

## DCP 325 COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

Company	Confidential/ Anonymous	Question 1 - Do you understand the intent of DCP 325?	Working Group Comments
British Gas	Non-confidential	Yes	Noted
Electricity North West Limited	Non-confidential	Yes, we understand the intent.	Noted
ESP Electricity ('ESPE')	Non-confidential	Yes, ESPE understand the intent of this Change Proposal.	Noted
Confidential	Confidential	Confidential	Confidential
Haven Power	Non-confidential	Yes	Noted
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.	Noted
npower	Non-confidential	Yes.	Noted
SEPD & SHEPD	Non-confidential	Yes.	Noted
SP Distribution & SP Manweb	Non-confidential	Yes	Noted

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UK Power networks	Non-confidential	Yes.	Noted
<b>Working Group Conclusions:</b> The Working Group concluded that all respondents to this question agreed that they understood the intent of DCP 325.			

Company	Confidential/Anonymous	Question 2 - Are you supportive of the intent of DCP 325?	Working Group Comments
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.	The Working Group highlighted that the intention is not to reduce the current level of information provided. A clarifying question will be sent to British Gas to ensure that there isn't anything specific that they think the Working Group should consider.
Electricity North West Limited	Non-confidential	Yes, we are broadly supportive of the intent.	Noted
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.	Noted
Confidential	Confidential	Confidential	Confidential
Haven Power	Non-confidential	Yes	Noted
Northern Powergrid on behalf of Northern	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.	Noted

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Powergrid (Northeast) Ltd. and Northern Powergrid (Yorkshire) plc			
npower	Non-confidential	We support the intention to remove duplication and streamline the provision of cost information from DNO operators.	Noted
SEPD & SHEPD	Non-confidential	Yes.	Noted
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.	Noted
UK Power networks	Non-confidential	Yes.	Noted
<b>Working Group Conclusions:</b> The Working Group concluded that the majority of respondents were supportive of the intent of DCP 325. A clarifying question will be sent to British Gas to ensure that the Working Group have not missed anything specific that should be considered.			

Company	Confidential/Anonymous	Question 3 - What additions or amendments, if any, do you think should be made to Table 1?	Working Group Comments
British Gas	Non-confidential	The Gas Distribution Networks include a separate table which breaks down the value of the MOD <sub>t</sub> 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	The Working Group agreed that this should be something to consider and they would need to review the electricity Price Control Financial Model

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		<p>breakdown of the MOD<sub>t</sub> term into the Clause 35A requirements. We include a picture of the GDN table below for information:</p> <table><tr><th colspan="7">TABLE 5: PCFM ADJUSTMENTS</th></tr><tr><th colspan="2">DESCRIPTION</th><th>PCFM TERM</th><th>2016/17</th><th>2017/18</th><th>2018/19</th><th>2019/20</th><th>2020/21</th></tr><tr><td>58</td><td>COST OF DEBT</td><td>CDE</td><td>2.38%</td><td>2.22%</td><td>1.91%</td><td>1.57%</td><td>1.12%</td></tr><tr><td>59</td><td>CORPORATION TAX RATE</td><td>CT</td><td>20.00%</td><td>19.00%</td><td>19.00%</td><td>19.00%</td><td>17.00%</td></tr><tr><td>60</td><td>COST OF DEBT ADJUSTMENT</td><td>CDE E IMPACT</td><td>(8.6)</td><td>(11.1)</td><td>(14.2)</td><td>(23.7)</td><td>(29.0)</td></tr><tr><td>61</td><td>TAX TRIGGER EVENT</td><td>TTE</td><td>(0.4)</td><td>(2.4)</td><td>(2.3)</td><td>(2.4)</td><td>(6.0)</td></tr><tr><td>62</td><td>TAX LIABILITY - GEARING/INTEREST COSTS</td><td>TGIE</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td></tr><tr><td>63</td><td>PENSION SCHEME ESTABLISHED DEFICIT</td><td>EDE</td><td>(0.9)</td><td>(0.9)</td><td>5.8</td><td>5.8</td><td>5.8</td></tr><tr><td>64</td><td>PENSION SCHEME ADMINISTRATION &amp; PPF LEVY</td><td>APFE</td><td>-</td><td>-</td><td>0.5</td><td>0.5</td><td>0.5</td></tr><tr><td>65</td><td colspan="2">SPECIFIED FINANCIAL ADJUSTMENTS</td><td>(9.9)</td><td>(14.4)</td><td>(10.2)</td><td>(19.7)</td><td>(28.7)</td></tr><tr><td>66</td><td>LEGACY CAPEX RAV ADJUSTMENT</td><td>LRAV</td><td>(0.3)</td><td>(0.3)</td><td>(0.3)</td><td>(0.3)</td><td>(0.3)</td></tr><tr><td>67</td><td>LEGACY ALLOWED REVENUE ADJUSTMENT</td><td>LAR</td><td>0.2</td><td>0.2</td><td>0.2</td><td>0.2</td><td>0.2</td></tr><tr><td>68</td><td>LEGACY IFI CAP ADJUSTMENT</td><td>IFIAR</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td></tr><tr><td>69</td><td>LEGACY STREETWORKS COST ADJUSTMENT</td><td>IAEAR</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td></tr><tr><td>70</td><td colspan="2">OVERALL LEGACY ADJUSTMENTS</td><td>(0.1)</td><td>(0.1)</td><td>(0.1)</td><td>(0.1)</td><td>(0.1)</td></tr><tr><td>71</td><td colspan="2">TOTEX INCENTIVE MECHANISM</td><td>0.3</td><td>(4.1)</td><td>(4.4)</td><td>(1.6)</td><td>8.2</td></tr><tr><td>72</td><td>ENHANCED PHYSICAL SITE SECURITY (CNI)</td><td>IAEEPS</td><td>1.4</td><td>11.2</td><td>8.1</td><td>(1.4)</td><td>(1.9)</td></tr><tr><td>73</td><td>SPECIFIED STREETWORKS</td><td>IAESW</td><td>-</td><td>-</td><td>-</td><td>7.8</td><td>0.9</td></tr><tr><td>74</td><td>CHANGE TO CONNECTION CHARGING BOUNDARY</td><td>IAECCB</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td></tr><tr><td>75</td><td>SMART METERING ROLL-OUT</td><td>IAESM</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td></tr><tr><td>76</td><td>LARGE LOAD CONNECTIONS</td><td>IAELLC</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td></tr><tr><td>77</td><td>FUEL POOR NETWORK EXTENSIONS</td><td>IAEFP</td><td>0.4</td><td>0.4</td><td>0.3</td><td>0.3</td><td>0.3</td></tr><tr><td>78</td><td>AGENCY COSTS (FGO)</td><td>IAECA</td><td>-</td><td>(1.5)</td><td>(2.8)</td><td>(3.5)</td><td>(3.9)</td></tr><tr><td>79</td><td>MAINS &amp; SERVICES (REPEX T2)</td><td>RE</td><td>(0.3)</td><td>(0.3)</td><td>(0.4)</td><td>(0.0)</td><td>(0.1)</td></tr><tr><td>80</td><td>INNOVATION ROLL-OUT MECHANISM</td><td>IRM</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td></tr><tr><td>81</td><td>NTS EXIT CAPACITY COST ALLOWANCE</td><td>AEX</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td></tr><tr><td>82</td><td>SHRINKAGE COST ALLOWANCE</td><td>ALSC</td><td>(5.4)</td><td>(3.5)</td><td>(3.5)</td><td>(3.5)</td><td>(3.5)</td></tr><tr><td>83</td><td colspan="2">UNCERTAIN COSTS</td><td>(3.8)</td><td>6.3</td><td>1.6</td><td>(0.4)</td><td>(8.1)</td></tr><tr><td>84</td><td colspan="2">TOTAL POTENTIAL IMPACT OF REVENUE ADJUSTMENTS SHOWN IN TABLE 5</td><td>(13.6)</td><td>(12.3)</td><td>(13.1)</td><td>(21.7)</td><td>(28.7)</td></tr><tr><td>85</td><td colspan="2">TOTAL VALUE INCLUDED IN TABLE 1 IN THIS FORECAST</td><td>(13.6)</td><td>(12.3)</td><td>(13.1)</td><td>(21.7)</td><td>(28.7)</td></tr></table>	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 E 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)	<p>to determine what the equivalent table would be. It was also agreed that the ‘modification to revenue from the Annual Iteration Process’ (MOD) term line will still be included within the table, but an extra sheet will be included for commentary.</p>
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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>The Working Group confirmed that the number of years that should be forecast will be considered as discussed in the Change Proposal form.</p> <p>In response to comment made by the respondent with respect to “a more</p>																																																																																																																																																																																																																																															

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		<p>Second, changes to the price control terms may result in the format of the table becoming obsolete in the future.</p> <p>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>	flexible approach to the definition of Table 1” the Working Group highlighted that Question 6 of the consultation sought views as to whether the tables should remain within the DCUSA document or sit outside of it and thus, the document would set out the obligation to complete them. As such, the Working Group will consider this comment when reviewing responses to question 6.
ESP Electricity ('ESPE')	Non-confidential	ESPE has no further suggestions to make with regards to Table 1.	Noted
Confidential	Confidential	Confidential	Confidential
Haven Power	Non-confidential	We support the changes proposed to Table 1	Noted
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</p>	The Working Group highlighted that this response aligns with the Change Proposal and the proposed table 1 template.

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		retained, we think it may also be useful for DNOs to provide a copy of 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.	Noted (echoing British Gas's response above)
SEPD & SHEPD	Non-confidential	No suggested amendments at this time.	Noted
SP Distribution & SP Manweb	Non-confidential	We are happy with the table 1 proposal	Noted
UK Power networks	Non-confidential	None. We do not believe that any changes to table one are necessary.	Noted
<b>Working Group Conclusions:</b> The Working Group concluded that respondents to this question were supportive of the proposed amendments to table 1. However, there were also some further suggestions made by respondents which the Working Group agreed to consider when developing their solution.			

Company	Confidential/Anonymous	Question 4 - Is Table 2 useful? Can it be improved, if so, how?	Working Group Comments
British Gas	Non-confidential	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	The Working Group agreed that to do this, there would need to be a "free

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		<p>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	field” included in the table without a specified format which may lessen the commonality across the DNO areas. The Working Group will consider the inclusion of a table that allows DNOs to provide information related to the biggest risks to their revenue that they have identified.
TABLE 6: RISKS AND SENSITIVITIES		2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23																																																										
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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.</p> <p>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.</p> <p>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 10<sup>th</sup>/90<sup>th</sup> percentile range) of potential outcomes.</p> <p>We would support the removal of Table 2.</p>	The Working Group noted the respondent’s rationale behind their support for the removal of table 2.																																																															
ESP Electricity (‘ESPE’)	Non-confidential	Yes. We do not have any suggestions for improvement.	Noted																																																															
Confidential	Confidential	Confidential	Confidential																																																															

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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>	The Working Group agreed that this supports other responses received.
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd. and Northern Powergrid (Yorkshire) plc	Non-confidential	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.	Noted
npower	Non-confidential	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.	Noted
SEPD & SHEPD	Non-confidential	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.	Noted
SP Distribution & SP Manweb	Non-confidential	This table would be used as part of DCP066A call hence there would be a stakeholder benefit.	<p>Noted</p> <p>The Working Group discussed that participants of the DCP066A teleconferences have the opportunity to ask questions regarding table 2, however, from experience, it is very</p>



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			rarely discussed and the DNOs do not spend much time covering it, although the information is provided on the presentation slides.
UK Power networks	Non-confidential	We are not users of this table so are not able to comment.	Noted
<b>Working Group Conclusions:</b> The Working Group believe that something needs to be included to allow users to be able to identify the DNOs major risks. The table provided by British Gas will be reviewed to determine whether the DNOs would be able to provide something similar.			

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?	Working Group Comments
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.	Noted
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.</p>	<p>The Working Group note the suggestion to remove table 3.</p> <p>Working Group members also agreed that they would consider the respondents' comments in regard to the timescales of publication when reviewing responses to question 10 and will use this as a basis on which to</p>

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		<p>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>	determine how many years should be forecasted.
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.	Noted
Confidential	Confidential	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>	The Working Group highlighted that Annex 1 has a different format to the template, but it would not be an issue to update and this will be considered by the group when developing the solution.
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.</p>	Noted, and agreed that this is in line with the content of the Change Proposal form and the merging of the cost information tables and the ARP.

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		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.	
npower	Non-confidential	We expect the additional commentary to be useful as it will give Suppliers an idea of what is expected to change in future years.	Noted
SEPD & SHEPD	Non-confidential	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.	The Working Group noted that this respondent is not supportive of providing commentary because they would not be in a position to update the CDCM input tables on a quarterly basis. However, the Working Group highlighted that in November a number of CDCM inputs would be able to be updated and as such would be a better forecast (although, this may not be the same for all DNOs).
SP Distribution & SP Manweb	Non-confidential	No suggested amendments.	Noted
UK Power networks	Non-confidential	We are not users of this table so are not able to comment.	Noted
<b>Working Group Conclusions:</b> The Working Group concluded that there were varying responses from industry on this question and the respondents' comments would be considered in the round when developing the solution for the CP.			

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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.	Working Group Comments
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.	Noted support for maintaining the tables outside of the DCUSA document.
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>	<p>Noted support for maintaining the tables outside of the DCUSA document.</p> <p>Two options provided:</p> <ol style="list-style-type: none"> <li>1. Panel provided template (similar to ARP) legal text referring to template rather than including the template itself – Schedule 16 would need to be updated as it currently refers to tables in Schedule 15</li> <li>2. Common format maintained by DNOs and reviewed by DCMDG.</li> </ol>

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ESP Electricity ('ESPE')	Non-confidential	ESPE believes a consistent format should be applied across all submissions and therefore should be contained within the DCUSA.	Noted support for maintaining the tables within the DCUSA document.
Confidential	Confidential	Confidential	Confidential
Haven Power	Non-confidential	The Cost Information Tables should be contained within the DCUSA.	Noted support for maintaining the tables within the DCUSA document.
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd. and Northern Powergrid (Yorkshire) plc	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"> <li>1. The status quo, whereby the precise format of tables is detailed in the DCUSA; or</li> <li>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.</li> </ol> <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</p>	Noted support for maintaining the tables outside of the DCUSA document.

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		<p>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	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.	Noted that they had no preference for how it would be maintained.
SEPD & SHEPD	Non-confidential	They should continue to be contained within the DCUSA to maintain consistency across DNOs.	Noted support for maintaining within DCUSA.
SP Distribution & SP Manweb	Non-confidential	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 DCUSA, then the change process would need to be adhered to which could take significantly longer, however for consistency we think the tables should be managed under DCUSA.	Noted support for maintaining within DCUSA.
UK Power networks	Non-confidential	We believe that retaining a robust process around how these tables are maintained is more important than the ability to make revisions in a prompt manner, so would conclude that they should be defined as part of DCUSA.	Noted support for maintaining within DCUSA.

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**Working Group Conclusions:** The Working Group concluded that the majority of support was for the cost information tables to be maintained within the DCUSA document. The Working Group highlighted that they must ensure that there is consistency in the template formats across DNO areas to guarantee that they are consistent across industry.

Company	Confidential/ Anonymous	Question 7 - Do you use the ARP? If so, for what purpose? (All responses to this question will be treated confidentially and will be anonymised and randomised by the Secretariat prior to being reviewed by the Working Group)	Working Group Comments
Anonymous	Randomised	We use the ARP as part of our DUoS tariff forecast process, which feeds into our tariff offerings to customers.	Noted that this respondent uses the ARP.
Anonymous	Randomised	No.  The ARP publication does not provide us with any additional information of any value beyond that in the publications required under Clause 35A.	Noted that this respondent does not use the ARP.
Anonymous	Randomised	Yes, for business planning purposes, as it provides a forward-looking view on volume forecasts and the movement of tariffs.	Noted that this respondent does use the ARP.
Anonymous	Randomised	We use the ARP to calculate tariffs for the quarterly returns, but we could use the models to do this also.	Noted that this respondent does use the ARP, but they could use the models if required.
Anonymous	Randomised	Yes, we use the APR to obtain an initial view of illustrative DUoS tariffs and volume forecasts.	Noted that this respondent does use the ARP.
Anonymous	Randomised	As a DNO party we are not a user of the ARP (either our own or that of other DNOs).	Noted that this respondent does not use the ARP.

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Anonymous	Randomised	No we don't.	Noted that this respondent does not use the ARP.
Anonymous	Randomised	No – we feel Suppliers utilise this more.	Noted that this respondent does not use the ARP.
Anonymous	Randomised	Yes. To update the view of allowed revenues, demand and other variables to reforecast tariffs. To model scenarios and potential changes to the model.	Noted that this respondent does use the ARP.
Anonymous	Randomised	Yes. We use the ARP documentation to update and assess inputs we will use for forecasting DUoS in future years after the latest year of final tariffs.	Noted that this respondent does use the ARP.
<b>Working Group Conclusions:</b> The Working Group concluded that there was a 50:50 split in responses to this question. It was agreed that they may need to consult further on this to determine party views on whether there is be a strong view on using the CDCM models instead of the ARP.			

Company	Confidential/ Anonymous	Question 8 - Are there any elements of the ARP that you find useful or not useful? For elements that are not useful, is there a reason to retain them? (All responses to this question will be treated confidentially and will be anonymised and randomised by the Secretariat prior to being reviewed by the Working Group)	Working Group Comments
Anonymous	Randomised	The 'Smoothed Input Details' and the 'CDCM Forecast Data' are useful to us. We need these broken down into the individual years that form the average to allow analysis and decisions to be taken in our own forecasts. We generally use all of the ARP.	Noted
Anonymous	Randomised	Not applicable.	Noted



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Anonymous	Randomised	Only to calculate tariffs as mentioned in Q7.	Noted
Anonymous	Randomised	<p>Forecasts of CDCM inputs have the potential to be useful if they are published on a more regular basis. At present these forecasts do not provide value as they are published at the same time as final charges and so there is no new information on which to base a forecast (the latest information available has already been used in final charges).</p> <p>We do not consider that the ARP provides any additional functionality beyond that in the CDCM model. If DNOs were to provide a series of CDCM models with the publications required under Clause 35A, parties would see more regular updates to forecast of CDCM inputs, and could flex inputs and see the impact on tariffs in the CDCM model itself.</p>	The Working Group highlighted that this response mirrors their discussion on question 7 regarding providing CDCM models rather than the ARP.
Anonymous	Randomised	All the elements of the ARP, as set out in paragraph 1.2 of the consultation, are useful.	<p>The Working Group highlighted that the elements set out in paragraph 1.2 of the consultation were as follows:</p> <ul style="list-style-type: none"> <li>• Historical CDCM input information for the previous three years;</li> <li>• Forecast CDCM input information for the next five years;</li> <li>• Illustrative tariffs for the next five years based on the forecast inputs provided;</li> <li>• Functionality to enable a user to amend any of the forecast inputs and recalculate illustrative tariffs; and</li> <li>• Details of the values calculated for each year where the CDCM inputs have been calculated</li> </ul>

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			based on a three-year average, most notably the load characteristics and peaking probabilities.
Anonymous	Randomised	We are not users of the ARP so are not able to comment.	Noted
Anonymous	Randomised	No response	Noted
Anonymous	Randomised	The forecast CDCM inputs and therefore tariffs (post year t in the ARP) are not particularly useful. The data (in terms of revenue) is superseded within a few months of the initial publication and so requires a manual update thereafter in order to produce more accurate tariff forecasts.	The Working Group highlighted that the data is superseded by the February publication of Schedule 15 hence why the CP was raised in first place.
Anonymous	Randomised	As discussed in the previous question, volume forecasts and a view on tariffs.	Noted
Anonymous	Randomised	The ability to update any of the calculation variables is useful.	Noted
<b>Working Group Conclusions:</b> The Working Group concluded that some respondents found varying elements of the ARP useful. Working Group members agreed that they would re-review responses to this question and will consider the useful elements when developing their solution.			

Company	Confidential/ Anonymous	Question 9 - Would it be beneficial to combine the ARP and the Cost Information Tables? Please provide your rationale. (All responses to this question will be treated confidentially and will be anonymised and randomised by the Secretariat prior to being reviewed by the Working Group)	Working Group Comments
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Anonymous	Randomised	It would be useful to combine the areas that overlap between the ARP and Cost Information Tables and harmonise the publication of both.	Noted that the respondent is supportive of combining the ARP and the Cost Information Tables.
Anonymous	Randomised	Yes, one source of information for the inputs and cost information would improve ease of use, and make it easier to analyse the change in forecasts	Noted that the respondent is supportive of combining the ARP and the Cost Information Tables.
Anonymous	Randomised	We consider there is significant potential benefit in combining the requirements of the two publications into a single, concise publication which is useful to parties. However, we do not consider it to be beneficial simply to combine the full requirements of the two publications without reviewing the content; hence if parties consider that all information is useful as published, the combination of the two publications would not add value.	Noted that the respondent is supportive of combining the ARP and the Cost Information Tables, but the Working Group need to consider the complexity of doing so as the publication needs to still be fit for purpose.
Anonymous	Randomised	This would seem useful and could improve efficiency, provided it did not reduce the overall level of information provision, or reduce the ability of suppliers to amend forecast inputs to derive their own forecasts.	Noted that the respondent is supportive of combining the ARP and the Cost Information Tables.
Anonymous	Randomised	Yes. The ARP has the merit of making transparent all the inputs into the future prices. This enables users of the ARP to understand the underlying inputs which is not possible with the Cost Information Tables 2 & 3.	Noted that the respondent is supportive of combining the ARP and the Cost Information Tables.
Anonymous	Randomised	It would depend upon whether any additional information would be provided by doing this. The ARP tables are generally useful annually to us, whilst the Cost Information Tables will be look at quarterly. If the additional items were updated in the ARP on a quarterly basis this would be of benefit to us.	Noted that the respondent is supportive of combining the ARP and the Cost Information Tables.
Anonymous	Randomised	We believe that the logic of providing a single source of forecast information would be beneficial to parties, but tariff forecasting is not required.	Noted that the respondent is supportive of combining the ARP and the Cost Information Tables. The Working Group highlighted that some respondents suggested the

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			removal of table 3 in a previous question and so this will be considered when developing the solution for the change.
Anonymous	Randomised	Yes – it would be beneficial to all parties if there is a combined document for forecasting purposes and the possibility of duplication/superseded information is removed.	Noted that the respondent is supportive of combining the ARP and the Cost Information Tables.
Anonymous	Randomised	No preference. We would need to keep multiple versions of the files either way for scenario analysis.	Noted that the respondent had no preference as to whether the ARP and Cost Information Tables were combined.
Anonymous	Randomised	Yes, it would reduce the effort required to complete the ARP, and result in a more succinct publication.	Noted that the respondent is supportive of combining the ARP and the Cost Information Tables.
<b>Working Group Conclusions:</b> The Working Group concluded that all respondents, who provided a preference, were supportive of combining the ARP and the Cost Information Tables. However, there were some varying degrees of caveats that will need to be considered by the Working Group when developing the solution for the change.			

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.	Working Group Comments
British Gas	Non-confidential	We don't see this as being necessary.	Noted that this respondent does not think that aligning the publication timescales with the HM Treasury Forecasts is necessary.

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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"> <li>• The issuing by Ofgem of the final MOD term in mid-November</li> <li>• The issuing by Ofgem of directions relating to incentives (although in relation to these the timing may not be formally set out).</li> <li>• The M16 and RIIO accounts completed in July.</li> </ul> <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>	<p>Noted that this respondent is supportive of aligning the publication timescales with the HM Treasury Forecasts. The Working Group confirmed that they would consider the suggested timescale changes to August, December and late May, however, a realistic publication would be the first five working days of September, January and June.</p>
ESP Electricity ('ESPE')	Non-confidential	<p>ESPE doesn't have a preference but understands the rationale for those Parties that would find this beneficial.</p>	<p>Noted</p>
Confidential	Confidential	<p>Confidential</p>	<p>Confidential</p>

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Haven Power	Non-confidential	Yes, we would support aligning the publication timescales with HM Treasury to ensure consistent inflation forecasts used across the DNOs.	Noted that this respondent is supportive of aligning the publication timescales with the HM Treasury Forecasts.
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>	Noted that this respondent is supportive of aligning the publication timescales with the HM Treasury Forecasts.
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.	Noted that this respondent is supportive of aligning the publication timescales with the HM Treasury Forecasts.
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.	Noted that this respondent is supportive of aligning the publication timescales with the HM Treasury Forecasts.
SP Distribution & SP Manweb	Non-confidential	Yes.	Noted that this respondent is supportive of aligning the publication

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			timescales with the HM Treasury Forecasts.
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.	Noted that this respondent is supportive of aligning the publication timescales with the HM Treasury Forecasts, however, there was a suggestion that one month would be needed by DNOs before publication of the updated Cost Information Tables. The Working Group highlighted that there has been a suggestion to publish within 5 working days the following month which would allow a lead time of 3 weeks. The UKPN Working Group representative confirmed that the suggested 2 to 3-week lead time would be sufficient.
<b>Working Group Conclusions:</b> The Working Group concluded that the majority of respondents were supportive of aligning the publication of the Cost Information Tables with the publication of the HM Treasury Forecasts. The Working Group also agreed that they would be supportive with the suggestion made by ENWL to move the publication dates but highlighted that these would need to be within the first 5 working days of January, June and September. Working Group members would need to consider whether a March publication would be required when they develop the solution for the change.			

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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.	Working Group Comments
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.	Noted
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> <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.</p>	Noted
ESP Electricity ('ESPE')	Non-confidential	Yes, it would be of use to ESPE to receive a consolidated set of tables on a quarterly basis.	Noted



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Confidential	Confidential	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.	Noted
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.	Noted
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.	Noted
SEPD & SHEPD	Non-confidential	Yes – as per response to Q9.	Noted
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.	Noted
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	Noted

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		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.	
<b>Working Group Conclusions:</b> The Working Group concluded that the majority of respondents are supportive of providing a consolidated set of tables, but the Working Group need to consider previous responses to questions 7, 8 and 9 to determine which tables and elements are useful to parties.			

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.	Working Group Comments
British Gas	Non-confidential	Yes, they are useful. They provide opportunity for questions.	Noted that this respondent finds the DCP066A teleconference useful.
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</p>	<p>Noted that the respondent does not believe that a teleconference is needed. Questions should be submitted for discussion at the DCMDG, however, if the teleconference is necessary then it is believed that the DCUSA Secretariat should host.</p> <p>The Working Group highlighted that there could be a timing issue if industry utilise the DCMDG. Specific timescales</p>

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		<p>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 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>	would need to be defined within the DCUSA legal text.
ESP Electricity ('ESPE')	Non-confidential	ESPE agrees that the secretariat should host these meetings.	Noted that the respondent believes that the DCUSA Secretariat should host the DCP066A teleconference.
Confidential	Confidential	Confidential	Confidential
Haven Power	Non-confidential	The DCP066A is useful in providing further background and understanding of the cost information tables and changes, especially the content provided by Northern Powergrid.	Noted that the respondent is supportive of the DCP066A teleconference, but it has been

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		<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>	<p>suggested that there needs to be consistency around the format of the DNOs' presentations.</p>
<p>Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd. and Northern Powergrid (Yorkshire) plc</p>	<p>Non-confidential</p>	<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> <p>These meetings could likely be more efficiently convened if responsibility for doing so lay with the DCUSA secretariat.</p>	<p>Noted that the respondent is supportive of the DCP066A teleconferences and that the DCUSA Secretariat should host them.</p>
<p>npower</p>	<p>Non-confidential</p>	<p>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.</p>	<p>Noted that the respondent is supportive of the DCP066A teleconferences. A suggestion has been made to record or provide commentary on the calls so that industry can refer back to what was discussed if necessary.</p> <p>The Working Group agree that minutes or a report should be provided after each call to enable industry to be able to review what was discussed.</p>

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SEPD & SHEPD	Non-confidential	<p>Yes – it helps to identify the assumptions DNOs have made when preparing their cost information tables.</p> <p>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.</p>	Noted that the respondent is supportive of the DCP066A teleconferences and they are happy for Energy Networks Association to host but suggest that minutes be made available.
SP Distribution & SP Manweb	Non-confidential	Currently DNOs provide presentations to stakeholders; we believe the DCUSA Secretariat should be responsible for hosting this.	Noted that the respondent is supportive of the DCP066A teleconferences and that the DCUSA Secretariat should host them.
UK Power networks	Non-confidential	<p>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.</p> <p>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.</p>	Noted that the respondent believes that the DCUSA Secretariat should host the DCP066A teleconferences.
<p><b>Working Group Conclusions:</b> The Working Group concluded that the majority of respondents were supportive of the DCP066A teleconferences and that the DCUSA Secretariat should host these. The Working Group also agreed that the DNOs should look at aligning their presentations and consider either recording the meetings or ensuring that there is some sort of minutes or report provided after the calls so that industry can refer back to the discussion if it is required.</p>			

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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.	Working Group Comments
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.	Noted
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.	Noted that the respondent believes that DCUSA General Objective 4 would be better facilitated by the intent of this CP.
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>	Noted that the respondent believes that DCUSA General Objectives 2 and 4 would be better facilitated by the intent of this CP.
Confidential	Confidential	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.	Noted that the respondent believes that DCUSA General Objective 2 would be better facilitated by the intent of this CP.
Northern Powergrid on behalf of	Non-confidential	We consider that general objectives two and four are better facilitated by this change, with general objectives one, three and five being unaffected.	Noted that the respondent believes that DCUSA General Objectives 2 and 4

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Northern Powergrid (Northeast) Ltd. and Northern Powergrid (Yorkshire) plc		<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>	would be better facilitated by the intent of this CP.
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.	<p>Noted that the respondent believes that DCUSA Charging Objective 6 would be better facilitated by the intent of this CP.</p> <p>The Working Group highlighted that they do not believe that the DCUSA Charging Objectives should be considered in relation to this change.</p>
SEPD & SHEPD	Non-confidential	<p>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.</p> <p>General Objective 4 – a consolidated approach to the DCUSA tables and ARP would be more efficient.</p>	Noted that the respondent believes that DCUSA General Objectives 2 and 4 would be better facilitated by the intent of this CP.
SP Distribution & SP Manweb	Non-confidential	<p>DCUSA General Objective 2</p> <p>As stakeholders specifically suppliers will be receive appropriate data for their needs, with the intent to improve cost forecasting hence competition.</p> <p>DCUSA General Objective 4</p>	Noted that the respondent believes that DCUSA General Objectives 2 and 4 would be better facilitated by the intent of this CP.

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		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.	Noted
<b>Working Group Conclusions:</b> The Working Group concluded that the majority of respondents believe that DCUSA General Objectives 2 and 4 would be potentially better facilitated by this CP. The Working Group will ask the question again in a further consultation once the solution has been developed.			

Company	Confidential/ Anonymous	Question 14 - Are you aware of any wider industry developments that may impact upon or be impacted by this CP?	Working Group Comments
British Gas	Non-confidential	No.	Noted
Electricity North West Limited	Non-confidential	We are not aware of any industry developments impacting on this area specifically.	Noted
ESP Electricity ('ESPE')	Non-confidential	No, ESPE is not aware of any wider industry development that may impact upon or by impacted by the DCP.	Noted
Confidential	Confidential	Confidential	Confidential



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Haven Power	Non-confidential	No	Noted
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd. and Northern Powergrid (Yorkshire) plc	Non-confidential	Not directly.  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.	Noted
npower	Non-confidential	No.	Noted
SEPD & SHEPD	Non-confidential	Not at this time.	Noted
SP Distribution & SP Manweb	Non-confidential	No	Noted
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.	Noted
<b>Working Group Conclusions:</b> The Working Group concluded that the majority of respondents to this question do not believe that there are any wider industry developments that need to be considered by Working Group members in the development of this change. However, the Working Group agreed that they will be mindful, during the development of the solution, of the outputs of the Significant Code Review that is being launched following on from Ofgem's Charging Futures Forum work.			

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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?	Working Group Comments
British Gas	Non-confidential	Yes	Noted that the respondent agrees with the proposed implementation date.
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.	Noted that the respondent agrees with the proposed implementation date and the Working Group agree with the rationale provided.
ESP Electricity ('ESPE')	Non-confidential	ESPE agrees with the proposed implementation date.	Noted that the respondent agrees with the proposed implementation date.
Confidential	Confidential	Confidential	Confidential
Haven Power	Non-confidential	Yes	Noted that the respondent agrees with the proposed implementation date.
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.	Noted that the respondent agrees with the proposed implementation date and the Working Group agree with the rationale provided.
npower	Non-confidential	Yes.	Noted that the respondent agrees with the proposed implementation date.

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SEPD & SHEPD	Non-confidential	Yes.	Noted that the respondent agrees with the proposed implementation date.
SP Distribution & SP Manweb	Non-confidential	Yes	Noted that the respondent agrees with the proposed implementation date.
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.	Noted that the respondent agrees with the proposed implementation date. The Working Group highlighted that they agree with the rationale provided and the response is mirroring the concerns raised by ENWL and NPG and therefore will be considered when developing the change.
<b>Working Group Conclusions:</b> The Working Group concluded that they are happy with the proposed implementation date. Consideration of the current arrangements when organising the DCP066A teleconferences and publishing the Cost Information Tables/ARP will be taken in to account so that there is no duplication of effort by industry.			