




DCUSA Change Report		At what stage is this document in the process?
<h2>DCP 336</h2> <h3>Rota Disconnections and the publication of data by a Nominated Central Source</h3> <p><i>Raised on 07 January 2019 as a Standard Change</i></p>		01 – Change Proposal
		02 – Consultation
		03 – Change Report
		04 – Change Declaration
<p>Purpose of Change Proposal:</p> <p>The intent of DCP 336 is to review and if appropriate amend the reference to the publication of a DVD by the Nominated Central Source for the publication of data for the Rota Disconnections.</p>		
	This document is issued in accordance with Clause 11.20 of the DCUSA, and details DCP 336 – Rota Disconnections and the publication of data by a Nominated Central Source.	
	DCP 336 is considered a Part 2 matter and Parties are invited to consider the proposed amendment (Attachment 1) and submit their votes using the Voting form (Attachment 2) to dcusa@electralink.co.uk by 02 September 2019	
	The voting process for the proposed variation and the timetable of the progression of the Change Proposal (CP) through the DCUSA Change Control Process is set out in this document.	
	If you have any questions about this paper or the DCUSA Change Process, please contact the DCUSA by email to dcusa@electralink.co.uk or telephone 020 7432 3011.	
	Parties Impacted: DNOs, IDNOs and Suppliers	
	Impacted Clauses: Schedule 8, Paragraph 13.2 to 13.4 and Schedule 14, Paragraph 3A	

Contents

1	Executive Summary	3
2	Governance	3
3	Why Change?	4
4	Solution	5
5	Relevant Objectives	10
6	Impacts & Other Considerations	11
7	Implementation	11
8	Legal Text	11
9	Code Specific Matters	12
10	Recommendations	12
11	Attachments	12



Any questions?

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Timetable

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

Change Proposal timetable

Activity	Date
Initial Assessment Report Approved by Panel	09 January 2019
Consultation issued to Parties	01 April 2019
Change Report approved by Panel	17 July 2019
Change Report issued for Voting	09 August 2019
Party Voting Closes	02 September 2019
Change Declaration Issued to Parties	04 September 2019
Implementation	First DCUSA release following Party approval

1 Executive Summary

What?

- 1.1 Paragraph 13 within Schedule 8 of the DCUSA states that each Distributor is to provide a Nominated Central Source with the Alpha Identifier by postcode associated with Rota Load Block disconnections within which they have customers connected to their Distribution System. It then details that a Nominated Central Source is to collate the data provided by each Distributor and issue the collated information to each Supplier in an Electronic Format. At present, Electronic Format is defined as meaning a DVD containing the relevant information in “.csv” format.

Why?

- 1.2 As DVDs are less frequently used, with many laptops no longer even having a DVD drive, it is suggested that an alternate means of providing this data be assessed. The use of a password protected website has been raised as being more appropriate, it is important that the format which is used for the data does not change.

How?

- 1.3 To review the existing arrangements requiring Distributors issuing a Nominated Central Source with the Alpha Identifier by postcode associated with Rota Load Block disconnections and then the Nominated Central Source collating the data provided by each Distributor and placing it on individual DVDs and the issuing a DVD to each Supplier. This review should lead to an understanding of whether there is a more appropriate method of communicating the data.

2 Governance

Justification for Part 2 Matter

- 2.1 The CP is considered a Part 2 Matter as it is a minor amendment which seeks to keep up with technological change by replacing the use of outdated technology with a more practical solution. It also does not meet any of the criteria for a Part 1 Matter or necessitate the Authority to make a determination.

Requested Next Steps

- 2.2 The Panel considered that the Working Group has carried out the level of analysis required to enable Parties to understand the impact of the proposed amendment and to vote on DCP 336.
- 2.3 The DCUSA Panel recommends that this CP:
- Be issued to Parties for Voting.

3 Why Change?

Background of DCP 336

- 3.1 Rota Disconnections are detailed by Ofgem as “If a prolonged electricity shortage affects a specific region, or the whole country, electricity rationing may be necessary. The electricity supply emergency code¹ outlines the process for ensuring fair distribution nationally while still protecting those who require special treatment, using a process known as ‘Rota Disconnections’”.
- 3.2 Paragraph 13.1 to 13.4 within Schedule 8 of the DCUSA states that each Distributor is to provide a Nominated Central Source with the Alpha Identifier by postcode associated with Rota Load Block disconnections within which they have customers connected to their Distribution System. It then details that a Nominated Central Source is to collate the data provided by each Distributor and issue the collated information to each Supplier in an Electronic Format. At present, Electronic Format is defined as meaning a DVD containing the relevant information in “.csv” format.
- 3.3 Further to this, there are inherent costs in the current process which could be reduced if a better solution is found, such costs being:
- The purchasing of DVDs to cover the number of Suppliers who are required to be provided with the information;
 - the manual process to transfer the data to each DVD for each Supplier; and
 - the manual process to package and post the DVD to each Supplier.
- 3.4 There are potential benefits to all Parties involved if this process is updated, being cost savings to Distributors as the charges levied for carrying out the manual elements of the process may be removed and for Suppliers in that they might have a simplified way in which they obtain the information.
- 3.5 The Proposer of DCP 336 has suggested that an alternate means of providing this data be assessed, one which no longer makes use of a DVD. One alternative suggested by the Proposer was to publish the collated information on a password-controlled website which would be accessible for Suppliers to download. This approach is detailed further in section 4.2 below.

¹ <https://www.gov.uk/government/publications/electricity-supply-emergency-code>

4 Solution

DCP 336 Working Group Assessment

- 4.1 The DCUSA Panel established a Working Group to assess DCP 336. This Working Group consists of DNO and Supplier 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 Working Group reviewed the Proposer's initial solution, which was to make a small number of amendments to the DCUSA legal text so that the collated information relating to Rota Load Block Alpha Identifiers could be made available on the DCUSA Website. Further to this, it was noted by the Working Group that although there was a desire to change the medium by which the collated information was provided to Suppliers, the .csv file format was still the preferred format for it to be published in.
- 4.3 The Working Group noted that the DCUSA Website is one that Parties are comfortable in accessing, as well as downloading data from, e.g. accessing the Charging Models and DNO Cost Information tables. Further to this, the Working Group noted the fact that the DCUSA Website has password protection for data/information that is not for public viewing, but that anyone with a username and password can readily access.
- 4.4 The Working Group discussed whether the responsibility for undertaking the collation of data relating to Rota Load Block Alpha Identifiers provided by Distributors should remain with the current Nominated Central Source or if the suggestion that this could be undertaken by the Secretariat was appropriate. It was agreed that as the Secretariat carries out the majority of functions on behalf of the Panel and/or Parties, it made sense to for the purposes of consistency for the Secretariat to undertake the collation of data relating to Rota Load Block Alpha Identifiers.

DCP 336 Consultation

- 4.5 The Working Group agreed that they were comfortable with the solution put forward and issued a consultation to all DCUSA Contract Managers on 01 April 2019 which sought Party views on the proposed solution including the draft legal text. A copy of the consultation document alongside the Party responses and Working Group conclusions can be found as attachment 4.
- 4.6 There were nine respondents to the consultation consisting of DNOs, Suppliers and one respondent who wished to remain anonymous.

Q1: Do you understand the intent of DCP 336?

- 4.7 All respondents to this question agreed that they understood the intent of DCP 336.

Q2: Are you supportive of the principles of DCP 336?

- 4.8 The majority of respondents to this question were fully supportive of the principles of DCP 336 and two respondents were supportive of only one part of the solution related to the removal of a DVD being the medium by which the data is provided.

Q3: Do you agree with the proposed solution for this CP? Please provide your rationale.

- 4.9 It was noted that six of the nine respondents agreed with the agreed with the proposed solution for DCP 336. Of the three remaining respondents, one highlighted a concern regarding the share of the costs being allocated across all Parties as compared to the status quo, being that charges are levied upon the DNOs by the Nominated Central Source. The respondent suggested that any additional costs for the Secretariat to undertake the task should be ring-fenced to DNOs/IDNOs.
- 4.10 Another respondent suggested that the proposed solution *“goes beyond the desired intent”* and that *“the process required to transfer data to and from the website need to be developed and tested”*.

Q4: The data is currently provided in .csv file format, are Parties comfortable that this remains the same for the purpose of sharing this data? Please provide your rationale.

- 4.11 Seven of the nine respondents were supportive of maintaining the current .csv file format for the purposes of sharing this data. One respondent suggested two other file formats but then suggested that these may not be appropriate at this time. Another respondent didn't disagree with the use of the current format but suggested that the legal text shouldn't define a specific format as then a CP would need to be raised to amend it in the future as has been the case with DVDs in this instance.

Q5: Do you believe the Working Group should consider a different solution? If so, please provide your rationale.

- 4.12 No respondents to this question believed that the Working Group should consider a different solution. However, one respondent suggested that further work was required to demonstrate that the proposed changes to use the DCUSA Secretariat are achievable. A further respondent also suggested that the DCUSA Secretariat should provide an email notification to inform Parties when the data is available.

Q6: Do you have any comments on the proposed legal text for DCP 336? Please provide your rationale.

- 4.13 Five respondents to this question were happy with the current drafting of the legal text. However, there were some common themes highlighted in the comments from the other respondents. These being:
- A concern regarding the removal of the text that states that the collated data will be provided to Suppliers free of charge;
 - If there are any costs incurred for the DCUSA Secretariat to conduct this process, then the costs should be ring-fenced to DNO and IDNO Parties only; and
 - There were concerns raised regarding the use of a .csv file format.

Q7: Which of the DCUSA General Objectives does this CP better facilitate? Please provide supporting comments.

- 4.14 The majority of respondents to this question agreed with the Proposer's views that DCUSA General Objective 1, 3 and 4 would be better facilitated by the implementation of this change. However, one respondent voiced that they were unable to comment on whether they thought that DCUSA General Objective 4 would be better facilitated as they were unaware of any costs that would be incurred.
- 4.15 One further respondent highlighted that they believe that DCUSA General Objective 4 would be better facilitated by the change if the Working Group progressed with their suggestion of only removing the need for a DVD to be produced.

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

- 4.16 Eight of the nine respondents were not aware of any wider industry developments that may impact upon or be impacted by DCP 336. However, one respondent noted that the status quo approach means that other interested parties are able to use the complied data for other purposes, i.e. the 105-emergency number and the "who is my network operator" website lookup. By using the DCUSA Secretariat to conduct the collation of the data it could mean that this may no longer be the case.

Q9: The proposed implementation date for DCP 336 is the first DCUSA Release following Party approval. Do you agree with the proposed implementation date? Please provide your rationale.

- 4.17 All respondents agreed that the proposed implementation date would be suitable so long as the Working Group consider the timing of the data being shared with Suppliers for 2019.
- 4.18 The Working Group considered that this implementation date does not result in any potential conflict with the Rota Load Disconnection arrangements for 2019 as they will have already concluded, and Suppliers will still receive a DVD which contains the information for the year.

Working Group Conclusions

- 4.19 The Working Group concluded that all respondents to the consultation understood the intent of DCP 336 and that the majority respondents were fully supportive of the principles of the change. Following a review of the consultation responses, the Working Group agreed that they were going to progress the original solution, whereby the Nominated Central Source would be removed and the DCUSA Secretariat would conduct the collation of the data. The use of a DVD will also be removed and replaced with an electronic file being uploaded to the DCUSA Website for Suppliers to be able to download.
- 4.20 It was noted by the Working Group that there were a couple of areas of the solution that required further detail, including:
- The use of a .csv file format;
 - Ensuring that the DCUSA Secretariat are aware of the process required for them to carry out the administration and collation of the data; and
 - Detailing any potential costs.

Use of a .csv File Format

- 4.21 A couple of respondents to the consultation raised concerns regarding explicitly stating in the DCUSA legal text that the .csv file format should be used. The respondents noted various reasons such as, it being too prescriptive, meaning if there was a desire to move away from it then another CP would need to be raised. It was noted another suggested it may be superseded in the near future, resulting in the need for same abovementioned process. However, the majority of respondents wished for the .csv file format to remain as it is what they are used to and so have processes in place to account for it being provided in that format.
- 4.22 The Working Group discussed the use of a .csv file and agreed that this was the best way forward as it was the same as the status quo. Explicitly stating that a .csv file format should be used will also alleviate the potential for different formats being received by the Secretariat and therefore, creating extra work for Parties to change their current processes.

DCUSA Secretariat Obligations

- 4.23 Respondents to the consultation also voiced concerns regarding the obligations that would be placed on the DCUSA Secretariat to collate the data and upload to the DCUSA Website. There were concerns that the DCUSA Secretariat did not fully understand what was needed to be completed each year to ensure that the data has been collated correctly.
- 4.24 The DCUSA Secretariat are aware that the current Nominated Central Source use a sub-contractor to collate the data and so the DCUSA Secretariat need to review this process to ensure that they are able to conduct the process themselves.

Costs

- 4.25 Consultation respondents highlighted that they wanted to be aware of the costs that will be applied to DCUSA Parties if the DCUSA Secretariat were to take over from the Nominated Central Source in the collation and publication of the data. The DCUSA Secretariat has confirmed that they envisage that the costs should be minimal and would be incorporated into the DCUSA Budgeting process.
- 4.26 It was also suggested that the costs for the DCUSA Secretariat to conduct this work should be ringfenced to DNO/IDNO Parties so that Supplier Parties do not have to contribute to the costs as Supplier Parties currently obtain the data for free. The Working Group discussed this and agreed that this would be a fair assumption and agreed that the legal text would be updated to include a clause indicating that DNO Parties only would pay for this work. This would be similar to how the costs for the Theft Risk Assessment Service are charged.

Further industry feedback and final solution

- 4.27 Two DCUSA Parties provided feedback to the Working Group regarding the proposed solution for DCP 336. Both Parties highlighted that they were unsupportive of the solution that the Working Group were progressing for this change and they would prefer for the Nominated Central Source to be maintained and for the only change be that of the DVD format being removed and the collated data being sent to the DCUSA Secretariat for publication on their password-controlled website. It should be noted that the feedback included references to a multitude of different uses and users of the Rota Load Disconnection data, which the Working Group had not previously been aware of.
- 4.28 Following receipt of the abovementioned feedback, the Working Group considered the two options set out below for progressing the CP:
1. The role of collating the Alpha Identifier and Postcode data provided by the DNOs/IDNOs is undertaken by Secretariat and not the Nominated Central Source. The Secretariat would then publish the collated information on the password-protected pages of the DCUSA website and issue a notice to relevant Parties that the information is available to download. Other interested parties would be able to access the data by requesting a copy from the DNOs; or
 2. The role of collating the Alpha Identifier and Postcode data provided by the DNOs/IDNOs stays with the Nominated Central Source, however instead of placing the collated information onto DVDs and sending one to each Supplier a copy, they would send a file to the DCUSA Secretariat who would publish it on the DCUSA website and issue a notice to relevant Parties that the information is available to download.
- 4.29 Following due consideration, the Working Group agreed that the second option presented the best solution for all Parties. This was due to a number of factors, including:
- It is the simpler solution of the two considered as the first solution required more amendments than had originally been envisaged, especially those required to enact to proposed cost structure set out in paragraphs 4.24 and 4.25 above;
 - There was a risk that the CP may be rejected if option one was taken forward, and that it would be a waste of time and effort if the main desired outcome was not achieved; and
 - The Working Groups increased understanding of the multitude of different uses and users of the Rota Load Disconnection data.

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.
- 5.2 The Proposer of DCP 336 believes that the proposed solution will better facilitate DCUSA General Objectives one, three and four as a result of revising the arrangements for the communication of the Rota Disconnection data. By having this data made available to Parties through a website download rather than using a DVD which many laptops no longer include a drive for will ensure that all Parties have sufficient visibility of this data.
- 5.3 The Working Group unanimously agree with the Proposer of the CP that DCUSA General Objectives three and four would be better facilitated by the implementation of the DCP 336 solution. However, they believe that there would be a neutral impact on DCUSA General Objective one.
- 5.4 DCUSA General Objective three would be better facilitated by this CP because the move to a solution whereby Suppliers can access the Rota Load Identifiers data from the DCUSA Website will enable DNOs to meet their licence conditions concerning maintaining consumers Suppliers.
- 5.5 DCUSA General Objective four would be better facilitated by this CP as the solution allows for a more efficient process as individual DVD's would not need to be posted out and so the solutions is ensuring that the implementation and administration of the DCUSA is more efficient

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.	Neutral
<input type="checkbox"/> 2 The facilitation of effective competition in the generation and supply of electricity and (so far is consistent therewith) the promotion of such competition in the sale, distribution and purchase of electricity.	None
<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 type="checkbox"/> 5 Compliance with the Regulation on Cross-Border Exchange and Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	None

6 Impacts & Other Considerations

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

6.1 This CP does not have any impacts on any SCR currently in progress.

Consumer Impacts

6.2 This CP does not have any impact on customers.

Code Administrator Impacts

6.3 This CP is expected to impact the DCUSA Code Administrator in the following ways:

- Publication of the collated data on the password-protected pages of the DCUSA Website once provided by the Nominated Central Source; and
- Notification to Parties to inform them that the data is available for them to download from the website.

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

7 Implementation

7.1 It is suggested that this CP should be implemented in the first DCUSA Release following Party approval, which is expected to be 07 November 2019. The Working Group considered that this implementation date does not result in any potential conflict with the Rota Load Disconnection arrangements for 2019 as they will have already concluded, and Suppliers will still receive a DVD which contains the information for the year. However, it was noted that if the collated information is made available to the Secretariat prior to the implementation date, then it would be willing to include a copy on the website if so requested.

8 Legal Text

8.1 The legal text for DCP 336 has been developed by the Working Group and has been reviewed by the DCUSA legal advisors and the Proposer is satisfied that the legal text meets the intent of the solution. The DCP 336 legal text is provided as attachment 1 to this Change Report.

8.2 The legal text changes include amendments to the following paragraphs of Schedule 8:

- Paragraph 13.2 has been updated to place an obligation on the Nominated Central Source to issue the collated information in .csv file format to the Secretariat, who in turn is to publish the

collated information on the DCUSA Website and issue a notification to relevant Parties once published;

- Paragraph 13.3 has been updated in line with the amendments made in paragraph 13.2 and the reference to paragraph 13.1 has been amended to reference 13.2 as 13.1 does not relate to the provision of information to a Supplier; and
- The removal of the “Electronic Format” from the definitions under paragraph 13.4, which had the meaning of a DVD containing the collated information in .csv file format.

8.3 DCP 336 also makes an amendment to paragraph 3A of Schedule 14 ‘Website Requirements’ to include item (f) which details that that a spreadsheet in .csv file format will be available via the password-controlled pages of the DCUSA Website, in accordance with paragraph 13.2 of Schedule 8.

9 Code Specific Matters

Modelling Specification Documents

9.1 Not applicable.

Reference Documents

9.2 Not applicable.

10 Recommendations

Panel’s Recommendation

- 10.1 The Panel approved this Change Report on 17 July 2019. The Panel considered that the Working Group has carried out the level of analysis required to enable Parties to understand the impact of the proposed amendment and to vote on DCP 336.
- 10.2 The Panel have recommended this report be issued for voting and DCUSA Parties should consider whether they wish to submit views regarding this CP. The Voting Form can be found in Attachment 2.

11 Attachments

- Attachment 1 – DCP 336 Legal Text
- Attachment 2 – DCP 336 Voting Form
- Attachment 3 – DCP 336 Change Proposal
- Attachment 4 – DCP 336 Consultation and Collated Responses Document