







DCUSA Consultation		At what stage is this document in the process?
<h1>DCP 326</h1> <h2>Introduction of Load Diversification Identifiers for Load Managed Areas</h2> <p><i>Raised on the 20 June 2018 as a Standard Change</i></p>		01 – Change Proposal
		02 – Consultation
		03 – Change Report
		04 – Change Declaration
Purpose of Change Proposal: <p>This Change Proposal (CP) seeks to introduce a simplified process for retaining the diversification of demand in Load Managed Areas (LMA) during the replacement of Radio Teleswitch System (RTS) controlled metering equipment by Suppliers or post the decommissioning of the RTS.</p>		
<p>The Workgroup recommends that this CP should: proceed to Consultation.</p>		
<p>Parties are invited to consider the questions set in section 9 and submit comments using the form in Attachment 1 to dcusa@electralink.co.uk by 30th April 2019.</p>		
<p>DCP 326 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 CP.</p>		
<p>Impacted Parties: Suppliers, DNOs, IDNOs</p>		
<p>Impacted Clauses: Schedule 8</p>		

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Timetable		 Contact: Code Administrator
The timetable for the progression of the CP is as follows:		 DCUSA@electralink.co.uk
Change Proposal timetable		 02074323000
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Activity	Date	
Initial Assessment Report Approved by Panel	11 July 2018	
First Consultation issued to Parties	5 December 2018	
Second Consultation issued to Parties	2 nd April 2019	
Change Report issued to Panel	June 2019	
Change Report issued for Voting	June 2019	
Party Voting Ends	July 2019	
Change Declaration Issued to Parties	July 2019	
Authority Decision	August 2019	
Implementation	TBC	

1 Summary

What?

- 1.1. The intention of this CP is to modify the wording in Schedule 8 of the DCUSA to provide a more practical way of ensuring diversification of switched load timing in LMAs and introduce a process to facilitate this.

Why?

- 1.2. Distributors may, from time to time, designate part of their network as an LMA¹ where they have identified a need to reinforce or extend the capacity of such areas and have been able to avoid or defer the need for such reinforcement or extension through limiting the coincidence of switched load by adopting to control the Load Switching Regimes.
- 1.3. Currently LMAs have diversification through the use of the numerous Standard Settlement Classes (SSCs) to ensure switched load such as night storage heaters and water heating does not occur simultaneously.
- 1.4. To maintain the best value for money for the customer it is important to retain this load diversification particularly where, on parts of the distribution network for example in the highland and islands, they were designed to use this approach. If it is not retained the estimated cost in the Scottish Hydro Electric Power Distribution (SHEPD) Licence area alone is in the region of £718m². In conjunction with this report there was also a supporting technical paper which was published for some additional technical detail³. Making the most efficient use of networks, through diversification of switched load timing (such as night storage heating) is well aligned with the abilities that are being developed as part of the transition to Distribution System Operator.
- 1.5. The diversification of switching times which enables networks to be utilised efficiently and cost effectively is under threat as metering systems are changed to accommodate smart metering through the removal of existing switch load timing systems such as RTS. It should be noted that it will not be possible to have visibility of dynamic switching times used by RTS due to the variable nature of the switching instructions made by the specific supplier who acts as the Group Code sponsor.
- 1.6. There is no defined process to retain the diversification that is obligated in Schedule 8. Since this diversification will be required indefinitely, this CP endeavours to make Schedule 8 easier to comply with and ensures that it is more sustainable into the future.

¹ LMAs currently exist in SSEPD and WPD network areas.

² Derived from an EA Technology Ltd (EATL) report written in 2012 – Attachment 2

³ The technical paper can be found in Attachment 3

How?

- 1.7. The proposed solution contained in the first consultation sought to make amendments to Schedule 8 to provide a mechanism to duplicate as closely as possible the current switching arrangements when replacing RTS with smart metering.
- 1.8. The approach adopted was to introduce a Load Diversification Identifier (LDI) which is derived from the last digit of the Metering Point Administration Number (MPAN) at the relevant property. Each LDI would then correspond to a specific set of switching times defined by the distributor responsible for the connection to the property. The visibility of this identifier forming part of a regular report provided to suppliers associated with LMAs which distributors are already obligated to provide.
- 1.9. An alternative solution was proposed by a party in their response to the first consultation. This proposal suggested the use of Line Loss Factor Class (LLFC) in preference to the LDI. The Working Group agreed that this solution should be developed further.
- 1.10. The Working Group are seeking views on both options:
 - Option A – the use of a LDI; or
 - Option B – the use of a LLFC;
 together with a set of switching times.
- 1.11. In addition, the Working Group also discussed creating an implementation guide that parties can use to implement this solution if approved. This would ensure a consistent approach across the country.

2 Governance

Justification for Part 1 Matter

- 2.1. This Change Proposal should be classed as a Part 1 matter since it:
 - 9.4.1 it is likely to have a significant impact on the interests of electricity consumers;
 - 9.4.2 (C) it is likely to have a significant impact on competition in the supply of electricity; and
 - 9.4.4 it is directly related to the safety or security of the Distribution Network.

Current Next Steps

- 2.2. This Consultation Document is issued for a period of four weeks. The Working Group will review the responses after this period and decide whether to move to the change report stage.

3 Why Change?

Background of DCP 326

- 3.1. In conventional metering the time switch and switched load settings on metering systems are implemented on site by the MOP (as the Supplier's agent) via the equipment fitted to reflect the

supply tariff (the settings being based on the SSC/Time Pattern Regime (TPR) provided by the Supplier). Time switching settings on smart metering systems can be applied remotely or locally (via hand-held terminal equipment).

- 3.2. Only suppliers have access to the relevant commands to set the time switching settings on a smart meter. Distributors have no ability to control, or be involved with, the tariff arrangements applied to any meters on their network. This will lead to a removal in part of the diversification of switched load times in their areas that were previously managed through Group Codes that were randomly associated with the RTS infrastructure. For example, there are five published SSC configurations operating in the SHEPD Scottish Mainland LMAs with a different Group Code association to each. This means approximately a 5th of the portfolio, on these arrangements, switch concurrently thus providing a smoothing of the load in that region to protect the network from peak demand.
- 3.3. The current obligation in DCUSA is for the Supplier to replicate the Switching Regime as closely to that already at the premises: Paragraph 8.4(d) states “where the User⁴ is replacing a Load Switching Device at a particular Metering Point, in the area identified in such a notice, the User shall use reasonable endeavours to ensure that the Load Switching Regime, and any other material characteristics of the existing Load Switching Device, are replicated on the new Load Switching Device”.
- 3.4. This process may be possible to follow due to the visibility of the switching times associated with the semi-static/ static SSCs. However, it will not be possible to have visibility of dynamic switching times due to the variable nature of the switching instructions made by the Group Code sponsor. In addition, as the time switched equipment is removed, the diversification effect enabled by this will be lost.
- 3.5. This solution is only considering the non-half hourly market (Measurement Class A) as there is no concept of structured off-peak time patterns, which are currently represented in the SSCs within half-hourly settlement (Measurement Class F and G).
- 3.6. The implications of 3.4 above are that the diversity of switched load times provided by the numerous SSCs will be lost resulting in the security of supply being put at risk, leading to the potential of faults, loss of supply and consequentially a significant negative impact on customers in terms of reliability and costs. This would ultimately lead to an escalation of the processes contained within Schedule 8 such as Security Restriction Notices being issued. The risk to supply security are also exacerbated by the loss of visibility of switching regimes once the load switching provision is replaced with a smart meter. It may also result in more LMAs being introduced as dynamically switched customers move to a static regime or economy 7 customers all move on to the same switching times. The above was highlighted in the development of DCP204⁵.
- 3.7. The solution proposed will enable the responsible distributor to specify the LDI and hence the corresponding switching times for each customer in an LMA in order to protect their network.

⁴ The User in this instance means the Supplier.

⁵ [DCP204 Working Group papers](#)

Moreover, for suppliers to comply with Schedule 8 as it stands the suppliers are required to replicate the current switching times, which they may have little or no visibility of, for example suppliers who are not Group Code sponsors and piggy back on the switching times determined by the Group Code sponsor. There is concern that, through lack of visibility of switching times, Schedule 8 as it is currently written will not be complied with. This change provides an easily derivable format that allows more flexibility whilst minimising ongoing workload for suppliers and maintains the integrity of Schedule 8 and more importantly the security of supply.

- 3.8. A consequence of doing nothing will result in significant costs to the industry as indicated in the EA Technology report (Attachment 2 and 3).

4 Working Group Assessment

DCP 326 Working Group Assessment

- 4.1 The DCUSA Panel established a Working Group to assess DCP 326. This Working Group consists of distributors, suppliers and Ofgem representatives. 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 issue of replicating Time Switching and Load Switching in the Smart Roll-out was originally raised in DCP 204. Paragraphs 6.19-6.24 within DCP 204 change report discusses this issue and the outcome was that it should be raised as a new CP once DCP 204 and the new legal text was approved. Subsequently a DCUSA Issue Form (DIF) 50 was submitted and discussed (including a consultation) as a sub group⁶ to the Standing Issues Group resulting in this CP being submitted.

DCP 326 first consultation

- 4.3 To aid the further development of the solution for this CP, the Working Group issued a consultation to parties on 5 December 2018. The aim of the first consultation was to ask the industry for views on the principles of the change and the solution proposed. There were eleven respondents to the first consultation comprising of five distributors, and six suppliers. A copy of the first consultation and the Working Group conclusions can be found as Attachment 4.
- 4.4 The majority of respondents stated that they understood and agreed with the intent of the change. However, one respondent stated that the intent should also be to ensure that consumers receive a materially similar customer experience following the installation of their smart meter, with the new SSC replicating as closely as possible the outcome achieved by the current RTS meter. The Working Group discussed the response and agreed that, although not explicit within the intent, it is in fact the case so that suppliers can meet their Schedule 8 obligations by providing the supplier with switching times that are similar to those that exist now but also retaining the diversification required by the network operator.

⁶ [DIF 50 Sub Group papers](#)

- 4.5 The majority of respondents also supported the principles of the change. The respondents that didn't raised concerns over the impact assessment, restriction in customer choice and whether distributors should do more to reduce LMAs. On the first, the analysis was provided as part of DCP 204 and the Working Group consider that this has not significantly changed, however the Working Group understand that this is currently being reviewed. On the second, it is the intention not to limit customer choice but to indicate when such switching times need to occur to provide diversity. On the final point, although this is outside the scope of this change, positive action continues to take place in this area citing that since DCP204 the number of distributors having LMAs has reduced from four to two.
- 4.6 The majority of respondents were comfortable with the format of the report and its inclusion in DCUSA as a schedule. Other respondents considered that the report was not clear, contained details not relevant to this CP and would be difficult to automate within their systems. On the inclusion into DCUSA as a schedule there were concerns that any changes would necessitate a further CP. In addition further consideration should be given to whether all the distributor reports are merged together. The Working Group concluded that the inclusion of the report as an appendix to the schedule ensures a consistent report format by all distributors and that the negatives of merging the distributor reports outweighed the positives and as such the status quo will remain.
- 4.7 There were mixed views as to whether the report provided sufficient information for suppliers to implement the solution, these included:
- the solution is complex and may need a wider education document;
 - it lacked clarity when considering the example and the legal text;
 - there was no understanding on how the supplier chooses an SSC if multiple ones provided;
 - it is not clear what, if any, relevance the 'restricted' periods noted on the report have for suppliers when using the report; and
 - it may benefit from the inclusion of the LLFC; and
 - consideration may need to be given to the General Data Protection Regulation (GDPR) implications of sharing MPANs.

On the latter, this is already a DCUSA obligation and has not been changed by this CP. Schedule 8 paragraph 5.2 states "A Load Managed Area Notice shall be sent to the User, all other Suppliers and the Authority". In addition one Working Group member has checked internally within their business and believe that this is not an issue. If parties consider that this is an issue consideration may need to be given to raising the concern with the DCUSA Panel.

- 4.8 Regarding the suggested analysis that the distributor needs to undertake in determining the number of LDIs required, in the main responders were comfortable with the approach although one stated that it would be helpful if such analysis is catered for in the change report, and another indicating that being too prescriptive may limit the flexibility available to the distributor.
- 4.9 There were a number of questions relating to an impact on other codes or Significant Code Reviews (SCR)s.

- the majority of responders agreed that it may be helpful to include some guidance in the Smart Metering Implementation Code of Practice, although it was noted that this would be subject to their change process and would only cater for instances where a smart meter is being installed.
- there were a number of responders generally agreed that no wide area network area coverage was out of scope while still reiterating the concern that this poses not just to this CP but also to the roll out of smart meters;
- there was mixed views as to whether this change should cater for Half-Hourly (HH) and Non Half-Hourly (NHH) metering arrangements; and
- there was support for the inclusion of a flag in the MPRS system to identify LMAs, although it is unlikely to be catered for during the faster switching programme.

4.10 Regarding the question on alternative solutions three were put forward for further consideration:

- indicate when heating load cannot be switched on;
- separate load control from metering; and
- use the LLFC instead of allocating the LDI to the last digit of the MPAN.

Of the three the second was deemed out of scope of the CP since this was suggested that it can be made available without a need to change DCUSA.

4.11 The implementation date of six months after the Authority approval was in the main supported, but an alternative date of February/March 2020 should be considered. This date corresponding with the contract end date of the RTS agreement.

4.12 The Working Group welcomed the feedback on the legal text and the DCUSA Objectives. These will be considered further during the development of the CP.

Working Group Conclusions and next steps

4.13 The Working Group identified a number of areas of further work having discussed the parties' responses to the first consultation:

- develop a guidance document;
- consider the alternative solutions;
- decide whether to include both NHH and HH settlements; and
- provide further clarity on the reporting example.

Guidance document

4.14 There were a number of concerns raised over the format of the report, the content contained within it and the complexity of the process. The Working Group agreed to develop a guidance document associated with the process to aid parties during the implementation stage. This will be produced and contained as an attachment to the Change Report based on the final solution.

Alternative Options

- 4.15 There were three options put forward by parties as indicated in Paragraph 4.10 above. Of the three options, two have been taken forward for further consideration.
- 4.16 On the option relating to the distributor just stating times of the day when heating load should not be allowed e.g. the metering system could be set up to avoid switching load between 00:30 – 02:30 and then that would leave the Supplier with the choice of when to switch the load, the Working Group felt that in part this is already catered for by Schedule 8 paragraph 5.3 (b)⁷ but added that this could result in a shift in demand patterns and therefore create the need for another change in those times resulting in further requests to suppliers to change the switching patterns. This could also restrict customer choice due to less available tariffs. There was a further concern that distributors would have to react to load shift rather than being proactive.
- 4.17 On the option regarding the use of LLFC in preference to the LDI, the responder stated that as the LLFC is already a data item it can be changed by distributors, they felt that this would enable the distributor greater control to update suppliers as and when network reinforcement actions were taken in LMAs or where new LMAs are identified by distributors without the need to go through MPAN changes. They also stated that by using the LLFC as the LDI the solution can be extended to cover HH settlement arrangements in the future.
- 4.18 Of the two suggested alternative solutions the Working Group agreed to develop further the LLFC option, see paragraphs 4.34-4.39 below.

HH settlements

- 4.19 The comments received from the first consultation were evenly split between a need for a solution to cater for both the NHH and HH settlement arrangement with most suppliers in favour of catering for both, and distributors preferring NHH settlements only.
- 4.20 The Working Group developed a potential solution for the HH market based on the LLFC approach suggested in the first consultation responses.
- 4.21 The current arrangements for elective HH settlements associated with the distributor's aggregated HH tariff was introduced by P300⁸. This introduced new settlement classes and an obligation on the distributor to provide the Supplier Volume Allocation Agent (SVAA) with a pseudo (dummy) SSC and Red, Amber, Green time bands which related to price signals similar to the HH site specific tariffs.

⁷ the time or times of day during which in the Company's opinion:

- (i) changes to Load Switching Regimes in force at particular Metering Points introduced by Suppliers have increased the coincidence of Demand to such an extent that Security of Supply may be threatened; and
- (ii) new applications of Load Switching Regimes to particular Metering Points introduced by Suppliers may reasonably be expected to increase the coincidence of Demand to such an extent that Security of Supply may be threatened;

⁸ P300 Final requirements

This allows the HH consumption data to be aggregated for the purpose of NHH Supercustomer DUoS billing to the HH aggregated tariff via the existing D0030 data flow.

- 4.22 The solution suggested by the Working Group builds on this by creating pseudo (dummy) SSC and Red, Amber, Green time bands for each LMA. The need for one SSC per LMA is to cater for the differing load impact and the time that it occurs on the network associated with each LMA. This allows the distributor to set up the appropriate cost signals via the charges to be applied to the red, amber, green time periods as is the current practice in the HH market. The SVAA would be provided with the pseudo (dummy) SSCs by the distributor for incorporation within their system to automate the aggregation process.
- 4.23 The Working Group consider that this solution may also need to introduce changes to Schedule 16⁹ with the creation of new aggregated HH tariffs for LMAs. In addition the red, amber and green time bands for LMAs may need to be amended more frequently than the current process of a year and so would the 15 months-notice period (schedule16, paragraph 41 and 41A) so that if there is a greater risk with the security of supply within the LMA these can be amended in a more realistic timeframe.
- 4.24 Consideration may also need to be given as to whether there is a need to introduce time of year tariffs since the impact may only be in the winter months (usually defined as from the 1 November through to the end of February but may differ by distribution region). There is a concern that the higher costs may be smeared across the customer base and passed through to the customers rather than shifting the switching times.
- 4.25 In addition, Working Group members are aware of an Ofgem led SCR (Electricity Network Access and Forward-Looking Charging Review) and whether the introduction of new tariffs could result in an overlap with it. If this was considered to be a new change the likelihood is that the DCUSA Panel may reject it due to the ongoing SCR.
- 4.26 If this CP continued with its inclusion there is likely to be an impact on the implementation date since the introduction of tariffs have a lead time of 15 months which would mean that the delivery of the change would be in April 2021 at the earliest due to the introduction of new tariffs, however it is expected that this may be stifled by the SCR project due to the need for additional Working Group expertise to ensure that full consideration is given to the new tariffs and their potential impact which are likely to be the same industry resource.
- 4.27 Even if this was not an issue, the time to develop the solution, the modelling changes and the need for a further consultation would mean that the April 2021 implementation is not achievable since to meet that deadline this CP would need to be presented to the July 2019 Panel. This would mean an implementation date of April 2022 which is beyond the current arrangements for the continuation of the RTS arrangements and the roll out of smart meters.

⁹ Common Distribution Charging Methodology

4.28 Based on the impact that the inclusion of the HH solution would have on this CP, the Working Group agreed that the HH solution will not be considered further. A party can however raise this as a separate CP if they wish so they can progress this separately.

Development of the two solutions

4.29 The Working Group now considers there to be two potential options to address the issues raised in this CP as follows:

- Option A - To introduce a LDI which is derived from the last digit of the MPAN at the relevant property. Each LDI will correspond to a specific set of switching times defined by the distributor responsible for the connection to the property; and
- Option B – To introduce the use of LLFC in preference to the LDI.

Option A - the use of a LDI

4.30 In the first consultation there were concerns that the solution was complex and needed further clarification (paragraph 4.7). This option seeks to make amendments to Schedule 8 to provide a way to duplicate as closely as possible the current switching arrangements when replacing NHH switched load with smart metering and when the current RTS contract ends in March 2020. The proposal is to introduce a LDI which is associated with the last digit of the MPAN at the relevant property. This means that there could be up to ten LDIs (one associated with each last digit 0-9). There is no intention to amend the MPAN but to indicate which LDI it will be associated with. If the distributor only needs five LDIs to diversify the load on the LMA network then the last digit of two MPANs will be used as shown below e.g. last digit 1 and 6 being associated with LDI one. This approach means that all MPANs ending in 1 and 6 in that LMA will be associated with LD1.

GSP Area (A_B_C_etc...)	Notice Effective From Date	Notice End Date (leave empty if ongoing)	Restriction Start Time (leave empty if 24hrs per day)	Restriction End Time (leave empty if 24hrs per day)	Restriction Start Month (leave empty if full year)	Restriction End Month (leave empty if full year)	Postcode Outcode	MPAN	LDI	Existing SSC	Available SSCs
L	01-Jan-15		00:00:00	05:00	01-Nov	31-Mar	EX16	22nnnnnnnnn1	1		
							EX16	22nnnnnnnnn2	2		
							EX16	22nnnnnnnnn3	3		
							EX16	22nnnnnnnnn4	4		
								22nnnnnnnnn7	4		
							EX16	22nnnnnnnnn5	5		
							EX16	22nnnnnnnnn6	1		
							EX16	22nnnnnnnnn7	2		
							EX16	22nnnnnnnnn8	3		
							EX16	22nnnnnnnnn9	4		
							EX16	22nnnnnnnnn0	5		
Notes:											
create a single row per MPAN											
Related MPANs are to be assigned the same LDI as the Primary MPAN											

4.31 After the distributor has determined how best to ensure that diversification is catered for the intention is for the distributor to indicate what SSC is required by providing not only the current SSC for that MPAN but also others that are available to the supplier when replacing RTS arrangements associated with the supplier tariff of choice for the customer. The supplier can therefore choose which SSC they need to meet the customers need.

- 4.32 The selection of SSCs available to each MPAN in an LDI are linked to existing supplier tariffs such as E10 but are switched at different times for different LDIs. So both have the same customer tariff but one switches at say 00:00 for LDI1 and another at 01:00 for LDI2. If there are more than two LDIs the remaining LDIs will also be switched at different times.
- 4.33 Another concern was over some of the columns not deemed necessary for this change, namely restriction start and end times. The intention of this solution was to add the LDI and associated SSCs to an existing LMA report already catered for by Schedule 8. The existing report catering for all the columns up to the LDI one. The columns thereafter (inclusive of LDI) forming part of this change.

Q1: Do you want the LDI data to form part of the existing LMA report or a separate one? Please provide your rationale.

Option B - the use of a LLFC

- 4.34 This solution is similar to option A but rather than create an LDI a LLFC is created.
- 4.35 The first stage is to create new LLFCs and associate them to the same existing Meter Timeswitch Code (MTC)/Standard Settlement Configuration (SSC)/Profile Class (PC) combinations within Market Domain Data (MDD) and which also meet the requirements of BSCP128 along with the associated Loss Adjustment Factors. This would create two valid LLFCs which are associated with the same MTC/SSC/PC combination. The existing LLFC catering for the majority of the network and in place now and the second specific for LMAs. The distributor would need to go through the MDD process to introduce them and link them to the MTC/SSC/PC combinations. Once raised the distributor would need to introduce an internal validation process to ensure that the appropriate LLFC is associated with the MTC/SSC/PC combination i.e. by having some form of flag to recognised that the MPAN is in a LMA and amendments may be required to IT systems to automate the process.
- 4.36 Once the new LLFCs and associated combinations are in MDD, the distributor needs to change the LLFC for each MPAN in a LMA and update the Metering Point Registration System (MPRS). MPRS then notifies the supplier of a change to the LLFC. This will also make MPANs in LMAs more visible to the supplier and also avoid the need for a LMA flag in the system and other systems such as the Electricity Central Online Enquiry Service and, in the future, the Central Switching Service which the amended LLFC updates. The supplier does not need to change anything at this stage.
- 4.37 A second stage is required to cater for the removal of dynamic and semi dynamic Radio Teleswitches within a LMA. This is because they have flexible time pattern regimes. Once this type of meter is removed the SSC needs to be changed to one which has a set time period. This creates the same problem that the change proposal identified i.e. the SSC chosen by the supplier could result in network reinforcement. Diversity is required by replacing the proposed LDI process. The only difference is that you have a number of LLFCs (in place of the LDIs) that are associated with multiple SSCs for the same supplier DUoS tariff. This would necessitate further work within MDD to create the valid combinations. In addition the distributor needs to ensure that they apply the appropriate LLFC to an MPAN within the LMA which then updates MPRS and the registered supplier. This is the

trigger for the supplier to amend the switching times for that MPAN to that of the SSC associated with the LLFC.

- 4.38 This approach means that the distributor retains control of the required switching times but still caters for customer tariff choice. The supplier is informed via existing processes as to what the correct combination is for the MPAN and can ensure that this is then updated to the smart meter rather than having to refer to a spreadsheet to see if the customer is in a LMA and if so what SSC to use.
- 4.39 There is an argument that this solution is using existing industry processes and as such there is no need for this change proposal to mandate it. It can be done today. The counter argument is that by adding the LLFC and associated SSC combinations with the current notification of LMAs this makes it more visible to suppliers. In addition parties are asked whether this report should be added to the existing LMA report and kept separate.

Q2: Do you want the LLFC data to form part of the existing LMA report or a separate one? Please provide your rationale.

Differences between Option A and Option B

- 4.40 Both options follow the same process in determining the diversity required in a LMA, the requirement to create potentially new MDD combinations, party system impacts and the need to provide additional information within the LMA report. The key difference is that Option B uses existing electronic processes to notify suppliers that, together with the use of the MDD validation rules built into the MPRS and party systems, make the second option more robust. It also provides better visibility of LMAs and avoids any system changes associated with a flag in MPRS as intimated in the first consultation.

Q3: Which option do you support? Please provide your rationale.

Q4: What impact does each option have on your business?

5 Legal Text

- 5.1 This CP places an obligation on the distributors to include in the LMA notice sent to suppliers the following additional information associated with an MPAN:
- LDI number (option A) or the LLFC (option B)
 - The current SSC; and
 - Available SSCs.
- 5.2 An Appendix to Schedule 8 shows the format of the LMA report. For option A, contained within it is a reference to related MPANs being associated with the same LDI number as the primary MPAN at the customer's property.

5.3 The draft legal text for each option is in Attachment 5.

Q5: Do you have any comments on the proposed legal text for each option?

6 Relevant Objectives

Assessment Against the DCUSA Objectives

6.1 For a DCUSA Change Proposal to be approved it must be demonstrated that it better meets the DCUSA Objectives.

6.2 Option A was raised by the proposer in the original CP who believed that change would:

- Better facilitate DCUSA General Objective 1 because it will continue to protect the network and avoid substantial reinforcement works. It will also facilitate a more effective process to co-ordinate with suppliers;
- Negatively impact DCUSA General Objective 2 because it will limit the exact switching times that can be applied to customers and therefore limit the times in the tariffs that can be offered;
- Better facilitate DCUSA General Objective 3. because distributors must operate a safe and reliable network, this proposal significantly limits the likelihood of overloading which impacts both of these; and
- Better facilitate DCUSA General Objective 4 because the change is a minor amendment which simplifies the process of retaining the necessary diversification during the smart meter roll out and beyond.

6.3 The proposer believes that the above equally applies to option B.

	DCUSA General Objectives	Identified impact
<input checked="" type="checkbox"/>	1. The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks	Positive
<input checked="" 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	Negative
<input checked="" type="checkbox"/>	3. The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences	Positive
<input checked="" type="checkbox"/>	4. The promotion of efficiency in the implementation and administration of the DCUSA	Positive

<input checked="" 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
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Q6: Do you believe that the DCUSA General objectives are better facilitated by this CP. Please provide your rationale for each option?

7 Impacts & Other Considerations

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

- 7.1 The Working Group view, having rejected the progression of a solution in the elective HH settlement market, is that this CP can be progressed in isolation of any SCR. The proposed solutions seek to improve an existing industry requirement as detailed in Schedule 8.

8 Implementation

- 8.1. The Working Group considered the importance of this CP due to the decommissioning of the RTS hence the decision to exclude any additional requirements that cross over with the SCRs and also the need for distributors to undertake network analysis to determine the number of LDIs/LLFCs required in each LMA.

- 8.2 In considering the above, the Working Group agreed that the implementation should be:

Option A - 6 months after Authority approval; and

Option B - 4 months after Authority approval.

In considering this CP, the Working Group would appreciate comments on whether this implementation date is acceptable.

Q7: Do you agree with the proposed implementation timescales for option 1 and option 2? Please provide your rationale

9 Consultation Questions

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

Number	Questions
1	Do you want the LDI data to form part of the existing LMA report or a separate one? Please provide your rationale.
2	Do you want the LLFC data to form part of the existing LMA report or a separate one? Please provide your rationale.
3	Which option do you support? Please provide your rationale.
4	What impact does each option have on your business?
5	Do you have any comments on the proposed legal text for each option?
6	Do you believe that the DCUSA General objectives are better facilitated by this CP. Please provide your rationale for each option?
7	Do you agree with the proposed implementation timescales for option 1 and option 2? Please provide your rationale.

9.2 Responses should be submitted using Attachment 1 to dcusa@electralink.co.uk no later than, **30 April 2019**.

9.3 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 – Consultation response form

Attachment 2 - EA Technology report

Attachment 3 - EA Technology technical paper

Attachment 4a – First consultation

Attachment 4b - Working Group response to first consultation

Attachment 5a – Legal text for option A

Attachment 5b – Legal text for option B