





DCUSA Consultation		At what stage is this document in the process?
<h2>DCP 312:</h2> <h3>Standardisation of the Reporting of HH Portfolio Billing Data by EDNOs.</h3> <p><i>Date raised</i> 10<sup>th</sup> 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>The Workgroup recommends that this Change Proposal should:</p> <ul style="list-style-type: none"> <li>• proceed to Consultation</li> </ul>		
<p> Parties are invited to consider the questions set in section 10 and submit comments using the form attached as Attachment 1 to <a href="mailto:dcusa@electralink.co.uk">dcusa@electralink.co.uk</a> by <b>midday 23 February 2018</b>.</p> <p> DCP 312 has been designated as a Part 1 Matter and a standard change.</p> <p>The Working Group will consider the consultation responses and determine the appropriate next steps for the progression of the Change Proposal (CP).</p>		
<p> Impacted Parties: DNOs, IDNOs</p>		
<p> Impacted Clauses: Schedule 19</p>		

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Timetable

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

Change Proposal timetable

Change Proposal timetable:

Activity	Date
Initial Assessment Report Approved by Panel	11 October 2017
Consultation issued to Parties	02 February 2018
Change Report issued to Panel	11 April 2018
Change Report issued for Voting	20 April 2018
Party Voting Ends	11 May 2018
Change Declaration Issued to Parties	15 May 2018
Authority Decision	19 June 2018
Implementation	First Release following Authority Approval

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Any questions?

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## 1. Summary

### What?

- 1.1 The Distribution Connection and Use of System Agreement (DCUSA) is a multi-party contract between electricity distributors, electricity suppliers and large generators. Parties to the DCUSA can raise Change Proposals (CPs) to amend the Agreement with the consent of other Parties and (where applicable) the Authority.
- 1.2 This CP proposes that Schedule 19 is changed to ensure portfolio billing data is provided in a consistent manner by all Embedded Distribution Network Operators<sup>1</sup> (EDNOs) and that it includes all Metering Point Administration Numbers (MPANs) associated with any invoice (for Distribution Network Operators' (DNOs) reconciliation purposes), and that credit/rebilling is consistently reported as two separate rows. (Attachment 2).

### Why?

- 1.3 Both DNOs and EDNOs 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 and IDNOs.
- 1.4 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 by the EDNOs as this will avoid queries with the data.

### How?

- 1.5 By amending Schedule 19 to clarify what is required and publishing an Excel template which shows the format of the data requirements.

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<sup>1</sup> A term used within Schedule 19 which refers to Independent Distribution Network Operators and Distribution Network Operators operating outside of their Distribution Service Area.

## 2 Governance

### Justification for Part 1 Matter

- 2.1 Part 1 matter as it is likely to discriminate in its effects between one or another Party as per Clause 9.4.3 of DCUSA. Please refer to additional information below.

### Requested Next Steps

- 2.2 Following a review of the Consultation responses, the Working Group will progress to Change Report stage on completion of an Impact Assessment.

## 3 Why Change?

### Background of DCP 312

- 3.1 Under Schedule 19 of DCUSA, EDNOs provide a spreadsheet for HH site specific data via a spreadsheet on a monthly basis. Albeit the data items are identified, the reporting of invoices requiring a credit/rebill and the information on multiple MPANs provided to the DNOs are not in a standardised form.
- 3.2 By applying a consistent approach to the EDNOs' credit/rebill and multiple MPAN reporting, this CP will improve the processing of this information by both DNOs and EDNOs without any need for reformatting or bespoke tailoring and therefore reduce the administration currently experienced by both Parties. Without this common approach the administration of this activity may be compounded as more EDNOs enter the market.
- 3.3 A previous attempt, DCP281<sup>2</sup>, sought to ensure that HH data was reported to DNOs in a consistent manner by all EDNOs and to define how revised data must be reported. Revised data was referring to credit/rebill. The CP 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. The difference between the two CPs being how multiple MPANs associated with an invoice would be shown within the spreadsheet and resulted in costs to DNOs dependent upon the solution chosen. This demonstrates that focusing on one preferred method to standardise this reporting, in a manner that

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<sup>2</sup> [DCP281 – changes to Schedule 19 - portfolio billing](#)

enables DNOs to reconcile the data provided and hence gives controls, had a discriminating impact on different parties.

**Q1: Do you understand the intent of the change proposal?**

**Q2: Do you agree with the principles of the change proposal? Please provide your rationale.**

## 4 Code Specific Matters

### Reference Documents

4.1 n/a

## 5 Working Group Assessment

### DCP 312 Working Group Assessment

- 5.1 The Working Group reviewed the DCP 312 legal text and associated example template (Attachment 2) and also considered the consultation and voting outcomes of DCP 281.
- 5.2 Upon completion of this review, the Working Group agreed that there were a number of various limitations of current DNO and EDNO systems due to differing system architecture, and it was agreed that based on these differences there are two viable solutions for this proposal:
  - **Option 1:** Each MPAN on a multi-MPAN invoice has its own row on the spreadsheet, with the 'Lead' MPAN (the first row) containing all consumption data for the entire invoice, and the other MPANs for the invoice having the consumption data set to 0. This has been included in Attachment 3 highlighted in green; or
  - **Option 2:** Each MPAN on a multi-MPAN invoice has its own row on the spreadsheet, with the total active consumption data for the entire invoice being spread over all of the MPANs based on the active consumption data for that MPAN. All other data will be associated with the lead MPAN. This has been included in Attachment 3 highlighted in blue.
- 5.3 It was agreed that both of these approaches could accommodate credits and re-bills, with the Option 1 approach showing the first set of invoice data as a negative value for the first MPAN only and the remaining MPANs continue showing an actual 0, followed by the updated data in the next rows showing the new data under the first MPAN and the rest of the MPANs consumption data remaining as an actual 0.

- 5.4 For the second option for credits and re-bills, all of the invoice data for each MPAN would show a negative value in the first set of data, followed by the rebilled invoice data per MPAN on the subsequent set of data.

**Q3: Can you support both options? Please provide impact and rationale.**

**Q4: Which option do you prefer? Please provide rationale.**

## 6 Legal Text

- 6.1 This change proposes to modify Schedule 19 Section 3 to provide clarity and consistency of how the EDNOs' HH credit/rebill data, and multiple MPANs for single sites associated with an invoice are 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”. The template included with this consultation provides some alternative ways in which this could be facilitated.
  - 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”.

**Q5: Do you have any comments on the legal text?**

- 6.2 It was noted by the Working Group that the currently proposed legal text includes a reference to the use of Excel 2003. The Working Group would like to understand whether there is an opportunity to update the version based on Parties' feedback on the version they use. Based on

the information received the Working Group will determine whether the version number can be updated to a later version that all Parties could support

**Q6: Which version of Excel does your company use?**

## 7 Relevant Objectives

### Assessment Against the DCUSA Objectives

- 7.1 For a DCUSA Change Proposal to be approved it must be demonstrated that it better meets the DCUSA Objectives. The Working Group is interested in parties' views on which of the following DCUSA General Objectives are better facilitated by this change and why.
- 7.2 The Working Group's view on which DCUSA General Objectives are better facilitated have been included below:

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.	

- 7.3 The Working Group believes that 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.

- 7.4 The Working Group is seeking views from Parties on whether the DCUSA objectives are better facilitated by this change proposal.

**Q7: Are the DCUSA Objectives better facilitated by this change proposal? Please provide your rationale.**

## 8 Impacts & Other Considerations

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

- 8.1 The Working Group do not believe that this change has any impact on a Significant Code Review or any other significant industry change project.

### **Environmental Impacts**

- 8.2 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 312 were implemented. The Working Group did not identify any material impact on greenhouse gas emissions from the implementation of this CP.

### **Engagement with the Authority**

- 8.3 Ofgem has been fully engaged throughout the development of DCP 312 as an observer on the Working Group.

**Q8: Are you aware of any wider industry developments that may impact upon or be impacted by this CP?**

## 9 Implementation

- 9.1 The proposed implementation date for this change is the next DCUSA release following Authority approval.
- 9.2 The Working Group would like your views on the proposed implementation date and whether you believe there needs to be a lead time associated with each option.



**Q9: What is the lead time for implementing each option? Please provide your rationale.**

## 10 Consultation Questions

10.1 The Working Group is seeking industry views on the following consultation questions:

Number	Questions
1	Do you understand the intent of the change proposal?
2	Do you agree with the principles of the change proposal? Please provide your rationale.
3	Can you support both options? Please provide impact and rationale.
4	Which option do you prefer? Please provide rationale.
5	Do you have any comments on the legal text?
6	Which version of Excel does your company use?
7	Are the DCUSA Objectives are better facilitated by this change proposal? Please provide your rationale.
8	Are you aware of any wider industry developments that may impact upon or be impacted by this CP?
9	What is the lead time for implementing each option? Please provide your rationale.

10.2 Responses should be submitted using Attachment 1 to [dcusa@electralink.co.uk](mailto:dcusa@electralink.co.uk) no later than **midday 23 February 2018**.

10.3 Responses, or any part thereof, can be provided in confidence. Parties are asked to clearly indicate any parts of a response that are to be treated confidentially.

### Attachments

- Attachment 1 – Party response form
- Attachment 2 – Change Proposal including initial legal text and spreadsheet template
- Attachment 3 – DCP 312 Legal text
- Attachment 4 – Excel spreadsheet showing credit rebill and multi MPAN invoices for both options