

DCUSA DCP 295 CHANGE DECLARATION**VOTING END DATE: 15 MARCH 2019**

DCP 295 – CVA REGISTRANTS ACCEDING TO THE DCUSA	WEIGHTED VOTING				
	DNO	IDNO	SUPPLIER	DISTRIBUTED GENERATOR	GAS SUPPLIER
CHANGE SOLUTION	Accept	n/a	Reject	n/a	n/a
IMPLEMENTATION DATE	Accept	n/a	Reject	n/a	n/a
RECOMMENDATION	<p>Change Solution – Reject.</p> <p>For the majority of the Party Categories that were eligible to vote, the sum of the Weighted Votes of the Groups in each Party Category which voted to accept the change solution was not more than 50%.</p> <p>Implementation Date – Reject.</p> <p>For the majority of the Party Categories that were eligible to vote, the sum of the Weighted Votes of the Groups in each Party Category which voted to accept the implementation date was not more than 50%.</p>				
PART ONE	Part One – Authority Determination Required				

PARTY	SOLUTION (A / R)	IMPLEMENTA TION DATE (A / R)	WHICH DCUSA OBJECTIVE(S) IS BETTER FACILITATED?	COMMENTS
DNO PARTIES				
SP Distribution plc	Accept	Accept	Agree with the working group assessment that General Objectives 1, 2 and 3 are better facilitated.	None.
SP Manweb plc	Accept	Accept		
Eastern Power Networks	Accept	Accept	Objective 3 is better met as the requirement to offer terms for Use Of System is made more efficient and using DCUSA as the mechanism for that leads to such terms being consistent over time	
London Power Networks	Accept	Accept		
South Eastern Power Networks	Accept	Accept		
Electricity North West	Accept	Accept	We believe that as DCP 295 will result in less agreements being maintained together with the potential to reduce administrative costs that DCUSA General Objectives 3 and 4 will be better facilitated.	
Northern Powergrid (Northeast) Ltd	Accept	Accept	We feel that this Change Proposal better facilitates General Objective 4, as this will improve the efficiency of the administration between DNOs and network users who are CVA Registrants.	N/A
Northern Powergrid (Yorkshire) plc	Accept	Accept		
Western Power Distribution (East Midlands) plc	Accept	Accept	WPD agree with the Working Group that DCUSA General Objectives 1, 2	

Western Power Distribution (West Midlands) plc	Accept	Accept	and 3 will be better facilitated with the implementation of this CP.	
Western Power Distribution (South Wales) plc	Accept	Accept		
Western Power Distribution (South West) plc	Accept	Accept		
IDNO PARTIES				
N/A				
SUPPLIER PARTIES				
British Gas	Reject	Reject	We remain unable to assess the true impact of the change proposal. We acknowledge there has been some improved <i>general</i> information provided on the impact of the change – but there remains a lack of detail on whether there has been any assessment on the <i>specific</i> impacts on individual sites and agreements. The engagement we have experienced with our own is that this assessment has not been carried out.	<p>We had hoped that following the Ofgem send back that DNOs would engage on a bilateral basis with all CVA customers with a bilateral agreement to explain the change, whether the individual CVA customers is affected, and if so how. For affected sites, this would seem necessary to us to fulfil the conditions of the send back.</p> <p>Following our response to the second consultation, we provided contact details for our Centrica colleagues, responsible for a number of CVA sites across the country, to allow the DNOs to be able to engage more effectively.</p>

				<p>Unfortunately, the engagement from DNOs has been unsatisfactory. Our colleagues received an email from one DNO regarding a single site. The email provided a high-level summary of the change proposal and asked if they were a signatory to DCUSA. Our colleagues replied to confirm that they were not a signatory, and that they were seeking advice as to how our CVA assets would be affected if the proposal went through. Our colleagues did not receive a reply.</p> <p>The change report highlights that the number of companies who have CVA sites who <u>may</u> need to accede to DCUSA ranges between 2-6 across the DNOs. Given such a small number, it should have been feasible for DNOs to engage directly with these companies to discuss whether in fact they <u>will</u> need to accede to DCUSA and to discuss in detail any impact on the existing agreements of doing so. We view this as a legal exercise – similar to when agreements are first agreed, or are amended. This may be time consuming initially, but we believe it is necessary before this change proposal is progressed – and it will be time well spent if the DNOs believe it will produce longer term efficiency.</p>
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DISTRIBUTED GENERATOR PARTIES				
N/A				
GAS SUPPLIER PARTIES				
N/A				