

**DCP 282 'EMBEDDED DISTRIBUTION NETWORK OPERATOR (EDNO) UMSO' CHANGE DECLARATION****VOTING END DATE: 7 APRIL 2017**

DCP 282	WEIGHTED VOTING				
	DNO	IDNO	SUPPLIER	DISTRIBUTED GENERATOR	GAS SUPPLIER
<b>CHANGE SOLUTION</b>	Accept	Accept	Accept	n/a	n/a
<b>IMPLEMENTATION DATE</b>	Accept	Accept	Accept	n/a	n/a
<b>RECOMMENDATION</b>	<p><b>Part 1 Matter</b></p> <p><b>Change Solution – Accept.</b></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 more than or equal to 50%.</p> <p><b>Implementation Date – Accept.</b></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 more than or equal to 50%.</p>				
<b>PART ONE / PART TWO</b>	<b>Part One</b> – Authority Determination Required				

PARTY	SOLUTION (A / R)	IMPLEMENTATION DATE (A / R)	WHICH DCUSA OBJECTIVE(S) IS BETTER FACILITATED?	COMMENTS
<b>DNO PARTIES</b>				

Electricity North West	Accept	Accept	We agree with the outcome of the assessment made by the Working Group that General Objectives 1 and 2 will be better facilitated by this change.	<p>We expect that the costs to the DNO in acting as the UMSO for the IDNO will not initially be material, but do understand these costs may increase in time. We do not believe there is anything to prevent a charge being raised by the DNO for acting as the UMSO on behalf of the IDNO, but we would value clarity on this so will investigate whether a further change proposal is required or if an update to the relevant charging statement would suffice taking into consideration Clause 43.2.2 under Section 2B – Distributor to Distributor/OTSO Relationships which provides for:</p> <p>43.2.2 the charges for any other services provided by the Company to the User pursuant to:</p> <p>(A) a provision of this Section 2B; or</p> <p>(B) any other agreement between the Company and the User for the provision of such services which provides for payment pursuant to this Agreement.</p>
Northern Powergrid (Northeast) Ltd	Reject	Reject	No comments provided.	<p>Whilst we appreciate why the LDNO's are seeking a solution to inventory management issues, the proposed DCUSA change would place an extra cost burden on our customers (as well as ourselves through the cost sharing incentive). Therefore we do</p>
Northern Powergrid (Yorkshire) plc	Reject	Reject		

				<p>not support a proposal that is aimed at improving matters by causing us and our customers to incur additional running costs and IT change costs.</p> <p>DCUSA general objective 4 is the efficient discharge by each of the DNO Parties and IDNO Parties of the obligations imposed upon them by their Distribution Licences. DNOs are obliged to comply with the Balancing and Settlement Code, including the provision of the Unmetered Supplies Operator (UMSO) role. Transferring responsibilities to manage IDNO inventories to DNO inventories increases costs for the DNO with no benefit for the generality of DUoS customers and risks reducing the efficiency of the DNO's delivery of the UMSO role.</p> <p>We would prefer a solution that placed the IDNO at the hub of the relationship with its unmetered connections customers and the UMS customer's appointed supplier.</p>
SP Distribution plc	Reject	Reject	SPEN do not believe that there is sufficient detail to confirm or suggest that any of the objectives are necessarily better facilitated by this	No comments provided.
SP Manweb plc	Reject	Reject		

			change. There has been a lack of clarity and evidence of the extent of the main issues raised and clear evidence of any such issues only impacting a specific customer base (Local Authorities). The position has not moved significantly enough forward from the previous Change Proposals that were rejected outright by the Settlements Volume Group (SVG) last year.	
Southern Electric Power Distribution plc	Accept	Accept	General Objective 1, as the distributors would work in a coordinated manner for the benefit of those customers who would prefer to operate combined UMS inventories. General Objective 2, as the CP would remove a perceived barrier to competition in distribution through providing an optional simplified approach to reporting and charging for EDNO UMS connections.	N/A
Scottish Hydro Electric Power Distribution plc	Accept	Accept		
Eastern Power Networks	Accept	Accept	Objective 1 It introduces efficiency between the EDNO and DNO.  Objective 2 It simplifies arrangements for customers and thereby removes a potential barrier.	We couldn't find reference to the outcome of the Working Group's engagement with Elexon regarding consistency of the final legal text with the BSC etc.
London Power Networks	Accept	Accept		
South Eastern Power Networks	Accept	Accept		

Western Power Distribution East Midlands	Accept	Accept	We feel that general objectives 1 and 2 are better facilitated by this change.	No comments provided.
Western Power Distribution West Midlands	Accept	Accept		
Western Power Distribution South West	Accept	Accept		
Western Power Distribution South Wales	Accept	Accept		

			<ol style="list-style-type: none"> <li>1 The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks – <i>Reason - It will encourage customers to declare their unmetered connections correctly and result in unmetered energy consumption to be more accurate.</i></li> <li>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 <i>Reasons i) Customers will be able to trade their electricity consumption using existing MPANs, which are subject to existing supply contracts. Ensuring they will not be burdened with additional costs for trading adopted IDNO connections separately. ii) Because the change will promote more accurate declaration of assets by customers, system losses will</i></li> </ol>	
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			<i>reduce and settlements will be more accurate.</i>	
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IDNO PARTIES				
Energetics Electricity Ltd	Accept	Accept	DCUSA General Objective 1 – improved co-ordination between DNO and EDNO can only benefit unmetered customers. DCUSA General Objective 2 – the CP can simplify arrangements for the UMS Customer, and removes a potential barrier for EDNOs competing for new connections.	No comments provided.
ESP Electricity Ltd	Accept	Accept	The implementation of the CP will allow UMS Customers to adopt IDNO UMS inventories without the negative impact of additional DUoS charges. The increased charges are a result of the requirement to have separate IDNO MPAN(s) to that of the Customer's existing DNO UMS MPAN. Therefore General Objective 2 is better facilitated by the CP.	ESP Electricity welcomes the progression of the CP by the Working Group, in developing a solution to the long-standing issue in both an efficient and timely manner.
Peel Electricity Networks Limited	Accept	Accept	Objective 1 The development, maintenance and operation by the DNO Parties and	No comments provided.

			<p>IDNO Parties of efficient, co-ordinated, and economical Distribution Networks Objective 2</p> <p>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>	
The Electricity Network Company	Accept	Accept	<p>We agree with the impacts on the DCUSA objectives as identified in the change report insofar as that General Objective 1 and General Objective 2 are better facilitated by this change.</p> <p>The process that this change proposal codifies will increase the co-ordination between the DNO and embedded network operator. We believe this co-ordination will ensure that UMS connections are more effectively administered as customers are given choice regarding the MPAN to which they are assigned and therefore traded.</p> <p>We believe that the adoption of UMS inventories is a significant barrier to competition in the provision of new connections. We do not believe that the choice of connection provider to</p>	<p>We would like to note the success of the trials within the Electricity North West distribution area prior to this change proposal being raised. The process that this change proposal will introduce has already been tested and we believe that this shows how successful it will be when it is spread out across the other DNO regions.</p>

			landowners, developers and connection customers should be restricted or dictated by the way that UMS connections are administered and we believe that this change proposal removes the restrictions that they are currently facing. Therefore, this change proposal better facilitates completion in the distribution of electricity.	
Utility Distribution Networks Ltd	Accept	Accept	General Objective One - The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks General Objective Two - 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	No comments provided.

**SUPPLIER PARTIES**

SSE Energy Supply	Accept	Accept	General Objective 1: The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks	No comments provided.
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DISTRIBUTED GENERATOR PARTIES				
n/a				

GAS SUPPLIER PARTIES				
n/a				