

DCUSA DCP 293 CHANGE DECLARATION**VOTING END DATE:** 13 OCTOBER 2017

DCP REF	WEIGHTED VOTING				
	DNO	IDNO	SUPPLIER	DISTRIBUTED GENERATOR	GAS SUPPLIER
CHANGE SOLUTION	Accept	Accept	Accept	n/a	n/a
IMPLEMENTATION DATE	Accept	Accept	Accept	n/a	n/a
RECOMMENDATION	<p>Change Solution – Accept. In respect of each Party Category that was eligible to vote, the sum of the Weighted Votes of the Groups in that Party Category which voted to accept the change solution was more than 50% in all Categories.</p> <p>Implementation Date – Accept. In respect of each Party Category that was eligible to vote, the sum of the Weighted Votes of the Groups in that Party Category which voted to accept the implementation date was more than 50% in all Categories.</p>				
PART ONE / PART TWO	Part One – Authority Determination Required				

PARTY	SOLUTION (A / R)	IMPLEMENTATION DATE (A / R)	WHICH DCUSA OBJECTIVE(S) IS BETTER FACILITATED?	COMMENTS
DNO PARTIES				
SP Distribution	Accept	Accept		

SP Manweb	Accept	Accept	We agree with the change report that DCUSA General Objective 3 and DCUSA Charging Objective 1 will be better facilitated with the implementation of this CP. Without this Change, there is the risk that late decisions on modifications could lead to DNOs being placed in a position of breaching their licence obligations.	No other comments
Electricity North West	Accept	Accept	<p>This change better facilitates DCUSA General Objectives 3 and 4 and the equivalent Charging Objectives 1 and 6.</p> <p>The charging models require multiple inputs and DNOs seek to ensure that all the inputs are validated according to the highest possible standards. Any change to the methodology could potentially result in a change to the required inputs and place fresh obligations on DNOs to gather new input data requiring new processes, systems and validation procedures. Certainty of the methodology to be used three months in advance of the production of the charges is therefore a great benefit to the DNOs responsible for producing the charges and both formalises and strengthens existing practice. This change will</p>	<p>It may be that some parties argue against this change on the basis that it restricts the ability of parties to propose changes to the methodology.</p> <p>However, such concerns are not justified because the change includes provisions for changes to be made at any date if directed by the Authority (perhaps if short-notice changes are necessary due to exceptional circumstances). Second, requiring parties to respect a reasonable period in which DNOs must produce the charges is not an undue restriction as it is entirely consistent with ensuring the highest standards of assurance in the charge setting process.</p>

		<p>enable DNOs to plan their charge setting processes more effectively to produce Distribution Use of System (DUoS) charges in a more efficient manner with less risk of error.</p> <p>General Objective 3 is better satisfied as DNOs are required to produce their charges in accordance with the CDCM and EDCM methodology under standard conditions 13A and 13B of their licence. This change formalises and strengthens the existing industry arrangements to ensure that DNOs have sufficient time to adequately produce compliant charges. The three month 'cut-off period' may include a period of 5 working days to finalise the legal changes and a further 30 days for the production of the final charging models before DNOs can start to populate the models, so we consider this to be a reasonable but not excessive time frame.</p> <p>General Objective 4 is better satisfied as the certainty of the timetable enables DNOs to design more efficient processes to produce DUoS charges.</p> <p>In terms of the DCUSA Charging Objectives, it is our view that this</p>	
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			<p>change better satisfies Charging Objectives 1 and 6. The reasoning is similar to that expressed in support of the General Objectives.</p> <p>There are no adverse impacts on any Objectives.</p>	
Northern Powergrid (Northeast) Ltd	Accept	Accept	Charging Objectives 3 and 4 are better facilitated.	Not at this time
Northern Powergrid (Yorkshire) plc	Accept	Accept	This change will help to ensure that robust change control, validation and approval takes place prior to issuing notice of revised charges. The change will also remove a potential anomaly where DNOs could be placed into a situation outside of their control where they would breach their DCUSA obligations.	
Eastern Power Networks	Accept	Accept	<p>We agree with the working group that DCUSA General Objective 3 and DCUSA Charging Objective 1 will be better facilitated with the implementation of this CP. 'Locking down' the methodology will ensure that the overall process of setting and publishing charges is robust and efficient.</p> <p>At the current time there is the risk that late decisions on modifications</p>	
London Power Networks	Accept	Accept		
South Eastern Power Networks	Accept	Accept		

			could lead to DNOs being placed in a position of breaching their licence obligations as a result of not having sufficient time to fully test, calculate and obtain the necessary internal approval before being required to publish charges.	
Western Power Distribution (East Midlands)	Accept	Accept	We agree with the Change Report that this change better facilitates Charging Objectives 1, 3 and 4.	
Western Power Distribution (West Midlands)	Accept	Accept		
Western Power Distribution (South Wales)	Accept	Accept		
Western Power Distribution (South West)	Accept	Accept		
IDNO PARTIES				
The Electricity Network Company	Accept	Accept	<p>We believe that this change proposal better facilitates general objective 3 of the DCUSA. DNO parties are more readily able to discharge their licence conditions given time to fully test the models created by the CDCM and other charging methodologies This objective is neutral for IDNO parties.</p> <p>We disagree with the working group’s assertion that Charging Objective 1 is</p>	None

			<p>better facilitated by this change. This change does not alter the actual methodologies so compliance with the charging methodologies discharging licence or Act obligations is unaltered.</p> <p>We believe that the remaining DCUSA objectives are neutral.</p>	
SUPPLIER PARTIES				
E.ON UK	Accept	Accept		
SSE Energy Supply	Accept	Accept	<p>General Objectives 3 &4 and Charging Objective 1 are better facilitated by avoiding multiple recalculations of the charges due to a late modification being approved.</p>	