









DCUSA Change Declaration		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>Raised on 10 October 2017 as a Standard Change</i></p>		01 – Change Proposal
		02 – Consultation
		03 – Change Report
		04 – Change Declaration
Purpose of Change Proposal: DCP 312 seeks to develop a consistent approach to the formatting of HH Portfolio Billing data for reporting purposes under Schedule 19.		
	DCUSA Parties have voted on DCUSA Change Proposal (DCP) 312 with the outcome being a recommendation to the Authority on whether the Change Proposal (CP) should be accepted or rejected. The DCUSA Parties consolidated votes are provided as Attachment 1.	
	For DCP 312, DCUSA Parties have voted and recommended to the Authority to determine that: <ul style="list-style-type: none"> • the proposed variation (solution) should be accepted; and • the implementation date should be accepted 	
	Impacted Parties: Distribution Network Operators (DNOs) and Independent Distribution Network Operators (IDNOs).	
	Impacted Clauses: Schedule 19	

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		 0207 432 3011
		Proposer: Donna Townsend
		 donna.townsend@espug.com
		 01372 587500
Timeline		
The timetable for the progression of the CP is as follows:		
Change Proposal timetable		
Activity	Date	
Initial Assessment Report Approved by Panel	11 October 2017	
Consultation issued to Parties	07 February 2018	
Change Report issued to Panel	09 May 2018	
Change Report issued for Voting	18 May 2018	
Party Voting Ends	11 June 2018	
Change Declaration issued to Authority	15 June 2018	
Authority Decision	18 July 2018	
Implementation Date	The first Release that is a minimum of three months after Authority Approval ¹	

¹ Based on the current timescales, this is expected to be on the 01 November 2018 DCUSA Release.

1 Summary

What?

- 1.1 The Distribution Connection and Use of System Agreement (DCUSA) is a multi-party contract between electricity Distributors and 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 Operators² (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. The Change Proposal form can be found as Attachment 3.

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.
- 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.

2 Governance

Justification for Part 1 Matter

- 2.1 DCP 312 has been classified as a 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.

² A term used within Schedule 19 which refers to Independent Distribution Network Operators and Distribution Network Operators operating outside of their Distribution Service Area.

3 Why Change?

Background of DCP 312

- 3.1 Under Schedule 19 of DCUSA, EDNOs provide Half-Hourly (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, DCP 281³, 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 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 enables DNOs to reconcile the data provided and hence gives controls, had a discriminating impact on different parties.

4 Solution

DCP 312 Working Group Assessment

- 4.1 The DCUSA Panel established a Working Group to assess DCP 312. This Working Group consists of DNO and IDNO representatives and an Ofgem observer. One of the DNOs is also an EDNO. Meetings were held in open session and the minutes and papers of each meeting are available on the DCUSA website – www.dcusa.co.uk
- 4.2 The Working Group reviewed the proposed DCP 312 legal text and associated example template and also considered the consultation and voting outcomes of DCP 281.
- 4.3 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 that based on these differences there are two viable solutions for this proposal:

³ DCP 281 – changes to Schedule 19 – portfolio billing

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; 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.

- 4.4 Both of these approaches could accommodate credit 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.
- 4.5 For Option 2 on 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.
- 4.6 The Working Group agreed that an understanding of the costs of each option and the lead time to introduce each option was required in order to determine which option was the preferred one and when such an option could be implemented.
- 4.7 The Working Group also discussed the spreadsheet excel format. The legal text states that this is in excel 2003 format. The Working Group suggested that this should be explored further to see if a later version can be utilised.

DCP 312 Consultation

- 4.8 The Working Group carried out a consultation (Attachment 4) to give DCUSA Parties an opportunity to review and comment on DCP 312 and the two proposed options.
- 4.9 There were eight responses received to the consultation. Six respondents were DNOs and two from IDNOs. The Working Group discussed each response and its comments are summarised alongside the collated consultation responses in Attachment 4.
- 4.10 A summary of the responses received, and the Working Group conclusions are set out below:

Question 1: Do you understand the intent of the Change Proposal?

- 4.11 All eight respondents understood the intent of the change proposal.

Question 2: Do you agree with the principles of the change proposal? Please provide your rationale.

- 4.12 All eight respondents understood the principles of the change proposal stating that it will provide a common approach to the reporting of the HH invoice data by all EDNOs, including the formatting of credit rebill and the handling of multiple MPANs associated with an invoice thereby reducing the administration for both Parties.

Question 3: Can you support both options? Please provide impact and rationale.

4.13 All eight respondents stated that they could support both options. Of those respondents who provided an impact, they stated that this would vary dependent upon the option chosen. For Option 1, the impact could be none or a minor change, whereas Option 2 was more material. No actual costs were provided in this question, but one respondent quoted costs within their response to question 4.

Question 4: Which option do you prefer? Please provide your rationale.

4.14 The response to this question was mixed. The IDNO respondents supported Option 2, whereas the four DNO respondents who expressed a preference supported Option 1. The other two DNO respondents did not express a preference although supportive of both.

4.15 One respondent indicated that the cost impact would be zero for Option 1 if the following two assumptions were met:

- That it is acceptable for DNOs to issue a single invoice per MPAN rather than a combined invoice for multi-MPAN sites; and
- EDNOs report the same lead MPAN for cancellations and for rebills of multi MPAN sites.

Should this not be the case the cost to amend the existing EDNO billing data validation functionality to enable validation of cancellations and rebills for multi-MPAN sites could be in the region of £40k shared between all DURABILL customers. This cost would be the same for either option.

Question 5: Do you have any comments on the legal text?

4.16 All respondents bar one had no comments to make on the legal text, the other stated that the proposed legal text does not mandate how multi-MPAN sites are reported. The template in Appendix A (within the consultation pack) does not have any sample records in it to help. A new market entrant would therefore not know how multi-MPAN sites should be reported. The legal text also does not indicate whether any of the fields on the report are optional or mandatory.

Question 6: Which version of excel do you use?

4.17 The respondents indicated that they use the following versions of excel:

Excel Version	Number of respondents supporting this version
2007	1
2010	5

2016	1
Office 365	1

Question 7: Are the DCUSA Objectives better facilitated by this change proposal?

4.18 All respondents agreed that the DCUSA objectives would be better facilitated specifically General Objective 4 – the promotion of efficiency in the implementation in the implementation and administration of this Agreement and the arrangements under it.

4.19 There was a similar theme across all respondents indicating that 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.

Question 8: Are you aware of any wider industry developments that may impact on or be impacted by this CP?

4.20 All eight respondents were of the view that this change does not impact on or by any other industry initiative.

Question 9: What is the lead time for implementing each Option? Please provide your rationale.

4.21 The respondents indicated the following implementation timescales in the table below:

Implementation timescale	Option 1	Option 2
Respondent 1	One month	
Respondent 2	Three months	
Respondent 3	One month	
Respondent 4	Next release of DCUSA	
Respondent 5	Not significant	Twelve months
Respondent 6	Two months	Six months
Respondent 7	At any time	
Respondent 8	Five months	Seven months

4.22 The Working Group also noted that one respondent indicated that if the DCP were to be implemented prior to the billing system changes being delivered it would still be possible for DNOs to bill the data received from the EDNOs with manual manipulation of the data received.

Working Group Conclusions

4.23 The Working Group agreed that Parties understood the intent and the principles of the change and that sufficient information was available to determine which option was to be progressed and by when.

4.24 The Working Group agreed to:

- Support 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; and
- Keep the current version of excel.

4.25 The areas for further consideration were to:

- Discuss the assumptions made by one respondent to determine what the costs of the changes would be;
- Provide clarity on how multi-MPAN sites are reported; and
- Agree on the implementation date.

Assumptions

4.26 The first assumption was that it is acceptable for DNO's to issue a single invoice per MPAN rather than a combined invoice for multi-MPAN sites. The Working Group response was that the CP is specific to the reporting requirements of the EDNO and does not impact the DNOs' billing processes so if the DNO wished to bill in a certain manner they can do so.

4.27 The second assumption was that the EDNO's report the same lead MPAN for cancellations and for rebills of multi-MPAN sites. The Working Group agreed that this was a sensible approach and avoided further administration by the DNO.

Reporting if Multi-MPAN sites

4.28 The Working Group developed further the spreadsheet as a worked example on where and how to populate the spreadsheet when multiple MPANs are associated with an invoice (Attachment 5) and amended the legal text accordingly.

Implementation Date

4.29 The Working Group noted a variety of suggested implementation dates but agreed that due to the changes being suggested to the formatting of the spreadsheet that a request for information was required. This covered the formatting requirement of placing multiple MPAN rows at the top of the spreadsheet each month and always using the same lead MPAN on the first row of any invoice and cancel/rebill on the formatting and to understand any impact this may have on the implementation.

Request for Information

4.30 The Working Group reviewed the RFI responses regarding the formatting requirements. There were three received responses:

- One indicated that they could support the formatting; and
- Two indicated that they could support the formatting, but some system changes would be required. It was noted that one party indicated that the costs would not be sufficiently material for this to be a concern.

4.31 Regarding required implementation timescales, of the three responses received:

- One indicated one month;
- The second indicated three months; and
- The third response did not provide a required time period.

4.32 The Working Group reviewed the responses regarding the implementation date. Upon discussion of the required implementation timescales, it was agreed that the implementation date should be the first DCUSA Release that is a minimum of three months after Authority Approval⁴. It was acknowledged that the respondent that indicated five months within the consultation response document also indicated that a manual work around can be implemented until such a time that their system could be updated.

5 Relevant Objectives

Assessment Against the DCUSA Objectives

5.1 For a DCUSA CP to be approved it must be demonstrated that it better meets the DCUSA Objectives. There are five General DCUSA Objectives which can be found in the CP form (Attachment 3).

⁴ Based on current timescales, this is expected to be the 01 November 2018 DCUSA Release.

- 5.2 The Working Group unanimously agreed that the following DCUSA General Objectives would be better facilitated by DCP 312.

Impact of the Change Proposal on the Relevant General Objectives:	
Relevant Objective	Identified impacts and rationale
General Objective Four – the promotion of efficiency in the implementation and administration of this Agreement and the arrangements under it	Positive

- 5.3 **General Objective Four** is better facilitated by DCP 312 because 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, giving clarity to new entrant EDNOs to the expectations in this area, and potentially reducing the administrative burden on all parties.
- 5.4 The Working Group unanimously considers that the rest of the DCUSA General Objectives are neutral as a consequence of this Change Proposal.

6 Impacts & Other Considerations

- 6.1 There will be a system and process impact on both the DNO and EDNOs as a consequence of this change. Based on Party responses, it is understood that these impacts will not be material.

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

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

Consumer Impacts

- 6.3 There is no consumer impact by this Change Proposal.

Environmental Impacts

- 6.4 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

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

7 Implementation

- 7.1 The proposed implementation date for DCP 312 is the first DCUSA Release that is a minimum of three months after Authority Approval⁵.
- 7.2 DCP 312 is classified as a Part 1 Matter and therefore Authority determination is required.

8 Legal Text

- 8.1 The DCP 312 proposed legal text acts as Attachment 2 to this Change Declaration.
- 8.2 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 required EDNOs to use the template spreadsheet which is proposed to be inserted as Appendix A to Schedule 19 and report all date 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 3.5 has been introduced to detail how multiple MPANs shall be populated within the report, and where they should be positioned within the report; and
 - 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”.

9 Code Specific Matters

Modelling Specification Documents

- 9.1 There is no modelling requirement from this Change Proposal.

Reference Documents

- 9.2 [DCP 281 – Changes to Schedule 19 – Portfolio Billing](#)

⁵ Based on current timescales, this is expected to be the 01 November 2018 DCUSA Release.

10 Voting

10.1 The DCP 312 Change Report was issued to DCUSA Parties for voting on 18 May 2018.

Part 1 Matter: Authority Decision Required

DCP 312: Proposed Variation (Solution)

10.2 For the majority of the Parties that were eligible to vote, the sum of the Weighted Votes of the Groups in that Party Category which voted to accept the proposed variation was more than 50%.

10.3 DCUSA Parties' have voted and recommend to the Authority to determine that the proposed variation (solution) is accepted for DCP 312.

DCP 312: Implementation Date

10.4 For the majority of the Parties that were 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%.

10.5 DCUSA Parties' have voted and recommend to the Authority to determine that the implementation date is accepted for DCP 312.

The table below sets out the outcome of the votes that were received in respect of the DCP 312 Change Report that was issued on 18 May 2018 for a period of 15 working days.

DCP 312	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

11 Recommendations

DCUSA Parties Recommendation

11.1 DCUSA Parties have voted on DCP 312 and in accordance with Clause 13.5 of the DCUSA, recommend to the Authority to determine that the Change Proposal be accepted and thus that the proposed variation to the DCUSA should be made.

12 Attachments

- Attachment 1 – DCP 312 Consolidated Party Votes
- Attachment 2 – DCP 312 Legal Text

- Attachment 3 – DCP 312 Change Proposal
- Attachment 4 – DCP 312 Consultation Documents
- Attachment 5 – Report worked examples