

APPENDIX B - RESPONSE FORM

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Role: Supplier / DNO / **IDNO** / Other – Please Specify:

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How do the proposed CPs better facilitate the DCUSA Objectives?

| <i>Change Proposal</i> | <i>Better Facilitates (Yes/No)</i> | <i>Which Objective</i> | <i>Reasons/Comments</i> |
|-------------------------------|---|-------------------------------|--|
| DCP001 | No | | <p>We support the principle that changes to charges should be managed. This has benefits to IDNOs as well as suppliers. Therefore we support that changes to existing charges should be made on prescribed dates and should be restricted.</p> <p>As an IDNO we establish networks in each of the distribution service areas. Our distribution licence condition BA1 requires us to replicate the DUoS charges of the ex-PES DNO. As such, under current arrangements, the frequency of changes we make is in large part determined by the changes brought about by DNOs. If each Licensee was to issue changes to charges only once a year on different dates, we may be in a position of issuing 14 statements a year. We recognise that there are only 7 DNO groups; however, some DNOs may make changes more than once a year.</p> <p>Additionally, we would be concerned if this meant that distributors could only introduce new tariffs once a year.</p> <p>We believe the obligation to use “best endeavours” is overly onerous.</p> |
| DCP001a | No | | <p>We believe that option DCP001B is better in that it does provide some flexibility for DNOs whilst providing a framework.</p> |

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| DCP001b | Yes | Of the four objectives we believe the change satisfies 2,3 and 4 | We believe that, of the four options, this best facilitates the DCUSA objectives. We believe that since DNOs would have two dates to implement changes the reasonable endeavours test would be sterner here than in DCP001a |
| DCP001c | No | | This is the least favourable options. As an IDNo this could result in us having to change statements 7 times within a year (see comments to Option DCP001 |

Are there any other alternative solutions you would like to be considered by the DCP 001 Working Group?

We would like to make sure that the change does not limit the introduction of new tariffs and tariff structures.

Our understanding of this is that this only restricts changes to charges and does not impact on changes to MDD or to valid LLFC/PC/SSC/TPR combinations.

Reasons and explanations:

As a new entrant IDNO we will be developing combinations on an ongoing basis

If you believe more than one solution better facilitate the DCUSA objectives, indicate an order of priority between each of the alternatives. This will inform the Panel's decision about which alternate(s) to put forward for formal voting in addition to the original CP.

Highest Priority:

DCP001b

Next Priority if any:

DCP001a

Next Priority if any:

Next Priority if any:

Reasons and explanations:

See comments in respect of each solution

Indicate if you expect to incur any costs to support each alternative, particularly where these are related to internal system changes:

No

Comment on the suitability of the proposed implementation date for each CP and each alternative:

We are happy with the proposed date in Option 2B

Reasons and explanations:

Any other comments or views on the Change Proposal and Alternatives:

Please clearly indicate which parts, if any, of your comments are to be treated by the Working Group and Panel as confidential.