

Company	Confidential/ Anonymous	Question 1 - Do you understand the intent of DCP 325?
British Gas	Non-confidential	Yes
Electricity North West Limited	Non-confidential	Yes, we understand the intent.
ESP Electricity ('ESPE')	Non-confidential	Yes, ESPE understand the intent of this Change Proposal.
First Utility	Confidential	Confidential
Haven Power	Non-confidential	Yes
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd. and Northern Powergrid (Yorkshire) plc	Non-confidential	Yes. We understand the intent of the CP being to streamline information which DNOs publish, primarily to improve the usefulness of the outputs by achieving greater commonality both between different DNOs and between similar publications, whilst also improving efficiency for DNOs in the processes required to prepare information for publication.
npower	Non-confidential	Yes.
SEPD & SHEPD	Non-confidential	Yes.
SP Distribution & SP Manweb	Non-confidential	Yes

UK Power networks	Non-confidential	Yes.
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Company	Confidential/ Anonymous	Question 2 - Are you supportive of the intent of DCP 325?
British Gas	Non-confidential	We are supportive of the intention to review the various DCUSA requirements in this area to improve transparency and efficiency. However, we believe the focus should be on how the information provision could be improved, and not on reducing the current level information provision.
Electricity North West Limited	Non-confidential	Yes, we are broadly supportive of the intent.
ESP Electricity ('ESPE')	Non-confidential	ESPE are supportive of work that looks to improve efficiency on the publication of information and that reduces the cross-over or replication of information.
First Utility	Confidential	Confidential
Haven Power	Non-confidential	Yes
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd. and Northern Powergrid (Yorkshire) plc	Non-confidential	Yes. At face value, the change appears to be a 'win-win' with the potential for DNOs to publish more useful information in a more efficient manner.

npower	Non-confidential	We support the intention to remove duplication and streamline the provision of cost information from DNO operators.
SEPD & SHEPD	Non-confidential	Yes.
SP Distribution & SP Manweb	Non-confidential	Yes, it would ensure that the schedules required are meaningful to stakeholders, and enable them to be compiled more efficiently removing any potential duplication, with publications being made at the appropriate time.
UK Power networks	Non-confidential	Yes.

Company	Confidential/ Anonymous	Question 3 - What additions or amendments, if any, do you think should be made to Table 1?
British Gas	Non-confidential	The Gas Distribution Networks include a separate table which breaks down the value of the MOD_t term included in the Table 1 forecast. This provides transparency and valuable insight into the assumptions behind this important revenue term. We would recommend DNOs incorporate an equivalent breakdown of the MOD_t term into the Clause 35A requirements. We include a picture of the GDN table below for information:

TABLE 5: PCFM ADJUSTMENTS							
DESCRIPTION		PCFM TERM	2016/17	2017/18	2018/19	2019/20	2020/21
58	COST OF DEBT	CDE	2.38%	2.22%	1.91%	1.57%	1.12%
59	CORPORATION TAX RATE	CT	20.00%	19.00%	19.00%	19.00%	17.00%
60	COST OF DEBT ADJUSTMENT	CDE £ IMPACT	(8.6)	(11.1)	(14.2)	(23.7)	(29.0)
61	TAX TRIGGER EVENT	TTE	(0.4)	(2.4)	(2.3)	(2.4)	(6.0)
62	TAX LIABILITY - GEARING/INTEREST COSTS	TGIE	-	-	-	-	-
63	PENSION SCHEME ESTABLISHED DEFICIT	EDE	(0.9)	(0.9)	5.8	5.8	5.8
64	PENSION SCHEME ADMINISTRATION & PPF LEVY	APFE	-	-	0.5	0.5	0.5
65	SPECIFIED FINANCIAL ADJUSTMENTS		(9.9)	(14.4)	(10.2)	(19.7)	(28.7)
66	LEGACY CAPEX RAV ADJUSTMENT	LRAV	(0.3)	(0.3)	(0.3)	(0.3)	(0.3)
67	LEGACY ALLOWED REVENUE ADJUSTMENT	LAR	0.2	0.2	0.2	0.2	0.2
68	LEGACY IFI CAP ADJUSTMENT	IFIAR	-	-	-	-	-
69	LEGACY STREETWORKS COST ADJUSTMENT	IAEAR	-	-	-	-	-
70	OVERALL LEGACY ADJUSTMENTS		(0.1)	(0.1)	(0.1)	(0.1)	(0.1)
71	TOTEX INCENTIVE MECHANISM		0.3	(4.1)	(4.4)	(1.6)	8.2
72	ENHANCED PHYSICAL SITE SECURITY (CNI)	IAEEPS	1.4	11.2	8.1	(1.4)	(1.9)
73	SPECIFIED STREETWORKS	IAESW	-	-	-	7.8	0.9
74	CHANGE TO CONNECTION CHARGING BOUNDARY	IAECCB	-	-	-	-	-
75	SMART METERING ROLL-OUT	IAESM	-	-	-	-	-
76	LARGE LOAD CONNECTIONS	IAELLC	-	-	-	-	-
77	FUEL POOR NETWORK EXTENSIONS	IAEFP	0.4	0.4	0.3	0.3	0.3
78	AGENCY COSTS (FGO)	IAECA	-	(1.5)	(2.8)	(3.5)	(3.9)
79	MAINS & SERVICES (REPEX T2)	RE	(0.3)	(0.3)	(0.4)	(0.0)	(0.1)
80	INNOVATION ROLL-OUT MECHANISM	IRM	-	-	-	-	-
81	NTS EXIT CAPACITY COST ALLOWANCE	AEX	-	-	-	-	-
82	SHRINKAGE COST ALLOWANCE	ALSC	(5.4)	(3.5)	(3.5)	(3.5)	(3.5)
83	UNCERTAIN COSTS		(3.8)	6.3	1.6	(0.4)	(8.1)
84	TOTAL POTENTIAL IMPACT OF REVENUE ADJUSTMENTS SHOWN IN TABLE 5		(13.6)	(12.3)	(13.1)	(21.7)	(28.7)
85	TOTAL VALUE INCLUDED IN TABLE 1 IN THIS FORECAST		(13.6)	(12.3)	(13.1)	(21.7)	(28.7)

Electricity North West Limited	Non-confidential	<p>As it currently stands the structure of Table 1 is logical and complete and we do not believe that there are any additions or amendments required. However, it is our view that this will not remain the case in the future for two reasons.</p> <p>First, Table 1 specifies that the DNO forecast four years ahead. Forecasts for years covered by unknown future price control arrangements would make these forecasts highly speculative to the point of irrelevance.</p> <p>Second, changes to the price control terms may result in the format of the table becoming obsolete in the future. For these two reasons we believe that a more flexible approach to the definition of Table 1 would be helpful, as it may not always be possible to respond to these changes in a sufficiently timely manner using the DCUSA change process.</p>
ESP Electricity ('ESPE')	Non-confidential	ESPE has no further suggestions to make with regards to Table 1.
First Utility	Confidential	Confidential
Haven Power	Non-confidential	We support the changes proposed to Table 1
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd. and Northern Powergrid (Yorkshire) plc	Non-confidential	<p>The rows of table 1 are structured to align to the process by which DNO allowances are determined in the distribution licence. Hence no update is needed to this information.</p> <p>The columns (years) shown in table 1 in each publication should be consistent across different DNO licensees. The columns should also be consistent across different templates (should multiple templates remain) unless there is a sound justification for misalignment.</p> <p>If the current requirement for DNOs to routinely publish updated versions of table 1 (i.e. the existing quarterly publications required under Clause 35A) is retained, we think it may also be useful for DNOs to provide a copy of</p>

		table 1 showing the variance to the previous publication, and a copy showing the variance to the position at the time at which use of system charges were most recently set (i.e. the previous December).
npower	Non-confidential	Expansion of the 'Annual Iteration adjustment before inflation' (A2) (mod term). Some quite large changes to annual revenue can be included in this item without an idea to interested parties to what it relates as it encompasses several items. Consideration of how to split it out and improve it would be useful or a description of the drivers within the total value.
SEPD & SHEPD	Non-confidential	No suggested amendments at this time.
SP Distribution & SP Manweb	Non-confidential	We are happy with the table 1 proposal
UK Power networks	Non-confidential	None. We do not believe that any changes to table one are necessary.

Company	Confidential/ Anonymous	Question 4 - Is Table 2 useful? Can it be improved, if so, how?
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British Gas	Non-confidential	<p>We don't believe Table 2 is useful in its current form. An alternative approach could be to include a table that allows DNOs to provide information related to specific risks and sensitivities that it is aware of that could impact the level or timing of revenues. For example, a DNO may have assumed that it will trigger a specific price control re-opener in its base forecast, but could use this table to highlight any uncertainty in the timing or scale of the revenue impact. Again, GDNs include a table of this nature, pasted below for info:</p> <table><tr><th colspan="2">TABLE 6: RISKS AND SENSITIVITIES</th><th>2016/17</th><th>2017/18</th><th>2018/19</th><th>2019/20</th><th>2020/21</th><th>2021/22</th><th>2022/23</th></tr><tr><td>86</td><td>NIA - MAXIMUM ALLOWED REVENUE (NOMINAL)</td><td>-</td><td>-</td><td>-</td><td>(1.1)</td><td>(1.1)</td><td>-</td><td>-</td></tr><tr><td>87</td><td>SMART METERING UM: REDUCED WORKLOAD</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td></tr><tr><td>88</td><td>SMART METERING UM: TIMING OF DETERMINATION</td><td>-</td><td>-</td><td>-</td><td>-</td><td>9.3</td><td>(9.6)</td><td>-</td></tr><tr><td>89</td><td>STREETWORKS UM: EAST OF ENGLAND ONLY</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td></tr><tr><td>90</td><td>NTS EXIT CAPACITY COST: INDICATIVE IMPACT OF MOD0621 (LAGGED GD-1 IMPACT)</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>(5.1)</td><td>(3.8)</td></tr><tr><td>91</td><td>NTS EXIT CAPACITY COST: INDICATIVE IMPACT OF MOD0621 (ALLOWANCE RESET)</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>7.8</td><td>13.4</td></tr></table>	TABLE 6: RISKS AND SENSITIVITIES		2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	86	NIA - MAXIMUM ALLOWED REVENUE (NOMINAL)	-	-	-	(1.1)	(1.1)	-	-	87	SMART METERING UM: REDUCED WORKLOAD	-	-	-	-	-	-	-	88	SMART METERING UM: TIMING OF DETERMINATION	-	-	-	-	9.3	(9.6)	-	89	STREETWORKS UM: EAST OF ENGLAND ONLY	-	-	-	-	-	-	-	90	NTS EXIT CAPACITY COST: INDICATIVE IMPACT OF MOD0621 (LAGGED GD-1 IMPACT)	-	-	-	-	-	(5.1)	(3.8)	91	NTS EXIT CAPACITY COST: INDICATIVE IMPACT OF MOD0621 (ALLOWANCE RESET)	-	-	-	-	-	7.8	13.4
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Electricity North West Limited	Non-confidential	<p>No, we do not believe Table 2 to be useful.</p> <p>The volatility of inputs to allowed revenue are impossible to quantify with any certainty as there is insufficient observed data to statistically model the possible range of variables with a satisfactory level of confidence. For users, analysis, aggregation or comparison of DNO figures is invalid because differences in underlying assumptions are not clear, and probably could not be made clear within the constraints of an efficient process. Therefore Table 2 is of no value and could possibly be misleading or harmful if parties rely on it to assess the maximum range (or more precisely the 10th/90th percentile range) of potential outcomes.</p> <p>We would support the removal of Table 2.</p>																																																															
ESP Electricity ('ESPE')	Non-confidential	<p>Yes. We do not have any suggestions for improvement.</p>																																																															
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Haven Power	Non-confidential	<p>Following the change to fix DUoS charges 15 months in advance, Table 2 has become less useful, as 2/3 years for which sensitivity analysis has been provided have fixed charges published.</p> <p>Therefore Table 2 for years further out would be more useful, to provide sensitivity for years with higher risk of material changes</p>
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd. and Northern Powergrid (Yorkshire) plc	Non-confidential	<p>We do not use the information required to publish table 2 for any other purpose, and nor do we use other DNOs' table 2 publications. We consider that this table is primarily intended for use by suppliers but it is not clear for what purpose, hence at this stage we do not have a view on how improvements could be made or whether it would be more appropriate for the table to be removed.</p>
npower	Non-confidential	<p>We find it useful to examine this table, however its use is limited as some parties high/low expectations can be outside what we would expect to occur.</p>
SEPD & SHEPD	Non-confidential	<p>We do not believe it is particularly useful at present as there is no consistent method amongst DNOs of calculating the +/- variances from the table 1 figures.</p>
SP Distribution & SP Manweb	Non-confidential	<p>This table would be used as part of DCP066A call hence there would be a stakeholder benefit.</p>
UK Power networks	Non-confidential	<p>We are not users of this table so are not able to comment.</p>

Company	Confidential/ Anonymous	Question 5 - Do Parties have any suggested amendments to Table 3? Do you expect the additional space for DNO commentary in the proposed template to be beneficial?
British Gas	Non-confidential	Additional commentary could be useful in clarifying which inputs have been changed, but if there have been any data changes then we would prefer that the revised data inputs be provided as well as commentary.
Electricity North West Limited	Non-confidential	<p>In some circumstances Table 3 refers to a year for which charges have already been published (i.e. in the February submission, where t+2 charges have been published by the end of the prior December) and is therefore pointless for that quarter's submission. This is a situation that has arisen because of changes to the charging timetable not being reflected in the provisions of Schedule 15 and should be addressed in any changes to be made.</p> <p>For quarters where Table 3 refers to a future year with unpublished charges our view is that it is still of little value. The calculation of CDCM charges includes a wide range of inputs, most of which vary over time, and often cannot be predicted with a satisfactory degree of precision in advance.</p> <p>It is our view that Table 3 is particularly unhelpful as it does not provide any insight to the underlying assumptions that have been used. In this regard it is in contrast to the ARP and the annual publication of charges.</p> <p>We suggest that Table 3 is removed.</p>
ESP Electricity ('ESPE')	Non-confidential	No, ESPE believes that the current proposition for Table 3 serves its purpose and is laid out in a format that is clear to understand.
First Utility	Confidential	Confidential
Haven Power	Non-confidential	<p>We would suggest providing Table 3 in the same format as Annex 1 of the DUoS charging statements to improve ease of comparison between published and forecast tariffs.</p> <p>Additional space for DNO commentary would also be useful, to provide details of which inputs have/have not been updated in the calculation of the illustrative tariffs and which are still liable to be changed.</p>

Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd. and Northern Powergrid (Yorkshire) plc	Non-confidential	<p>We have no suggested amendments.</p> <p>The additional space for commentary has the potential to bring what we consider to be some of the more useful information from the ARP into this publication. For example, in the ARP, DNOs can amend forecasts of CDCM inputs for future years and provide commentary on those forecasts. At the time of publishing the ARP, for the majority of CDCM inputs most DNOs simply hold the forecast values at prior year values as no additional information is available. This new template would enable the DNO to publish a series of CDCM models and provide commentaries on the updates made to forecasts of CDCM inputs on a more regular basis (perhaps quarterly in line with current requirements of Clause 35A), enabling clear identification of those inputs which have been updated and those which are simply held at prior year values.</p>
npower	Non-confidential	<p>We expect the additional commentary to be useful as it will give Suppliers an idea of what is expected to change in future years.</p>
SEPD & SHEPD	Non-confidential	<p>The additional commentary wouldn't be beneficial as we would not be in a position to update the CDCM input tables on a quarterly basis (other than the revenue table). Our commentary would therefore be nil.</p>
SP Distribution & SP Manweb	Non-confidential	<p>No suggested amendments.</p>
UK Power networks	Non-confidential	<p>We are not users of this table so are not able to comment.</p>

Company	Confidential/ Anonymous	Question 6 - Should the Cost Information Tables be contained within the DCUSA or should the agreement only set out the obligation to complete the tables without specifying their exact format? If you believe they should be removed, who should maintain them? Please provide your rationale.
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British Gas	Non-confidential	Maintaining a consistent format is important for the efficiency of using the data. We consider that DNOs should be able to maintain an agreed consistent format without the need for the exact format to be specified in DCUSA.
Electricity North West Limited	Non-confidential	<p>The prescription of the tables in full within DCUSA has caused issues previously when industry changes have occurred, for example in the case of changes to the price controls terms. Currently, changes to the format of the tables can only be done through the DCUSA changes process which cannot guarantee that changes are enacted in a sufficiently timely manner.</p> <p>We would prefer a more general DCUSA drafting that sets out the requirements for the tables (to forecast out for the next four years ahead if the price control is known, to separately detail constituent regulatory terms, etc), rather than detailing a set format of the tables.</p> <p>We recognise that the use of a common format by all DNOs is of considerable value to users of the tables, and therefore suggest the process be changed so that DNOs either: use a template as issued by the panel (facilitated by drafting similar to the ARP which refers to the version of the template to use without the full format of the table(s) appearing in the legal text); or, more informally, use a common format maintained collectively by DNOs, with communication and the opportunity for other industry parties to provide feedback through the DCMDG.</p>
ESP Electricity ('ESPE')	Non-confidential	ESPE believes a consistent format should be applied across all submissions and therefore should be contained within the DCUSA.
First Utility	Confidential	Confidential
Haven Power	Non-confidential	The Cost Information Tables should be contained within the DCUSA.
Northern Powergrid on behalf of Northern	Non-confidential	<p>We consider that there are two feasible approaches, both of which have pros and cons:</p> <ol style="list-style-type: none"> 1. The status quo, whereby the precise format of tables is detailed in the DCUSA; or

Powergrid (Northeast) Ltd. and Northern Powergrid (Yorkshire) plc		<p>2. An approach where the DCUSA references the distribution licence, and places a requirement on DNOs to publish information in line with the structure of the calculation of revenue allowances in the licence.</p> <p>Option 1 has the benefit that commonality between different DNO licensees is guaranteed as the format is precisely defined. However it does create complications between the DCUSA and the distribution licence, with any change to the calculation of revenue allowances in the distribution licence requiring a DCUSA change to be progressed to maintain alignment.</p> <p>Option 2 provides greater efficiency when changes to the distribution licence are made, in that the content of the tables can be updated without a DCUSA change. However, there is a risk of a lack of commonality between DNO licensees. We consider that this could be mitigated by a requirement on DNOs to use a common template. Under this approach, the precise format of the tables being published would not be known beyond the DNOs prior to publication, which may also reduce the ability of industry parties (most notably suppliers) to use the information efficiently.</p> <p>We consider that the benefits of option 2 with a reduced requirement for DCUSA changes outweigh the dis-benefits which can be mitigated by DNOs committing to publishing in a common template which is updated only when necessary and with advanced notice. But we are sympathetic to the views of other parties on this issue, and recognise the value which commonality between different licensees can achieve, and so remain open in our view.</p>
npower	Non-confidential	<p>We do not have strong views on whether the Cost Information Tables should be contained within the DCUSA. However we believe that the cost information tables should be consistent in format across all DNO parties for use and cross referencing.</p>
SEPD & SHEPD	Non-confidential	<p>They should continue to be contained within the DCUSA to maintain consistency across DNOs.</p>
SP Distribution & SP Manweb	Non-confidential	<p>If it is managed by DNOs, i.e. a common template is agreed by all and maintained by all, it may be more reactive and efficient to update when alterations are required to reflect other industry changes. If the tables remain under</p>

Company	Confidential/ Anonymous	Question 10 - Would it be beneficial to align the publication timescales with those used by HM Treasury for the Forecasts for the UK economy publication? Please provide your rationale.
British Gas	Non-confidential	We don't see this as being necessary.
Electricity North West Limited	Non-confidential	<p>Yes, this would be helpful. Currently it is common practice for DNOs to present information to interested parties knowing that the RPI figures used are already out of date. This is unnecessary as a minimal change in the timetable would ensure the latest HMT RPI data could be used.</p> <p>Furthermore, we would also ask that the working group give consideration to other key industry publication dates, namely:</p> <ul style="list-style-type: none"> • The issuing by Ofgem of the final MOD term in mid-November • The issuing by Ofgem of directions relating to incentives (although in relation to these the timing may not be formally set out). • The M16 and RIIO accounts completed in July. <p>Taking all these factors into account, it is our view that it would be better to provide a single mid-year update sometime around the end of August (once the HMT figures are available) in addition to the existing ARP commitment at the time of price setting at the end of December. There may be some merit in providing an update in late May once DNOs know their year-end revenues and the May quarter HMT inflation forecast is available.</p> <p>We see little merit in providing quarterly updates in February (too near to the recently issued ARP at the end of December, and little new industry information available), or in November (just one month prior to the issuing of final prices and a new ARP).</p>
ESP Electricity ('ESPE')	Non-confidential	ESPE doesn't have a preference but understands the rationale for those Parties that would find this beneficial.

First Utility	Confidential	Confidential
Haven Power	Non-confidential	Yes, we would support aligning the publication timescales with HM Treasury to ensure consistent inflation forecasts used across the DNOs.
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd. and Northern Powergrid (Yorkshire) plc	Non-confidential	<p>We consider that the publications required under Clause 35A are primarily intended for use by suppliers; hence at this stage we do not have a view on the most appropriate timescale for publication.</p> <p>That said, given the relatively slow timescales over which the input information varies, a quarterly or biannual publication seems appropriate and publishing shortly before HM Treasury issues an update which would otherwise inform the forecast does not appear to present the most logical approach.</p>
npower	Non-confidential	Yes. Parties may update the inflation forecasts within their processes and a variation in timing can create a scenario where the DNO commentary suggests cost will fall and the individual process suggests the costs will rise due to the inflation report changing due to current timescales. This creates additional difficulties in analysing movements and providing commentary to other stakeholders.
SEPD & SHEPD	Non-confidential	Yes - the majority of forecast data is impacted by RPI so utilising the latest information would result in more reasonable estimated data.
SP Distribution & SP Manweb	Non-confidential	Yes.

UK Power networks	Non-confidential	Yes we believe that there would be great benefit in aligning to the HM Treasury forecasts, as by not doing so runs the risk that the values issued to parties could actually be quite different following the publication of such forecasts. However we would need a reasonable period of time to calculate outputs and seek the necessary internal approval following these forecasts being published, before we would be in a position to publish any data, we would suggest that one month after this data is published would be appropriate.
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Company	Confidential/ Anonymous	Question 11 - Is there benefit in providing a consolidated set of tables on a quarterly basis, which would combine useful elements of the ARP and Schedule 15 publications? Please provide your rationale.
British Gas	Non-confidential	The ARP, or an improved version of it, could be published on a quarterly basis and could be designed to include information which would make the Schedule 15 tables redundant.
Electricity North West Limited	Non-confidential	<p>As a DNO party we recognise that the provision of a consolidated set of tables on a quarterly basis is not undertaken for our benefit, but exists to aid other industry parties understand the likely future DNO revenues and DUoS charges. On this basis we look forward to hearing the views of other parties.</p> <p>However, it is currently our view that it would be useful to review the current quarterly arrangements and the information provided. We believe that it would be more useful to provide the information two or three times per year (August, December, and perhaps May) and not on a strictly quarterly basis. Our reasoning for this is set out in our response to Q10.</p> <p>Regarding the nature of the consolidated tables, we do not believe that the current Schedule 15 Tables 2 and 3 are useful as they do not make clear the assumptions used to calculate the outputs. The ARP includes a wide range of inputs and updating all of these outside of the price setting process would be overly burdensome for DNOs.</p>

		For mid-year returns, there may be merit in an approach that provides a Table 1 accompanied by a partly updated ARP. The ARP would be updated for the revised allowed revenues, and perhaps volume forecast, only. All other ARP inputs would be fixed at the same level as the last December submission.
ESP Electricity ('ESPE')	Non-confidential	Yes, it would be of use to ESPE to receive a consolidated set of tables on a quarterly basis.
First Utility	Confidential	Confidential
Haven Power	Non-confidential	Yes, one source of information provided on a quarterly basis for the inputs and cost information would improve ease of use and make it easier to analyse the change in forecasts.
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd. and Northern Powergrid (Yorkshire) plc	Non-confidential	Yes. We consider that the useful elements of the ARP (a forecast of CDCM inputs and the ability to flex those forecast inputs and recalculate charges) can be made more useful and easier to produce by simply publishing the CDCM models used to derive tariffs published in Table 3 and providing associated commentary.
npower	Non-confidential	If current elements of the ARP, apart from RPI, were updated quarterly this would be useful to us. However if not we do not see the benefit of this.
SEPD & SHEPD	Non-confidential	Yes – as per response to Q9.

SP Distribution & SP Manweb	Non-confidential	This would not add any benefit to us as a DNO and may result in additional work. However it is not clear what elements are being suggested for consolidation.
UK Power networks	Non-confidential	We believe that maintaining the quarterly publication of key elements which make up the allowed revenue is beneficial to parties, which at the current time is table one of the cost information publication. However as stated further in Q7, we are of the view that the publication of illustrative tariffs is not useful to parties and can in fact be misleading if not fully understood that they are only illustrative, and use values (such as revenue or volumes) which might be fundamentally different when charges are set.

Company	Confidential/ Anonymous	Question 12 - Do you find the meeting convened under clause 35A (known as the 'DCP066A teleconference') useful? Are there any improvements that should be made and who should be responsible for hosting them? Please provide your rationale.
British Gas	Non-confidential	Yes, they are useful. They provide opportunity for questions.
Electricity North West Limited	Non-confidential	<p>As a DNO party we recognise that the DCP066A teleconference meetings are not held for our benefit, but exist to aid other industry parties understand the likely future DNO revenues and DUoS charges.</p> <p>We believe that the opportunity for non-DNO parties to ask questions and receive answers in an open forum in regard to the clause 35A submission is of value but that there may be more efficient ways to achieve the same outcome.</p> <p>We would favour providing parties with the means to submit written questions on the clause 35A submission (or proposed replacement) that could then be responded to formally within the DCMDG meeting as a periodic standing item. All questions and answers would be shared within the minutes of the DCMDG. This would have the benefit of providing an open process that could be accessed by parties in circumstances where they do not have the opportunity to attend the teleconference on a particular day and time (perhaps because they are smaller</p>

		<p>suppliers with less available resources to engage with industry processes). Further, this would provide more time for DNOs to give fully considered and in-depth responses to the queries raised. If this approach was followed then a teleconference would not be required.</p> <p>Under the current DCUSA processes DNOs are responsible for convening the cost information meetings held under clause 35A, and we take this to include responsibility for hosting the meeting. As currently drafted DNOs could host separate teleconferences, perhaps at the same time, which would be wasteful and highly inconvenient, if not impossible, for parties wishing to attend. A convenient single teleconference has been undertaken effectively via the ENA only due to the commendable cooperation and goodwill of DNOs.</p> <p>We would favour an approach that doesn't require a teleconference, however, if a teleconference continues to be held it is appropriate that the DCUSA drafting is changed. DCUSA should promote efficient administrative processes and so it is appropriate for the legal drafting to state that the DCUSA secretariat has responsibility for convening the teleconference to ensure that a single teleconference is held.</p>
ESP Electricity ('ESPE')	Non-confidential	ESPE agrees that the secretariat should host these meetings.
First Utility	Confidential	Confidential
Haven Power	Non-confidential	<p>The DCP066A is useful in providing further background and understanding of the cost information tables and changes, especially the content provided by Northern Powergrid.</p> <p>However, this could improve by having a consistent presentation format and content across the DNOs, as currently there is quite a range in detail and content provided by the DNOs</p>
Northern Powergrid on behalf of Northern Powergrid	Non-confidential	<p>We find these meetings useful, primarily from the perspective of being in a position to provide greater context to the information published than we are able to provide in the publications themselves and also as a useful forum to inform parties of other points of interest. For example we have used the most recent meetings to provide an update on progress of the recovery of Co-operative Energy Limited's last resort supply payment claim.</p>

(Northeast) Ltd. and Northern Powergrid (Yorkshire) plc		These meetings could likely be more efficiently convened if responsibility for doing so lay with the DCUSA secretariat.
npower	Non-confidential	We find the DCP066A teleconference useful to add commentary to the movements we are seeing in the data. One improvement could be to add the verbal commentary provided to the slides so that it can be referred back to at a later date. This would enable parties to come up with detailed questions ahead of the teleconference and would improve overall communication. It could also be possible for the teleconference to be turned into a webinar to allow people who can't make the teleconference to still access the information. We have no strong opinion on who should be responsible for hosting the teleconference.
SEPD & SHEPD	Non-confidential	Yes – it helps to identify the assumptions DNOs have made when preparing their cost information tables. It would be beneficial if the ENA hosted the quarterly meetings and issued Minutes of the call so a record of the questions/issued is retained.
SP Distribution & SP Manweb	Non-confidential	Currently DNOs provide presentations to stakeholders; we believe the DCUSA Secretariat should be responsible for hosting this.
UK Power networks	Non-confidential	It is difficult to comment on whether parties find the meetings useful, because a DNO we are presenting, however depending upon what parties respond, it might be worth considering reviewing the frequency of the meetings. As these meetings are held in order to fulfil a DCUSA obligation, we believe that the DCUSA secretariat should arrange and host these meetings, the current arrangements were DNOs organise them through the ENA is not particularly efficient and could be improved.

Company	Confidential/ Anonymous	Question 13 - Which of the DCUSA General Objectives do you believe would be better facilitated by the proposed intent of the DCP? Please provide your rationale.
British Gas	Non-confidential	The detail of the revised proposal has not been sufficiently worked up for us to provide a view at this stage.
Electricity North West Limited	Non-confidential	We believe the proposed intent of the DCP would better facilitate to DCUSA General Objective 4: The promotion of efficiency in the implementation and administration of the DCUSA.
ESP Electricity ('ESPE')	Non-confidential	<p>ESPE believes General Objective 2 would be better facilitated by this Change Proposal as it will improve the timing, frequency, and quality of information provided to industry. The publications promote transparency and ensuring the information is accessible to all Parties supports a level playing field.</p> <p>ESPE also believes this Change Proposal would better facilitate General Objective 4 as it seeks to align the various publications required by combining the areas that crossover and amending areas that aren't providing full use presently.</p>
First Utility	Confidential	Confidential
Haven Power	Non-confidential	DCUSA General Objective 2. Greater certainty of future tariffs will result in less risk premia being used and facilitate more effective competition.
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd. and Northern Powergrid (Yorkshire) plc	Non-confidential	<p>We consider that general objectives two and four are better facilitated by this change, with general objectives one, three and five being unaffected.</p> <p>General Objective 2 – this change will improve the quality of information which DNOs provide to industry – most notably suppliers – and thus may enable suppliers to more accurately forecast their costs and so improve competition.</p> <p>General Objective 4 – this change will improve both the efficiency with which DNOs can provide information, and the usefulness of the information provided, thus improving efficiency in the implementation of the DCUSA.</p>

npower	Non-confidential	We believe this change proposal would better facilitate Charging Objective 6 by improving the efficiency of providing and retrieving information on charging inputs.
SEPD & SHEPD	Non-confidential	General Objective 2 – the data that is ordinarily quickly superseded in the ARP will be removed and Suppliers will have more accurate tariff forecasts (based on revenue updates) to utilise. General Objective 4 – a consolidated approach to the DCUSA tables and ARP would be more efficient.
SP Distribution & SP Manweb	Non-confidential	DCUSA General Objective 2 As stakeholders specifically suppliers will be receive appropriate data for their needs, with the intent to improve cost forecasting hence competition. DCUSA General Objective 4 This change looks at the appropriateness of including these tables under DCUSA, and also the impact of DCP-178, which sets out to align the timeframes used in within Section 35A and 35B
UK Power networks	Non-confidential	It is impossible to determine which DCUSA General Objectives would be better facilitated by this change proposal, as a clear solution has not been laid out as part of this consultation. We believe that parties thoughts on how the DCUSA General Objectives are better facilitated should be sought as part of a further consultation, when a final solution and the associated legal text can be clearly seen and understood.

Company	Confidential/ Anonymous	Question 14 - Are you aware of any wider industry developments that may impact upon or be impacted by this CP?
British Gas	Non-confidential	No.

Electricity North West Limited	Non-confidential	We are not aware of any industry developments impacting on this area specifically.
ESP Electricity ('ESPE')	Non-confidential	No, ESPE is not aware of any wider industry development that may impact upon or be impacted by the DCP.
First Utility	Confidential	Confidential
Haven Power	Non-confidential	No
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd. and Northern Powergrid (Yorkshire) plc	Non-confidential	<p>Not directly.</p> <p>We are aware of many ongoing industry changes with wide scope which are likely to influence future use of system charges. But we consider that there will always be benefit in DNOs publishing transparent information regarding revenue allowances and future tariff forecasts, so do not consider this change to be influenced by the wider change agenda.</p>
npower	Non-confidential	No.
SEPD & SHEPD	Non-confidential	Not at this time.
SP Distribution & SP Manweb	Non-confidential	No
UK Power networks	Non-confidential	The work which will shortly take place as part of the expected SCR following on from the Charging Futures work, could have an impact on forecasted values and / or even the need for an ARP.

Company	Confidential/ Anonymous	Question 15 - The proposed implementation date for DCP 325 is the first scheduled DCUSA release following approval. Do you agree with the proposed implementation date?
British Gas	Non-confidential	Yes
Electricity North West Limited	Non-confidential	Yes, we agree with this proposed implementation date with the sole caveat that the implementation date should not fall so close to a scheduled quarterly submission or teleconference that it would be disruptive to arrangements already underway.
ESP Electricity ('ESPE')	Non-confidential	ESPE agrees with the proposed implementation date.
First Utility	Confidential	Confidential
Haven Power	Non-confidential	Yes
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd. and Northern Powergrid (Yorkshire) plc	Non-confidential	Yes, subject to such a release date being compatible with the timetable for publications which is agreed by the group and allowing a reasonable period of time in which DNOs can make changes to the processes by which the templates are populated and users (primarily suppliers) can make changes to processes which use the information produced.
npower	Non-confidential	Yes.
SEPD & SHEPD	Non-confidential	Yes.

SP Distribution & SP Manweb	Non-confidential	Yes
UK Power networks	Non-confidential	We are comfortable with this approach at this time. Although the change from the current arrangements to anything different would need to be carefully considered and managed in order to ensure that parties are not duplicating work, or there is a larger gap than was previously the case between publications, which was not intended. It should also be considered if significant changes are proposed, then parties may need a period of time to obtain the data or move away from the existing arrangements, as a result an alternative implementation date / strategy might be necessary, however this will not be known until a solution has been determined.