

Company	Confidential/Anonymous	1. Do you understand the intent of the change proposal?	Working Group Comments
Electricity North West	Non-confidential	Yes, we understand the intent of this change proposal.	<u>Noted.</u>
ESP Electricity Ltd	Non-confidential	Yes. The CP seeks to hardcode the portfolio billing reporting format in to Schedule 19 of the DCUSA.	<u>Noted.</u>
Leep Electricity networks Limited	Non-confidential	Yes	<u>Noted.</u>
Northern Powergrid	Non-confidential	Yes.	<u>Noted.</u>
SP Manweb plc and SP Distribution plc	Non-confidential	Yes	<u>Noted.</u>
UK Power Networks	Non-confidential	Yes, the data provided is received in various different formats and this change will standardise the format, which will reduce the administration process.	<u>Noted.</u>
Western Power Distribution plc	Non-confidential	Yes	<u>Noted.</u>
<u>The Working Group noted that all respondents understood the intent of DCP 312.</u>			

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<b>Company</b>	<b>Confidential/ Anonymous</b>	<b>2. Do you agree with the principles of the change proposal? Please provide your rationale.</b>	<b>Working Group Comments</b>
Electricity North West	Non-confidential	Yes, we agree with the principles of this change proposal as the provision of a common approach will improve the efficiency of the overall process.	<a href="#">Noted.</a>
ESP Electricity Ltd	Non-confidential	Yes. Introducing an agreed format for reporting half hourly (HH) invoice data to host DNOs will standardise the reporting across all EDNOs, reducing the administration for both Parties.	<a href="#">Noted.</a>
Leep Electricity networks Limited	Non-confidential	Yes	<a href="#">Noted.</a>
Northern Powergrid	Non-confidential	Yes, Both DNOs and EDNOs currently experience administration issues with EDNO Portfolio Billing as data is currently provided in a number of formats and there is no consistency as to how credit/rebilling is being reported.	<a href="#">Noted.</a>
SP Manweb plc and SP Distribution plc	Non-confidential	Yes. This change will ensure a common approach for all EDNOs to provide the HH data to the DNOs. It will also include all MPANS associated with any invoice for DNO reconciliation.	<a href="#">Noted.</a>
UK Power Networks	Non-confidential	Yes, to have a clear and consistent approach to the process	<a href="#">Noted.</a>
Western Power Distribution plc	Non-confidential	Yes – by applying a consistent approach to EDNO's Credit Rebill and Multiple mpan reporting the change proposal will improve processing for both DNO's and EDNO's	<a href="#">Noted.</a>

The Working Group noted that all respondents agreed with the principles of DCP 312.

Company	Confidential / Anonymous	3. Can you support both options? Please provide impact and rationale	Working Group Comments
Electricity North West	Non-confidential	We can support both of the options detailed, our main concern was that each MPAN had its own row and both options provide for this facility.	<u>Noted.</u>
ESP Electricity Ltd	Non-confidential	Yes. Whichever option is approved, our billing system will be configured accordingly.	<u>Noted.</u>
Leep Electricity networks Limited	Non-confidential	Yes	<u>Noted.</u>
Northern Powergrid	Non-confidential	<p>NPg supports both options, impacts are as follows.</p> <p>Systems The impact on the system would be minor, the suggested template adjustment would mean more than one MPAN in a single cell, Lead MPAN and all subsidiaries. A DURABILL patch will be needed to ensure that the flows can be imported without any errors as currently we use only one MPAN in a single cell when we manipulate the data sent from the IDNO. The patch would be easy to test as creating the data is straight forward, rarely encountering any problems.</p> <p>Process &amp; People</p>	<u>Noted.</u>

		The process will be improved from a DUoS point of view. EDNO data is usually received in various different formats which will no longer happen. No manipulation of the data should in theory quicken the billing process, a welcomed improvement.	
SP Manweb plc and SP Distribution plc	Non-confidential	The DNO billing application (DURABILL) does not currently support either option, however the green option would require only a minor change, whereas the blue option would require a change to the applications core billing and/or a very complicated new report as it does not currently calculate per MPAN when creating HH invoices for multi-MPAN sites.	<u>Noted.</u>
UK Power Networks	Non-confidential	Yes, both options can be accommodated	<u>Noted.</u>
Western Power Distribution plc	Non-confidential	<p>Yes , based on the following 2 assumptions</p> <ul style="list-style-type: none"> <li>• That it is acceptable for DNO's to issue a single invoice per mpan rather than a combined invoice for multi- MPAN sites,</li> <li>• EDNO's report the same lead mpan for cancellations and for rebills of multi mpan sites</li> </ul> <p>Option 1 would require no changes to current functionality- however if the cancellation and rebills are reported against a different Lead mpan</p>	<p><u>The Working Group noted that this change proposal is regarding the data given from the EDNO to the DNO and does not address the arrangements from the DNO to the EDNO.</u></p> <p><u>Such a requirement should be contained within the legal text.</u></p>

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		<p>then existing validation would not work. and changes would be required to our billing system</p> <p>Option 2 Change would be required to our billing system to validate cancellations and rebills for this option. We would need a reliable method of identifying cancellation records. Currently the system treats any record where the Standing Charge Days is less than zero as a cancellation. As records for 'related MPANs' in multi MPAN sites will always have the Standing Charge Days set to zero, a new method will need to be chosen.</p>	
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The Working Group noted that all respondents support either Option 1 or Option 2 and further clarity has been provided in comments to WPD's consultation response.

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Company	Confidential / Anonymous	4. Which option do you prefer? Please provide rationale.	Working Group Comments
Electricity North West	Non-confidential	Please see answer to Q3 above, although we currently put all the consumption data against one MPAN and zero against the other we can support both options so do not have a particular preference.	<u>Noted.</u>
ESP Electricity Ltd	Non-confidential	ESP Electricity (ESPE) would prefer Option 2 as Option 1 would be a more complex change for our billing system.	<u>Noted.</u>
Leep Electricity networks Limited	Non-confidential	Option 2	<u>Noted.</u>
Northern Powergrid	Non-confidential	NPg prefer option 1 as this is how we currently Credit and Rebill.	<u>Noted.</u>

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SP Manweb plc and SP Distribution plc	Non-confidential	As above – the green option is the preferred option.	<u>Noted.</u>
UK Power Networks	Non-confidential	No preference. Both options can be applied to our current process, whether the active consumption is on one line or split out over the MPANs.	<u>Noted.</u>
Western Power Distribution plc	Non-confidential	I prefer option 1 – based on the opinion that the user group can agree the 2 assumptions below and include within the change proposal – this would involve no changes to our billing system <ul style="list-style-type: none"> <li>• That it is acceptable for DNO’s to issue a single invoice per mpan rather than a combined invoice for multi- MPAN sites,</li> <li>• EDNO’s report the same lead mpan for cancellations and for rebills of multi mpan sites</li> </ul> However should this not be the case the cost to amend the existing IDNO billing data validation functionality to enable validation of cancellations and rebills for multi-MPAN sites could be in the region of £40k shared between all DURABILL customers. This cost would be the same for either option.	<u>Noted.</u>
<u>The Working Group majority decision was to proceed with Option 1 based on consultation responses.</u>			

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Company	Confidential / Anonymous	5. Do you have any comments on the legal text?	Working Group Comments
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Electricity North West	Non-confidential	We believe the legal text supports the solution described in this change proposal.	<a href="#">Noted.</a>
ESP Electricity Ltd	Non-confidential	No	<a href="#">Noted.</a>
Leep Electricity networks Limited	Non-confidential	No	<a href="#">Noted.</a>
Northern Powergrid	Non-confidential	No.	<a href="#">Noted.</a>
SP Manweb plc and SP Distribution plc	Non-confidential	The Legal Text is fine.	<a href="#">Noted.</a>
UK Power Networks	Non-confidential	No	<a href="#">Noted.</a>
Western Power Distribution plc	Non-confidential	The proposed legal text does not mandate how multi-MPAN sites are reported. The template in Appendix A does not have any sample records in it to help. A new market entrant would therefore not know how multi MPAN sites should be reported. The legal text also does not indicate whether any of the fields on the report are optional or mandatory.	<a href="#">The Working Group noted this response and updated the legal text to provide clarity on how to compile the new report.</a>
<a href="#">The Working Group noted these responses and updated the Legal Text as a result of comments submitted by WPD.</a>			

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Company	Confidential /	6. Which version of Excel does your company use?	Working Group Comments
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	<b>Anonymous</b>		
Electricity North West	Non-confidential	Excel 2007.	<a href="#">Noted.</a>
ESP Electricity Ltd	Non-confidential	Excel 2010	<a href="#">Noted.</a>
Leep Electricity networks Limited	Non-confidential	Office 365	<a href="#">Noted.</a>
Northern Powergrid	Non-confidential	The current version of Microsoft office that NPg use is Microsoft 2010. This facilitates Excel workbooks 1997-2003 as per legal text.	<a href="#">Noted.</a>
SP Manweb plc and SP Distribution plc	Non-confidential	Microsoft Excel 2010	<a href="#">Noted.</a>
UK Power Networks	Non-confidential	2016	<a href="#">Noted.</a>
Western Power Distribution plc	Non-confidential	Excel 2010	<a href="#">Noted.</a>
<p><a href="#">The Working Group noted that the eight respondents have various versions of Microsoft Excel, and so the pragmatic solution is to keep the version as currently stated in DCUSA.</a></p>			

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Company	Confidential I/ Anonymous	7. Are the DCUSA Objectives are better facilitated by this change proposal? Please provide your rationale.	Working Group Comments
Electricity North West	Non-confidential	We believe General Objective 4 would be better facilitated by this change, as it will provide consistency in the way that data is sent, allowing DNOs to process this data more efficiently.	<a href="#">Noted.</a>
ESP Electricity Ltd	Non-confidential	Yes, ESPE believes that standardising the portfolio billing HH MPAN report template will reduce the administration needed by both DNOs and EDNOs to meet the obligations of Schedule 19 of the DCUSA. The DNOs will receive the same report format from all EDNOs and the EDNOs will not have to support different formats depending on which DNO they are reporting to. This improves the efficiency in the implementation and administration of the DCUSA.	<a href="#">Noted.</a>
Leep Electricity networks Limited	Non-confidential	Yes	<a href="#">Noted.</a>
Northern Powergrid	Non-confidential	Yes, as per positive comments relating to objective 4 will be better facilitated as the introduction of this change will provide a clear and standardised defined method to provide HH Portfolio data to the DNO. This will enable DNOs to manage all EDNOs' HH Portfolio billing data in a consistent manner.	<a href="#">Noted.</a>
SP Manweb plc and SP Distribution plc	Non-confidential	The DCUSA General Objective number 4 is better facilitated by this proposal.	<a href="#">Noted.</a>
UK Power Networks	Non-confidential	Objective 4 is better facilitated as the change would give consistency and clarity	<a href="#">Noted.</a>

Western Power Distribution plc	Non-confidential	Objective 4 will be better facilitated as the introduction of this change will provide a clear and standardised defined method to provide HH Portfolio data to the DNO. This will enable DNOs to manage all EDNOs' HH Portfolio billing data in a consistent manner.	<a href="#">Noted.</a>
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[The Working Group noted that the majority of respondent's view was that this proposal better facilitated DCUSA General Objective 4. The Working Group unanimously agreed and that all other DCUSA General Objectives are neutral. This will be reflected in the DCP 312 Change Report.](#)

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Company	Confidential I/ Anonymous	8. Are you aware of any wider industry developments that may impact upon or be impacted by this CP?	Working Group Comments
Electricity North West	Non-confidential	We do not believe there are any wider industry developments that may impact or be impacted by this Change Proposal.	<a href="#">Noted.</a>
ESP Electricity Ltd	Non-confidential	No	<a href="#">Noted.</a>
Leep Electricity networks Limited	Non-confidential	No	<a href="#">Noted.</a>
Northern Powergrid	Non-confidential	No	<a href="#">Noted.</a>
SP Manweb plc and SP	Non-confidential	None	<a href="#">Noted.</a>

Distribution plc			
UK Power Networks	Non-confidential	No	<a href="#">Noted.</a>
Western Power Distribution plc	Non-confidential	NO	<a href="#">Noted.</a>
<a href="#">The Working Group noted that there are no other changes currently at industry that will impact the progression of DCP 312.</a>			

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Company	Confidential I/ Anonymous	9. What is the lead time for implementing each option? Please provide your rationale.	Working Group Comments
Electricity North West	Non-confidential	It would be useful if a lead time of at least one month was provided for.	<a href="#">Noted.</a>
ESP Electricity Ltd	Non-confidential	3 months to allow for billing system report change, UAT and implementation.	<a href="#">Noted.</a>
Leep Electricity networks Limited	Non-confidential	One month – We can deliver this within one month. Anything less would impact on our resources.	<a href="#">Noted.</a>
Northern Powergrid	Non-confidential	Minimal lead time, NPg could accommodate this change against the next release of the DCUSA.	<a href="#">Noted.</a>
SP Manweb plc and SP	Non-confidential	Green Option has a lead time of 2 months, Blue Option would be at least 6 months.	<a href="#">Noted.</a>

Distribution plc			
UK Power Networks	Non-confidential	We would not require any change to our current system so we can proceed with our processes any time after implementation.	<a href="#">Noted.</a>
Western Power Distribution plc	Non-confidential	Should option 1 be approved, and it is decided that changes are required to our billing system we would need 5 months from instructing our developers  Should option 2 be approved, the lead time required would be approximately 7 months following agreement to proceed.  If the DCP were to be implemented prior to the billing system changes being delivered it would still be possible for DNOs to bill the data received from the IDNOs with manual manipulation of the data received	<a href="#">Noted.</a>
<p><u>The Working Group noted that there were various different lead times quoted. Following discussion and agreement that Option 1 would be progressed, all Working Group members have been asked to confirm their required lead times and EDNOs will be contacted via an RFI to ascertain the required lead times for the solution.</u></p>			

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