

Company	Confidential/ Anonymous	1. Do you understand the intent of the DCP 281?
Electricity North West	Non-confidential	Yes.
ESP Electricity Ltd	Non-confidential	Yes, we understand the intent of DCP 281.
Northern Powergrid for the Northeast and Yorkshire Licence areas	Non-confidential	Yes.
Scottish Power Energy Networks	Non-confidential	Yes
South Eastern Power Networks	Non-confidential	Yes. This change will provide a clear approach to reporting of Half Hourly Portfolio data to the DNOs and ensures that all credit and rebilling is captured using a clear method to do so.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Yes
The Electricity Network Company	Non-confidential	Yes

Company	Confidential/ Anonymous	2. Are you supportive of the principles of the DCP 281?
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Electricity North West	Non-confidential	Yes.
ESP Electricity Ltd	Non-confidential	We are supportive of the principles that underpin the CP.
Northern Powergrid for the Northeast and Yorkshire Licence areas	Non-confidential	Yes.
Scottish Power Energy Networks	Non-confidential	Yes
South Eastern Power Networks	Non-confidential	Yes. We believe with increasing numbers of EDNOs 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
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Yes
The Electricity Network Company	Non-confidential	Yes

Company	Confidential/Anonymous	3. Do you consider that this change should not be designated as a Part 2 matter?
Electricity North West	Non-confidential	No.
ESP Electricity Ltd	Non-confidential	We agree that the CP should remain as a Part 2 matter as designated by the Proposer.

Northern Powergrid for the Northeast and Yorkshire Licence areas	Non-confidential	No. This change should be designated as a Part 2 matter as it does not satisfy the criteria to be classified as a Part 1 matter.
Scottish Power Energy Networks	Non-confidential	No, I think this is a Part 2 matter.
South Eastern Power Networks	Non-confidential	No. This change does not meet with the criteria of a part 1 matter as set out in clause 9.4 of DCUSA.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	No
The Electricity Network Company	Non-confidential	Yes

Company	Confidential/ Anonymous	4. Would you rather include three (red or black, amber or yellow, green) or five (red, amber, black, yellow, green) columns for the block units? Please provide your rationale inclusive of any financial, resource or system impact or restriction.
Electricity North West	Non-confidential	We would prefer to retain 3 columns for the unit rates as this matches our existing bill calculation template. It is also a simpler approach with less room for error - for example data is less likely to be placed in the wrong column if there are only 3 options rather than 5.
ESP Electricity Ltd	Non-confidential	We believe three columns is the better option. Reporting on five columns instead of three is an 'additional' change to the core intent of introducing consistency in to the current format report format. This could potentially introduce additional impact on parties. Reporting 5 columns would have system impacts for ESPE and associated development costs (not yet known).
Northern Powergrid for the Northeast and Yorkshire Licence areas	Non-confidential	We would prefer three columns for the block units as this matches the current functionality within our existing billing system. Moving to five columns would result in additional costs in the region of £3k to £11k for no real benefit.

Scottish Power Energy Networks	Non-confidential	Three columns. This layout has less risk for both the IDNO and the DNO, since there are only 3 columns to populate. There is more chance of human error when having to decide between 5 columns. Billing applications are set-up to send and receive data in 3 columns. (Please note the first unit column can also be used for Super-Red, which is noted in the template, but not in this question.). There would either be a financial or resource impact if 5 columns were voted for.
South Eastern Power Networks	Non-confidential	We believe that for clarity and completeness that 5 columns for red, amber, black, yellow and green should be included within the template. We do not see any financial, resource or system impact.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Three columns are preferable in our view. The template used to import data into our billing system currently uses three, so would require minimal changes.
The Electricity Network Company	Non-confidential	Our billing system currently provides the data in five columns for the block units. We have been advised that changing the column structure to using three columns will require changes to the structure of the database tables, objects classes using the tables, stored procedures, output functionality and updates to historical data to line up with the new format. This work has been costed at c£15k and will take several months to implement. In view of the cost and resource issues we would rather include five columns for the block units as is currently the situation. We also do not believe that changing to three columns has any benefit.

Company	Confidential/ Anonymous	5. Do you agree that where an invoice does not include data that would fall into a given column of the report, a zero value should be provided? Please provide your rationale inclusive of any financial, resource or system impact or restriction.
Electricity North West	Non-confidential	Yes, we agree that a zero should be inserted as this provides confirmation that none of the columns have been overlooked and removes the potential for errors to occur.

ESP Electricity Ltd	Non-confidential	We believe a zero value should be provided as leaving a cell empty is ambiguous. It could be perceived as zero consumption but also that the consumption value is actually missing from the report. Reporting zero values removes any ambiguity. ESPE would have no financial, resource, system impact or restrictions.
Northern Powergrid for the Northeast and Yorkshire Licence areas	Non-confidential	We agree that when an invoice does not include data that would fall into a given column then a zero value should be used. This would give clarification that all data has been provided where necessary, whereas if fields are left blank then there could be an assumption that data has been 'accidentally' omitted. Using zeroes would result in having no system changes or costs to incur as our system can cope with the data being issued in this way.
Scottish Power Energy Networks	Non-confidential	Yes. The Standing Charge column should always be populated with the number of billing days in the period, therefore never a zero. Entering a zero in every other column on the template, confirms that the sender is sending a zero value and not that he has forgotten to populate a column, which could be the case if the column is left blank. To proceed with populating a zero value in all columns apart from the Standing Charge column, then Question 6 needs to be answered Yes, that in the instance of a credit bill, two separate lines should be shown as detailed in Question 6.
South Eastern Power Networks	Non-confidential	Yes, we agree that zero values should be provided where there is no data to report. This will ensure a consistent approach in both the delivery and processing of the data.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Yes. If no data is entered where there should be a zero it could cause validation failures.
The Electricity Network Company	Non-confidential	Yes

Company	Confidential/ Anonymous	6. Do you agree that in the instance of a credit rebill, two separate lines should be shown: one being the negative value of the amount being credited and the other being the new invoice as per the example in Appendix 1 of the Change Proposal? Please provide your rationale inclusive of any financial, resource or system impact or restriction.
Electricity North West	Non-confidential	<p>Yes, we agree with the proposal as in our experience this is the approach already taken by the majority of EDNOs and it works well. The billing process is already manually intensive and we have found this to be the most straightforward and efficient way of carrying out any re-billing that is required.</p> <p>In our experience where a similar approach is not used the processing time increases, on average fourfold.</p>
ESP Electricity Ltd	Non-confidential	<p>ESPE agree that mandating two separate lines for full credit/rebill data would achieve the CP's intent - consistency across the EDNOs. Two separate lines supporting a full credit for the previous invoice and a new line for the latest invoice is also consistent with the Company/User credit/rebill arrangements under 21.2C (Section A).</p>
Northern Powergrid for the Northeast and Yorkshire Licence areas	Non-confidential	<p>We agree that in the instance of a credit & rebill two separate lines should be reported as this gives a clear indication of what is being corrected. We would have no system changes or costs to incur as our system can cope with the data being issued in this way.</p>
Scottish Power Energy Networks	Non-confidential	<p>Yes. This is the normal way that HH DUOS Credits and re-bills are processed. This process is the most simple and should be consistent from all parties.</p>
South Eastern Power Networks	Non-confidential	<p>Yes, we agree that the template which is used by EDNOs to provide HH Portfolio data to DNOs should include a credit row and new debit row in order to provide clarity of prior months' adjustments. We do not see any financial, resource or system impact.</p>

Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	<p>Yes. In our view, we think the principle set out in Section 2A 21.2C should be carried over to Section 2B for consistency of approach. Clause 21.2C states where new data is received a credit and a replacement invoice should both be issued.</p> <p>Some EDNO's currently provide the difference between the invoices rather than a credit line and a new bill line.</p> <p>We believe we should receive a credit line for any rebill request.</p>
The Electricity Network Company	Non-confidential	Yes

Company	Confidential/ Anonymous	7. Do you have a preference whether multiple MPAN(s) or a Lead MPAN for each invoice is reported in the proposed template? Please provide your rationale.
Electricity North West	Non-confidential	We would prefer all MPANs to be listed rather than a lead MPAN as this allows us to match the individual MPANs back to the MPAN Report from ECOES to highlight if any are missing, rather than simply carrying out a check on the overall number of MPANS. .
ESP Electricity Ltd	Non-confidential	Currently, ESPE do not have related MPANs and we are unsure if we will in the future. Consequently, our system doesn't support related MPANs either so changes would be required including how related MPANs would be reported.
Northern Powergrid for the Northeast and Yorkshire Licence areas	Non-confidential	Our preference is to use the 'lead MPAN' for an invoice when a site contains multiple MPANs. Our system currently displays one MPAN per invoice for HH IDNO billing. In moving to displaying all MPANs per site on the invoice, would result in a change to the current software with associated costs being in the region of £11k.

Scottish Power Energy Networks	Non-confidential	No preference, since SPEN do not have multiple MPAN sites.
South Eastern Power Networks	Non-confidential	The multiple MPANS should be shown grouped in one cell within the template in order to maintain a standard approach for reporting the data. If this is the case, then we are happy with that approach. The DCUSA has a requirement to provide a HH MPAN report (Clause 4 of Schedule 19). Therefore, if the invoice does not list all MPANS then the intended control is missing.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Lead MPAN – providing all data is presented against this MPAN.
The Electricity Network Company	Non-confidential	We do not currently have any instances of this arrangement on our network.

Company	Confidential/ Anonymous	8. Do you have any comments on the proposed legal text?
Electricity North West	Non-confidential	The unit kVA is incorrectly written.
ESP Electricity Ltd	Non-confidential	In paragraph 3.2, the word 'should' could be replaced with 'shall'. The text is also introducing 5 columns instead of 3 (contrary to question 4).
Northern Powergrid for the Northeast and Yorkshire Licence areas	Non-confidential	<p>There is an inconsistency in paragraph 3.2, instead of using the acronym 'IDNO', 'EDNO' should be used as per the rest of the schedule.</p> <p>In paragraph 3.3, point g, please can the (s) from month(s) be removed as this gives a clear indication that the invoice only covers one month rather than inferring it can cover multiple months. In addition to this please can the year be included in order to remove any potential ambiguity.</p>

Scottish Power Energy Networks	Non-confidential	I think we should change the wording in 3.3 (g) – ‘the month(s) of consumption covered by the invoice’. This wording suggests that column (g) can be for 1 month or more than 1 month, it should only ever be for a maximum of 1 month. It would be better to say – the month of consumption covered by the invoice. If the vote is for only 3 unit columns in question 4, then the wording needs to be amended for (j) to (m)
South Eastern Power Networks	Non-confidential	The revised legal text will require an update as per our previous comments within this response, including references to IDNO to be updated to EDNO to ensure consistency throughout.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	In paragraph 3.3 (g) we would wish to see the text cover both the month and year of consumption to ensure absolute clarity of which billing period is referred to.
The Electricity Network Company	Non-confidential	No

Company	Confidential/ Anonymous	9. Do you have any comments on the proposed template?
Electricity North West	Non-confidential	No, other than to confirm our preference is to retain 3 columns for the reporting of consumption data (question 4.)
ESP Electricity Ltd	Non-confidential	As in question 8, the template introduces 5 columns. Regarding the Appendix itself, an actual example of how a credit/rebill would be reported would improve the usefulness of the Appendix. This is similar to the approach in Elexon’s Market Domain Data Hand Book.
Northern Powergrid for the Northeast and Yorkshire Licence areas	Non-confidential	No.

Scottish Power Energy Networks	Non-confidential	No
South Eastern Power Networks	Non-confidential	An amendment to the template is required to replace IDNO with EDNO. I have attached a copy for reference.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Template 3b is our preference.
The Electricity Network Company	Non-confidential	We support the column format on current template with the additional lines proposed for credits and rebills. We do not support the alternative template with three time of day columns (see 4 above)

Company	Confidential/ Anonymous	10. Can you please provide a lead time for the implementation of this change?
Electricity North West	Non-confidential	If we retain the 3 columns mentioned above there is no impact on us and if we moved to 5 columns we would need to make some changes manually, but the impact would be minimal so we could implement almost immediately.
ESP Electricity Ltd	Non-confidential	Due to the impact on current systems, we would require 12 weeks following approval in order to implement the CP.
Northern Powergrid for the Northeast and Yorkshire Licence areas	Non-confidential	If our preferred changes are implemented then our system would not be affected by the CP therefore the lead time would be as per the timetable for the next DCUSA release. If we had to incorporate any system changes then we would need a lead time of a minimum of 6 months to incorporate required changes to the billing system mentioned in the CP.
Scottish Power Energy Networks	Non-confidential	There would only be a Lead Team if the vote is for 5 columns, as the billing application is designed to receive 3 columns, which are all the columns which are required for DUOS billing.

South Eastern Power Networks	Non-confidential	This will depend on the outcome, but we would be able to implement changes within 6 weeks.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	This would depend on which template is used. In our case, 3b requires minimal changes and could therefore be very quickly implemented.
The Electricity Network Company	Non-confidential	The credit/rebill functionality within our billing system will be enhanced shortly we would prefer an implementation date of April 2017 to ensure all changes have been tested and deployed.

Company	Confidential/ Anonymous	<p>11. Which DCUSA General Objectives does the CP better facilitate? Please provide supporting comments.</p> <ol style="list-style-type: none"> 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.
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Electricity North West	Non-confidential	We believe General Objectives 3 and 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.
ESP Electricity Ltd	Non-confidential	ESPE agree with the Proposer that DCUSA General Objective 4 would be better facilitated by the introduction of this CP.
Northern Powergrid for the Northeast and Yorkshire Licence areas	Non-confidential	Objective 4 better facilitates this CP as all IDNOs will have to adhere to a set template when providing HH portfolio data to DNOs, thus promoting efficiencies.
Scottish Power Energy Networks	Non-confidential	4.
South Eastern Power Networks	Non-confidential	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.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	In our view, General Objective 4 is most clearly better facilitated by this CP, as significant improvements in the efficiency of billing arrangements between distributors would be achieved.
The Electricity Network Company	Non-confidential	We believe that the implementation of this change proposal better facilitates General Objective and would echo the reasoning of the working group in the consultation

Company	Confidential/Anonymous	12. Are you aware of any wider industry developments that may impact upon or be impacted by this CP?
Electricity North West	Non-confidential	The Working Group may need to be mindful of the growth for nested networks and the potential impact this may have on this schedule.

ESP Electricity Ltd	Non-confidential	None at this time.
Northern Powergrid for the Northeast and Yorkshire Licence areas	Non-confidential	No.
Scottish Power Energy Networks	Non-confidential	No
South Eastern Power Networks	Non-confidential	No
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	No
The Electricity Network Company	Non-confidential	No

Company	Confidential/ Anonymous	13. Are there any alternative solutions or matters that should be considered by the Working Group?
Electricity North West	Non-confidential	No
ESP Electricity Ltd	Non-confidential	None at this time
Northern Powergrid for the Northeast and Yorkshire Licence areas	Non-confidential	No
Scottish Power Energy Networks	Non-confidential	No

South Eastern Power Networks	Non-confidential	No
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	NA
The Electricity Network Company	Non-confidential	No

Company	Confidential/ Anonymous	14. It is proposed that DCP 281 be implemented in the next DCUSA Release following Approval. Do you agree with the date that DCP 281 is to be implemented into the DCUSA?
Electricity North West	Non-confidential	Yes
ESP Electricity Ltd	Non-confidential	No we do not agree with the implementation date of 'next release following consent'. The Working Group's Work Plan has the Change Declaration issued on 14 March and implementation listed as 29 June 2017. If approved by Parties, the 1 April DCUSA Release could be the first release. Due to the system changes required to support the revised portfolio billing template under this scenario, ESPE would not be able to meet a 1 April deadline. The implementation should remain as listed in the current Work Plan as the 29th of June 2017.
Northern Powergrid for the Northeast and Yorkshire Licence areas	Non-confidential	Yes. Please see our response to question 10.
Scottish Power Energy Networks	Non-confidential	Yes if the vote is for 3 columns in question 4. As stated above there would be a lead time and a financial cost to change the billing application to receive 5 columns.

South Eastern Power Networks	Non-confidential	Yes
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Yes
The Electricity Network Company	Non-confidential	See our answer to question 10. We would like a lead time to be given from the acceptance on this change proposal to its implementation to fully test the credit and rebill functionality of our billing system complies with the requirements of this change.