DCP 332 and DCP 333 COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

Company	Confidential/ Anonymous	Q1: Do you understand the intent of DCP 332 and DCP 333?	Working Group Comments
BU-UK	Non-confidential	Yes, we understand the intent of DCP 332 & DCP 333.	Noted
Anonymous	Anonymous	Yes	Noted
Electricity North West Limited	Non-confidential	Yes.	Noted
ESP Electricity Ltd	Non-confidential	Yes.	Noted
Haven Power	Non-confidential	Yes	Noted
Leep Utilities	Non-confidential	We understand the intent of the change proposals	Noted
Northern Powergrid	Non-confidential	Yes.	Noted
npower	Non-confidential	Yes.	Noted
Opus Energy Limited	Non-confidential	Yes.	Noted
SP Distribution / SP Manweb	Non-confidential	Yes we understand the intent of DCP 332 & DCP 333	Noted

UK Power Networks	Non-confidential	Yes.	Noted
Western Power Distribution	Non-confidential	Yes.	Noted
Working Group Conclusions: The Working Group concluded that all respondents to the consultation understood the intent of both DCP 332 and DCP 333.			

Company	**Confidential/ Anonymous**	**Q2: Do you agree with the principles of DCP 332 & DCP 333? If not, please provide your rationale.**	**Working Group Comments**
BU-UK	Non-confidential	Yes, we agree with the principles of DCP 332 & DCP 333.	Noted
Anonymous	Anonymous	Yes	Noted
Electricity North West Limited	Non-confidential	Yes, we agree with the principles of this change.	Noted
ESP Electricity Ltd	Non-confidential	Yes.	Noted
Haven Power	Non-confidential	Yes	Noted
Leep Utilities	Non-confidential	We are in agreement with the principles	Noted
Northern Powergrid	Non-confidential	Yes.	Noted

npower	Non-confidential	We believe that SoLR process is out of alignment with wider financial administration processes and that these should be looked at holistically. However that aside we are responding to this consultation based on the current processes. We agree with the principle of DCP 332. We think that there should be more work to signpost potential costs either from the SoLR, the DNOs or the Authority on the magnitude of upcoming, but not yet submitted, claims so that Suppliers can track these and be cognisant of cases where a late claim may cause a threshold breach in the upcoming charging year. In the case of DCP 333 we do not agree with bringing bad debt claims into the current price control period and the introduction of claims for IDNO bad debt. This introduces new costs to be borne by Suppliers at a time of financial strain but recognise that this has already been included in the recent licence changes.	Noted Respondent agrees with the principles of DCP 332 but does not agree with the principles of DCP 333. However, they recognise that bringing bad debt claims into the current price control period and introducing claims for IDNO bad debt has already been included in the licence changes. The Working Group noted that the disagreement is with the licence changes made by Ofgem rather than DCP 333. The Working Group also agree with the point raised regarding the signposting work required and agreed that this would be included in the DCP 332 Change Report for Ofgem to consider.
Opus Energy Limited	Non-confidential	Yes.	Noted
SP Distribution / SP Manweb	Non-confidential	Yes we agree with the principles of DCP 332 & DCP 333	Noted
UK Power Networks	Non-confidential	Yes.	Noted
Western Power Distribution	Non-confidential	Yes.	Noted

Working Group Conclusions: The Working Group concluded that 11 of the 12 respondents agree with the principles of DCP 332 and DCP 333. However, one respondent highlighted that they are in agreement with DCP 332 in response to this consultation, but they do not agree with the principles of DCP 333, however, they do recognise that bringing bad debt into the current price control and introducing claims for LDNO bad debt has been introduced by the new licence changes. Signposting Change Report.

Company	Confidential/ Anonymous	Q3: Do you agree with the Working Group that Option D is appropriate for DCP 332? If not, which option do you consider to be more appropriate? Please provide your rationale.	Working Group Comments
BU-UK	Non-confidential	We agree Option D is appropriate for DCP 332 with a fixed charge for recovery as new pass-through terms cannot be reduced through network usage. Domestic customers benefit from continuity and protection of supply should their supplier's licence be revoked and therefore should be the only contributor to the costs associated with the appointment of SoLR.	Noted
Anonymous	Anonymous	We do not believe that option D is the most appropriate solution. We feel that neither option C or D is the best approach, while the SoLR safety net primarily benefits domestic customers through protection of their credit balances business customers supply is also protected, and costs associated with non-domestic supply (excluding customer credit balances) can still be claimed from the industry via the SoLR process. Under both options we feel that the costs for a SoLR would not be recovered against the appropriate consumer groups given exclusions detailed under option C, combined with the costs to be recovered also being	Noted SoLR claims are dominated by costs for domestic customers but not to say that it will always be the case in the future. Non-domestic customers are a risk, but the costs would be sufficiently small and the pence per day would be wrapped up in the unit costs.

		hidden in the existing fixed charge per day which may possibly link into the TCR SCR, which is also seeking apportion residual costs potentially into the fixed charge per day. Under Option D, if a non-domestic supplier went out of business and claimed through the SoLR process, domestic customers would have to foot the bill.	
Electricity North West Limited	Non-confidential	We agree that applying the tariff changes to fixed charges is more appropriate because it minimises distortion to the price signals provided by tariffs. However, we are not certain that Option D is more appropriate than Option C as it is our view that Supplier of Last Resort arrangements benefit all users of the electricity system, and in particular would be likely to benefit small non-domestic customers in a similar way to domestic customers.	Noted The Working Group noted that Supplier of Last Resort arrangements do not benefit non-domestic customers in a similar way to the domestic customers is not entirely true as they do not cover credit cover.
ESP Electricity Ltd	Non-confidential	Yes, we agree with the WG that Option D is more appropriate. The costs associated with Supplier of Last Resort (SoLR) cannot be reduced through reduced network usage (higher unit rates sends a cost signal to customers to reduce usage) so a fixed charge is the most appropriate means of recovery. Option C includes both commercial and domestic customers. Domestic customers have their credit balances protected by the SoLR whereas commercial customers do not have that protection. Option D ensures that only domestic customers contribute to the recovery of costs.	Noted
Haven Power	Non-confidential	We understand the Working Group's reasoning for preferring Option D, however, we believe that to be truly fair and equitable, it would be most appropriate to recover the shortfall from the customers in the market where the shortfall has arisen and not an adjacent	Noted The Working Group highlighted that the respondent's suggestion would be impractical as there are multiple charges

		market. However, if this is impracticable, we support the proposal to collect from the Domestic market only (Option D), as they make up the vast majority of failed supplier portfolios.	and customers and therefore multiple shortfalls.
Leep Utilities	Non-confidential	In respect of DCP 332, we consider option D to be the most appropriate. Options C and D are preferable to options A and B as applying the increase as a fixed charge is more equitable and does not potentially drive an unsustainable change in usage. Option C spreads the cost across all users of the system, whereas option D limits the payments to non-business users, to whom the benefits of SoLR actually apply. Option D would be the favoured choice, as non-business users are the only ones that see the benefit of the SOLR arrangements and as an explicit acknowledgement that consumer choice of unsustainable suppliers caused the liability and might cause some consumers to consider more carefully who they choose to supply their energy.	Noted
Northern Powergrid	Non-confidential	Yes.	Noted
npower	Non-confidential	We agree with the working group opinion that Option D is the most appropriate method of recovery for DCP 332. This is due to the fact that the SoLR costs only protect domestic credit balances and would be unfair to charge other users who are not covered in the current SoLR. We also agree that the implementation should be to recover the costs through the standing charge. This is due to the fact that this is more transparent in any potential increases, as the calculations are easier for the industry to track and calculate outside of the CDCM model, if claims have yet to be made or are not in the DCP066A yet. The use of the recovery from the standing charge will	Noted

		also improve the accuracy of the recovery reducing the over/under recovery from volume fluctuations if in the unit rate.	
Opus Energy Limited	Non-confidential	Although we understand the rationale behind the DCP 332 Working Group's preference for Option D, we believe it would be fairer and more logical to recover any shortfall from those customers for which the shortfall has arisen. If this cannot be accommodated, we are supportive of Option D (to collect from the Domestic market only) because they make up the majority of failed supplier portfolios.	Noted The Working Group highlighted that the respondent's suggestion would be impractical as there are multiple charges and customers and therefore multiple shortfalls
SP Distribution / SP Manweb	Non-confidential	Yes we agree with the Working Group that Option D is appropriate for DCP 332.	Noted
UK Power Networks	Non-confidential	Yes, we support the approach of choosing option D for this change, recovering from solely the fixed charge allows the DNO to make its most accurate forecast of the change to charges which is required to recover the necessary revenue. It is in our view, correct that applying this solely to Domestic Customers is appropriate, as they are considered to represent the primary beneficiaries of the protection which the safety net provides.	Noted
Western Power Distribution	Non-confidential	Yes.	Noted
Working Group Conclusions: The Working Group concluded that the majority of respondents agreed that Option D would be the most appropriate option to progress for DCP 332 and so the Working Group agreed to progress with Option D for DCP 332.			

Company	Confidential/ Anonymous	Q4: Do you agree with the Working Group that Option C or Option D is appropriate for DCP 333? If so, which option would be your preference? If not, which option do you consider to be more appropriate? Please provide your rationale.	Working Group Comments
BU-UK	Non-confidential	We agree that both options C and D are appropriate for DCP 333, as both efficient, recovering through a residual, fixed charge. However, Option C is our preference as a levy on all customers seems fair; one part of the market shouldn't place undue burden on another. It is cost reflective and the costs do not discriminate against different types of customer.	Noted Preference of Option C
Anonymous	Anonymous	As per our answer to Q3. 1. We would recommend an approach that distributes the LRSP claim amount between domestic and non-domestic customers based on the customer split of the failed supplier would be the fairest way to apportion costs. 2. We feel that a further option should be explored by the workgroup which considers the benefits of making SoLR cost recovery a standalone charging item rather than considering smearing the costs into existing charging items. 3. In principle, a standalone charging item offers better transparency to suppliers in terms of costs being recovered/bad debt left behind when a SoLR event occurs, which in turn could offer transparency to end	Noted The Working Group questioned whether this would mean creating an additional line in the charging methodologies to show a new fixed charge item different from the fixed charge used on Use of System invoices. This would create material costs for industry to be able to implement and so would not be appropriate. As an alternative, the Working Group suggested that the DNOs could publish the breakdown of the fixed charge in the LC14 statement to show the costs of SoLR and Bad Debt.

		consumers where applicable. and would not send unintended signals to the market.	
Electricity North West Limited	Non-confidential	We agree with the working group and our preference would be Option C, as we do not believe that the recovery of bad debt is limited to that relating to domestic customers.	Noted Preference for Option C
ESP Electricity Ltd	Non-confidential	Yes, we agree with the WG that Option C and Option D are appropriate for DCP 333. The costs associated with bad debt due to a failing supplier cannot be reduced through reduced network usage (higher unit rates sends a cost signal to customers to reduce usage) so a fixed charge is the most appropriate means of recovery. As bad debt can be a combination of DUoS relating to both domestic and commercial, ESPE have a preference for Option C.	Noted Preference for Option C
Haven Power	Non-confidential	We believe Option D is the best Option for the same reasoning as our response to Q3.	Noted Preference for Option D
Leep Utilities	Non-confidential	In respect of DCP 333, we prefer option C. The same argument applies as to usage vs fixed charge – the liability cannot be altered by changing the usage, so it is more equitable to apply it to the fixed charge, making options C and D preferable to options A and B. The split between options C and D is a little less clear, as there can be bad debt liability attributable for business and domestic use, albeit the vast majority is stated to attach to non-business. Option C would be our choice as there is freedom of choice of supply for both business and non-business users, so bad debt due to supplier failure can be incurred against both classes.	Noted Preference for Option C

Northern Powergrid	Non-confidential	Yes, either option would better facilitate the DCUSA objectives. Option C (fixed charges for all metered customers) is the most appropriate solution for DCP333 for the following reasons: • Unlike the costs associated with last resort supply payment claims which predominantly relate to the credit balances of domestic customers, use of system bad debt costs are incurred for domestic and non-domestic customers alike and so should be recovered from all customers. • The changes to the distribution licence result in a situation in which charges may be changed with less than 15 months' notice for costs associated with last resort supply payment claims – this is not the case for bad debt costs, and so the arguments for amending as few tariffs as possible to minimise amendments to previously charges do not apply for DCP333. However, option D (fixed charges for domestic customers) has merits, particularly given that to date the vast majority of use of system bad debt relates to unpaid invoices for domestic customers.	Noted Preference for Option C
npower	Non-confidential	We think that Option C is the most appropriate outcome for DCP 333. Bad debt owed to DNOs will be from all segments and not just domestic and therefore should be recovered from all users. The use of the recovery from the standing charge will improve the accuracy of the recovery reducing the over/under recovery from volume fluctuations if in the unit rate. Also it will not create a	Noted Preference for Option C

		signal for some users the reduce consumption and therefore avoiding the cost.	
Opus Energy Limited	Non-confidential	We believe Option D is the best Option for DCP 333 for the same rationale as set out in our response to Q3 above.	Noted Preference for Option D
SP Distribution / SP Manweb	Non-confidential	Yes we agree with the Working Group that Option C or Option D is appropriate for DCP 333. Our preference would be Option C.	Noted Preference for Option C
UK Power Networks	Non-confidential	We believe that Option C would be the best option for DCP333, as it would only look to recover the costs from demand customers, however due to the small number of domestic generators, we would also be comfortable with option D, for the same reasons as in the response to Q3.	Noted Preference for Option C
Western Power Distribution	Non-confidential	Yes. A fixed charge solution is the more appropriate means of recovery because the costs associated with the new pass-through terms cannot be reduced through reduced network usage as would be encouraged by the signal from a unit rate solution. Option C is the preference of WPD because bad debt costs do not discriminate against different types of customers in the way, for example, SOLR costs do.	Noted Preference for Option C
Working Group Conclusions: The majority of respondents have put forward a preference of Option C with two respondents preferring Option D. One respondent has provided an alternative option for the Working Group to consider but following discussion, the Working Group agreed that Option C would be the most appropriate option to progress but will also state that the DNOs should publish the breakdown of costs for SoLR and Bad Debts in their LC14 statements.			

Company	Confidential/ Anonymous	Q5: Which of the DCUSA Objectives does the implementation of DCP 332 and DCP 333 better facilitated? Please provide your rationale.	Working Group Comments
BU-UK	Non-confidential	We support the Proposer's view that DCUSA Objectives 2,3 and 4 are better facilitated. Objective 2 – promotes competition in distribution of electricity as provides a mechanism for IDNOs to recover bad debt. Objective 3 – better facilitated as allows appropriate allocation of costs and recovery of costs through fixed charges. Objective 4 -agree this objective ensures appropriate allocation of pass-through costs in the CDCM.	Noted Supportive of DCUSA Charging Objectives 2, 3 and 4.
Anonymous	Anonymous	We Agree with workgroups assessment against the DCUSA objectives detailed in DCP 332/3.	Noted Supportive of DCUSA Charging Objectives 2, 3 and 4
Electricity North West Limited	Non-confidential	We believe the proposed changes would better facilitate DCUSA Charging Objectives 3 & 4 as below: 3:that compliance by each DNO Party with the Charging Methodologies results in charges which, so far as is reasonably practicable after taking account of implementation costs, reflect the costs incurred, or reasonably expected to be incurred, by the DNO Party in its Distribution Business Because the changes ensure cost signals are not distorted by changes in allowed revenue resulting from the new pass-through terms.	Noted Supportive of DCUSA Charging Objectives 3 and 4

		4:that, so far as is consistent with Clauses 3.2.1 to 3.2.3, the Charging Methodologies, so far as is reasonably practicable, properly take account of developments in each DNO Party's Distribution Business Because the changes provide a methodology for applying charges relating to changes in DNO's Distribution Licences.	
ESP Electricity Ltd	Non-confidential	ESPE agree with the WG that Objectives 2, 3 and 4 are better facilitated. Obj 2 is better facilitated by removing distortions which would occur if the SoLR and bad debt costs were discounted in the calculation of LDNO tariffs. Obj 3 is better facilitated by ensuring the costs are recovered appropriately from customers for both bad debt and SoLR costs. Ojb 4 is better facilitated by ensuring the appropriate costs are input in the CDCM.	Noted Supportive of DCUSA Charging Objectives 2, 3 and 4
Haven Power	Non-confidential	We believe the DCUSA Objectives 2, 3 and 4 are better facilitated for the same reasons as stated in the consultation document.	Noted Supportive of DCUSA Charging Objectives 2, 3 and 4
Leep Utilities	Non-confidential	We consider the implementation of DCP 332 and DCP 333 best facilitates the development, maintenance and operation by each of the DNO Parties and IDNO Parties of an efficient, co-ordinated, and economical Distribution System. The proposals ensure costs relating to SoLR and bad debt can be efficiently and economically recovered.	Noted Supportive of DCUSA General Objective 1

Northern Powergrid	Non-confidential	As proposer of these changes our view remains that DCUSA charging objectives 2, 3 and 4 are better facilitated. Charging objective 2 - better facilitated by avoiding the distortions which would occur by not amending use of system charges levied on LDNOs. Charging objective 3 - better facilitated by ensuring that supplier of last resort and eligible bad debt costs are allocated to customers appropriately. Charging objective 4 - better facilitated by ensuring appropriate allocation of supplier of last resort and eligible bad debt costs in the CDCM, which are currently not included. We do not believe the other charging objectives are impacted.	Noted Supportive of DCUSA Charging Objectives 2, 3 and 4
npower	Non-confidential	We agree with the workgroup that the changes proposed are positive for DCUSA Objectives 3 and 4. Objective 3 – The changes will reflect the costs to the DNO businesses but only changes the point of when they are recovered. Objective 4 – The changes reflect the licence condition changes which have been approved and will shortly come into effect.	Noted Supportive of DCUSA Charging Objectives 3 and 4
Opus Energy Limited	Non-confidential	DCUSA Objectives 2, 3 and 4 are better facilitated for reasons specified within the consultation document.	Noted Supportive of DCUSA Charging Objectives 2, 3 and 4

SP Distribution / SP Manweb	Non-confidential	We believe DCUSA Objectives two, three and four are better facilitated by this change proposal for the same reasons as given in the consultation.	Noted Supportive of DCUSA Charging Objectives 2, 3 and 4
UK Power Networks	Non-confidential	As there are still a number of options being considered as part of this consultation it is difficult to consider how these changes would better facilitate the objectives. However should option D be selected for DCP332, and Option C for DCP333, we believe that DCUSA objectives 2, 3 and 4 will be better facilitated by these changes. The options if chosen would ensure that costs associated with the appointment of a SoLR are allocated to customers appropriately in the most cost reflective way, alongside avoiding a non-cost reflective cross-subsidy from I&C to domestic customers. The costs to be recovered can also not be reduced by minimising network usage, as these costs would be recovered through fixed charges.	Noted Supportive of DCUSA Charging Objectives 2, 3 and 4 if Option D is selected for DCP 332 and Option C is selected for DCP 333.
Western Power Distribution	Non-confidential	Objective 2 because the implementation endeavours to avoid distortions which would occur in tariffs for LDNOs. Objective 3 because implementation endeavours to ensure that costs associated with the appointment of an SOLR are allocated to customers appropriately. Objective 4 because the implementation endeavours to ensure the appropriate allocation of pass-through costs in the CDCM.	Noted Supportive of DCUSA Charging Objectives 2, 3 and 4
Working Group Conclusions: Eleven respondents believe DCUSA Charging Objectives 3 and 4 will be better facilitated by the implementation of DCP 332 and DCP 333. Nine respondents believe DCUSA Charging Objective 2 will be better facilitated and one respondent believes DCUSA General Objective 1 would be better facilitated by the implementation of these changes.			

Company	Confidential/ Anonymous	Q6: Are you aware of any wider industry developments that may impact upon or be impacted by DCP 332 or DCP 333? Please provide your rationale.	Working Group Comments
BU-UK	Non-confidential	Both option C and D align with Ofgem's preferred option for fixed residual charging within the TCR. Within the gas market, there are two UNC modifications, 0687 and 0688 which are addressing the same issue. It would seem pragmatic to align the implementation of the solutions to remain consistent from a consumers' perspective.	Noted The Working Group recognise that there is similar work being conducted in the gas market, but it was agreed that DCP 332 and DCP 333 should not be put on hold to align with the UNC modifications but it will be raised at the next Code Administrators Code of Practice so that the Joint Office are aware of the DCUSA changes being progressed.
Anonymous	Anonymous	In the gas industry UNC 0687 is seeking to make changes to facilitate cost recovery under a SoLR event, our proposed solution aligns to the UNC 0687 proposed principles.	Noted The Working Group recognise that there is similar work being conducted in the gas market, but it was agreed that DCP 332 and DCP 333 should not be put on hold to align with the UNC modifications but it will be raised at the next Code Administrators Code of Practice so that the Joint Office are aware of the DCUSA changes being progressed.
Electricity North West Limited	Non-confidential	None beyond those already considered by the working group.	Noted
ESP Electricity Ltd	Non-confidential	DCUSA DCP 314 "Appropriate treatment of bad debt following appointment of Supplier of Last Resort" and the Ofgem distribution licence review. DCP 314 is with	Noted

		Ofgem for decision and the licence review has recently been completed. Both deal with the recovery of costs due to SoLR and bad debt as a result of a failing supplier and allow the LDNO to recover DUoS bad debt from the DNO. Neither of these developments have a negative impact on DCP 332 or DCP 333.	The Working Group agreed that DCP 314 should be explained in both of the DCP 332 and DCP 333 Change Reports.
Haven Power	Non-confidential	No	Noted
Leep Utilities	Non-confidential	We consider the change proposals have an effect on Ofgem's statutory consultation on modifications to the Electricity Distribution Licence to recover the costs associated with appointing a Supplier of Last Resort. Ofgem has proposed the introduction of condition 'BA5 - Valid Bad Debt Claims' in order to allow the IDNO to pursue bad debts following the failure of a supplier. The CP's overlap this proposal in order to promote a level playing field by ensuring that IDNOs do not receive any windfall margin increase as an unintended consequence of Ofgem's proposals.	Noted
Northern Powergrid	Non-confidential	No.	Noted
npower	Non-confidential	No. We are not aware of any other industry developments that impact DCP 332 or DCP 333.	Noted
Opus Energy Limited	Non-confidential	No.	Noted

SP Distribution / SP Manweb	Non-confidential	We are not aware of any wider industry developments that may impact upon or be impacted by DCP 332 or DCP 333.	Noted
UK Power Networks	Non-confidential	No.	Noted
Western Power Distribution	Non-confidential	No.	Noted
Working Group Conclusions: The majority of respondents to this question did not believe that there were any wider industry developments that the Working Group should consider. There was however, a suggestion that the proposal implementation should align with that being developed by the UNC for the gas market.			

Company	**Confidential/ Anonymous**	**Q7: Do you have any comments on the proposed legal text for DCP 332 or DCP 333? Please provide your rationale.**	**Working Group Comments**
BU-UK	Non-confidential	No.	Noted
Anonymous	Anonymous	No Comments.	Noted
Electricity North West Limited	Non-confidential	No.	Noted
ESP Electricity Ltd	Non-confidential	No.	Noted

Haven Power	Non-confidential	No	Noted
Leep Utilities	Non-confidential	We are content with the proposed legal text	Noted
Northern Powergrid	Non-confidential	No.	Noted
npower	Non-confidential	No.	Noted
Opus Energy Limited	Non-confidential	No.	Noted
SP Distribution / SP Manweb	Non-confidential	No comments on the proposed legal text for DCP 332 or DCP 333	Noted
UK Power Networks	Non-confidential	No, we are comfortable with the changes proposed to the legal text.	Noted
Western Power Distribution	Non-confidential	No.	Noted
Working Group Conclusions: All respondents to the consultation agreed that they were happy with the drafting of the current proposed legal text.			

Company	**Confidential/ Anonymous**	**Q8: The proposed implementation date for DCP 332 is 01 April 2020 and for DCP 333 is 01 April 2021.**	**Working Group Comments**

		Do you agree with the proposed implementation date?	
BU-UK	Non-confidential	Yes.	Noted
Anonymous	Anonymous	No Comments.	Noted
Electricity North West Limited	Non-confidential	Yes, we agree with the proposed implementation dates.	Noted
ESP Electricity Ltd	Non-confidential	Yes ESPE agree with both implementation dates.	Noted
Haven Power	Non-confidential	Yes	Noted
Leep Utilities	Non-confidential	We agree with the proposed implementation dates	Noted
Northern Powergrid	Non-confidential	Yes.	Noted
npower	Non-confidential	We agree with the implementation date for DCP 332 of April 2020 as this is not much of a change from the current process and even provides a measure of upside in not processing smaller claims through the current process. For DCP 333 we believe there should be a 3 year implementation period. Suppliers have already sold fixed contracts covering the year 21/22 and this unexpected charge will not have been forecast for this price control	Noted

		period. We would recommend that DCP 333 is introduced in the 22/23 charging year.	
Opus Energy Limited	Non-confidential	Yes.	Noted
SP Distribution / SP Manweb	Non-confidential	Yes we agree with the proposed implementation date of 1 April 2020 for DCP 332 and 1 April 2021 for DCP 333	Noted
UK Power Networks	Non-confidential	Yes.	Noted
Western Power Distribution	Non-confidential	Yes.	Noted
Working Group Conclusions: All respondents were comfortable with the proposed implementation date for DCP 332. However, one respondent believes that DCP 333 should have a 3-year implementation period and should be implemented in the 2022/23 charging year.			