




DCUSA Change Report		At what stage is this document in the process?
<h1>DCP 337</h1> <h2>Resolution of Housekeeping Items</h2> <p><i>Date Raised: 08 January 2019</i></p> <p><i>Proposer: Donna Townsend</i></p> <p><i>Company: ESP Electricity Ltd</i></p> <p><i>Category: IDNO</i></p>		01 – Change Proposal
		02 – Consultation
		03 – Change Report
		04 – Change Declaration
<b>Purpose of Change Proposal:</b> This CP seeks to address and where appropriate to implement a number of housekeeping items that have been identified over a period of time.		
	This document is issued in accordance with Clause 11.20 of the DCUSA, and details DCP 337 – ‘Resolution of Housekeeping Items’.	
	DCP 337 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 <a href="mailto:dcusa@electralink.co.uk">dcusa@electralink.co.uk</a> by <b>12 April 2019</b> .	
	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 <a href="mailto:dcusa@electralink.co.uk">dcusa@electralink.co.uk</a> or telephone 020 7432 3011.	
	Parties Impacted: <b>All Parties</b>	
	Impacted Clauses: <b>Various</b>	

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Any questions?

Contact:

**Code Administrator**



**DCUSA@electralink.co.uk**



**020 7432 3011**

Proposer:

**Donna Townsend**



**Donna.Townsend@espug.com**



## Timetable

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

### Change Proposal timetable

Activity	Date
Initial Assessment Report Approved by Panel	20 February 2019
Change Report Approved by Panel	20 March 2019
Change Report issued for Voting	22 March 2019
Party Voting Closes	12 April 2019
Change Declaration Issued to Parties	16 April 2019
Implementation	27 June 2019

## 1 Executive Summary

### What?

- 1.1 A number of housekeeping items have been identified by various parties over time and are recorded in the housekeeping log. Under the Electricity Distribution Licence, Clause 22, no modification can be made unless Parties to the DCUSA have voted and that the relevant DCUSA Objectives are better facilitated. Throughout this document the use of the acronym 'HK' followed by a numerical value refers to a specific housekeeping log item.
- 1.2 The proposer has reviewed the items in the housekeeping log that this change seeks to address, being:
  - HK105: Removal of applicable references to fax/facsimile throughout the DCUSA
  - HK106: Missing description for the term 'revenue not to share'.
  - HK107: Update location of reference to 'Nominated Calculation Agent'.
  - HK108: Updated location of the reference to the definitions for "HV Split" and/or "LV mains split".
  - HK109: Updating the references to Model M and/or Method M in light of the new models which will be implemented on 01 April 2020.
  - HK110: Updating references to the "extended" PCDM due to the implementation of DCP 234.
  - HK111: Update to paragraph 2 in Schedule 16.

### Why?

- 1.3 This CP has been raised to resolve the issues that are periodically identified within DCUSA which are recorded in the housekeeping log. The implementation of this CP will ensure that the legal text throughout the DCUSA document is correct.

### How?

- 1.4 By completing a review of the items recorded in the housekeeping log and subsequently revising the DCUSA document to incorporate the required amendments.

## 2 Governance

### Justification for Part 2 Matter

- 2.1 As the amendments detailed in this Change Proposal are for housekeeping purposes, there is no material impact on Parties and thus, does not meet the criteria for it to be considered a Part 1 Matter.

### Requested Next Steps

- 2.2 The Panel considered that the Proposer has carried out the level of analysis required to enable Parties to understand the impact of the proposed amendment and to vote on DCP 337.
- 2.3 The DCUSA Panel recommends that this CP be issued to Parties for Voting.

### 3 Why Change?

#### Background of DCP 337

- 3.1 This Change Proposal has been raised by ESP Electricity Ltd to address the items recorded in the housekeeping log. The proposer has reviewed the items in the housekeeping log that this change seeks to address, being HK105, HK106, HK107, HK108, HK109, HK110 and HK111.

**HK105: Removal of applicable references to fax/facsimile throughout the DCUSA**

- 3.2 At the November 2017 Panel meeting it was highlighted that ElectraLink no longer has a fax facility and as such questioned if a housekeeping change should be raised to remove references to fax or facsimile in the DCUSA. It is noted that there are 17 references located in DCUSA which are related to Parties contacting each other and not DCUSA Ltd. Therefore, these references would need to stay.

**HK106: Missing description for the term 'revenue not to share'.**

- 3.3 The term 'revenue not to share' is currently referenced in the Glossary of terms for Schedule 16 and the words describing the definition reference back to paragraph 111. Due to the implementation of DCP 234 'Merging the PCDM and extended PCDM', paragraph 111 was deleted and replaced with the words 'Not used.'. It may be that this term is no longer needed in Schedule 16 and can be removed, however if it is still needed then the definition will need to be amended and another paragraph reference used.

**HK107: Update location of reference to 'Nominated Calculation Agent'.**

- 3.4 Due to the implementation of DCP 234 on 01 April 2018, there is a need to update the definition of 'Nominated Calculation Agent' as the references are no longer contained in Schedule 16 and are now located within Schedule 29 of DCUSA.

**HK108: Updated location of the reference to the definitions for "HV Split" and/or "LV mains split".**

- 3.5 The references to the definition of "HV Split" and/or "LV mains Split" are now contained in Schedule 29 and not Schedule 16. This means that Clauses 42.12 and 42.13 need to be amended to reference the correct Schedule number. It is noted that this has come about due to the implementation of DCP 234 on 01 April 2018.

**HK109: Updating the references to Model M and/or Method M in light of the new models which will be implemented on 01 April 2020.**

- 3.6 The PCDM model references in paragraph 24.1 of both Schedule 17 and Schedule 18 are currently described using the term "method M". It is noted that this will change when the CEPA/TNEI models come into effect on 01 April 2020. As such, we should monitor this and ensure it is amended when the time comes.

**HK110: Updating references to the "extended" PCDM due to the implementation of DCP 234.**

- 3.7 The PCDM model references in paragraph 24.1 of both Schedule 17 and Schedule 18 are currently described using terms; method M and "extended" method M/PCDM. The PCDM and Extended PCDM were merged as a result of the implementation of DCP 234 on 01 April 2018 and as such the references to "extended" should be removed.

#### **HK111: Update to paragraph 2 in Schedule 16.**

- 3.8 A change is required in Schedule 16, paragraph 2, as it refers to ‘the Schedule 16’ when every other reference is to ‘this Schedule 16.’

## **4 Solution**

### **DCP 337 Assessment**

- 4.1 Following the review of each housekeeping item, the Proposer believes that this CP is required to address HK106, HK107, HK108, HK109, HK110 and HK111.
- 4.2 The Proposer believes HK105 should be deleted from the Housekeeping log as it has been confirmed during their review that no amendment is necessary due to the fact that the references to fax or facsimile located in DCUSA are related to Parties contacting each other and not DCUSA Ltd. Therefore, the references would need to stay in place at this stage.
- 4.3 The amendments to the legal text for HK107 and HK108 are relatively minor in nature and only update the cross-referenced Clause, Schedule or Paragraph numbers. The amendments to the legal text for HK109 and HK110 remove the references to Model/Method M and the extended version which is no longer in use and replaces these with a text to guide the reader to the relevant Schedule, being Schedule 29. The amendment to the legal text for HK111 is a minor update to the text to align to similar paragraphs in other Schedules.
- 4.4 For HK106, the Proposer noted there were a number of options for resolution and sought guidance from the DCUSA legal advisors when submitting the text for legal review. HK106 relates to the term [Revenue not to share] within the Glossary of terms in Schedule 16, that cross references a non-existent paragraph for a term that is no longer used in the Schedule. The term [Revenue not to share] is contained in Paragraph 21 of Schedule 29 and the options which the Proposer sought guidance on are set out below:
- 1) Remove it from the Glossary of terms of Schedule 16 and not add it to a Glossary of terms for Schedule 29 if it is not considered necessary as Schedule 29 does not currently contain a Glossary of terms; or
  - 2) If it should remain in place, then the term [Revenue not to share] in Schedule 16 should be amended to state paragraph 21 of Schedule 29 but it was thought that this may not be needed, given all other references to it are in Schedule 29 (3 in total); or
  - 3) If it should be added to a Glossary of terms in Schedule 29, then a Glossary of terms will need to be created in Schedule 29 and the term [Revenue not to share] included in the glossary.
- 4.5 Following a review of the options, the DCUSA legal advisors considered that option 1 above is the most suitable option to resolve the identified issue.
- 4.6 During the review of HK110, the Proposer investigated if the term “price control disaggregation model” was actually referenced anywhere as the PCDM and in searching the only reference to PCDM was in paragraph 1A of Schedule 29 but the acronym had not been spelt out. The Proposer has suggested that this paragraph could also be amended to spell out the acronym before its first use, just so it is clear.

## 5 Relevant Objectives

### Assessment against the DCUSA Objectives

5.1 For a DCUSA Change Proposal to be approved it must be demonstrated that it better meets the DCUSA Objectives.

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	None
<input type="checkbox"/> 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	None
<input type="checkbox"/> 3 The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences	None
<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 in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	None

5.2 Correcting the housekeeping items that have been periodically identified within the DCUSA document ensures that the legal text throughout the DCUSA document is accurate which will aid comprehension thereby improving efficiency which better facilitates DCUSA General Objective four. It is noted that although some impacted clauses are within the methodology sections, this is not a methodology change.

## 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 change does not impact any SCR currently in progress.

### Consumer Impacts

6.2 This change does not impact consumers.

### Environmental Impacts

6.3 In accordance with DCUSA Clause 11.14.6, the Proposer assessed whether there would be a material impact on greenhouse gas emissions if DCP 337 were implemented. The Proposer did not identify any material impact on greenhouse gas emissions from the implementation of this Change Proposal.

## 7 Implementation

- 7.1 The proposed implementation date for this CP is the next applicable DCUSA release date following approval, which is on 27 June 2019.

## 8 Legal Text

- 8.1 The legal text for DCP 337 has been recommended by the Proposer and reviewed by the DCUSA legal advisor and is provided as Attachment 1.
- 8.2 The legal text sets out the amendments made to the legal text which addresses housekeeping items HK106, HK107, HK108, HK109, HK110 and HK111 and an additional item identified as noted previously.
- 8.3 The Proposer is satisfied that the legal text meets the intent of the change.

## 9 Code Specific Matters

### Modelling Specification Documents

- 9.1 Not applicable.

### Reference Documents

- 9.2 None.

## 10 Recommendations

### Panel's Recommendation

- 10.1 The Panel approved this Change Report on 20 March 2019. The Panel considered that the Proposer has carried out the level of analysis required to enable Parties to understand the impact of the proposed amendment and to vote on DCP 337.
- 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.

### Attachments

- Attachment 1 – DCP 337 Legal Text
- Attachment 2 – DCP 337 Voting Form
- Attachment 3 – DCP 337 Change Proposal