

Company	Confidential/ Anonymous	1. Do you want the LDI data to form part of the existing LMA report or a separate one? Please provide your rationale.	Working Group Comments
Npower Ltd	Non-confidential	<p>We believe the data and reports should be combined to simplify the process.</p> <p>Additionally, we believe there is a benefit in regularly updating suppliers with LMA information to support increased compliance where there has been a change of supply. Suggested legal text is below.</p> <p>Section 5.2 should be expanded to how and when these are initially updated:</p> <p>5.2 A Load Managed Area Notice shall be sent to the registered DCUSA Contract Manger for the User, all other Suppliers and the Authority. These notices should be reissued on no less than a [6] monthly basis.</p> <p>A further point that we would request the workgroup discuss is how, with option A, TPI's will know whether a site is within a LMA (or not). Currently the SSC will provide this information, however under option A it will not be possible going forward. TPI's are generally not DCUSA parties, therefore will not receive the LMA report information and list of LMA MPANs. A risk is therefore created that LMA customers may be sold products that are not suitable for their enforced load characteristics.</p>	<p>Noted</p> <p>How often Distributors should update Suppliers with LMA information is covered in Paragraph 11.1 of Schedule 8 within DCUSA. There is also details of the review procedures in schedule 8 (para 12). The Working Group are comfortable with these procedures.</p> <p>This risk already exists, and this CP does not create any additional risk.</p>
Shell Energy Retail Ltd	Non-confidential	Yes - Please see question 5	Noted
E.ON Energy Solutions Ltd	Non-confidential	We are comfortable with the existing LMA report, the data format appears to be logical & easy to follow so do not feel this should be provided on a separate report.	Noted

Northern Powergrid	Non-confidential	Although we currently have no Load Managed areas (LMAs), this seems sensible if Option A (LDIs) is approved, but it may be more appropriate to clarify Suppliers' preferences if they are the prime recipient of the report.	Noted
British Gas	Non-confidential	The LID data should form part of the existing LMA report as this will should involve less internal process changes to implement the solution.	Noted
SP Distribution SP Manweb	Non-confidential	In the first consultation SP Distribution supported the inclusion of the format of the report as an Appendix to Schedule 8 as this will mean that all potential users of the report will have full transparent information available to them going forward and as such we still support that view going forward.	Noted – the Working Group supports the format of the report being included as an Appendix to Schedule 8.
SSE Electricity Ltd.	Non-confidential	The preference would be to have the LDI data form part of the existing LMA report, as all data would be held in one table and would not require any cross referencing	Noted
UK Power Networks	Non-confidential	Our preference would be for the LDI data to form part of the existing report and for that format to be clearly set out in the legal text. This would help to ensure consistency in the application of LMAs.	Noted
Western Power Distribution	Non-confidential	It seems sensible to include the LDI in the existing report as shown in the consultation document. This report containing the MPAN is likely to be sent as a confidential report to suppliers. We would expect the LDI's to also be published more widely as part of a "Guidance Document" but without information personal to domestic customers.	Noted – the Working Group will consider this when drafting the guidance document.
Working Group Conclusions: All respondents supported the LDI data forming part of the existing LMA report.			

Company	Confidential/ Anonymous	2. Do you want the LLFC data to form part of the existing LMA report or a separate one? Please provide your rationale.	Working Group Comments
Npower Ltd	Non-confidential	<p>We believe the data and reports should be combined to simplify the process.</p> <p>Additionally, there must be non LMA LLFC's available to account for customers that exit within a LMA but no longer have load controlled equipment. It is our understanding that DNO's do not keep records of customers that do not have load controlled equipment within a LMA.</p> <p>Additionally, we believe there is a benefit in regularly updating suppliers with LMA information to support increased compliance where there has been a change of supply. Suggested legal text is below.</p> <p>Section 5.2 should be expanded to how and when these are initially updated:</p> <p>5.2 A Load Managed Area Notice shall be sent to the registered DCUSA Contract Manger for the User, all other Suppliers and the Authority. These notices should be reissued on no less than a [6] monthly basis.</p>	<p>Noted.</p> <p>In this scenario the customer should move to an existing LLFC. The Distributor will have to know which customers have load controlled equipment to ensure they are moved to the appropriate LLFC.</p> <p>How often Distributors should update Suppliers with LMA information is covered in Paragraph 11.1 of Schedule 8 within DCUSA. There is also details of the review procedures in schedule 8 (para 12). The Working Group are comfortable with these procedures.</p>
Shell Energy Retail Ltd	Non-confidential	Yes - Please see question 5	Noted
E.ON Energy Solutions Ltd	Non-confidential	We feel the LLFC should be included in the report but only on the proviso that option B becomes the approved solution, otherwise the LLFC would unnecessary data in the report.	Noted
Northern Powergrid	Non-confidential	Although we currently have no LMAs, this seems sensible if Option B (LLFCs) is approved, but it may be more appropriate to clarify Suppliers'	Noted

		preferences if they are the prime recipient of the report. Please note our preference for option B.	
British Gas	Non-confidential	Existing LMA report.	Noted
SP Distribution SP Manweb	Non-confidential	Similar to the LDI response in Q1, SP Distribution believe that to ensure all potential users have full and transparent information available to them going forward then we would support the LLFC data being included in the existing LMA report.	Noted
SSE Electricity Ltd.	Non-confidential	As before, we support including the LLFC in the existing LMA report as this removes the need for cross referencing.	Noted
UK Power Networks	Non-confidential	Our preference would be for the LLFC data to form part of the existing report and for that format to be clearly set out in the legal text. This would help to ensure consistency in the application of LMAs.	Noted
Western Power Distribution	Non-confidential	It seems sensible to include the LLFC in the existing report as shown for the LDI in the consultation document. This report containing the MPAN is likely to be sent as a confidential report to suppliers. We would expect the LLFC(s) to also be published more widely as part of a "Guidance Document" but without information personal to domestic customers. Thirdly, the LLFC(s) would also have to be published in "annexe one" of our charging statements.	Noted.
Working Group Conclusions: All respondents supported the LLFC data forming part of the existing LMA report.			

Company	Confidential/ Anonymous	3. Which option do you support? Please provide your rationale.	Working Group Comments
Npower Ltd	Non-confidential	<p>We are not supportive of either option and do not believe suppliers should be responsible for managing the load of networks. However, for the following reasons we believe option B appears more robust:</p> <ul style="list-style-type: none"> • Option B has no requirement for the DNO to send the data of individual customers to suppliers i.e. the MPAN, which may be classed as personal data. • DNO's must apply for MDD combinations which utilises robust existing industry processes. • It is easier to establish processes for suppliers to identify new LMA gains. • As noted in question 1, option B appears to work better for TPI arrangements. • System changes could be introduced for option B to automate processes for suppliers. 	<p>This change is adding clarity to an existing process.</p> <p>As agreed by the Working Group the LLFC is the supported option and therefore the reference to MPAN has been replaced by LLFC within the legal text to avoid any potential issues associated with GDPR.</p> <p>Regarding the remaining bullet points the Working Group agree with the points raised.</p>
Shell Energy Retail Ltd	Non-confidential	LDI - Please see question 5	Under question 5, Shell Energy Retail Ltd's preferred choice was Option A.

E.ON Energy Solutions Ltd	Non-confidential	Option B is our preferred option – we outlined the rationale when proposing this alternative solution in the 1st consultation & feel that the workgroups development detailed of this solution confirms that this is a more robust and effective solution to manage LMA's.	Noted
Northern Powergrid	Non-confidential	Option B – the use of a LLFC. Option B seems preferable to Option A as it utilises an existing industry data item.	Noted
British Gas	Non-confidential	Option B– as it aligns to existing processes.	Noted
SP Distribution SP Manweb	Non-confidential	SP Distribution would prefer the use of the LLFC data to identify an LMA. The rationale behind this view is that this option will allow the use existing processes to enable identification of an LMA.	Noted
SSE Electricity Ltd.	Non-confidential	We support Option B, the use of LLFC, as this would require fewer changes to our IT systems than Option A.	Noted
UK Power Networks	Non-confidential	Our preference would be for Option B (the use of LLFC). We feel this provides a clearer indicator of which MPANs are in a LMA by providing specific LLFCs. We believe this is a more transparent solution.	Noted

Western Power Distribution	Non-confidential	<p>We do not see the two methods as mutually exclusive. We could use the alpha-numeric functionality in MDD to create ten LLFC's "LM0", "LM1", "LM2" etc for example and these would also double as LDI's. Since the MPAN/LLFC combination is under the control of the Distributor we would see the LLFC option as the more natural solution.</p> <p>The group also needs to consider if the recent approval of DCP 268 (DUOS Charging Using HH Settlements Data) impacts DCP 326. It may well be that the only viable option is by using the LLFC. WPD notes that the authority decision to implement SECMP0025 provides an alternative route for a DNO to know the switching times being programmed into a smart meter.</p> <p>WPD would point out that if LLFC's are created for use with a "NHH SSC/PC2" type solution, then different LLFC's would have to be created for use with an "Red/Amber/Green aggregate HH" type solution.</p>	<p>Noted.</p> <p>The proposed solution is only looking at NHH and therefore DCP 268 does not effect this change. The WG supports the SECMP0025 change that has been proposed.</p>
Working Group Conclusions: All respondents bar one supported Option B. The Working Group are also supportive of Option B and therefore this is the option that will be taken forward in the Change Report.			

Company	Confidential/ Anonymous	4. What impact does each option have on your business?	Working Group Comments
Npower Ltd	Non-confidential	The impact from both options is comparable. The modification extends the concept introduced by DCP204 that suppliers are required by the DCUSA to take steps to manage network load on behalf of the DNO, when a Load Managed Area Notice has been issued. Option A facilitates this by restriction of customer load at an individual MPAN level basis by	This change is adding clarity to an existing process.

		<p>introducing a load indicator. Option B facilitates this by restricting customer load on a broader basis, linking this restriction to a LLFC. Both options require suppliers to provide a costly and ongoing load management service to DNO's and restricts customer choice.</p> <p>There are some additional points that we ask the proposer and workgroup to consider:</p> <ul style="list-style-type: none"> • The main difference between DCP326 and DCP204 is that DNO's will gain the ability to make changes to when customer load is restricted, rather than allowing the supplier to replicate existing load restrictions at the point of smart meter installation. This brings uncertainty to the customer and the risk that supplier contractual rates may not align to customer switching times. This could create increased costs for the customer. • What consideration has been given to future network investment may be needed regardless of this proposal due to the forecast increase in uptake of EV's? Equally, we understand SSE Network customers are required to install a load restriction device before a charging point can be installed – could this technology also be applied to storage heating load? • Given the customer right to refuse a smart meter installation we would request a view from the workgroup on whether the DCUSA limitation of liability would extends to network damage in the scenario where a supplier/user is in breach of schedule 8 requirements? 	<p>The change seeks to improve the communication regarding the load restrictions Suppliers need to consider and compliments existing obligations.</p> <p>There is no obligation to install a load restriction device, however on a case by case basis this may be appropriate. This is out of scope of this CP.</p> <p>This would be as your Companies legal advice. Consideration needs to be given to Clause 53.1 of DCUSA.</p> <p>If a customer refuses a Smart Meter the obligation within Schedule 8 remain.</p>
Shell Energy Retail Ltd	Non-confidential	Please see question 5	Noted

E.ON Energy Solutions Ltd	Non-confidential	No comments.	Noted
Northern Powergrid	Non-confidential	<p>We have comments on 2 aspects of the change proposal.</p> <p>In respect of LMAs themselves we expect little impact on our business, as at present we do not have any existing LMAs. However, we are interested in the change proposal given the possibility that uptake of Low Carbon Technologies (LCTs) including Electric Vehicles has the potential to create new load managed areas, albeit these are more likely to be half hourly settled given the timing.</p> <p>We are grateful to the working group for the information on the implications for HH settlements set out in the section starting at 4.19 in the consultation, including the thinking in 4.23 and the potential need to change time-bands more frequently. We also note the reasoning and support the logic not to progress a solution for HH at this time. We think it is worth highlighting this again in the change report and noting that outcomes of Ofgem SCR work on network charging and market wide HH settlement have the potential to necessitate a further change proposal for HH settled customers in LMAs.</p>	Noted – The Working Group comments regarding HH settlements will be reiterated in the Change Report.
British Gas	Non-confidential	Either solution appears is complex and will require all Suppliers to individually update the DCC with all the various combinations of switching times that will be notified by the distributor. If approved we recommend a wider education piece is undertaken to ensure that all Suppliers are fully engaged and understand the obligations that this change will place upon them.	Noted – The Working Group will produce a guidance document regarding Party obligations.
SP Distribution SP Manweb	Non-confidential	Each option will effectively have a similar impact on our business. The reason for this view is that at present SP Distribution have no LMAs. However, should an LMA be identified we would have to instigate	Noted

		whichever process has been agreed going forward, therefore whichever option is chosen will result in a business change.	
SSE Electricity Ltd.	Non-confidential	Option A would require some degree of system change for us to implement, while Option B would by comparison require minimal change for us as this involves a process that already exists.No	Noted -
UK Power Networks	Non-confidential	At the current time we do not have any LMAs. If we were to implement a LMA we feel that either option would have a similar impact.	Noted
Western Power Distribution	Non-confidential	DCP 326 is designed to use the existing functionality in MDD and MPRS and this means that the impact is minimal. We already use the LLFC/MPAN combination in other contexts to flag up special groups of MPANs. Increasing the scope of this to include flagging up MPANs in Load Managed Areas is not significantly more work.	Noted
Working Group Conclusions: The Working Group notes the impacts that Schedule 8 has on Suppliers. This CP is intended to add clarity to existing obligation. The Working Group will produce a guidance document detailing the Party obligations.			

Company	Confidential/ Anonymous	5. Do you have any comments on the proposed legal text for each option	Working Group Comments
Npower Ltd	Non-confidential	No, other than the point noted in answer to Q1/Q2.	Noted
Shell Energy Retail Ltd	Non-confidential	We understand that DCP 326 is adding clarity to an existing process and that this change should not negatively impact customers in the short term. Network constraints in the current Load Managed Areas are important to recognise and manage. The proposed changes are	The Working Group notes the support for option A, however based on the overall comments from this consultation and the

		<p>efficient and as a Load Management Flag does not exist, we believe it would be better to create and use a Load Diversification Indicator to communicate load management options for suppliers. We also believe the report would benefit from the inclusion of LLFC's to help with charging transparency. Plus the creation of guidance notes, which should cover the requirements of both DNO and Supplier parties.</p> <p>This is beyond the scope of this CP, but we believe Load Managed areas should only be in place when all other commercial solutions have been exhausted. It is worth noting that the technology available for managing customer energy usage is rapidly changing. Network usage information will improve over the next few years, and the quicker the right market signals are created, the better for network efficiency. This will incentivise the development and help in the effective delivery of new products.</p> <p>Electricity system managers and market participants should use and develop commercial tools to responsibly manage load. The Load Diversification Indicator will help identify an opportunity to enable highly efficient load management at customers' premises, or on a wider aggregated basis. We must make sure the use of Load Managed Areas does not suppress market development to meet the evolving realities of the energy industry.</p>	<p>Working Group review of both options, Option B will be recommended.</p> <p>The Working Group will produce a guidance document regarding Party obligations.</p> <p>The Working Group agrees that other actions should be considered to mitigate the risks around coincidence of demand and that this is out of scope of this CP. It should be noted that at the time of DCP 204 there were four DNOs with Load Managed Areas and this has now been reduced to two DNOs. Therefore, this demonstrates that other mitigation actions are being considered to avoid using this process.</p>
E.ON Energy Solutions Ltd	Non-confidential	No Comments	Noted

Northern Powergrid	Non-confidential	No	Noted
British Gas	Non-confidential	No	Noted
SP Distribution SP Manweb	Non-confidential	No	Noted
SSE Electricity Ltd.	Non-confidential	No	Noted
UK Power Networks	Non-confidential	<p>The definition of 'LLFC' in option B legal text should state "has the meaning given to the term in the BSC".</p> <p>While it may not be appropriate to place a guidance document in the legal text we feel that there is a need to provide more information to parties in terms of what they need to do and what would be expected of them. The availability of a supporting guidance document should be noted in Schedule 8. This is particularly important when, perhaps in a few years' time, new LMAs are notified and DNOs and Suppliers would need to know how to proceed and what is expected of them.</p>	<p>Noted – the legal text will be updated accordingly.</p> <p>Noted – The Working Group will consider this when producing the guidance document.</p>
Western Power Distribution	Non-confidential	The proposed legal texts look appropriate.	Noted
Working Group Conclusions: The Working Group will correct the error within the definition of LLFC in the legal text. As noted above, the reference to MPAN has been replaced by LLFC within the legal text to avoid any potential issues associated with GDPR.			

Company	Confidential/ Anonymous	6. Do you believe that the DCUSA General objectives are better facilitated by this CP. Please provide your rationale for each option?	Working Group Comments
Npower Ltd	Non-confidential	<p>No. We believe both modifications are identical in relation to the DCUSA general objectives. The end impact on networks, suppliers and customers does not change with either option. For avoidance of doubt we remain unsupportive of the principle that suppliers should manage load on behalf of networks</p> <p>Impacts on the DCUSA general objectives:</p> <ol style="list-style-type: none"> 1. Negative – This modification may reduce network costs in short term, however it avoids short term network investment and creates additional costs for suppliers. 2. Negative – Individual customer choice in tariff is likely to be reduced by this modification. 3. Neutral – We agree that this modification reduces the likelihood of network issues, however control (dynamic RTS) is reduced and complexity is increased compared to baseline. 4. Negative – This is complex for suppliers to implement alongside smart meter installation and increasingly flexible systems such as market wide half hourly settlements. 	Noted
Shell Energy Retail Ltd	Non-confidential	In the short term, but Distributors and Suppliers need to work together to transform load management. Customers will expect this to support the next generation of products and services.	Noted
E.ON Energy Solutions Ltd	Non-confidential	Yes, we feel that the general DCUSA objectives are better facilitated for each option.	Noted

Northern Powergrid	Non-confidential	Yes. We believe that DCUSA general objectives 1 & 3 are better facilitated by this CP.	Noted
British Gas	Non-confidential	<p>We agree that the CP will better facilitate DCUSA General Objective 1 because it will continue to protect the network and may avoid substantial reinforcement works albeit at considerable cost to Suppliers and impacts on consumers by limiting choice</p> <p>We agree that the CP will negatively impact DCUSA General Objective 2 because it will limit the exact switching times that can be applied to customers and therefore limit the times in the tariffs that can be offered</p> <p>We agree that the CP will better facilitate DCUSA General Objective 3. because Distributors must operate a safe and reliable network, this proposal significantly limits the likelihood of overloading which impacts both of these</p> <p>We disagree that this CP will better facilitate DCUSA General Objective 4 as will believe this CP has no impact on the administration of the agreement.</p>	Noted
SP Distribution SP Manweb	Non-confidential	SP Distribution continue to agree with the proposer's rationale laid out in the second consultation document that the change better facilitates DCUSA General Objectives 1, 3 and 4 and does not better facilitate DCUSA General Objective 2.	Noted
SSE Electricity Ltd.	Non-confidential	We agree that this CP, specifically with the use of Option B, has a positive impact on Objectives 1, 3 and 4.	Noted
UK Power Networks	Non-confidential	Yes, we believe that DCUSA general objectives are better met with both options, especially with regard to general objective 1, in that either solution will lead to a more efficient, co-ordinated, and economical	Noted

		Distribution Network, by ensuring that unnecessary reinforcement expenditure is avoided.	
Western Power Distribution	Non-confidential	<p>The two options are similar and their impact on the DCUSA General objectives are the same. We agree with the assessment of the impacts as listed by the proposer.</p> <p>The negative impact on competition noted by the proposer is more to do with possible inhibition of new, innovative tariffs, possibly from new market entrants. WPD would expect that this inhibition would only apply during the transition away from the legacy Radio-Teleswitch system. The focus of innovation going forward should include other ways of diversifying loads on the distribution networks.</p>	Noted
Working Group Conclusions: The Working Group will review the DCUSA General Objectives again once the Change Report has been drafted.			

Company	Confidential/ Anonymous	7. Do you agree with the proposed implementation timescales for option 1 and option 2? Please provide your rationale.	Working Group Comments
Npower Ltd	Non-confidential	Yes, if approved by the authority we would support the proposed implementation dates.	Noted
Shell Energy Retail Ltd	Non-confidential	Yes	Noted
E.ON Energy Solutions Ltd	Non-confidential	We feel the implementation lead times are appropriate for either option.	Noted

Northern Powergrid	Non-confidential	Yes. The implementation timescales seem logical.	Noted
British Gas	Non-confidential	It is unlikely that a smart meter variant capable of replacing a RTS meter with switched heating load will be available before Q3 2019. We would suggest that the implementation date is amended to the next DCUSA standard release 6 months after Authority consent.	Noted
SP Distribution SP Manweb	Non-confidential	SP Distribution agree with the proposed implementation timescales for both options. We believe that Option 1 will take longer to implement as parties will be required to implement a completely new process, whereas Option 2 can be effected by changes to Market Domain Data, which will utilise an existing process. However, we recognise that Option 2 could possibly be constrained by the timing of the MDD change process, though we do not envisage that to be an issue.	Noted
SSE Electricity Ltd.	Non-confidential	Yes, we consider this sufficient time to implement each option.	Noted
UK Power Networks	Non-confidential	Yes, although we do not have any LMAs at the current time and therefore unaffected by the implementation timescales.	Noted
Western Power Distribution	Non-confidential	Yes, this change needs to be implemented urgently in expectation of the RTS system becoming unavailable, possibly by April 2020.	Noted
Working Group Conclusions: The Working Group notes the comments regarding the proposed implementation date. After consideration from the Working Group it was concluded that the implementation timescale for Option B (2) should be extended to 6 months. This is to cater for the MDD Change process timescales which takes 6 weeks.			