

DCUSA Change Proposal Form

This form is issued in accordance with Clause 10.5 of the DCUSA.

Completed forms should be returned to dcusa@electralink.co.uk for assessment by the DCUSA Panel. Failure to complete all parts of the form may result in it being rejected by the DCUSA Panel.

- PART A – Mandatory for all Change Proposals
- PART B – Mandatory for Non Charging Methodologies Proposals
- PART C – Mandatory for Charging Methodologies Proposals
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PART A - MANDATORY FOR ALL CHANGE PROPOSALS

Document Control	
CP Status	Standard / Urgent
CP Number	DCP 282
Date of submission	14 September 2016
Attachments	[See Guidance Note 1]
Originator Details	
Company Name	Eastern Power Networks
Originator Name	Peter Waymont
Category	DG / DNO / IDNO / OTSO / SUPPLIER / OTHER
Email Address	Peter.waymont@ukpowernetworks.co.uk
Phone Number	07875112757
Change Proposal Details	
CP Title	Embedded Distribution Network Operator (EDNO) UMSO
Impacted parties	DNOs, IDNOs, Suppliers
Impacted Clause(s)	See attachment
Part 1 / Part 2 Matter	Part 1
Provide your rationale why you consider this change is a Part 1 or Part 2 Matter	Impact on customers as well as DCUSA parties.
Related Change Proposals	DCP 168, DCP 203
Change Proposal Intent	
<p>To facilitate the management and trading of UMS apparatus connected to EDNO networks via the "host" DNO's UMSO service on one combined inventory, without the need for additional MPANs, following a request from the customer to the EDNO to do so.</p> <p>The EDNO will be deemed to have passed such a request to the DNO, through DCUSA wording, such that the DNO does not need to perform further checking or validation on any inventory it receives (i.e. to the extent of checking whether the inventory contains data for the correct EDNO or not).</p> <p>To oblige the EDNO to ensure its connection agreements oblige the customer, where the use of a combined inventory has been requested, to provide combined inventories to both the host DNO/UMSO and each EDNO using that service to whom it has connections and has requested combined inventories within a GSP group (i.e. so that there is only one inventory for the DNO to manage, covering all relevant UMS in the GSP group for that customer) and to allow sharing of this data with each other.</p> <p>The NTC will also need to be amended to facilitate this.</p>	

Business Justification and Market Benefits

EDNOs have experienced difficulties with some large organisations with portfolios of UMS items often refusing to adopt UMS within EDNO networks due to the need to use one or more additional MPANs to manage separate inventory items. A number of industry changes (to each of the DCUSA and the BSC) have previously been raised with the aim of obliging the host DNO to manage their inventories in some way. These change proposals have typically required the DNO to manage the inventory data processing for such larger UMS customers by including items on EDNO networks within the DNO inventory, where EDNOs would still be responsible for the accuracy of data pertaining to their networks. To date these change proposals have either been withdrawn or rejected.

This change proposal has been designed with the purpose of overcoming some of these perceived hurdles and proposes the development of a solution that is easy to administer and minimises cost impact.

In essence under this change proposal the EDNO would continue to approve the connection as UMS. It would need to manage any connection agreement. The UMS customer would then be able to choose whether it wishes to combine all of its data on to one inventory for which the DNO provides the UMSO service. If it does so it must notify the EDNO and then must then provide a single inventory to the host DNO with a field identifying the relevant distributor. All parties would agree, via DCUSA and the NTC and the DNO's and EDNO's Connection agreements as necessary, that the single inventory can be shared with any distributor named on it so that this removes any admin for the DNO of splitting out the inventory and passing it on or of receiving separate EDNO inventories and adding them in. The DNO will merely process the inventory it receives (system constraints may mean it removed the identity of the distributor first so that the inventory looks like any other) in good faith – it does not need to check whether EDNO data is present, whether EDNO data that shouldn't be included has been etc.

The EDNO remains responsible for the quality of the data in the inventory for items in its networks and remains responsible for any associated BSC audit requirements.

This will remove the need for additional MPANs and will therefore be of benefit to customers who request this service.

Proposed Solution and Draft Legal Text

See attached draft legal text.

Proposed Implementation Date

First practicable release after approval

Impact on Other Codes

Please tick the relevant boxes and provide any supporting information.

- BSC
- CUSC
- Grid Code
- MRA
- SEC

Other <input type="checkbox"/>
None <input type="checkbox"/>
If other please specify
Consideration of Wider Industry Impacts
We believe that BSC (Section S Clause 8) and BSCP520 need to be reviewed to consider whether any changes are required.
Environmental Impact
none
Confidentiality
none

PART B – MANDATORY FOR NON CHARGING METHODOLOGIES CHANGE PROPOSALS

DCUSA Objectives
<p><u>General Objectives:</u></p> <p>Please tick the relevant boxes. [See Guidance Note 9]</p> <p><input checked="" type="checkbox"/> 1 The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks</p> <p><input checked="" type="checkbox"/> 2 The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent therewith) the promotion of such competition in the sale, distribution and purchase of electricity</p> <p><input type="checkbox"/> 3 The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences</p> <p><input type="checkbox"/> 4 The promotion of efficiency in the implementation and administration of this Agreement</p> <p><input type="checkbox"/> 5 Compliance with the Regulation on Cross-Border Exchange in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.</p>
Detailed rationale for better facilitation of the DCUSA Objectives identified above
<p>Objective 1 The change introduces efficiency and co-ordination for the DNO and EDNO.</p> <p>Objective 2 It has been stated elsewhere in the industry that the need to separately manage UMS has been a</p>

potential barrier in competing for new connections for IDNOs. This change would help to overcome any such barrier.

[See Guidance Note 10]

PART C – MANDATORY FOR CHARGING METHODOLOGIES CHANGE PROPOSALS

DCUSA Charging Objectives

Please tick the relevant boxes. [See Guidance Note 11]

Charging Objectives:

- 1 that compliance by each DNO Party with the Charging Methodologies facilitates the discharge by the DNO Party of the obligations imposed on it under the Act and by its Distribution Licence
- 2 that compliance by each DNO Party with the Charging Methodologies facilitates competition in the generation and supply of electricity and will not restrict, distort, or prevent competition in the transmission or distribution of electricity or in participation in the operation of an Interconnector (as defined in the Distribution Licences)
- 3 that compliance by each DNO Party with the Charging Methodologies results in charges which, so far as is reasonably practicable after taking account of implementation costs, reflect the costs incurred, or reasonably expected to be incurred, by the DNO Party in its Distribution Business
- 4 that, so far as is consistent with Clauses 3.2.1 to 3.2.3, the Charging Methodologies, so far as is reasonably practicable, properly take account of developments in each DNO Party's Distribution Business
- 5 that compliance by each DNO Party with the Charging Methodologies facilitates compliance with the Regulation on Cross-Border Exchange in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.

General Objectives:

- 1 The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks
- 2 The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent therewith) the promotion of such competition in the sale, distribution and purchase of electricity
- 3 The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences
- 4 The promotion of efficiency in the implementation and administration of this Agreement
- 5 Compliance with the Regulation on Cross-Border Exchange in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.

Detailed rationale for better facilitation of the DCUSA Objectives identified above

[See Guidance Note 10]

Charging Objectives:

General Objectives:

Has this issue been discussed at any other industry forums? If so please specify and provide supporting documentation

PART D – GUIDANCE NOTES FOR COMPLETING THE FORM

Guidelines for Working Group Members and Working Group Terms of Reference are available on the DCUSA Website and provide more information about the progression of the Change Process. www.dcusa.co.uk

Ref	Data Field	Guidance
1	Attachments	Append any proposed legal text or supporting documentation in order to better support / explain the CP.
2	Part 1 / Part 2 Matter	A CP must be categorised as a Part 1 or Part 2 matter in accordance with Clause 10.4.7 of the DCUSA. All Part 1 matters require Authority Consent.
3	Related Change Proposals	Indicate if the CP is related to or impacts any CP already in the DCUSA or other industry change process.
4	Proposed Solution and Draft Legal Text	<p>Outline the proposed solution for addressing the stated intent of the CP. The Change Proposal Intent will take precedence in the event of any inconsistency. A DCUSA Working Group may develop alternative solutions. The plain English description of the proposed solution should include the changes or additions to existing DCUSA Clauses (including Clause numbers).</p> <p>Insert proposed legal drafting (change marked against any existing DCUSA drafting) which enacts the intent of the solution. The legal text will be reviewed by the Working Group (if convened) and is likely to be subject to legal review as part of its progress through the DCUSA change process.</p>
5	Proposed Implementation Date	The Change can be implemented in February, June, and November of each year or as an extraordinary release. For Charging Methodology CPs, select an implementation date which takes in to consideration the deadlines for publishing indicative tariffs.

		<ul style="list-style-type: none"> • Submission of Company indicative tariffs is 31 December of each year. • Final tariffs are published on 1 April of each year. <p>Please select an implementation date that provides sufficient time for the change to be incorporated into the appropriate charging model and the DCUSA in order to be reflected within the December indicative tariffs.</p> <p>Contact the DCUSA helpdesk for any further information on the releases dcusa@electralink.co.uk.</p>
6	Consideration of Wider Industry Impacts	Indicate whether this Change Proposal will be impacted by or have an impact upon wider industry developments. If an impact is identified, explain why the benefit of the Change Proposal may outweigh the potential impact and indicate the likely duration of the Change.
7	Environmental Impact	Indicate whether it is likely that there would be a material impact on greenhouse gas emissions as a result of the proposed variation being made. Please see Ofgem Guidance .
8	Confidentiality	Clearly indicate if any parts of this Change Proposal Form are to remain confidential to DCUSA Panel (and any subsequent DCUSA Working Group) and Ofgem.
9	DCUSA General Objectives	Indicate which of the DCUSA Objectives will be better facilitated by the Change Proposal.
10	Detailed Rationale for DCUSA Objectives	Provide detailed supporting reasons and information (including any initial analysis that supports your views) to demonstrate why the CP will better facilitate each of the DCUSA Objectives identified.
11	DCUSA Charging Objectives	Indicate which of the DCUSA Charging Objectives will be better facilitated by the Change Proposal. Please note that a CDCM or EDCM change may also facilitate the DCUSA General objectives.