

Working Group actions as a consequence of the DCP314 Consultation response review
Ofgem and Guidance Notes Actions

Action Ref.	Action	Owner	Update
Action 01	<p>Engage with Chris Parish from Ofgem to discuss the following;</p> <ul style="list-style-type: none"> • Response letter to the WG Chair's letter in the spring (02/03) • Is there likely to be an IDNO Licence modification (action 03/01) • And if so what is included within the IDNO licence and expected timeframes for completion <p>Northern Powergrid's Question 4 response is also to be discussed with CP regarding the progress of our Change Proposal with the license modification also in progress.</p>	JL	<p>11/10/2018 Email sent to Chris Parish post meeting, no response received yet.</p> <p>15/10/2018 Ongoing - No response received from CP.</p> <p>17/10/2018 - Ongoing There is a WG under Ofgem and there are some draft proposals in progress for Ofgem to consult on later on. (<i>DNO would complete the Recovery</i>)</p> <p>Ongoing 18/10/2018 - Chris Parish joined the meeting on the 18/10/2018 and provided updates on the following points.</p> <ol style="list-style-type: none"> 1.) I have drafted a response letter & I am just waiting for clarity from the current policy discussions arising from 2 below. 2.) The licence drafting currently proposed by DNOs does not

			<p>cater for IDNOs; I have flagged this up & so has Mike Harding. This will be discussed at the next meeting on 31 October.</p> <p>3.) My understanding is that the DUoS recovery for DNOs is for DUoS bad debts of the licensee, which would include out of area networks.</p> <p>4.) As regards the policy guidance document, my view is that if we refer to the policy guidance in the legal text we should refer to it being silent on this issue.</p>
Action 02	Action to review the guidance note with reference if the text should be updated to EDNO from LDNO.	Working Group	Completed 18/10/2018 - The Working Group agreed to give with the suggested option of LDNO instead of EDNO.
Action 03	Review section 4.7 of the Guidance Note Northern PowerGrid regarding NPGs suggestion of "Companies" to "DNOs"	Working Group	Ongoing LW took the action to look at the Best Practice guidance relating to this action and 05 of this section.
Action 04	Investigate if the out of area charges are recovered through the License.	Working Group	Completed – 18/10/2018 CP - DUoS recovery for DNOs is for DUoS bad debts of the licensee, which would include out of area networks.
Action 05	SEPD suggest changing the first word of paragraph 4.7 to 'DNOs' rather than 'Companies' so that it is clear which category of companies is referred to.	Working Group	Ongoing - Working group don't see 4.7 as the issue more the preceding text. Therefore, LW took the Action to review

			<p>the text of the Guidance note and update accordingly.</p> <p>Change 4.7 wording to DNO from Companies</p>
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TRAMs Spreadsheet Report Actions

Action Ref.	Action	Owner	Update
Action 01	Review the TRAMs Report Spreadsheets to see if there is scope to include a “Anomaly Box” for out of the ordinary costs in regard to ESPs Consultation response in Question 8.	AE/RJ	Completed – AE has added a Commentary box to spreadsheet on each section for anomalies to be recorded on.
Action 02	Include a Total in the TRAMs Report Spreadsheet for DNOs	AE/RJ	Completed – Totals added to the spreadsheet HH data tab NHH summary tab and overall summary tab.
Action 03	Review the TRAMs Report and proceed with the voted option of “By Date”. Also look into the potential for providing Half Hourly settlement data to allow more accurate reconciliation.	Working Group	Completed – Dates added to the spreadsheet for HH data.
Action 04	Dave Wornell to investigate internally on the response to Question 10, and feedback if the issue was a billing system related issue.	DW	Completed Email received on the 12/10/2018 data all in the spreadsheet also. Maybe include a tolerance.

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Action 05	Investigate the current Half Hourly Reports and see if for a credit if the bill shows a negative value on the report.	JL	Completed. The report does show negative values and is to be implemented as apart of DCP312 on the 1 st November 2018. Consideration needs to be given to the NHH Report where the negative value is difficult to see.
Action 06	Clarify the spreadsheet associated with the percentage being claimed due to the passage of time post the expected payment date	Working Group	Completed - The spreadsheet includes an <i>Amounts recoverable</i> to cover this issue with the % that is able to be claimed over the time.

Legal Text Actions

Action Ref.	Action	Owner	Update
Action 01	<p>Review the legal text for disputes process within Schedule 4, and Schedule 19 provided that legal text is amended.</p> <ul style="list-style-type: none"> Identify which clause refers to schedule 4 and what amendments are required <p>Email BU-UK in regard to the response in which they stated</p> <p><i>"provided that legal text is amended"</i></p>	Working Group	Completed 11/10/2018 Emailed Chris Barker regarding Answer to question, CB provided feedback to the group.
Action 02	Review schedule 4 and 19 to see if this is relating to making payments rather than cancelling a bill as the Working Group were unsure on if Schedule 4 was the correct approach.	Working Group	Completed Group reviewed this action during the meeting with Action 08/05 to rectify this issue.

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Action 03	Review the legal text associated with Credit Cover relating to Northern Powergrids response to question 8.	Working Group	Completed Working group reviewed the legal text and agreed to update the text accordingly.
Action 04	Review the legal text associated with the Administrator	Working Group	Completed reviewed text in the meeting regarding this and a new legal text for Option a and c will be circulated.
Action 05	Review the legal text provided by ESP	Working Group	Completed in Meeting 18/10/2018 legal text was reviewed.
Action 06	Produce the legal text appendix based on the option chosen	Working Group	Completed the Working Group have chosen to progress with a model on the DCUSA Website and refer to this model as the most recent model in the text.
Action 07	Clarify the legal text associated with the percentage being claimed due to the passage of time post the expected payment date	Working Group	Completed Included in AEs updated Legal text and included in the TRAMS Report.
Action 08	<p>Consider a legal text amendment suggested by NPG associated with the HH report suggest that paragraph 8.3 be amended as follows:</p> <p>“...the EDNO shall re-submit <u>an extract of any half-hourly DUoS reports which relates to sites registered to the defaulting Supplier Party, and</u> which relate to a period for which the EDNO has payments outstanding from the defaulting Supplier Party.”</p>	Working Group	Completed Considered during the meeting and the legal text will be updated.

Additional

Action Ref.	Action	Owner	Update
Action 01	ElectraLink to include Northern Powergrid's response to Question 1 in the Change Report regarding the LDNO and recovery of bad debts	ElectraLink	Ongoing – Will be completed in the Change Report phase
Action 02	RJ and GM both to investigate internally regarding whether to raise an alternative to Option A and feedback the result to the Working Group	RJ/GM	Completed - RJ has raised an alternate CP and this will be attached to the meeting minutes to view.
Action 03	<p>Email UK Power Networks regarding their responses to the consultation questions to see if there is a misunderstanding or if there is insight into ways in which to improve the Change.</p> <ul style="list-style-type: none"> - Question 8 <i>"However we do have a concern over the additional work placed upon the DNO to provide the audit assurance role as part of this exercise"</i> <p>Working Group also unsure on UK Powers Response to Question 15 in regard to the treatment of any disputed invoices an Email will be sent to understand the response.</p>	HN	Ongoing - Emailed and no response received as of the meeting
Action 04	Attach ESPs legal text to the Actions log	HN	Completed attached to the Minutes of meeting 07
Action 05	<p>Email Electricity North West regarding the answer to Question 12</p> <ul style="list-style-type: none"> - standard formatted backing data? <p>Working group were unsure on the data they were talking about in the response.</p>	HN	<p>Completed 11/10/2018 Emailed ENW response received below.</p> <p>With regard to the "standard formatted backing data" we were just referring to the information shown in 5.17 to 5.23 of the consultation documents, sorry if using the expression "standard formatted" caused confusion.</p>

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			<p>In paragraph 3 of our response to question 12, we were highlighting that currently payment terms relate to Use of System, but as these 'bad debts' are separate would separate payment terms need to be defined.</p>
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