

Part A: Generic

DCUSA Change Proposal (DCP)		At what stage is this document in the process?
<h1>DCP 281 Alternate:</h1> <h2>DCP 281 Alternate - Changes to Schedule 19 – Portfolio Billing</h2> <p><i>Insert date raised</i> 06/12/16</p> <p><i>Proposer Name</i> Peter Waymont</p> <p><i>Company Name</i> South Eastern Power Networks</p> <p><i>Company Category</i> DNO</p>		<p>01 – Change Proposal</p> <p>02 – Consultation</p> <p>03 – Change Report</p> <p>04 – Change Declaration</p>
<p>Purpose of Change Proposal: This Change Proposal seeks to ensure that HH Portfolio data is reported to DNOs in a consistent manner by all embedded LDSOs and to define how revised data must be reported.</p> <p><i>Alternate to DCP 281</i></p>		
	The DCUSA Panel determined that DCP 281 be treated as a Part 2 Matter. As an alternate proposal to DCP 281, this change will be treated as a Part 2 Matter.	
	Impacted Parties: DNO, IDNO's, Suppliers	
	Impacted Clauses: Clause 3.2, 3.3, 3.4	

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8	Implementation	Proposer: Peter Waymont										
9	Recommendations	6										
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Indicative Timeline												
<p>The Secretariat recommends the following timetable:</p> <table border="1"> <tbody> <tr> <td>Change Report Approved by Panel</td> <td>21 December 2016</td> </tr> <tr> <td>Change Report issued for Voting</td> <td>03 January 2016</td> </tr> <tr> <td>Party Voting Closes</td> <td>24 January 2017</td> </tr> <tr> <td>Change Declaration Issued to Parties</td> <td>25 January 2017</td> </tr> <tr> <td>Proposed Implementation Date</td> <td>01 April 2017</td> </tr> </tbody> </table>			Change Report Approved by Panel	21 December 2016	Change Report issued for Voting	03 January 2016	Party Voting Closes	24 January 2017	Change Declaration Issued to Parties	25 January 2017	Proposed Implementation Date	01 April 2017
Change Report Approved by Panel	21 December 2016											
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Proposed Implementation Date	01 April 2017											

1 Summary

What?

The purpose is the same as DCP281 except that the invoice data provided by the EDNO must include a list of all invoiced MPANs (suggest within one cell per invoice in the template).

References to including a listing of all MPANs invoiced (not just lead MPANs) added to the DCP281 text and the reporting template.

Why?

Because the MPAN list is required to validate that all data has been received for multi-MPAN sites but the DCP281 Working Group has decided by majority vote that it is not needed.

The EDNO provides a list of all HH MPANs to accompany the billing data for validation purposes.

If two or more MPANs are combined onto one invoice and then the invoice data provided by the EDNO only quotes a "lead" MPAN, then the DNO cannot validate that it has received all relevant billing data as one or more HH MPANs will not be included in the billing report under the Working Group's proposed text for DCP281.

The DNO cannot know from the data received whether or not he has received all relevant data.

For example if there are 5 MPANs on a site, as proposed by the DCP281 Working Group, the EDNO will only report one MPAN as the “lead” MPANs in its billing data. If for some reason only one of those MPANs changes supplier (as can happen) the EDNO will suddenly start reporting two “lead” MPANs as it will raise two separate invoices (one for each supplier). So what is a “lead” MPAN? As a DNO we wish to know that we have invoiced correctly and completely, for all relevant MPANs. If the EDNO is only reporting a fraction of the relevant MPANs as having been billed then we cannot know this. The DCP281 Working Group proposal takes away existing financial controls. Although it allows for an “MPAN Count” per invoice, this may not be sufficient to undertake any reconciliation in the event of a discrepancy between the billing data and the HH MPAN report data.

How?

Amend the reporting template and the Working Group proposed changes to Clause 3.3 of Schedule 19 such that they refer to providing details of all MPANs on the site being invoiced. It should be noted that DCUSA already provides for this i.e. to retain the DCUSA current wording – “(e) a list of the MPANs covered by the invoice;” albeit that the subparagraph reference letter may change.

2 Governance

Justification for Part 1 and Part 2 Matter

Requested Next Steps

This Change Proposal should:

- Be treated as a Part 2 Matter
- Be treated as a Standard Change
- Proceed to Change Report/Working Group

3 Why Change?

Schedule 19 (Portfolio Billing) states that ‘The EDNO shall provide a report to the DNO Party, on or before the 15th day of each month’ including ‘any adjustments to data previously reported.’

With increasing numbers of IDNOs we are seeing increasing permutations of providing the data, particularly for credit/rebill situations.

This change seeks to introduce a standard approach for submission of HH Portfolio data and provide clarity of how revised data is submitted to the DNO.

The proposed change will introduce further clarity within the legal text to define the information that is required to be sent to the DNOs.

We believe that that the proposed change to Schedule 19 would improve the current process for submitting HH Portfolio data by introducing a standard approach which benefits all parties in managing this work.

Part B: Code Specific Details

4 Solution and Legal Text

The recommendation is that a template to be introduced as an appendix within Schedule 19, which will be used by IDNOs to provide HH Portfolio data to DNOs. In addition to this change it is proposed that the legal text is updated within clause 3.2 to provide clarity of how revised data is submitted to the DNO.

We propose that the report provided by IDNOs contains any rebilling data, shown as a line giving credit values against the original invoice data and another line giving the new invoice data, which can then be processed at the same time under the DCUSA rules.

The template illustrates how we would expect to receive the data with any rebilling provided in the same report as the HH Specific Portfolio data to avoid any impact in terms of processing the data.

LDSOs should be mandated to all use the same template and provide zero values if any item is not billed for a particular customer.

Alternate Specific

Amend the reporting template and the Working Group proposed changes to Clause 3.3 of Schedule 19 such that they refer to providing details of all MPANs on the site being invoiced i.e. to retain the current wording – “(e)a list of the MPANs covered by the invoice;” albeit that the subparagraph reference letter may change.

5 Code Specific Matters

Reference Documents

n/a.

6 Relevant Objectives

DCUSA Charging Objectives Please tick the relevant boxes. [See Guidance Note 10]	Identified impact
<input type="checkbox"/> 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	Positive/Negative/None

<input type="checkbox"/> 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)	Positive/Negative/None
<input type="checkbox"/> 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	
<input type="checkbox"/> 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	Positive/Negative/None
<input type="checkbox"/> 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.	Positive/Negative/None
DCUSA General Objectives Please tick the relevant boxes. (See Guidance Note 9)	Identified impact
<input type="checkbox"/> 1 The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks	Positive/Negative/None
<input 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	Positive/Negative/None
<input type="checkbox"/> 3 The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences	Positive/Negative/None
<input checked="" type="checkbox"/> 4 The promotion of efficiency in the implementation and administration of the DCUSA	Positive/Negative/None
<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.	Positive/Negative/None
DCUSA General Objective 4 will be better facilitated as the introduction of this change will provide a clear defined method to provide HH Portfolio data to the DNO.	Positive

7 Impacts & Other Considerations

No cross code impact has been determined as part of this change.

Does this Change Proposal impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

n/a

Does this Change Proposal Impact Other Codes?

Please tick the relevant boxes and provide any supporting information. [\[See Guidance Note 6\]](#)

- BSC
- CUSC
- Grid Code
- MRA
- SEC
- Other
- None

Consideration of Wider Industry Impacts

DCP 281 and this proposed alternate solution have been discussed at the DCP 281 Working Group. All meeting minutes and papers are publically available on the DCUSA website (www.dcusa.co.uk).

Confidentiality

This CP is not confidential.

8 Implementation

This change proposal should be implemented on the 01 April 2017.

Proposed Implementation Date

01 April 2017

9 Recommendations

The Code Administrator will provide a summary of any recommendations/determinations provided by the Panel in considering the initial Change Proposal. This will form part of a Final Change Report.

Part C: Guidance Notes for Completing the Form

Ref	Section	Guidance
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<p>1</p>	<p>Attachments</p>	<p>Append any proposed legal text or supporting documentation in order to better support / explain the CP.</p>
<p>2</p>	<p>Governance</p>	<p>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.</p> <p>Part 1 Matter</p> <p>A change Proposal is considered a Part 1 Matter if it satisfies one or more of the following criteria:</p> <p>a) it is likely to have a significant impact on the interests of electricity consumers;</p> <p>b) it is likely to have a significant impact on competition in one or more of:</p> <ul style="list-style-type: none"> i. the generation of electricity; ii. the distribution of electricity; iii. the supply of electricity; and iv. any commercial activities connected with the generation, distribution or supply of electricity; <p>c) it is likely to discriminate in its effects between one Party (or class of Parties) and another Party (or class of Parties);</p> <ul style="list-style-type: none"> i. it is directly related to the safety or security of the Distribution Network; and ii. it concerns the governance or the change control arrangements applying to the DCUSA; and iii. it has been raised by the Authority or a DNO/IDNO Party pursuant to Clause 10.2.5, and/or the Authority has made one or more directions in relation to it in accordance with Clause 11.9A. <p>Part 2 Matter</p> <p>A CP is considered a Part 2 Matter if it is proposing to change any actual or potential provisions of the DCUSA which does not satisfy one or more of the criteria set out above.</p>
<p>3</p>	<p>Related Change Proposals</p>	<p>Indicate if the CP is related to or impacts any CP already in the DCUSA or other industry change process.</p>

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.</p> <p>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	<p>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 into consideration the minimum notice periods for publishing tariffs. These are:</p> <ul style="list-style-type: none"> • 15 months, for DNOs acting within their Distribution Services Areas; or • 14 months, for IDNOs and DNOs acting outside their Distribution Services Area. <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 in future tariffs.</p> <p>Contact the DCUSA helpdesk for any further information on the releases dcusa@electralink.co.uk.</p>
6	Impacts & Other Considerations	<p>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.</p>
7	Environmental Impact	<p>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.</p>
8	Confidentiality	<p>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</p>
9	DCUSA General Objectives	<p>Indicate which of the DCUSA Objectives will be better facilitated by the Change Proposal.</p>
10	Detailed Rationale for DCUSA Objectives	<p>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.</p>

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.
12	Defining 'Material' for Charging Methodology Changes	In respect of proposals to vary one or more of the Charging Methodologies, such proposals shall be deemed to be "material" if they might reasonably be expected to have a significant impact on the tariffs calculated under one or more of the methodologies.