

DCP 343 COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

Company	Confidential/ Anonymous	Q1: Do you understand the intent of DCP 343?	Working Group Comments
BU-UK	Non-confidential	Yes, we understand the intent of DCP 343; to remove the need for a calculation agent for calculating the 'LV mains split'.	Noted
Electricity North West	Non-confidential	Yes.	Noted
ESP Electricity Ltd	Non-confidential	Yes, the intent is to allow DNO Parties to calculate the HV/LV Mains Split using LV connection counts already received by the DNO as part of the Settlements process. This removes the requirement for a Nominated Calculation Agent (NCA) to provide the calculation thereby reducing the administration costs of the DCUSA which are borne by all Parties.	Noted A clarification was made to highlight that these costs are not currently covered by DCUSA as the service is provided by Energy Networks Association who in turn contract out the NCA service.
Leep Utilities	Non-confidential	Yes, we understand the intent of the change proposal	Noted
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	Yes.	Noted

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Scottish Hydro Electric Power Distribution plc (SHEPD) and Southern Electric Power Distribution plc (SEPD)	Non-confidential	Yes.	Noted
SP Distribution / SP Manweb	Non-confidential	Yes we understand the intent of DCP 343	Noted
UK Power Networks	Non-confidential	Yes	Noted
WPD	Non-confidential	Yes	Noted
<p>Working Group Conclusions: The Working Group concluded that all respondents to the DCP 343 consultation understood the intent of the change, however, a clarification was made to one response to highlight that the costs for this service are not undertaken by DCUSA.</p>			

Company	Confidential/ Anonymous	Q2: Are you supportive of the principles of DCP 343?	Working Group Comments
BU-UK	Non-confidential	Yes, we are supportive of the principles for DCP 343.	Noted

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Electricity North West	Non-confidential	Yes.	Noted
ESP Electricity Ltd	Non-confidential	Yes.	Noted
Leep Utilities	Non-confidential	<p>While we acknowledge that the use of an external NCA may be inefficient and costly, we are not wholly supportive of the proposed change.</p> <p>It is assumed that the LV split calculation is something that the DNO was always capable of completing. Therefore, consideration ought to be given to why the NCA was inserted into the process in the first place, i.e. was it because they were independent of the DCUSA parties or was it too complex/time consuming for the DNO to complete the calculations in a timely manner?</p> <p>We note that in the summary of the change proposal it states:</p> <p><i>'The calculation uses commercially sensitive input data from each DNO and LDNO. The NCA is used to ensure that such data remains confidential.'</i></p> <p>What therefore has changed? Why is the NCA no longer required?</p> <p>If the calculation is carried out by the DNO, will the results be the same as if carried out by the NCA? Therefore, what assurances/guarantees do LDNO's have that they will not be disadvantaged through the loss of independent adjudication? Theoretically, the DNO could move costs away from the LV network to the HV network without scrutiny, resulting in a loss of revenue for the LDNO.</p>	<p>Noted</p> <p>The Working Group understand the questions raised in this response and clarification on each of these points have been set out in the Change Report document that will detail the final solution and Working Group assessments.</p>

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Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	Yes.	Noted
Scottish Hydro Electric Power Distribution plc (SHEPD) and Southern Electric Power Distribution plc (SEPD)	Non-confidential	We are supportive of the principles of DCP 343 provided there is evidence of substantial cost savings relative to the additional effort for DNOs to provide the same data.	Noted
SP Distribution / SP Manweb	Non-confidential	Yes we are supportive of the principles of DCP 343	Noted
UK Power Networks	Non-confidential	Yes	Noted
WPD	Non-confidential	No, WPD do not support the intent of this change proposal. The current method allows DNOs and LDNOs to submit their data to the NCA for a small cost. The	Noted

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		DNOs having to calculate the splits themselves will negate the proposed cost saving.	
<p>Working Group Conclusions: The majority of respondents were supportive of the principles of DCP 343. One respondent was not wholly supportive of the change and raised a number of questions and concerned that the Working Group agreed to address as part of their Change Report. A further respondent was not supportive of the change and believed that the proposed solution is less efficient overall.</p>			

Company	Confidential/ Anonymous	Q3: Do Parties agree that the D0314 flow relating to the most recent March 31 st is the most appropriate source customer data for the LV Split calculation? Please provide your rationale.	Working Group Comments
BU-UK	Non-confidential	Yes, we agree the D0314 flow relating to the most recent March 31 st is the most appropriate source customer data for the LV split calculation.	Noted
Electricity North West	Non-confidential	<p>The current data sources are as follows:</p> <ol style="list-style-type: none"> 1. Length of LV mains (on the DNO's network) connecting licensed embedded networks. 2. Number of end users on LV-connected embedded networks. 3. Length of LV mains (on the DNO's network) connecting LV end users. 4. Number of LV end users on DNO's network. <p>It would seem appropriate for the DNOs to receive data with regard to item 2. from the D0314 which will provide the total number of end users on LV-connected embedded networks.</p>	Noted

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ESP Electricity Ltd	Non-confidential	The calculation requires an input of the number of LV-connected end users on the DNO's network. This figure is submitted to the Authority as part of the Regulatory Reporting Pack (RRP). The embedded connection count should also be taken from the same date i.e. March 31 st of the most recent year.	Noted
Leep Utilities	Non-confidential	We acknowledge that the D0314 flow is an appropriate source of customer data. However, our concerns regarding fairness and transparency remain.	Noted
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	Yes.	Noted
Scottish Hydro Electric Power Distribution plc (SHEPD) and Southern Electric Power	Non-confidential	While D0314 is a useful source of NHH customer counts, it does not include any HH customer counts and hence is not a complete source of data for LV split calculations.	Noted Not supportive as it is not a complete source of data as it does not include the HH metered MPAN data.

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Distribution plc (SEPD)			
SP Distribution / SP Manweb	Non-confidential	<p>Yes, this ensures all relevant LV Mains Split inputs:</p> <ul style="list-style-type: none"> • Are taken from the same time period reducing possible distortion. <p>Represents the most recent time period available.</p>	Noted
UK Power Networks	Non-confidential	<p>We support the view that the D0314 flow is an appropriate source of data for NHH metered MPAN counts and as the 31st March is an established cut-off date used in many other regulatory returns, it seems reasonable to use it. The working group will also need to confirm the same date is used for the data source for LV HH metered MPAN counts.</p>	Noted
WPD	Non-confidential	Yes, if this CP is approved.	Noted
<p>Working Group Conclusions: The majority of respondents believe that the D0314 flow is the most appropriate source of data to obtain the customer count needed for the LV Split calculation as it contains the total number of end users on LV embedded networks. However, it was noted by some respondents that the D0314 flow only includes the NHH metered MPAN data and so the Working Group need to consider where they will obtain the HH metered MPAN data so that they can calculate the full LV mains split.</p>			

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Company	Confidential/ Anonymous	Q4: Do you agree that LDNOs should have the option to request the customer count used by a DNO for their portfolio? Please provide any comments.	Working Group Comments
BU-UK	Non-confidential	<p>We agree that LDNOs should have the option to have visibility of the customer count used by a DNO for their portfolio.</p> <p>However, we feel this count should not have to be 'requested' by an LDNO and should be provided automatically.</p> <p>We appreciate that a LDNO will receive its customer counts only (not counts from each LDNO) so cannot know if total count is accurate, however it is important that the tool to check individual LDNO counts is available.</p> <p>With a requirement for DNOs to report numbers used, LDNOs maintain visibility and can raise any discrepancy if required (we acknowledgment any discrepancy would be a breach of the DCUSA and dealt with accordingly).</p>	<p>Noted</p> <p>Support for the LDNO receiving the data used by the DNO automatically.</p>
Electricity North West	Non-confidential	<p>We do not understand what value this would add to the LDNOs processes, as the data would not be sufficient to check the calculations made and LDNOs will already be aware of the number of customers connected to the LDNO's LV connected Network.</p>	<p>Noted</p>
ESP Electricity Ltd	Non-confidential	<p>Yes, for transparency purposes and to provide a level of assurance as part of the initial implementation, we believe LDNOs should have the ability to request the MPAN count used by the DNOs as part of their calculation.</p>	<p>Noted</p> <p>Support for the LDNO being able to request the data used by the DNO.</p>

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Leep Utilities	Non-confidential	Yes, in order to ensure transparency, the DNO should provide this information on request.	Noted Supportive of the LDNO being able to request the data used by the DNO.
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	Yes. We agree with the Working Group that, of the options presented in paragraph 4.7 of the consultation document, the option for LDNOs to request customer counts is the most appropriate. But we would be unconcerned if either of the other options were taken forward – even if DNOs are required to report to all LDNOs on the customer counts used, the processes will be less administratively burdensome than the status quo and the cost associated with the Nominated Calculation Agent will be avoided, so the objective of the change will still be achieved.	Noted Supportive of the LDNO being able to request the data used by the DNO.
Scottish Hydro Electric Power Distribution plc (SHEPD) and Southern Electric Power Distribution plc (SEPD)	Non-confidential	Yes, provided data can be broken down for the requested party there is no harm to give LDNOs the option to request the customer count used by a DNO for their portfolio. However, depends on the uptake of such request, which if become excessive, would introduce additional burden on DNOs to provide such data, particularly during tariff setting period. In this case, it would be more efficient to stick with the status quo for LDNOs to provide such data to an NCA.	Noted Supportive of the LDNO being able to request the data used by the DNO dependent on the number of requests as there is a risk that the requests could become burdensome to the DNOs.
SP Distribution / SP Manweb	Non-confidential	Yes, if an IDNO feels like they would benefit from having access to the values calculated for their portfolio, then they should be able to request it.	Noted Supportive of the LDNO being able to request the data used by the DNO.

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UK Power Networks	Non-confidential	We agree that in order to maintain trust of the numbers used, DNOs need to be transparent with the MPAN counts used for Customer Numbers in the calculations	Noted Supportive of the LDNO being able to see the data used by the DNO.
WPD	Non-confidential	WPD do not support the intent of this proposal. The current process allows LDNOs to submit their data themselves and so does not require this additional process and complication. What would happen if the LDNO wishes to challenge the data in December just as prices are being issued?	Noted The Working Group will consider introducing a "challenge timescale" for the LDNOs so that there are no issues with price setting.
<p>Working Group Conclusions: The majority of respondents agree that LDNOs should have the right to request the DNO customer count used, however one respondent suggested that this should be provided automatically and another who is not supportive of the proposed change questions what process would be in place should a LDNO wish to challenge the DNO count used. The Working Group will look at introducing a "challenge timescale" into the legal text to ensure that there is a formal process in place.</p>			

Company	Confidential/ Anonymous	Q5: Do you agree with the proposed solution for this CP? Please provide your rationale.	Working Group Comments
BU-UK	Non-confidential	Yes, we agree with the proposed solution.	Noted
Electricity North West	Non-confidential	The solution seems reasonable and would be enabling the process of calculating the 'LV mains split' to be brought 'in-house' which will improve efficiency and indeed reduce costs.	Noted
ESP Electricity Ltd	Non-confidential	Yes, by allowing the DNO to calculate the LV Mains Split based on existing data, it removes the requirement for the Nominated Calculation Agent to process and charge DCUSA Ltd for that element of the calculation.	Noted Clarification that DCUSA Ltd do not pay for this service – as per question 1.
Leep Utilities	Non-confidential	Please see our response to question 2	Noted

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Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	Yes.	Noted
Scottish Hydro Electric Power Distribution plc (SHEPD) and Southern Electric Power Distribution plc (SEPD)	Non-confidential	No, as said in question 3, D0314 is not a complete source of data required for LV Split % calculation.	Noted
SP Distribution / SP Manweb	Non-confidential	Yes, it improves efficiency, and is cost effective.	Noted
UK Power Networks	Non-confidential	Yes. The proposed solution of using the D0314 flows to produce the LV NHH MPAN counts and the calculation being done 'in-house' gives greater control of the process. The working group will also need to consider a	Noted

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		unified approach to collecting the LV HH MPAN counts as the D0314 flow does not contain these	
WPD	Non-confidential	No, a problem does not exist and so therefore does not require a solution.	Noted
<p>Working Group Conclusions: The majority of responses agree with the proposed solution; however, one respondent reiterated their response to question two where they raised questions and concerns which the Working Group are going to address within their Change Report. Two respondents also voiced that there were not in agreement with the proposed solution.</p>			

Company	Confidential/ Anonymous	Q6: Do you believe the Working Group should consider a different solution? Please provide your rationale.	Working Group Comments
BU-UK	Non-confidential	No.	Noted
Electricity North West	Non-confidential	We do not believe a different solution needs to be considered by the Working Group.	Noted
ESP Electricity Ltd	Non-confidential	No, we believe the solution is clear and simple to implement. No major system changes should be required to implement the solution.	Noted
Leep Utilities	Non-confidential	We do not necessarily advocate a different solution but would make the following points: When the use of the NCA was advocated, what was the reason for doing so? What, (if anything), would be lost as a result of its removal?	Noted Answers to the questions will be made clear in the Change Report so that Parties have the full picture before voting on the change.

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		What reassurances would be given if the DNO was to complete the LV split calculations that its work would be open to scrutiny to ensure fairness and transparency?	
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	No.	Noted
Scottish Hydro Electric Power Distribution plc (SHEPD) and Southern Electric Power Distribution plc (SEPD)	Non-confidential	Alternatively, LDNOs can submit their data to DNOs, same way as they submit to the NCA, for DNOs to collate and calculate the LV Split %.	Noted The Working Group will consider this option further.
SP Distribution / SP Manweb	Non-confidential	No, this is an efficient and effective solution.	Noted
UK Power Networks	Non-confidential	We are not aware of any other solutions. Any new solutions should be considered based on their own	Noted

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		merit, however the proposed solution is the best option currently	
WPD	Non-confidential	No, there is no problem with the current method for the calculation of the LV split.	Noted
<p>Working Group Conclusions: The majority of respondents did not provide any alternative solution for the Working Group to consider. One respondent sought clarifications and assurances as voiced in previous questions and so these will be addressed within the Change Report. One respondent provided an alternative option whereby the LDNO provided the data to the DNO, as they would the NCA. The Working Group concluded that they will progress a hybrid solution whereby the LDNO will provide all of their data directly to the DNO (as they would the NCA currently) by the end of September each year. If the data is not provided in time, the DNO will then use the D0314 flow and request the HH metered MPAN count from the LDNO.</p>			

Company	Confidential/ Anonymous	Q7: Do you have any comments on the proposed legal text for DCP 343? Please provide your rationale.	Working Group Comments
BU-UK	Non-confidential	We are happy with the proposed legal text, although as we request the customer counts should be automatically provided to LDNOs, recognise this may require an addition to the proposed legal text (Clause 42.13) in order to facilitate this request.	Noted The Working Group will not be taking forward this suggestion as they believe that the new solution will mean that the LDNO will provide the DNO the data themselves and therefore they will not need to see the data used.
Electricity North West	Non-confidential	As we do not believe there is any value in the DNO Party providing data to the LDNO, the following wording under Paragraph 34 of Schedule 29 would not be required: "On request, the DNO Party must provide to each LDNO Party:	Noted The Working Group will not be taking forward this suggestion as they believe that the new solution will mean that the LDNO will provide the DNO the data

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		<ul style="list-style-type: none"> • the number of customers used for that LDNO in the calculation of the number of end users on LV-connected embedded networks for the purpose of clause 33 (b); and • the combined total number of LDNO customers used for all LDNOs in the calculation of the number of end users on LV-connected embedded networks for the purpose of clause 33 (b).” 	themselves and therefore they will not need to see the data used.
ESP Electricity Ltd	Non-confidential	No comments, we believe the legal text supports the intention.	Noted
Leep Utilities	Non-confidential	We have no comment on the proposed legal text in so far as it reflects the content of the change proposal.	Noted
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	No.	Noted
Scottish Hydro Electric Power	Non-confidential	No.	Noted

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Distribution plc (SHEPD) and Southern Electric Power Distribution plc (SEPD)			
SP Distribution / SP Manweb	Non-confidential	No comments on the proposed legal text for DCP 343	Noted
UK Power Networks	Non-confidential	It will be beneficial to include the equation / formula for the calculation in paragraph 33 to avoid any misinterpretation and to remain consistent with the rest of the Schedule	Noted This will be included within the legal text.
WPD	Non-confidential	No	Noted
<p>Working Group Conclusions: The Working Group noted that the legal text will be updated to reflect the new hybrid solution and the suggestion to include the formula for how the calculation is completed will be taken forward.</p>			

Company	Confidential/ Anonymous	Q8: Which of the DCUSA Charging Objectives does this CP better facilitate? Please provide supporting comments.	Working Group Comments
BU-UK	Non-confidential	We agree with the Proposer that the proposed solution will better facilitate DCUSA Charging Objective six by improving efficiency and reducing the costs incurred for both DNOs and LDNOs by allowing the DNOs to carry out the calculation of 'LV mains split'.	Noted Support for DCUSA Charging Objective Six

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Electricity North West	Non-confidential	We believe that this change will better facilitate Charging Objective 6 promoting efficiency in the implementation and administration of the Charging Methodologies.	Noted Support for DCUSA Charging Objective Six
ESP Electricity Ltd	Non-confidential	ESPE agree with the working group in that Charging Objective 6 is better facilitated. Reducing the NCA costs incurred improves the efficiency of the Charging Methodologies.	Noted Support for DCUSA Charging Objective Six
Leep Utilities	Non-confidential	Charging Objective 6 (promoting efficiency): The change proposal states that the use of the NCA is inefficient. It therefore follows that its removal promotes efficiency.	Noted Support for DCUSA Charging Objective Six
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	As proposer of this change, our view remains unchanged from that presented in the change proposal form, being that this change will have no impact on Charging Objectives one to five and will better facilitate Charging Objective six. This will be achieved by reducing the costs incurred by DNOs in procuring the NCA and improving efficiency for both DNOs and LDNOs by enabling DNOs to carry out the calculation of the 'LV mains split' internally.	Noted Support for DCUSA Charging Objective Six
Scottish Hydro Electric Power Distribution plc (SHEPD) and Southern Electric	Non-confidential	It is questionable whether Charging Objectives 5 be better facilitated: that compliance with the Charging Methodologies promoted efficiency in its own implementation and administration. On one hand it saves DNOs the NCA fees, but on the other if DNOs ends up providing data to each of the IDNOs that would be a lot of effort required (on top of the data collection and calculation of the required LV split).	Noted Unsure whether DCUSA Charging Objective Six would be better facilitated due to the DNOs potentially having to provide data to each of the IDNOs. Due to the hybrid solution – this concern would be alleviated and therefore objective six would be better facilitated.

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Power Distribution plc (SEPD)			
SP Distribution / SP Manweb	Non-confidential	Charging objective six given the change will increase efficiency and reduce the costs associated with this exercise.	Noted Support for DCUSA Charging Objective Six
UK Power Networks	Non-confidential	This CP supports Charging Objective 6. Since the LV Split calculation can be done 'in-house' and avoids the use of a third party agent	Noted Support for DCUSA Charging Objective Six
WPD	Non-confidential	It negative impacts DCUSA Charging Objective 6 as it creates an addition process and complication to the process.	Noted Negative impact on DCUSA Charging Objective Six
<p>Working Group Conclusions: The Working Group concluded that seven of the nine respondents believe that DCUSA Charging Objective Six would be better facilitated by the implementation of DCP 343. One respondent was unsure about this but after discussion regarding the hybrid solution, they know agree. However, one respondent believe that DCUSA Charging Objective Six would be negatively impacted by the implementation of DCP 343 due to the additional process.</p>			

Company	Confidential/ Anonymous	Q9: Are you aware of any wider industry developments that may impact upon or be impacted by this CP?	Working Group Comments
BU-UK	Non-confidential	No.	Noted
Electricity North West	Non-confidential	We are not aware of any wider industry developments that may impact this change.	Noted
ESP Electricity Ltd	Non-confidential	ESPE is not aware of any wider industry developments that would impact the implementation of this CP.	Noted

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Leep Utilities	Non-confidential	No comment	Noted
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	No. This change is only concerned with the practicalities behind the calculation of tariffs in accordance with the existing charging methodologies and has no impact on the underlying methodologies themselves, and so does not interact with other ongoing industry developments looking at the charging methodologies more widely.	Noted
Scottish Hydro Electric Power Distribution plc (SHEPD) and Southern Electric Power Distribution plc (SEPD)	Non-confidential	Not that we are aware of.	Noted
SP Distribution / SP Manweb	Non-confidential	We are not aware of any wider industry developments that may impact upon or be impacted by this CP.	Noted
UK Power Networks	Non-confidential	No	Noted

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WPD	Non-confidential	The SCR will impact this as the current charging methodologies are likely to change as a result.	Noted
<p>Working Group Conclusions: The majority of respondents believe there are no wider impacts that should be considered by the Working Group. However, one respondent believe that the current Access and Forward-Looking Charging SCR should be considered as it is likely that the current charging methodologies are likely to change as a result, which in turn may negate the need for this calculation in the future.</p>			

Company	Confidential/ Anonymous	Q10: The proposed implementation date for DCP 343 is the first DCUSA Release following Party approval. Do you agree with the proposed implementation date? Please provide your rationale.	Working Group Comments
BU-UK	Non-confidential	Yes.	Noted
Electricity North West	Non-confidential	The data is required no later than the end of October each year and it would seem reasonable for implementation to be linked to the first release following approval.	Noted
ESP Electricity Ltd	Non-confidential	Yes, there is minimal impact on DCUSA parties and there should not be a requirement to implement significant system changes.	Noted
Leep Utilities	Non-confidential	No comment	Noted
Northern Powergrid on behalf of Northern Powergrid (Northeast)	Non-confidential	Yes. Assuming this is within the next few months, this will enable the efficiency benefits of this change to be realised when DNOs set 2021/22 charges later in 2019.	Noted

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Ltd and Northern Powergrid (Yorkshire) plc			
Scottish Hydro Electric Power Distribution plc (SHEPD) and Southern Electric Power Distribution plc (SEPD)	Non-confidential	Yes if going ahead.	Noted
SP Distribution / SP Manweb	Non-confidential	Yes	Noted
UK Power Networks	Non-confidential	Yes, this CP causes a small amount of work to be taken on by the Pricing teams but implementation for the 2021/22 charge setting will still allow time to create processes and controls for the calculation	Noted
WPD	Non-confidential	N/A	Noted
Working Group Conclusions: All respondents that provided an answer to this question agreed with the implementation date of the first DCUSA Release following approval.			