

DCP 270 Consultation Responses – Collated Comments

Company	Confidential/ Anonymous	1. Do you understand the intent of the DCP 270?
Electricity North West	Non-confidential	Yes we understand the intent.
Anonymous	Anonymous	Yes. To remove the HV, LV and LV Sub Medium Non Domestic Tariffs from the CDCM
Northern Powergrid Northeast and Yorkshire	Non-confidential	Yes
RWE npower	Non-confidential	Yes – the intent of DCP 270 is understood.
Scottish Power Energy Retail Limited	Non-confidential	Yes
SEPD & SHEPD	Non-confidential	Yes
SP Distribution / SP Manweb	Non-confidential	Yes we understand the intent of DCP 270
SSE Energy Supply	Non-confidential	Yes
the Electricity Network Company Limited	Non-confidential	Yes
UK Power Networks	Non-confidential	Yes
Western Power Distribution	Non-confidential	Yes

Company	Confidential/ Anonymous	2. Are you supportive of the principles of the DCP 270?
Electricity North West	Non-confidential	Yes we are supportive of the principles.
Anonymous	Anonymous	In principle, yes, but it's not clear what rules will ensure that all customers will migrate to the tariffs proposed.
Northern Powergrid Northeast and Yorkshire	Non-confidential	Yes
RWE npower	Non-confidential	No. Whilst we understand the intent of the change, we believe that the removal of the tariff will lead to further issues (please see Q4).
Scottish Power Energy Retail Limited	Non-confidential	Yes
SEPD & SHEPD	Non-confidential	Yes
SP Distribution / SP Manweb	Non-confidential	Yes we are supportive of the principles of DCP 270
SSE Energy Supply	Non-confidential	Yes
the Electricity Network Company Limited	Non-confidential	Yes, to an extent
UK Power Networks	Non-confidential	Yes

Western Power Distribution	Non-confidential	Yes
----------------------------	------------------	-----

Company	Confidential/ Anonymous	3. Do you have any comments on the proposed legal text?
Electricity North West	Non-confidential	Regarding clause 84 – it seems strange to remove all the tariffs from the list this refers to, but to still leave the paragraph in. Why not remove the entire paragraph?
Anonymous	Anonymous	No
Northern Powergrid Northeast and Yorkshire	Non-confidential	None
RWE npower	Non-confidential	No comments.
Scottish Power Energy Retail Limited	Non-confidential	No
SEPD & SHEPD	Non-confidential	DCUSA Schedule 16, Clause 84. If the 3 tariffs are deleted should the entire clause also be deleted and replaced with “No Longer Used”?
SP Distribution / SP Manweb	Non-confidential	No comments
SSE Energy Supply	Non-confidential	No
the Electricity Network Company Limited	Non-confidential	No
UK Power Networks	Non-confidential	No, we believe that the proposed changes to the legal text are appropriate.

Western Power Distribution	Non-confidential	No
----------------------------	------------------	----

Company	Confidential/ Anonymous	4. Do you agree that the ' <i>HV Medium Non Domestic</i> ' tariff should be removed from the CDCM? Please provide your rationale.
Electricity North West	Non-confidential	<p>We agree that the HV Medium Non Domestic tariff should be removed from the CDCM. The existing sites should already have HH capability as the analysis shows them as having CT metering. As they are all identified as Profile Class (PC) 5-8, they should all have had advanced meters fitted (by March 2014 as required by supplier licence). However, there may still be some customers on the legacy meters.</p> <p>It is expected that during 2015-17 they will have migrated to HH trading.</p>
Anonymous	Anonymous	<p>Not without a mandate that means customers have to make the necessary transition to one of the remaining tariffs. P272 implies customers will make the transition but it's not clear what will happen to customers with NHH meters installed pre-April 2014. If they don't make the transition, won't they still require the old tariff?</p>
Northern Powergrid Northeast and Yorkshire	Non-confidential	<p>Yes - The tariff for HV connected NHH traded customers has been preserved for a number of years. All HV connected customers will be CT metered, and PC 5-8 customers should have HH capable metering installed, therefore should be migrated to the HH tariff.</p> <p>Due to the relatively small number of these sites we believe they should be migrated prior to April 2017.</p>
RWE npower	Non-confidential	<p>Not agreed. We do not agree that the tariff should be removed because there seems to be an assumption within the proposal that all meters which fall into this category will be HH capable by the time of the change.</p> <p>If there is no HH capable meter installed, DCP 270 requires Suppliers to change the tariff to a HH set-up on a temporary measure until the meter is changed to HH.</p>

		However, there is no guarantee that all meters which fall within the HV Medium Non Domestic tariff will be re-configured or replaced as Half Hourly metering in time for the proposed implementation date (April 2018). There is the further risk of 'churn' of NHH HV meters from other suppliers who fail to change the customer's meter to Half Hourly metering capable or make the switch to HH metering.
Scottish Power Energy Retail Limited	Non-confidential	Scottish Power Support the removal of HV Medium Non Domestic tariff from the CDCM. We agree that the number of affected sites is low and will be migrated to Half Hourly therefore the tariff is no longer required.
SEPD & SHEPD	Non-confidential	Yes. As a preserved tariff the customer numbers should have been either static or reducing in recent years. Complying with DCP179/P272 makes the tariff redundant as all customers should be migrated by April 2017; so the tariff should be deleted from CDCM.
SP Distribution / SP Manweb	Non-confidential	Yes we agree that the 'HV Medium Non Domestic' tariff should be removed from the CDCM
SSE Energy Supply	Non-confidential	Yes
the Electricity Network Company Limited	Non-confidential	We do not agree that the <i>HV Medium Non-Domestic</i> Tariff should be removed from the CDCM until it is certain that all customers have been migrated to another tariff. It is our belief that whilst there are still customers on the <i>HV Medium Non-Domestic</i> tariff, it should continue to be preserved. Customers should not be moved to another tariff without their consent, and upon giving their consent, a capacity should be agreed. This point is expanded upon further in our response to question 7.
UK Power Networks	Non-confidential	Yes, this tariff was included within the CDCM as a preserved tariff in a limited number of DNO regions only. We believe that by April 2018 sufficient time would have been provided for Suppliers to make alternative arrangements for these customers.
Western Power Distribution	Non-confidential	Yes, the HV Medium Non Domestic Tariff should be removed from the CDCM because it will no longer be used by DNOs/ Suppliers.

Company	Confidential/ Anonymous	5. Do you agree that the 'LV Medium Non Domestic' and 'LV Sub Medium Non Domestic' tariffs from the CDCM? Please provide your rationale.
Electricity North West	Non-confidential	Yes we agree that these tariffs should also be removed from the CDCM. They are PC5-8 customers and should be migrated to HH trading as soon as possible.
Anonymous	Anonymous	Not without a mandate that means customers have to make the necessary transition to one of the remaining tariffs. P272 implies customers will make the transition but it's not clear what will happen to customers with NHH meters installed pre-April 2014. If they don't make the transition, won't they still require the old tariff?
Northern Powergrid Northeast and Yorkshire	Non-confidential	We believe these tariffs should be removed from the CDCM - Even though there are more LV and LV Sub customers, they will all need to be moved. All these tariffs will become redundant once all PC 5-8 customers are migrated to HH settlement under the P272 'Mandatory Half Hourly Settlement for Profile Classes 5 -8' migration plans. The current timeframe for the migration to be completed is by the end of March 2017.
RWE npower	Non-confidential	Not agreed. For the same reasons outlined in Question 4, we believe that not all metering systems will migrate to HH metering for a variety of reasons (customer, system, or process related). Therefore the existing tariffs need to be made available.
Scottish Power Energy Retail Limited	Non-confidential	On the assumption that the question should read; do we agree that the named tariffs above should be removed from the CDCM our response would be yes. We agree these tariffs will become redundant once all 5 to8 customers are migrated to HH settlement under the P272 'migration plan. Our view is that removing this category from CDCM will not cause any significant issue.
SEPD & SHEPD	Non-confidential	Yes. Again, complying with DCP179/P272 should see all of the customers on these tariffs migrated to other tariffs by April 2017. As PC5-8 will no longer be valid, these tariffs should be removed from the CDCM.

SP Distribution / SP Manweb	Non-confidential	Yes we agree that the 'LV Medium Non Domestic' and 'LV Sub Medium Non Domestic' tariffs should be removed from the CDCM
SSE Energy Supply	Non-confidential	Yes
the Electricity Network Company Limited	Non-confidential	As with question 4, we do not agree that the <i>LV Medium Non Domestic</i> and <i>LV Sub Medium Non Domestic</i> tariffs should be removed from the CDCM until it is certain that all customers have been migrated to another tariff. It is our experience that not all customers which are currently on the <i>LV Medium Non-Domestic</i> tariff will have half hourly capable metering. By moving those customers to the <i>LV Network Non-Domestic Non CT</i> tariff then profiled consumption data would be required to be used for billing purposes. We believe that this may send incorrect pricing signals to customers.
UK Power Networks	Non-confidential	As a result of P272, by the end of March 2017 most customers who would have been registered to these tariffs would have had an AMR meter installed and would have moved onto an alternative tariff. As a result we believe that it is appropriate to remove these tariffs from the CDCM.
Western Power Distribution	Non-confidential	Yes, for the same reason as the previous question the LV and LV Sub Medium Non Domestic Tariffs should be removed from the CDCM because they will no longer be used by DNOs/ Suppliers.

Company	Confidential/ Anonymous	6. Do you agree with the approach proposed for the migration of any remaining customers to the tariffs proposed in section 5 of this consultation? ?
Electricity North West	Non-confidential	Yes, generally we are in agreement with the proposed approach for the migration of any remaining customers. We agree with the prioritisation of the removal of HV Medium Non Domestic tariffs, and believe this could take place from 1st April 2017 onwards. We also agree with the proposed transfer from NHH to HH tariffs proposed.

		We are not certain that there needs to be specific provisions made for exceptional cases where customers have not had the HH metering installed. Those customers subject to exceptional circumstances can be treated in line with the DNO charging statements which should include provision for the treatment of customers with an invalid settlement combination. Specifying treatment of such customers under this change proposal could create confusion or disputes around which is the correct policy to be applied. It is anticipated that the numbers of such customers would be extremely small.
Anonymous	Anonymous	No. Some customers might not be happy with this, particularly if it means they will receive higher tariffs than they might otherwise have received or be exposed to additional charges such as capacity, excess capacity and reactive power etc.
Northern Powergrid Northeast and Yorkshire	Non-confidential	<p>We believe that PC 5-8 HV sites should be prioritised and moved to HH tariffs as they will all have CT's installed and therefore will have a HH capable meter installed.</p> <p>PC 5-8 LV and LVS customers with whole current meters should be moved onto the HH Aggregate 'LV Network Non Domestic Non CT' tariff, but where they are CT metered together with HH capable metering equipment they should move onto the LV HH tariff or the LV Sub HH tariff, depending upon their point of connection.</p>
RWE npower	Non-confidential	<p>Not agreed. If customers do not move to HH metering / settlement, then the DUoS charging should be reflective (even if these are minimal differences). Changing the DUoS tariff should not be a lever to influence consumer behaviour.</p> <p>We would not want to move customers being billed on actual NHH meter readings to a bill on HH estimated data.</p>
Scottish Power Energy Retail Limited	Non-confidential	Yes this approach seems reasonable.
SEPD & SHEPD	Non-confidential	Yes. The proposed approaches seem logical and justifiable.

SP Distribution / SP Manweb	Non-confidential	Yes we agree with the proposed approach for the migration of any remaining customers.
SSE Energy Supply	Non-confidential	Yes
the Electricity Network Company Limited	Non-confidential	We agree with the approach in regards to the tariffs that have been selected for customers to move to, however, we have reservations about moving these customers onto the tariffs by default due to the removal of the existing tariff, as opposed to in agreement with the customer.
UK Power Networks	Non-confidential	We believe that all HV customers would have CTs installed and thus it would seem appropriate that any HV Medium Non Domestic Customers are moved onto the HV HH Metered tariff, these customers should already have an HH capable meters installed. The customers who remain on either LV (or LV Sub) Medium Non Domestic tariffs should move depending upon whether they have CTs installed, if they do they should migrate to the LV (or LV Sub) HH Metered tariff, if they have WC metering installed then the LV Non Domestic Non CT tariff would seem appropriate. Failure to have migrated all customers by the implementation date would see DUoS billing charged as an invalid combination for these MPANs.
Western Power Distribution	Non-confidential	Yes.

Company	Confidential/ Anonymous	7. Do you agree on the approach on assigning a ' <i>default</i> ' capacity value for these customers where they have migrated to a HH tariff where a capacity isn't already agreed? Please provide your rationale.
Electricity North West	Non-confidential	Yes we agree with this approach. This approach is as per P272 which specifies a default capacity of 71kVA for PC5-8 customers in this situation.
Anonymous	Anonymous	Yes, this seems reasonable.

Northern Powergrid Northeast and Yorkshire	Non-confidential	We believe the default capacity should only be used as a last resort. We would rather apply/agree a relevant value and if necessary amend this at the customer's request. Customers now have protection under DCP 248 to agree a backdated value for 12 months from the date of the change of measurement class; therefore applying capacities derived but not agreed is something we consider a more practicable approach than using a default value.
RWE npower	Non-confidential	Clarification required. In principle we acknowledge that where the site has changed to half hourly, and no agreement has been made between the customer and the Distribution Company, there should be a 'default capacity'. Please clarify the working group's assumption of the proposed value.
Scottish Power Energy Retail Limited	Non-confidential	Where all reasonable methods to determine true value have been explored then we would support the default value.
SEPD & SHEPD	Non-confidential	No. This was discussed in the context of DCP179/P272. We think that 71kVA is too high and might disadvantage a number of customers. We are currently using the average of the known kVA for these customer types: 50kVA and 53kVA for our SHEPD and SEPD Areas, respectively.
SP Distribution / SP Manweb	Non-confidential	Yes we agree with default capacity value for those customers where a capacity hasn't already been agreed.
SSE Energy Supply	Non-confidential	Yes
the Electricity Network Company Limited	Non-confidential	We do not agree with the proposed approach of assigning a 'default' capacity value for migrated customers where a capacity has not already been agreed. We note that the proposed capacity value of 71kVA is the maximum import capacity for a 240v three phase supply, fused at 100A with whole current metering and therefore has been chosen as an arbitrary figure. We would be averse to assigning any capacity to each customer by default as there is no guarantee that this capacity is available for use. It would be unfair for customers to incur Use of System charges based on a capacity which is not and has never been available to them and therefore billing each customer based on a default Maximum Import Capacity would mean that customers could incur disproportionate charges for the services they receive. We propose that each customer should be allowed to agree their capacity value before migration. If distributors are unable to agree the capacity with the customer then we believe there are more effective ways of imposing a capacity for billing purposed than by setting a

		default value. On the assumption that the customer has HH capable metering fitted then we believe that suppliers will be able to provide maximum demand values. Maximum demand information could form the basis of calculation to determine the Maximum Import Capacity to be imposed by the distributor.
UK Power Networks	Non-confidential	Where a capacity value has not been agreed then a default will be required, otherwise how will the DNO be able to charge for capacity? We support the use of 71kVA for the likely small numbers of customers this is likely to affect.
Western Power Distribution	Non-confidential	Yes although WPD has written to all our profile class 5 to 8 CT customers notifying them of their deemed capacity. Therefore we expect this list to be small. In doing the analysis for the DCP179 project WPD found that the average Maximum demand for CT customers where agreed capacities had not already existed was 48. Therefore the figure of 71 as stated in the consultation seems a little high.

Company	Confidential/ Anonymous	8. Suppliers - Do you see any issues in supporting the process which might involve changes to the metering equipment and updating the registration details for these MPANs in MPRS in a timely manner?
Electricity North West	Non-confidential	n/a
Anonymous	Anonymous	No.
Northern Powergrid Northeast and Yorkshire	Non-confidential	N/A
RWE npower	Non-confidential	<p>Current industry processes, and our systems, do not support updating registration details of NHH metered MPANs to HH in MPRS when the metering remains NHH at site.</p> <p>Industry cost benefit analysis would be required to determine any benefits of any such change, for relatively low number of sites.</p>

Scottish Power Energy Retail Limited	Non-confidential	No
SEPD & SHEPD	Non-confidential	N/A
SP Distribution / SP Manweb	Non-confidential	N/A
SSE Energy Supply	Non-confidential	No
the Electricity Network Company Limited	Non-confidential	N/A
UK Power Networks	Non-confidential	n/a
Western Power Distribution	Non-confidential	N/A

Company	Confidential/ Anonymous	<p>9. Which DCUSA Charging Objectives does the CP better facilitate? Please provide supporting comments.</p> <ol style="list-style-type: none"> 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.
Electricity North West	Non-confidential	The proposal supports Charging Objective 1, removing preserved tariffs from the charging model would facilitate the efficient discharge of our licence obligations.
Anonymous	Anonymous	No comment
Northern Powergrid Northeast and Yorkshire	Non-confidential	<p>We believe this proposal facilitates Charging Objective 1:</p> <p>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.</p> <p>These tariffs should no longer be required for the period for which DNOs will next set Use of System charges, and it is therefore efficient to remove them from the methodology.</p>

RWE npower	Non-confidential	No comment.
Scottish Power Energy Retail Limited	Non-confidential	Agree with objectives highlighted in the CP
SEPD & SHEPD	Non-confidential	We agree with the Proposer – DCUSA Charging Objective 1 is better met by DCP270.
SP Distribution / SP Manweb	Non-confidential	Charging Objective 1 due to these tariffs no longer being required, it is efficient to remove them from the methodology.
SSE Energy Supply	Non-confidential	4
the Electricity Network Company Limited	Non-confidential	We believe that DCUSA Charging Objective 1 is better facilitated by the implementation of DCP270. This is due to the obligation under licence condition 13A.5(b) whereby the licensee must 'make such modifications of the methodology as are necessary for the purpose of better achieving the Relevant Objectives'. The fifth Relevant Objective (13A.11) is better achieved by the implementation of DCP270. This is because the removal of the <i>HV Medium Non-Domestic</i> tariff would be a reflection of a new development within the licensee's Distribution Business; the development being that there are no longer any customers remaining of the tariff.
UK Power Networks	Non-confidential	Charging Objective 1 is better facilitated by this change. The tariffs being removed from the CDCM will no longer be required as a result of other changes to governance / code arrangements which have already been approved; as a result it is efficient to remove these tariffs from the methodology.
Western Power Distribution	Non-confidential	Charging objectives 3 as it makes the application of the charging methodologies more efficient.

Company	Confidential/ Anonymous	10. It is proposed that DCP 270 be implemented on the 01 April 2018. Do you have a preference on the date that DCP 270 is implemented into the DCUSA?
Electricity North West	Non-confidential	We agree with the 01 April 2018 implementation date.
Anonymous	Anonymous	It might be better to wait until progress on P272 migration was understood in full before finalising the date. If a lower number of meters than expected has made the migration to HH then a later implementation date might be more suitable.
Northern Powergrid Northeast and Yorkshire	Non-confidential	We agree with the rationale for 1 April 2018 implementation date. As a result of BSC P272 all PC 5-8 customers with AMR metering installed should be moved by the end of March 2017 to HH settlement. April 2018 allows a further year to address any remaining customers who have not moved for whatever reason.
RWE npower	Non-confidential	We do not support this change
Scottish Power Energy Retail Limited	Non-confidential	Supportive of 1 st April 2018 implementation date.
SEPD & SHEPD	Non-confidential	01 April 2018 is fine, if the appropriately updated CDCM model can be provided to DNOs before November 2016. We do not want to introduce any potential delays or uncertainty to the 2018/19 tariff setting process which will conclude in December 2016.
SP Distribution / SP Manweb	Non-confidential	We agree with the 1 April 2018 implementation date.
SSE Energy Supply	Non-confidential	No
the Electricity Network Company Limited	Non-confidential	Our preference for the implementation date of DCP270 would be 01 April 2018, on the proviso that all customers have already been migrated off of the <i>HV Medium Non-Domestic</i> tariff. Furthermore, we can only support this implementation date of DCP 270 if there is a better solution proposed in regards to the assigning of a maximum capacity to migrated customers.

UK Power Networks	Non-confidential	We believe that this change should be implemented from April 2018.
Western Power Distribution	Non-confidential	WPD agree with the implementation date of 1 st April 2018.

Company	Confidential/ Anonymous	11. Are you aware of any wider industry developments that may impact upon or be impacted by this CP?
Electricity North West	Non-confidential	None that we are aware of.
Anonymous	Anonymous	No comment
Northern Powergrid Northeast and Yorkshire	Non-confidential	DCP 268 is progressing and is looking to create R/A/G tariffs for all customers in preparation for the smart meter rollout and the desire to have HH metering for all by 2020.
RWE npower	Non-confidential	No comment.
Scottish Power Energy Retail Limited	Non-confidential	Not at this time
SEPD & SHEPD	Non-confidential	Not at this time
SP Distribution / SP Manweb	Non-confidential	We are not aware of any wider industry developments that may impact upon or be impacted by this CP.
SSE Energy Supply	Non-confidential	No
the Electricity Network Company Limited	Non-confidential	No

UK Power Networks	Non-confidential	DCP268 is looking at changes to tariffs, it is important that issues' relating to 'medium non-domestic' tariffs undertaken under DCP268 aligns to any work taken forward under DCP270.
Western Power Distribution	Non-confidential	No

Company	Confidential/ Anonymous	12. Are there any alternative solutions or matters that should be considered by the Working Group?
Electricity North West	Non-confidential	None that we are aware of.
Anonymous	Anonymous	No comment.
Northern Powergrid Northeast and Yorkshire	Non-confidential	None that we are aware of.
RWE npower	Non-confidential	No comment.
Scottish Power Energy Retail Limited	Non-confidential	n/a
SEPD & SHEPD	Non-confidential	None that we are aware of.
SP Distribution / SP Manweb	Non-confidential	None at this time.
SSE Energy Supply	Non-confidential	No
the Electricity Network Company Limited	Non-confidential	We believe that the working group should consider alternative solutions to the assigning of a 'default capacity' to customers that are migrated. Our rationale for this is set out in our response to question 7.

UK Power Networks	Non-confidential	Not that we are aware of at this time.
Western Power Distribution	Non-confidential	No