




Part A: Generic

DCUSA Change Proposal (DCP)		At what stage is this document in the process?
<h1>DCP 312:</h1> <h2>Standardisation of the Reporting of HH Portfolio Billing Data by EDNOs.</h2> <p><i>Date raised</i> 10th October 2017</p> <p><i>Proposer</i> Donna Townsend</p> <p><i>Company</i> ESP Electricity Ltd</p> <p><i>Company Category</i> IDNO</p>		01 – Change Proposal
		02 – Consultation
		03 – Change Report
		04 – Change Declaration
<p>Purpose of Change Proposal:</p> <p>To develop a consistent approach to the formatting of HH Portfolio Billing data for reporting purposes under Schedule 19.</p>		
	<p>Governance:</p> <p>The Proposer recommends that this Change Proposal should be:</p> <ul style="list-style-type: none"> • Treated as a Part 1 Matter • Treated as a Standard Change • Proceed to a Working Group 	
	Impacted Parties: DNOs, IDNOs	
	Impacted Clauses: Schedule 19	

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 Any questions?

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Indicative Timeline

The Secretariat recommends the following timetable:

Initial Assessment Report	11 October 2017
Consultation Issued to Industry Participants	TBC
Change Report Approved by Panel	20 December 2017
Change Report issued for Voting	22 December 2017
Party Voting Closes	17 January 2018
Change Declaration Issued to Authority	19 January 2018
Authority Decision	23 February 2018
Implementation Date	First Release following Authority Approval

1 Summary

What?

This CP proposes that Schedule 19 is changed to ensure portfolio billing data is provided in a consistent manner by all EDNOs and that it includes all MPANs associated with any invoice (for DNOs' reconciliation purposes), and that credit/rebilling is consistently reported as two separate rows.

Why?

DNOs currently experience administration issues with EDNO Portfolio Billing as data is currently provided in a number of formats and there is no consistency as to how credit/rebilling should be reported. This issue will be compounded with the increasing number of EDNOs entering the market. Standardising the reporting format will reduce the administration currently experienced by DNOs.

It is also important that all MPANs are listed for multi-MPAN invoices so that reconciliation can be made back to the registration data provided as this will avoid queries with the data.

How?

By amending Schedule 19 as per this proposal and publishing an excel template as per this proposal.

2 Governance

Justification for Part 1 and Part 2 Matter

Part 1 matter as it is likely to discriminate in its effects between one or another Party. Please refer to additional information below.

Requested Next Steps

This Change Proposal should:

- Be treated as a Part 1 Matter
- Be treated as a Standard Change
- Proceed to the Change Report phase

We believe this should be a Part 1 matter (referring to Clause 9.4.3 of the DCUSA). A previous attempt, DCP281, to standardise the reporting of credit/rebill HH data was raised as a Part 2 matter and therefore progressed under self-governance. Although the need for a standardised format was broadly supported, the CP failed because an alternative was raised, causing the voting to be split with no clear majority. This demonstrates that focusing on one preferred method to standardise this reporting, in a manner that enables DNOs to reconcile the data provided and hence gives controls, had a discriminating impact on different parties

We suggest this goes straight to Change Report. The consistent reporting template concept was previously raised as DCP281, which was developed by the Working Group to remove the listing of MPANs for multi MPAN sites (which is currently provided and which allows reconciliation to the provided registration reports and hence gives a degree of “control”). The removal of the listing of all MPANs caused the original proposer to raise alternate DCP281A. Given two options the voting was split.

3 Why Change?

As the reporting of credit/rebilling is not in a standardised form, by applying consistency to the EDNOs' credit/rebill reporting, this CP will improve the management of this work by DNOs without any need for reformatting or bespoke tailoring etc. and therefore reduce the administration currently experienced by DNOs. Reformatting or bespoke tailoring will be compounded as more EDNOs enter the market.

Part B: Code Specific Details

4 Solution and Legal Text

Legal Text

See attachments for suggested legal text and proposed template

Text Commentary

This change proposes to modify Schedule 19 Section 3 to provide clarity and consistency of how the EDNOs' HH credit/rebill data is submitted to the DNO as set out below;

Wording added to Clause 3.2 – *“Where revised data is received by the EDNO and rebilled, a credit row and new debit row should be reported”*. In the proposed spreadsheet template a credit re-bill is displayed using two separate lines, the first line shows the negative value of the original invoice and the second line shows the value of the new invoice.

- Clause 3.3 lists the data items to be included in respect of each invoice raised on a HH settled connectee.
- Clause 3.4 is modified to require EDNOs to use the template spreadsheet which is proposed to be inserted as Appendix A to Schedule 19 and report all data within the same tab. The wording *“Where any data item was not present or had a value of zero in the invoice raised, the report shall show zero for that data item”* is introduced in reference to the population of the proposed template.
- Clause 4.2 has been introduced to reflect the approach taken for HH Site Specific Data in Clause 3.4 in the MPAN Report. In Clause 4 the wording proposed is *“Where there are no half-hourly-settled Connectees, the EDNO shall submit a nil return”*.

5 Code Specific Matters

Reference Documents

DCP281 “Changes to Schedule 19 – Portfolio Billing”

6 Relevant Objectives

DCUSA Charging Objectives	Identified impact
<input type="checkbox"/> 1 that compliance by each DNO Party with the Charging Methodologies facilitates the discharge by the DNO Party of the obligations imposed on it under the Act and by its Distribution Licence	None
<input type="checkbox"/> 2 that compliance by each DNO Party with the Charging Methodologies facilitates competition in the generation and supply of electricity and will not restrict, distort, or prevent competition in the transmission or distribution of electricity or in participation in the operation of an Interconnector (as defined in the Distribution Licences)	None
<input type="checkbox"/> 3 that compliance by each DNO Party with the Charging Methodologies results in charges which, so far as is reasonably practicable after taking account of implementation costs, reflect the costs incurred, or reasonably expected to be incurred, by the DNO Party in its Distribution Business	

<input type="checkbox"/> 4 that, so far as is consistent with Clauses 3.2.1 to 3.2.3, the Charging Methodologies, so far as is reasonably practicable, properly take account of developments in each DNO Party's Distribution Business	None
<input type="checkbox"/> 5 that compliance by each DNO Party with the Charging Methodologies facilitates compliance with the Regulation on Cross-Border Exchange in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	None
DCUSA General Objectives	Identified impact
<input type="checkbox"/> 1 The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks	None
<input type="checkbox"/> 2 The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent therewith) the promotion of such competition in the sale, distribution and purchase of electricity	None
<input type="checkbox"/> 3 The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences	None
<input checked="" type="checkbox"/> 4 The promotion of efficiency in the implementation and administration of the DCUSA	Positive
<input type="checkbox"/> 5 Compliance with the Regulation on Cross-Border Exchange in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	None
Objective 4 will be better facilitated as the introduction of this change will provide a clear and standardised defined method to provide HH Portfolio data to the DNO. This will enable DNOs to manage all EDNOs' HH Portfolio billing data in a consistent manner.	

7 Impacts & Other Considerations

Does this Change Proposal impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

None.

Does this Change Proposal Impact Other Codes?

- BSC ☐
- CUSC ☐
- Grid Code ☐
- MRA ☐
- SEC ☐
- Other ☐
- None ☒

Consideration of Wider Industry Impacts

None

Confidentiality

None

8 Implementation

Proposed Implementation Date

Next release following approval.

9 Recommendations

Part C: Guidance Notes for Completing the Form

Ref	Section	Guidance
1	Attachments	Append any proposed legal text or supporting documentation in order to better support / explain the CP.
2	Governance	<p>A CP must be categorised as a Part 1 or Part 2 matter in accordance with Clause 10.4.7 of the DCUSA. All Part 1 matters require Authority Consent.</p> <p>Part 1 Matter</p> <p>A change Proposal is considered a Part 1 Matter if it satisfies one or more of the following criteria:</p> <p>a) it is likely to have a significant impact on the interests of electricity consumers;</p> <p>b) it is likely to have a significant impact on competition in one or more of:</p>

		<ul style="list-style-type: none"> i. the generation of electricity; ii. the distribution of electricity; iii. the supply of electricity; and iv. any commercial activities connected with the generation, distribution or supply of electricity; <p>c) it is likely to discriminate in its effects between one Party (or class of Parties) and another Party (or class of Parties);</p> <ul style="list-style-type: none"> i. it is directly related to the safety or security of the Distribution Network; and ii. it concerns the governance or the change control arrangements applying to the DCUSA; and iii. it has been raised by the Authority or a DNO/IDNO Party pursuant to Clause 10.2.5, and/or the Authority has made one or more directions in relation to it in accordance with Clause 11.9A. <p>Part 2 Matter</p> <p>A CP is considered a Part 2 Matter if it is proposing to change any actual or potential provisions of the DCUSA which does not satisfy one or more of the criteria set out above.</p>
3	Related Change Proposals	Indicate if the CP is related to or impacts any CP already in the DCUSA or other industry change process.
4	Proposed Solution and Draft Legal Text	<p>Outline the proposed solution for addressing the stated intent of the CP. The Change Proposal Intent will take precedence in the event of any inconsistency. A DCUSA Working Group may develop alternative solutions.</p> <p>The plain English description of the proposed solution should include the changes or additions to existing DCUSA Clauses (including Clause numbers).</p> <p>Insert proposed legal drafting (change marked against any existing DCUSA drafting) which enacts the intent of the solution. The legal text will be reviewed by the Working Group (if convened) and is likely to be subject to legal review as part of its progress through the DCUSA change process.</p>

5	Proposed Implementation Date	<p>The Change can be implemented in February, June, and November of each year or as an extraordinary release. For Charging Methodology CPs, select an implementation date which takes into consideration the minimum notice periods for publishing tariffs. These are:</p> <ul style="list-style-type: none"> • 15 months, for DNOs acting within their Distribution Services Areas; or • 14 months, for IDNOs and DNOs acting outside their Distribution Services Area. <p>Please select an implementation date that provides sufficient time for the Change to be incorporated into the appropriate charging model and the DCUSA in order to be reflected in future tariffs.</p> <p>Contact the DCUSA helpdesk for any further information on the releases dcusa@electralink.co.uk.</p>
6	Impacts & Other Considerations	<p>Indicate whether this Change Proposal will be impacted by or have an impact upon wider industry developments. If an impact is identified, explain why the benefit of the Change Proposal may outweigh the potential impact and indicate the likely duration of the Change.</p>
7	Environmental Impact	<p>Indicate whether it is likely that there would be a material impact on greenhouse gas emissions as a result of the proposed variation being made. Please see Ofgem Guidance.</p>
8	Confidentiality	<p>Clearly indicate if any parts of this Change Proposal Form are to remain confidential to DCUSA Panel (and any subsequent DCUSA Working Group) and Ofgem</p>
9	DCUSA General Objectives	<p>Indicate which of the DCUSA Objectives will be better facilitated by the Change Proposal.</p>
10	Detailed Rationale for DCUSA Objectives	<p>Provide detailed supporting reasons and information (including any initial analysis that supports your views) to demonstrate why the CP will better facilitate each of the DCUSA Objectives identified.</p>
11	DCUSA Charging Objectives	<p>Indicate which of the DCUSA Charging Objectives will be better facilitated by the Change Proposal. Please note that a CDCM or EDCM change may also facilitate the DCUSA General objectives.</p>
12	Defining 'Material' for Charging Methodology Changes	<p>In respect of proposals to vary one or more of the Charging Methodologies, such proposals shall be deemed to be "material" if they might reasonably be expected to have a significant impact on the tariffs calculated under one or more of the methodologies.</p>