




DCUSA Consultation		At what stage is this document in the process?
<h2>DCP 314</h2> <h3>Appropriate treatment of Bad Debt following appointment of Supplier of Last Resort.</h3> <p><i>Raised on the 02 January 2018 as a Standard Change</i></p> <p>Purpose of Change Proposal:</p> <p>DCP 314 seeks to implement a process that is triggered in the event that a Supplier of Last Resort (SoLR) is appointed following a supplier default. Under these circumstances, it is proposed that Distribution Network Operators (DNOs) must credit Licensed Distribution Network Operators (LDNOs) for the amount of DUoS charges attributable to the defaulting supplier where the LDNO has not received payment.</p> <p>This document is a Consultation issued to DCUSA Parties and any other interested Parties in accordance with Clause 11.14 of the DCUSA seeking industry views on DCP 314.</p>		01 – Change Proposal
		02 – Consultation
		03 – Change Report
		04 – Change Declaration
	<p>The Workgroup recommends that this Change Proposal should:</p> <ul style="list-style-type: none"> • proceed to Consultation 	
	<p>Parties are invited to consider the questions set in section 10 and submit comments using the form attached as Attachment 1 to dcusa@electralink.co.uk by XX XXX XX.</p> <p>DCP 314 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 Change Proposal (CP).</p>	
	<p>Impacted Parties: DNOs and IDNOs</p>	
	<p>Impacted Clauses: Section 2B – Clause 46, Schedule 4 (Payment Default) and Schedule 19 (Portfolio Billing)</p>	

Commented [JL1]: To be populated once known

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 Any questions?

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Timetable

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

Change Proposal timetable

Change Proposal timetable:

Activity	Date
Initial Assessment Report Approved by Panel	17 January 2018
First Consultation issued to Parties	XX XXX XX
Change Report issued to Panel	10 October 2018
Change Report issued for Voting	19 October 2018
Party Voting Ends	09 November 2018
Change Declaration Issued to Parties	13 November 2018
Authority Decision	18 December 2018
Implementation	First Scheduled DCUSA Release following approval

Commented [JL2]: To be updated prior to sending out based on work plan at that time

1. Summary

What?

- 1.1 The Distribution Connection and Use of System Agreement (DCUSA) is a multi-party contract between electricity Distributors and electricity Suppliers and large Generators. Parties to the DCUSA can raise Change Proposals (CPs) to amend the Agreement with the consent of other Parties and (where applicable) the Authority.
- 1.2 This CP provides Licensed Distribution Network Operators¹ (LDNO)s a mechanism to request the credit of a portion of portfolio billing payments back from DNOs without penalty under the specific circumstance whereby the LDNO has not received payment due to a supplier default which results in a Supplier of Last Resort (SoLR) being issued by the Authority.
- 1.3 Credited payments should be reflective of the amounts payable to the DNO by the LDNO attributable to supply points held by the defaulting supplier for the duration of the defaulted payments.

Why?

- 1.4 Under the portfolio billing DUoS charging mechanism, an LDNO collects DUoS revenue from the supplier in respect of both its assets and the upstream DNO assets. The LDNO is then billed by the DNO for DUoS charges for the use of the DNO's upstream assets by the LDNO's customers. Should there be a supplier default event, the LDNO may not receive its DUoS revenue from the supplier but would still be bound to pay the DNO. The LDNO is therefore taking on payment risk and exposure for both revenues due in respect of the use of its assets and in respect of the use of upstream DNO assets should there be a supplier default event.
- 1.5 For the purposes of this Change Proposal, Bad Det is defined as the invoiced amount that is unrecoverable from a supplier that has defaulted and the SoLR appointed to resume supply for the affected customers.

¹ LDNOs are Independent Distribution Network Operators and DNOs operating out of their Distribution Services Area.

How?

1.6 By introducing the provisions that allow for LDNOs to request a credited amount from upstream distribution charges to the host DNO for portfolio billing. This is accomplished via the following processes:

- The LDNO must provide supporting information to the DNO in order that the sum to be credited can be calculated. This information will be from extracts of billing data for the relevant defaulting supplier for the relevant periods;
 - For supply points which are settled on Measurement Classes C, D or E (i.e. half hourly site specific settled) the LDNO will give notice that it is seeking a credit to the DNO by re-submission of HH DUoS report which relates to a period for which the LDNO had Bad Debts outstanding and which details the MPANs consumption and Upstream Network as described in Schedule 19 of the DCUSA document;
 - For supply points which are settled on Measurement Classes A, B, F or G (i.e. non-half hourly settled, and half hourly aggregate settled), a new report that is extracted from D0030 usage files to be sent by the LDNO to the DNO is required detailing all the Transferred MPANs to SoLR and the credit to be returned (TraMS Report). The TraMS Report details the required information that the DNO will need in order to verify the Credit to return; and
 - The data submissions to the DNO must only reflect the period of billing where the LDNO is seeking a credit. This should be the period from the point payments from the defaulting supplier to the LDNO ceased up to the point when the SoLR has been appointed and normal DUoS payments have been resumed.
- The DNO must then, taking into account of the data submitted by the LDNO, advise the LDNO of the billed amount of portfolio charges for the relevant MPANs attributable to the defaulted supplier for the relevant period – the amount to be credited;
 - The LDNO may, if it disagrees with the DNO, enter into a negotiation period in order to agree the amount to be credited.
 - Should the LDNO and DNO not reach an agreement on the amount to be credited, the LDNO may make an appeal. The final decision on the amount to be credited then rests with the Authority.
- The DNO must then issue a credit note to the LDNO in line with the agreed amount (or the Authority if the appeals process has been carried out).

Q1: Do you understand the intent of DCP 314?

2 Governance

Justification for Part 1 Matter

- 2.1 DCP 314 has been designated as a Part 1 Matter as the proposed CP because:
- 9.4.2 it is likely to have a significant impact on competition in the distribution of electricity; and
 - 9.4.3 it is likely to discriminate in its effects between one Party (or class of Parties) and another Party (or class of Parties).

Requested Next Steps

- 2.2 Following a review of the Consultation responses, the Working Group will work to agree the detail of the solution for DCP 314.

3 Why Change?

Background of DCP 314

- 3.1 LDNOs have no specific mechanism for the recovery of Bad Debt within the Electricity Distribution Licence or the DCUSA. Ofgem have granted DNOs allowances to recover Bad Debts incurred through supplier default previously, but as LDNOs do not have allowed revenue determined by Ofgem, no such option is available to them.
- 3.2 Under current arrangements there are no mechanisms that allow LDNOs to reconcile payments to the DNO to reflect the Bad Debt created by a defaulting supplier. Furthermore, the only grounds for an LDNO to dispute charges with the DNO are where there has been a Manifest Error or where the accuracy of the data is under dispute². The net effect of these deficiencies are that LDNOs are obligated to pay portfolio charges to DNOs irrespective of whether the supplier has paid the LDNO or not and that the LDNO is exposed to the DNOs shares of risk from Supplier default.
- 3.3 The threat of supplier default represents significant financial risk for LDNOs. The proposer believes that the current arrangement places an undue burden on the LDNO in respect of Bad Debt exposure. It is appropriate to consider the element of an LDNO's portfolio bill attributable to the defaulting supplier's supply points as efficiently incurred Bad Debt on the part of the DNO and it should, therefore, be recoverable through the existing Bad Debt recovery processes for DNOs.

Q2: Do you agree with the principles of DCP 314?

² Covered by Schedule 4 of DCUSA

4 Code Specific Matters

Reference Documents

4.1 None

5 Working Group Assessment

DCP 314 Working Group Assessment

- 5.1 The DCUSA Panel established a Working Group to assess DCP 314. This Working Group consists of DNO and IDNO representatives and an Ofgem observer. Meetings were held in open session and the minutes and papers of each meeting are available on the DCUSA website – www.dcusa.co.uk.
- 5.2 DCP 314 was raised because when a Supplier ceases to trade, there is a level of mutualisation of industry debt of the Supplier. However, there is no mutualisation of risk between DNO and LDNO, irrespective of whether the LDNO has taken payment from the Supplier or not. Implementation of DCP 314 will mean that DNOs credit LDNOs attributable to the level of defaulted debt (provided the Supplier has not paid the LDNO). The number of small suppliers in the electricity market has increased significantly, and therefore, there is greater potential for more than one Supplier to default at the same time.
- 5.3 The Working Group reviewed Ofgem's "*Best Practice Guidelines for gas and electricity network operator credit cover*"³, that was published in February 2005 as this provides further guidance in the event of a SoLR being appointed. The Working Group reviewed section 4 of the document and addressed some concerns. Firstly, it was noted that the document is only a guideline, secondly, the document was written in 2005 and therefore, may be out of date and thirdly, the document was written at the time when the first IDNOs were obtaining their licences to operate and as such it was unclear as to whether they were considered as a network operator and finally the market has changed since the document was published.
- 5.4 The Working Group drafted a letter to Ofgem to obtain clarity on the following:
- Whether the 2005 best practice guidelines document is still in force and if not, what alternative arrangements exist for the recovery of the bad debt;
 - Whether an embedded distributor (LDNO) can recover bad debt in accordance with the criteria of the guidance document and if not, what process should they follow; and
 - How the bad debt provision should be considered and processed?
- 5.5 In response to the questions above Ofgem confirmed that the 2005 guidance document can be applied to IDNOs however, paragraph 4.7 of the document states, '*All sums to be recovered will be 'logged-up' and dealt with at the subsequent price control review.*' It then goes on to say that '*where a delay in recovery would have a material adverse effect on the financial position of a network operator, Ofgem may consider earlier licence modifications.*' The Ofgem observer of the Working Group discussed that it was unfortunate that this wording was used as an earlier cost recovery

³ https://www.ofgem.gov.uk/sites/default/files/docs/2005/02/9791-5805_0.pdf

mechanism is not available to IDNOs. There is also no licence condition in the IDNO licence under which a direction could be issued. DCP 314 would provide **only** a partial recovery method for IDNOs and would allow the recovery of the upstream DNO Use of System charges and not that of the downstream IDNO.

- 5.6 Adding a sub-term in the pass-through terms in Allowed Revenue for DUoS bad debt will not cater for the IDNOs and neither would amending the definition of Regulated Network Revenue to exclude DUoS bad debts.
- 5.7 One option explored by Ofgem was to look at widening the scope of Standard Licence Condition (SLC) 38 to cover DUoS bad debts as well as SoLR costs would ensure SLC38 is consistent with the proposed modification of Charge Restriction Condition (CRC) 2A paragraph 25. It was hypothesised that SLC38 could be modified to enable Ofgem to issue a direction allowing a network operator to recover costs arising from the insolvency of a supplier, including DUoS bad debts, as well as SoLR cost claims. However, SLC38 is in Section B *'additional standard conditions for electricity distributors who are distribution services providers'*, therefore, it is not in force in the IDNO licences. Consequently, this route would also need to modify the IDNO standard conditions.
- 5.8 A further option discussed by Ofgem was the recovery of DUoS bad debts through the SoLR process as it would be more efficient and would allocate the cost across GB customers. However, the SoLR process is subject to the agreement of the SoLR, so there would still be a need for a fall-back process to deal with any cases where the DUoS bad debts are not recovered through the SoLR claim. Also, any residual distributions eventually received by the network operators from the liquidators would also need to be dealt with the network operators.
- 5.9 DCP 314 would provide a mechanism for IDNOs to recover a proportion of their DUoS bad debts while the existing process or the other proposed options would deal with the recovery of DUoS bad debts by DNOs but not IDNOs.
- 5.10 Due to the fact that there is no process in place for the IDNO to recover their bad debt and may be considered to be discriminatory, the Working Group's preferred option was for Ofgem to undertake a modification to the IDNO licences so that they are able to collect bad debt.
- 5.11 The Ofgem Representative confirmed that licence conditions are now being drafted as a consequence of the issues highlighted by this CP for further discussion within Ofgem as IDNOs currently have no recovery method for the recovery of bad debt from a defaulting supplier, therefore a modification will need to be completed for a method to be created. However the Ofgem Representative also stated that there is a potential for this CP to be investigated alongside the licence modification. There was concern that Ofgem's priorities could be elsewhere, i.e. with the Charging Futures Forum and the Targeted Charging Review and therefore, it may be some time before the licence modification could be made so the Working Group agreed to progress with the CP although accepting that this may result in the CP having to be withdrawn or backed out of DCUSA at a later stage.

Q3: Do you agree with the Working Group that the solution to this issue should be via a licence modification? Please provide your rationale

- 5.12 Concerns were raised over the 2005 best practice guidelines document and that it may need to be updated to facilitate the processing of bad debt by the DNO on behalf of the LDNO. A review of this was undertaken:
 - The first part of the document details the views of consultation respondents to a consultation which was issued 14 years ago and so is not especially relevant;

- The document recommends 'codifying' the best practice guidelines. With the exception of section four (which relates to the amounts which network operators will be allowed to pass through) this has been achieved with the inclusion of Schedule 1 ('cover') in the DCUSA – republishing a document stating this is still to be done would be somewhat misleading; and
- As a consequence of the previous point, the decision tree in section four is also out of date in referring to whether the 'claimant has in place procedures to comply with the best practice guidelines'. I think the actual test now would be whether the claimant has in place procedures to comply with schedule 1 of the DCUSA.

5.13 The Working Group agreed that a simple approach may be for Ofgem to publish a guidance note which deals only with the pass-through criteria (i.e. section four of the existing guidance only) since the remainder has been superseded.

5.14 The Working Group suggest that a separate document is produced specific to the electricity industry that takes section 4 of the 2005 Guidance document and amends it to bring it up to date and cater for this change. (Attachment 4)

5.135.15 The document refers to both Schedule 1 and the proposed changes to Schedule 19 of DCUSA. It allows the LDNO to request the DNO to act on its behalf where the LDNO has been unable to recover bad debts through any other approved means.

Q4: Do you agree with the Working Group that Ofgem would need to either consider updating the 2005 document or provide a guidance note to allow the DNO to act on behalf of the LDNO? Please provide your rationale.

Q5: Do you have any comments on the guidance note amendments suggested by the Working Group?

The Working Group raised a number of concerns over the how, what and why sections of the change proposal form (attachment 3) and updated this to reflect the discussion held. The updated version of these sections is included in section 4 above. Generic

5.16 The Working Group discussed the process that needs to be adopted when a SoLR event occurs. One area of concern was the magnitude of the bad debt compared to the amount of administration required. Consideration was given as to whether have a de-minimus value. The Working Group considered that it may be more appropriate to provide the LDNO with the right to redistribute bad debt where they so wish. In other words the choice is with the LDNO to decide whether it is worth progressing with the recovery of bad debt or not.

Q6: - Do you agree the Working Group view that to progress with a redistribution of debt is for the LDNO to determine rather than invoke a de-minimus value? Please provide your rationale

5.17 The Working Group then discussed what the minimum amount of information was needed from LDNO to indicate that such an occurrence had taken place and they wished to invoke the process. The following is a list of information required from the LDNO:

- a self-certification of compliance with Schedule 1;
- the name of the defaulting Supplier Party that has resulted in a Last Resort Supply Direction being issued;
- the list MPANs affected;

- the amount of financial loss incurred together with the number of days the debt has been outstanding from the due date; and
- the date when the Supplier Party issued with a Last Resort Supply Direction is to be Registered in the MPAS Registration System.

Q7: - What are your thoughts on the list of information required at the start of the process?

HH Site specific billing

5.18 The solution developed states that for supply points which are settled on measurement classes of C, D or E (HH supply points) the LDNO must give notice that it is seeking credit to the DNO by the resubmission of HH DUoS report where the LDNO has already paid the invoice.

Q7: What are your thoughts on the process covering the redistribution of bad debt associated with HH site specific billing?

Non-half hourly and half hourly aggregate billing

5.145.19 The proposer suggested that ~~f~~For non-half hourly and half hourly aggregate (classes A, B, F and G) a new report should be created similar in structure to the D0314 data flow. The data being taken from the D0030 data flow This would be sent by the ~~EDNO-LDNO~~ to the DNO in the format of a TraMS Report and will allow the DNO to calculate the credit to return to the LDNO.

Commented [JL3]: We probably need to put this in full.

5.20 The Working Group discussed this and consideration was given to:

- The format of the report; and
- when such a report is to be provided.

5.21 The Working group agreed that the report should be taken from the information within the D0030 data flow and presented in the same manner as the D0314 flow. It was also agreed that to ensure consistency the data required should be specified in the DCUSA and as such this could be added as an appendix to schedule 19.

5.22 On when the report should be submitted the Working Group discussed various scenarios ranging from a report submitted shortly after the SOLR Registration date through to after the final reconciliation settlement run or as part of the DNO submission on cost recovery as part of the price control. The Working Group agreed to consider three options:

- Initial Settlement Run;
- Final Settlement Run;
- Initial Settlement Run with a reconciliation after the Final Settlement Run.

Option A - Initial Settlement Run

5.23 The LDNO submits its report to the DNO on receipt of the initial settlement run (received circa 20 days after the settlement date) for days up to and including the date of failure based on the latest reconciliations available at that time with the DNO then making payment to the LDNO on this basis. Any variation between the initial settlement run, further settlement runs and the final settlement run would be left unaltered. This would result in a reasonably small inaccuracy.

Option B – Final Settlement Run

5.24 The LDNO submits its report to the DNO on completion of the settlement process (i.e. 14 months later) with the DNO then making payment to the LDNO. This will cater for the Initial settlement run

and all the further Reconciliation Runs up to and including the Final Settlement Run but any redistribution of bad debt is only cater for more than 14 months after the majority of the bad debt is known.

Option C - Initial Settlement Run with a reconciliation after the Final Settlement Run

5.25 The LDNO submits its report to the DNO on receipt of the initial settlement run for days up to and including the date of failure based on the latest reconciliations available at that time with the DNO then making payment to the LDNO on this basis. A reconciliation would then take place once the settlement process has concluded 14 months later, i.e. another LDNO to DNO report and then either DNO to LDNO payment or vice versa depending on whether the reconciliations were net positive or net negative. This provides the majority of the bad debt being recovered at the outset with a final reconciliation in line with industry timescales.

5.26 In addition all three options will have an obligation to pass on any income received from the administrator of the defaulting supplier where the LDNO has received a credit back from the DNO.

5.27 The Working Group discussed each of the three options and there was [majority/unanimous] support for option [A,B,C]. The Working Group is seeking views on the three options.

<finalise the process of at what point the report is sent associated with reconciliation runs will the report run at time of default, will it be repeated at each settlement run or at the end of the process once there is a full understanding of the amount to be returned including any potential recovery from the Administrator. In the proposal there was no exact timeline mentioned.>

<do we want a question on whether we complete billing and this is classed as a separate process, this may fall out of the discussion above under 5.17>

Q85: Do you agree with the credit process covering the HH and NHH billing arrangements Which option do you support to cater for the redistribution of bad debt associated with NHH and HH aggregate billing? Please provide your rationale

<Authority notification and the expected timeframe for the additional information to be provided to the DNO from the LDNO, the Working Group confirmed that the expected timeframe is found in the supply licence, and this will be linked in the consultation> Placeholder for a question here if required.

5.155.28 The original suggestion by the Proposer for credit disputes was to go through the Authority to resolve, the Working Group noted that there is already a disputes process in place in DCUSA within Schedule 4 and identified as such within Schedule 19 where the legal text is to be amended. The Proposer took the suggestion onboard and accepted the fact that the Authority need not be involved in the process as the disputes process in DCUSA was seen as robust enough to be used for this as well as current disputes.

Q96: Do you agree that DCUSA already caters for a dispute process and as such there is no need to escalate to the Authority? Please provide your rationale

6 Legal Text

6.1 It is proposed that a paragraph-section covering Supplier of Last Resort be added to the text of the DCUSA Document Section 19, that define Bad Debt.

6.2 <to be populated once agreed>The legal text within this section covers:

- The information required when the LDNO invokes their right to re-distribute bad debt;
- When and the format of the report covering HH aggregate and NHH billing (amended for each option);
- When and the format of the report covering HH site specific billing;
- The criteria used by the DNO in assessing the amount of credit based on age of debt (this is taken from Ofgem's 2005 best practice guidelines document);
- Handling payments received from the Administrator of the defaulting supplier;
- A requirement for the DNO to submit the LDNO data as part of their submission cost recovery; and
- An obligation on the LDNO to provide any information requested by the ASAuthority that relates to their data.

6-26.3 A copy of the proposed legal text can be found as Attachment 2.

Commented [JL4]: All attachments to be checked

Q107: Do you have any comments on the proposed legal text for DCP 314?

7 Relevant Objectives

Assessment Against the DCUSA Objectives

- 7.1 For a DCUSA Change Proposal to be approved it must be demonstrated that it better meets the DCUSA Objectives. The Proposer believes that this Change Proposal better facilitates DCUSA General Objectives 1 and 2.
- 7.2 It is believed that General Objective 1 is better facilitated as the change will help to ensure LDNO business continuity in the event of supplier default. This allows LDNOs to better recover the costs incurred in operating its distribution businesses and is a more appropriate allocation of risk between distributor parties.
- 7.3 General Objective 2 is better facilitated as it ensures a more reflective allocation of risk between different classes of a distributor party. The reallocation of risk fairly reduces exposure to LDNO parties and may, therefore, encourage competition in distribution.
- 7.4 The Working Group are interested in which of the DCUSA General Objectives Parties believe would be better facilitated by this Change Proposal and why.

Q118: Which of the DCUSA General Objectives does the CP better facilitate? Please provide supporting comments.

DCUSA General Objectives:

General Objective 1 - the development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks
General Objective 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
General Objective 3 – the efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences
General Objective 4 – the promotion of efficiency in the implementation and administration of the DCUSA
General Objective 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.

8 Impacts & Other Considerations

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

- 8.1 The Working Group are aware of a recent consultation undertaken by Ofgem entitled “Proposed modifications to SoLR supply licence conditions”⁴. The consultation closed on 11 July 2018. If, following consideration of respondents’ views, Ofgem decide to proceed to modify the licences, they will issue a statutory consultation as soon as practicable following their review of the consultation responses. No-

Consumer Impacts

- 8.2 N/A

Environmental Impacts

- 8.3 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 314 were implemented. The Working

⁴ https://www.ofgem.gov.uk/system/files/docs/2018/06/consultation_licence_changes_solr.pdf



Group did not identify any material impact on greenhouse gas emissions from the implementation of this CP.

Engagement with the Authority

8.4 Ofgem has been fully engaged throughout the development of DCP 314 as an observer on the Working Group.

Q9Q12: Are you aware of any wider industry developments that may impact upon or be impacted by this CP?

Q10Q13: Are there any alternative solutions or unintended consequences that should be considered by the Working Group?

9 Implementation

~~9.1 At the time of drafting, no system changes were anticipated in implementing this DCUSA Change Proposal. Therefore, it~~ is proposed that the change is implemented as soon as practicable following an Authority decision to do so.

~~9.1 Prior to finalising the date, the Working Group would like to understand whether any of the options being proposed by this CP would result in system changes and if so what the lead time would be to~~

~~implement~~ **the change.**

Q11Q14: The proposed implementation date for DCP 314 is the first scheduled DCUSA Release following approval. Do you agree with the proposed implementation date?

Q15: Do you have any system changes as a consequence of this change proposal and if so what would be the cost and implementation time frame?

10 Consultation Questions

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

Number	Questions
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1	Do you understand the intent of DCP 314?
2	Do you agree with the principles of DCP 314?
3	Do you agree with the Working Group that the solution to this issue should be via a licence modification? Please provide your rationale
4	Do you agree with the Working Group that Ofgem would need to either consider updating the 2005 document or provide a guidance note to allow the DNO to act on behalf of the LDNO? Please provide your rationale.
<u>5</u>	<u>Do you have any comments on the guidance note amendments suggested by the Working Group?</u>
<u>6</u>	<u>Do you agree the Working Group view that to progress with a redistribution of debt is for the LDNO to determine rather than invoke a de-minimus value? Please provide your rationale</u>
<u>7</u>	<u>What are your thoughts on the process covering the redistribution of bad debt associated with HH site specific billing?</u>
<u>58</u>	<u>Which option do you support to cater for the redistribution of bad debt associated with NHH and HH aggregate billing? Please provide your rationale</u> <u>Do you agree with the credit process covering the HH and NHH billing arrangements?</u>
<u>69</u>	Do you agree that DCUSA already caters for a dispute process and as such there is no need to escalate to the Authority? Please provide your rationale
<u>710</u>	Do you have any comments on the proposed legal text for DCP 314?
<u>811</u>	Which of the DCUSA General Objectives does this change better facilitate? Please provide supporting comments.
<u>912</u>	Are you aware of any wider industry developments that may impact upon or be impacted by this CP?
<u>1013</u>	Are there any alternative solutions or unintended consequences that should be considered by the Working Group?
<u>1114</u>	The proposed implementation date for DCP 314 is the first scheduled DCUSA Release following approval. Do you agree with the proposed implementation date?
<u>15</u>	<u>Do you have any system changes as a consequence of this change proposal and if so what</u>

would be the cost and implementation time frame?

10.2 Responses should be submitted using Attachment 1 to dcusa@electralink.co.uk no later than **XX**
XXX XX.

Commented [JL5]: To be added once known

10.3 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 – DCP 314 Consultation Response Form
- Attachment 2 – DCP 314 Draft Legal Text
- Attachment 3 – DCP 314 Change Proposal
- [Attachment 4 – Suggested amendment to section 4 of the 2005 Guidance document](#)