

## 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](mailto: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

PART D – Guidance Notes

### PART A - MANDATORY FOR ALL CHANGE PROPOSALS

Document Control	
CP Status	Standard
CP Number	DCP 276
Date of submission	4 July 2016
Attachments	Attachment 1 – Proposed Legal Text
Originator Details	
Company Name	Southern Electric Power Distribution plc
Originator Name	Angus Rae
Category	DNO
Email Address	angus.rae@sse.com
Phone Number	01738 456308
Change Proposal Details	
CP Title	Amendments to CDCM LV Substation Tariff 'Note 5'
Impacted parties	DNOs; IDNOs and Suppliers
Impacted Clause(s)	Schedule 16, paragraph 144, Note 5
Part 1 / Part 2 Matter	Part 1
Provide your rationale why you consider this change is a Part 1 or Part 2 Matter	This Proposal is likely to have a significant impact on the interests of electricity consumers, specifically those consumers who may qualify to transfer from a Low Voltage Network DUoS tariff to a Low Voltage Substation DUoS tariff. This Proposal, which results from an Ofgem determination, seeks to clarify application arrangements for the Low Voltage Substation tariff and these may have a material financial impact for affected consumers.
Related Change Proposals	N/A
Change Proposal Intent	
<p>This Change Proposal intends to amend the text of Note 5 to Paragraph 144 of Schedule 16 (the CDCM), to:</p> <ol style="list-style-type: none"><li>1. remove the customer or supplier evidence terms in Note 5, to better reflect responsibilities for allocation of a customer's DUoS tariff; and</li><li>2. require LV Substation tariff charges to be applied from when a customer became eligible for this tariff, subject to limitations legislation.</li></ol>	
Business Justification and Market Benefits	

The existing text of Note 5 to Paragraph 144 of Schedule 16 (the CDCM) sets out a process under which customers may transfer from a Low Voltage Network DUoS tariff to a Low Voltage Substation DUoS tariff. This process is unique to this specific tariff change. Determination RBA/TR/A/DET/191 concluded that the current text of this Note specifies that the new tariff applies on a forward basis, following confirmation of eligibility by the DNO Party, and places no obligation to backdate charges to the date from which a customer met the qualification criteria associated with the tariff.

This Proposal seeks to implement text changes which amend the application arrangements for the Low Voltage Substation tariff and which place an obligation to backdate the tariff charges. It is expected that implementation of the Proposal would result in clearer and more consistent change arrangements in relation to this particular tariff, which would therefore be beneficial to customers.

#### Proposed Solution and Draft Legal Text

See Attachment 1

#### Proposed Implementation Date

Next DCUSA release following approval

#### Impact on Other Codes

Please tick the relevant boxes and provide any supporting information.

BSC	<input type="checkbox"/>
CUSC	<input type="checkbox"/>
Grid Code	<input type="checkbox"/>
MRA	<input type="checkbox"/>
SEC	<input type="checkbox"/>
Other	<input type="checkbox"/>
None	<input checked="" type="checkbox"/>

If other please specify

#### Consideration of Wider Industry Impacts

No impacts identified

#### Environmental Impact

No impacts identified

#### Confidentiality

Non-confidential

### PART B – MANDATORY FOR NON CHARGING METHODOLOGIES CHANGE PROPOSALS

## DCUSA Objectives

### 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

Not applicable – see below

## PART C – MANDATORY FOR CHARGING METHODOLOGIES CHANGE PROPOSALS

### DCUSA Charging Objectives

#### 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**

##### Charging Objectives:

This Proposal better facilitates Charging Objective 4 as it seeks to implement outcomes of Ofgem determination RBA/TR/A/DET/191, in particular paragraph 8.5.

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

This Proposal is to be tabled at the Methodology Issues Group meeting dated 7 July 2016.

### **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](http://www.dcusa.co.uk)

Ref	Data Field	Guidance
<b>1</b>	<b>Attachments</b>	Append any proposed legal text or supporting documentation in order to better support / explain the CP.
<b>2</b>	<b>Part 1 / Part 2 Matter</b>	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.
<b>3</b>	<b>Related Change Proposals</b>	Indicate if the CP is related to or impacts any CP already in the DCUSA or other industry change process.
<b>4</b>	<b>Proposed Solution and Draft Legal Text</b>	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>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>
<b>5</b>	<b>Proposed Implementation Date</b>	<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 in to consideration the deadlines for publishing indicative tariffs.</p> <ul style="list-style-type: none"> <li>• Submission of Company indicative tariffs is 31 December of each year.</li> <li>• Final tariffs are published on 1 April of each year.</li> </ul> <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 <a href="mailto:dcusa@electralink.co.uk">dcusa@electralink.co.uk</a>.</p>
<b>6</b>	<b>Consideration of Wider Industry Impacts</b>	<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>
<b>7</b>	<b>Environmental Impact</b>	<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 <a href="#">Ofgem Guidance</a>.</p>
<b>8</b>	<b>Confidentiality</b>	<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>
<b>9</b>	<b>DCUSA General Objectives</b>	<p>Indicate which of the DCUSA Objectives will be better facilitated by the Change Proposal.</p>
<b>10</b>	<b>Detailed Rationale for DCUSA Objectives</b>	<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>
<b>11</b>	<b>DCUSA Charging Objectives</b>	<p>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.</p>

