraLink</p>
SSEPD and SSE Hydro	We disagree that this DCP will better facilitate General Objective 1, as the proposal requires that the current arrangement to be kept along with the introduction of the proposed solution. We consider this would add to rather than reduce the administrative burden and also	Points A and B – The Working Group disagreed with the items raised within these points as the solution proposed does not attempt to combine the DNO and EDNO inventories under a single MPAN. It was noted that this was previously a considered solution within

	<p>add complexity to the current situation, for the reasons below:</p> <ul style="list-style-type: none"> a) In cases where different departments of the same local authority choose to adopt different approaches under this proposal (current and new arrangement), it would be difficult to split the data between the departments due to having a single inventory. b) In cases where the customer requests data from the meter administrator, this would require manual processes to split the data and this is an additional administrative burden. <p>There will be cost consequences in terms of the administration burden and IT systems changes, in terms of identifying, delinking and reassigning data from the D0314 flow to the new LLFCs in order to bill correctly in the new arrangement.</p>	DCP 168 ¹ and is being actively pursued within the Balancing and Settlement Code (BSC); however it is highlighted that these two CPs are independent of one another.
SP Distribution / SP Manweb	Yes, we agree with the working group's assessment.	
UK Power Networks	We believe that both General Objectives 1 and 2 are improved as a result of this change proposal, as it should remove what many consider to be a barrier for LDNOs to compete with DNOs in this sector. This is as a result of the simplified approach to the allocation of the LLFC which will apply, which will reduce the administration for both LDNOs and their Customers. We	

¹ The Administration of Use of System charges relating to connections from Embedded Distribution Network Operator (EDNO) systems to Unmetered Supplies (UMS) for LA customers

	would also agree that the Charging Objectives are neutral as a result of this change.	
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Company	5. As the CP does not affect the Charging Methodologies, the change could be implemented in the next DCUSA release following Authority consent. Do you agree with the implementation approach of DCP 203?	Working Group Response
Electricity North West	We do not agree that the CP does not affect the Charging Methodologies. We believe there is a detrimental effect to Charging Objective 3 as IDNOs will be charged based on the typical voltage of connection for UMS customers. This will result in a cost increase or reduction to the DNO which will be paid for/credited to all customers.	<p>The Working Group reviewed and noted the comments within this response.</p> <p>It was noted that the cost increase/reduction that is referred to within the response is minimal, and this is demonstrated within the impact analysis which was included with the consultation documents.</p>
ESP Electricity Ltd	Yes	
GTC	Yes	
Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	If this is considered to be the best solution then there is no reason to delay.	

SSEPD and SSE Hydro	No, as we believe there will be significant IT and system changes required we consider the proposed implementation date unrealistic. We would therefore require further clarification of the implications of the change to fully assess the effects on IT and processes.	The Working Group did not agree with this points raised within this response. It was agreed to contact SSE in order to clarify whether these points are in relation to DCP 203 or CP 1414 ² under the BSC. Action: NF
SP Distribution / SP Manweb	Yes.	
UK Power Networks	We believe this change directly impacts the methodologies. Therefore it must be made on 1 April, which at the earliest would now be 1 April 2016.	The Working Group noted the response.

Company	6. Do you agree that amending Schedule 19 only would avoid introducing the additional complexity that the first solution would have done?	Working Group Response
Electricity North West	It reduces complexity, but does not resolve the fundamental problem with cross subsidy.	The Working Group noted the comments and agreed there is an issue, but it comes down to the scale of the issue. It was noted that there will be an attempt to quantify the benefits and include this within the Change Report. The analysis should also consider the increase in complexity to deal with the cross subsidy issue.
ESP Electricity Ltd	Yes	

² Combining LDSO and Embedded LDSOs UMS Inventories on to single LDSO MSID

GTC	Yes, whilst the original solution initially appeared to be more cost reflective it only is so if all EDNO has a similar mix of DNO boundary network level connections and associated end user customer connections. We know that this is currently not the case so this proposal appears to be a more pragmatic solution without any price disturbance given the relatively small scale of inter-distributors billing now and in the foreseeable future.	
Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	We agree that the proposal to amend schedule 19 only avoids introducing extra complexity into the tariff structure but it does introduce a similar level of greater complexity into the inter-distributor billing arrangements.	
SSEPD and SSE Hydro	No. we believe the proposed amendment is going to increase complexity of administration due to the parallel operation of different options.	The Working Group noted the comments, and it was agreed to contact SSE directly to discuss the issue raised. Action: NF
SP Distribution / SP Manweb	Yes, this seems a more pragmatic approach, though it is noted that the changes only cover Pseudo HH MPANs for UMS, it does not cover any that could be settled on an NHH basis, though we assume these will be covered in the NHH aggregated settlement volumes.	The Working Group reviewed the comments and disagreed with the first assumption regarding Pseudo HH MPANs, as this is covered in the D0314. The Working Group agreed with the assumptions made within the second part of the paragraph.
UK Power Networks	No - we believe that changes are required to the Charging Methodologies but that they need not be complicated.	The Working Group noted the response, and will modify the legal text accordingly. Action: NF

Company	7. Do you agree that new LDNO entrants to the	Working Group Response
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	market should have the choice to opt for the current arrangements or choose to adopt the new approach?	
Electricity North West	No, as we do not agree with the principle as it allows LDNOs to cherry pick the most advantageous trading arrangements rather than being allocated the most appropriate tariff.	The Working Group discussed the comments raised within this response and noted that the impact assessment provided within the consultation documents demonstrated that this CP would be very unlikely to place a perverse incentive on the IDNO; furthermore the connection is led by the IDNO customer (Local Authority or street-lighting authority) and not the IDNO itself.
ESP Electricity Ltd	Yes – forcing a new entrant to opt for a particular arrangement could affect their business model and therefore be considered anti-competitive. Providing a choice removes that risk.	
GTC	Yes	
Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Yes, but as stated in our response to question three we would like any new entrant to be required to explicitly state to the host DNO which option they intend to use.	
SSEPD and SSE Hydro	No, as we believe this would introduce additional administrative burden to LDNOs to operate both approaches at the same time. If one approach is considered to better facilitate DCUSA objectives then it should be adopted to replace the other.	The Working Group highlighted that the only thing that will change if DCP 203 is implemented would be the Line Loss Factor (LLF) to reflect what is agreed, ie one MPAN (one LLF) per network boundary level or an agreed LLF to represent the single discount of the agreed boundary network level.
SP	No, SPEN have some concerns that providing a choice to	The Working Group discussed the points raised within

Distribution / SP Manweb	the new LDNO entrants on whether to use existing tariffs or the new "LDNO Any: Unmetered" tariff creates inconsistency and possible unfair discrimination towards particular markets/portfolios. This also raises the question as to whether the LDNO can 'cherry-pick' the tariffs to use (i.e. choose Any for some and specific for others) – it should be made absolutely clear that the choice is for one or the other, and is exclusive to the other. If the issue which has caused the DCP 203 to be raised is so prevalent across the market that the Working Group anticipates full transfer, we are not convinced that a choice should be given in anticipation of a future event and instead would therefore suggest that the existing tariffs and MPANs etc. are removed. Should the specific future event occur, there is then an opportunity to introduce further CPs which would be limited to that situation.	this response and noted that once the amendments to the legal text that was agreed within previous responses is made, it will clarify how the solution will work in practice more clearly.
UK Power Networks	No - we believe this should be consistently applied. At the point at which an LDNO connects NHH UMS they must be able to calculate the proportion of customers they have at each voltage level and use the appropriate LLFC.	The Working Group reviewed and noted the comments within this response.

Company	8. Do you agree that that there should be no adverse impact on Suppliers or Customers as a result of the migration to the new arrangements?	Working Group Response
Electricity North West	No, there are consequential impacts on competition which will impact customers and could impact competition in connections.	<p>The Working Group reviewed this response and agreed to contact ENWL for more information/clarity (see Q2 WG comments)</p> <p>Post Meeting Note: ENWL Response</p>

		<p><i>Under the proposed solution the potential margin for LDNOs will be dependent on the predominance of the voltage of connection for its UMS customers as this will determine the tariff they pay for all their UMS customers. Consequently, it will be advantageous to an LDNO to acquire networks, so that the predominance of their portfolio is connected at HV and therefore benefit from larger discounts and consequently lower tariffs from the DNO. Therefore if a LDNO has 51% of their UMS connections at an LV boundary, they have a greater incentive to acquire networks where the boundary is at HV rather than LV. These could result in LDNOs quoting lower connection costs for a new HV connected network than a DNO or a competing LDNO as the marginal cost of winning a HV boundary network could be extremely low as it may move the overall boundary from LV to HV which will reduce the DUoS costs.</i></p>
ESP Electricity Ltd	Due to the fact that the change affects only the portfolio billing arrangements between DNO and IDNO Parties and does not impact on the CDCM/EDCM UMS all the way tariffs – neither Suppliers nor Customers will see any changes to the tariffs as part of the migration exercise. Customers will be positively impacted in that the number of MPANs required for settlement purposes will be reduced – and as result their costs (both DUoS and admin) will also be reduced.	
GTC	Yes, these changes will not impact on any tariffs.	
Northern Powergrid (Northeast) Ltd and	None we are aware of.	

Northern Powergrid (Yorkshire) plc		
SSEPD and SSE Hydro	No as this would adversely affect customers. In the new arrangement an LDSO cannot transfer the MSID to a developer as they would need to keep records of inventory, therefore the developer would need to register new MSIDs every time they develop a new site.	The Working Group reviewed the response and, as previously noted, will contact SSE in order to clarify how the solution will work under DCP 203 if implemented.
SP Distribution / SP Manweb	Yes. Specifically, customers should benefit for the reduced standing charges from Suppliers, with both parties incurring reduced MPAN administration costs.	
UK Power Networks	We agree that this change proposal should have no adverse impact upon either Suppliers or Customers.	

Company	9. Do you agree that the basis for determining the applicable LLFC to be applied by the LDNO for the LDNO discount will be based on the upstream LDNO/DNO boundary connection level of the majority of all NHH domestic LDNO connections?	Working Group Response
Electricity North West	No, we do not agree with this principle as outlined earlier.	The Working Group reviewed and noted the contents within this response. As stated earlier, the Working Group will request further clarity from ENWL about the points raised within their response.
ESP Electricity Ltd	We do agree with the approach to determining the applicable LLFC. Following migration should this CP be successful – it would be difficult to use settlement data	

	to determine the POC voltage for UMS connections solely. Basing the determination on numbers of domestic connections is sensible as numbers of UMS connections (particularly streetlights) increase in line with the number of domestic connections. This trend has been discussed at other industry forums e.g. UMSUG.	
GTC	We believe using NHH customer numbers makes a reasonable proxy for UMS connections as we think that the ratio of street lighting columns (which make up the vast majority of UMS connections) to domestic customers is broadly the same across all the DNO areas. We cannot think of any other easy way of tracking the boundary network level of connection for EDNO UMS connections as following the implementation of this CP then all UMS connections will have an LLFC linked to the boundary network level of the majority of the portfolio not the actual network that the UMS connection is made to.	
Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	No, this should be based on the upstream LDNO/DNO boundary connection level of the majority of all domestic (NHH and HH) LDNO connections. As DCP179 and P300 are implemented we would expect domestic customers to move to HH aggregate settlement, but there is no reason why these customers should be excluded from count of customers at each boundary connection level.	The Working Group noted the response and will incorporate changes into the legal text to address the issue.
SSEPD and SSE Hydro	We do not agree on the basis that the DCP would dilute the principle of cost reflectivity signals in DUoS charges and we do not believe that this basic principle is adequately justified. Also we do not agree with the conclusions of the 'cost analysis' submitted by the Working Group to take an 'average' over several	The Working Group agreed to attempt to quantify the charges/impacts of these charges; if it can be successfully accomplished it was agreed to include this information within the Change Report. Action: NF and ElectraLink

	scenarios.	
SP Distribution / SP Manweb	Yes, this seems a sensible approach.	
UK Power Networks	<p>We believe it should be based on energised upstream/boundary NHH connections.</p> <p>We also believe this should be subject to periodic review, say annually. Such review could be undertaken based on a snapshot of say 31 March in any calendar year for implementation on 1 April, any changes to the LLFC to be made within 5 days of 31 March.</p>	<p>The Working Group noted the response and will incorporate changes into the legal text to address the issue.</p> <p>In regard to the review, it may be easier to state "periodic" rather than a fixed time frame.</p>

Company	10. Do you agree that the Portfolio Billing data already received by the DNO (in the D0314 flow) will be able to be assessed by the DNO to confirm the LLFC requested by the LDNO is correct?	Working Group Response
Electricity North West	There is a potential issue with reviewing the dataflow to ensure the correct LLFC has been requested. These dataflows are in standard dataflow format and aren't easy to read and the data contained in them is not easily manipulated.	<p>The Working Group reviewed this comment and noted that the response from ESP Electricity Limited addresses this point, it states:</p> <p><i>Yes – the D0314 flow holds MPAN counts for all NHH connections and this information is broken down into profile class and LLFC (that will identify the POC voltage for the NHH MPANs) which can be easily interrogated to determine the POC voltage with the majority of connections.</i></p>

ESP Electricity Ltd	Yes – the D0314 flow holds MPAN counts for all NHH connections and this information is broken down into profile class and LLFC (that will identify the POC voltage for the NHH MPANs) which can be easily interrogated to determine the POC voltage with the majority of connections.	
GTC	Yes, that should be a simple comparison and is likely to only need to be done very infrequently. For example if the split of NHH connections for a particular EDNO with 40,000 customers is 30% LV , 70% HV, it is a safe assumption that this will not change to 51% LV to 49% HV within say a 12 or even 24 month period.	
Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Yes.	
SSEPD and SSE Hydro	No. Although DNOs may have access to the D0314 flow but this proposal does not mention what approach DNOs are expected to take with this flow. We require further clarification to fully understand the implications of this aspect of the proposal and note the suggestion of a further consultation, which hopefully will provide greater detail.	The Working Group reviewed the response and, as previously noted, will contact SSE in order to clarify how the solution will work under DCP 203 if implemented.
SP Distribution	Provided the information is provided in accordance with requirements, we should be able to confirm the	

/ SP Manweb	appropriate LLFC.	
UK Power Networks	Yes. The D0314 can be used to validate which connection voltage the LDNO has defaulted to for UMS and can be used to determine the connection voltages of all other customers. This should enable the DNO to validate the application of the LLFC if they choose.	

Company	11. The Working Group believes that the current wording defined in Schedule 19 will support the proposed new UMS LLFC assignment and associated billing arrangements and there should be no impact on Parties IT systems as a result. Do you agree with this assertion? Please provide your rationale if you disagree with this view.	Working Group Response
Electricity North West	From a billing perspective we don't envisage a material impact on our IT systems.	
ESP Electricity Ltd	We agree that the change will have no impact on Parties IT systems – there are no amendments to data flows or tariff structures.	
GTC	Yes, the comparison could be done manually, see response to question 10 above.	

Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Yes, this change would require no amendments to our IT systems.	
SSEPD and SSE Hydro	No we do not agree. We believe that the Working Group should further clarify what the requirements of the data are for the new arrangement.	The Working Group reviewed the response and, as previously noted, will contact SSE in order to clarify how the solution will work under DCP 203 if implemented.
SP Distribution / SP Manweb	Provided the information is provided in accordance with requirements, there should be no impact on our IT Systems.	
UK Power Networks	We agree that, with the amendments described above, the proposed text can work. However we believe it sits within the Charging Methodologies (Schedules 16-18) and not Schedule 19. There should be no consequential impact on IT systems.	The Working Group noted the comments within this response.

Company	12. Are there any alternative solutions or matters that should be considered by the Working Group?	Working Group Response
Electricity North West	We note that the change report highlights that there are potentially 180+ MPANs and this is the main driver of the change. This assumes 7 network levels, including 5 EHV levels. During the development of the EDCM, DNOs identified that there were only 4 or 5 EHV connected	The Working Group noted the comments within this response; however, does not feel that this proposed solution would be a stronger solution than the one proposed by the Working Group.

	IDNOs in the UK and therefore the 180+ MPANS is extremely unlikely to materialise. We would be supportive of rationalising the UMS EHV tariffs from 5 to 1, which would reduce the number of potential MPANS, without significant impact on customers.	
ESP Electricity Ltd	No – the change seems a simple and effective solution that only impacts DNO and IDNO Parties (and does not affect their respective business systems).	
GTC	None at this time	
Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	The Change Proposal suggests “suppliers may be levying administration charges to UMS customers on a per MPANS basis” and that “there is evidence that administration charges are also levied against UMS customers by their nominated meter administrators (MAs) in respect of each additional MPAN that the MA processes for them”. We would suggest that these charges are challenged and properly investigated to determine whether they are unjustifiably high. If these costs can be reduced without amending inter-distributor billing then the aims of the proposal to reduce administration costs can be achieved without the loss in cost reflectivity brought about by a reduction in the number of tariffs.	<p>The Working Group noted the contents within this response. It was highlighted that this type of analysis would be difficult to quantify as it is deals with commercial arrangement between the customer/supplier and the MAs.</p> <p>It was noted that the Working Group will make best endeavours to provide as much analysis as possible within the Change Report.</p>
SSEPD and SSE Hydro	No we do not agree. We believe that the Working Group should further clarify what the requirements of the data are for the new arrangement.	The Working Group reviewed the response and, as previously noted, will contact SSE in order to clarify how the solution will work under DCP 203 if implemented.
SP Distribution/ SP Manweb	<p>SPEN would like to note that the approval of DCP203 will in all likelihood negate the need for CP1414.</p> <p>SPEN also wish to highlight that the number of MPANS in</p>	Paragraph 1 - The Working Group noted the comments within this response and agreed that DCP 203 should be considered and progressed on its own merit.

	<p>reality is nowhere near the potential number quoted in the DCP203 and used as the basis for the change proposal (our responses to withdrawn DCP 168 refer), and are pleased to see that this point has been noted. Notwithstanding this it seems inefficient to create multiple MPANs within the IDNO businesses purely for internal DUoS charge and settlement purposes. We have attached the RFI showing our MPAN counts.</p> <p>This SPEN data showed total MPAN Counts of SPD – 78, SPM – 24, which covers all customers across all 5 IDNO Companies. As stated earlier, when this is compared to the underlying claims (underpinning the reason for the change) of potentially 180 per individual customer (e.g. for 10 large LA customers, we could potentially require 1,800 MPANs to be created), then based on actual evidence this is clearly not happening in practice within our Network Areas.</p>	<p>Paragraph 2 – The Working Group noted the comments within this paragraph.</p> <p>Paragraph 3 - The Working Group noted the response. NF agreed to will send through text in relation to this portion of the response.</p> <p>Action: NF</p>
UK Power Networks	No nothing at this time.	