

## DCP 268 Request for Information Responses – Collated Comments

Company	Confidential/ Anonymous	1. Please advise which is your preferred option? Please provide your rationale inclusive of any financial, resource or system impact or restriction.
British Gas	Non-confidential	<p>Our preference is for the non-centralised approach. The existing D0030 already contains the data required to facilitate DCP 268 and so there is no need to change it. The only 'con' identified in the RFI for this option simply reflects the established arrangements for the East and West Midlands regions and so should not impact on parties.</p> <p>Options which change the structure of the D0030 (including new headers) will require system changes for all parties. For our own systems we estimate a development timescale of 6 months with a cost of at least £100k.</p>
EDF Energy	Non-confidential	<p>Our preferred option is 1d as we consider it has the following benefits.</p> <ul style="list-style-type: none"> <li>• Retains each settlement combination, apart from the TPR</li> <li>• Both suppliers and distributors receive the same data</li> <li>• Likely to be a simpler change than options 1a, 1b and 1c</li> <li>• Of the Centralised options it is closest to the '<i>status quo</i>', so likely to have lowest implementation cost</li> </ul>
First Utility	Non-confidential	<p>Option 1c is the most preferable option since it is the only option that gives Profile Classes 1 and 2 level transparency, whilst also reducing the size of the D0030.</p> <p>Option 1c also means no pseudo data in the D0030, so implementation and validation should be simpler.</p>
Northern Powergrid on behalf of Northern	Non-confidential	<p>We prefer the Distributor approach. This option would cause the least impact on our internal systems as the existing D0030 data would remain unchanged. All of the options will have financial implications as changes will be required to our billing system; however the Distributor approach is the least of these.</p>

Powergrid (Yorkshire) Plc and Northern Powergrid (Northeast) Limited		
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	On balance we move to prefer Option 2. We understand that there will be some additional costs arising from this (c£30k, plus an additional c£30k for our company), but are persuaded that it is the most satisfactory option.
SP Distribution and SP Manweb	Non-confidential	<p>Our preferred option is the Distributor (Non-Centralised) approach, which is De-Linking. There are various reasons for this option and we have noted the main reasons. This option gives the DNOs <b>control</b> over how charges are calculated. This option requires <b>no change</b> to the existing D0030/D0314 flows. A further advantage of retaining the data within the D0030 is this keeps the relationship between the D0030 and MPRS data, and gives ALL parties, details at the lowest possible level. <b>It also allows Billing of invalid combinations on a default tariff.</b> All of this can be achieved on our Billing application with only minor system changes. Our estimated system costs which are shared by all DNOs who use DURABILL are £25k to £30k.</p> <p>Our second option is the Centralised option 1d. This option requires the least number of changes on the D0030, only replacing the TPRs with the distributor's pseudo TPRs. This has the advantage (that all the 4 centralised options have) that Distributors can apply RAG unit charges without using de-linking. It also retains the relationship between the D0030 data and MPRS data. It gives parties detail at the lowest possible level. This WG has advised that this is likely to be a simpler change than 1a, 1b and 1c and is likely to have the lowest implementation cost for the centralised options. Our estimated system costs which are shared by all DNOs who use DURABILL are £20k to £40k, depending on which Flow Option (i) to (iv) is adopted. <b>We would like to know how ELEXON will deal with invalid combinations on the D0030 and D0314, since currently we bill these invalid</b></p>

		<b>combinations on a de-fault tariff and need to continue to do so.</b> We also require ELEXON to clarify how they will differentiate between UMS data, which has to be split into BYG and all other data, which has to be split into RAG.
SSE Energy Supply	Non-confidential	The distributor approach is the preferred option, this has the least impact both financially and on systems and it retains the reporting flexibility as current. The financial impact of option 2 'the distributor option' is small, approx. £6,250.
The Electricity Network Company	Non-confidential	<p>We are not supportive of this change proposal as we do not see that it better facilitates any of the relevant DCUSA objectives. Notwithstanding that opinion we have set out our preferences and answers to the questions below.</p> <p>Our preferred option would be option 1c. We believe that this provides the most sensible solution for providing data for Use of System Charges that would be relevant to the parties involved. It is likely that any solution and transitional period would require systems developments for all parties and it seems prudent to us that if systems developments are going to be made then they should not be made redundant by any move towards mandatory HH settlement. Whilst we would rather see the intent of this change considered more holistically in relation to HH settlement we believe that option 1c provides the most efficient way of transitioning in the future. In our opinion the introduction of pseudo data (which is not added to MDD) can complicate the validation process of data flows as most systems will use MDD to validate data for incoming flows as per the Data Transfer Catalogue. Retaining the profile class split on the D0030 negates the requirement to include pseudo profile classes which we believe will complicate and add unnecessary systems developments to the Use of System billing processes.</p>
UK Power Networks	Non-Confidential	Option 1d would be our preferred option, as it utilises the approach already used successfully following the introduction of the new Measurement Classes (F & G). This method would have zero costs for UK Power Networks, and offers the benefit of speedy implementation whereas the other solutions would all require system and process changes, which could be considerable, coupled with lengthy development timeframes and later implementation dates.
Western Power Distribution plc	Non-confidential	Our preferred option is Option 2, - Under this approach the data provided to parties in the D0030 & D0314 would remain the same, which allows Distributors control over how charges are applied and would not require any

		<p>central system changes. The link between data on the D0030 and MPRS is retained and there is no risk of data being missed off the data flows due to incomplete mapping.</p> <p>In effect this would be the introduction of De- linking which WPD already does within our 2 midland DNO areas. However to adopt de-linking we believe there would be a change to schedule16, para 130 of the DCUSA required.</p> <p>The cost for this option would be in the region of £25 to £30k shared between all durabill users</p> <p>.</p>
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Company	Confidential/ Anonymous	2. Please provide your comments on all options (Centralised approach options 1a-d and the Distributor approach) based on your priority of preference for the solution proposed? Please provide your rationale inclusive of any system impacts.
British Gas	Non-confidential	<p>Our preference is for the non-centralised approach.</p> <ul style="list-style-type: none"> <li>• Requires no central system changes</li> <li>• Requires no BSC changes</li> <li>• This means that even where parties are required to make internal system changes, they do not need to wait until the technical specifications of BSC/central system changes have been agreed before they make their own system changes.</li> <li>• Requires no internal system changes for our systems (although we will need to make changes to standing data for DCP 268)</li> <li>• No transitional arrangements (or issues).</li> </ul> <p>Option 1a:</p>

		<ul style="list-style-type: none"> <li>• System development estimated at 6 months and &gt;£100k</li> <li>• We do not support the mixing of HH settled consumption and NHH settled consumption</li> <li>• Loss of transparency of settlement combination costs</li> <li>• The use of pseudo LLFCs and PCs for billing adds complexity to charging arrangements</li> <li>• Requires transitional arrangements which could add to system cost and charging complexity.</li> <li>• We do not support option 1a.</li> </ul> <p>Option 1b:</p> <ul style="list-style-type: none"> <li>• System development estimated at 6 months and &gt;£100k</li> <li>• Loss of transparency of settlement combination costs</li> <li>• The use of pseudo LLFCs and PCs for billing adds complexity to charging arrangements</li> <li>• Requires transitional arrangements which could add to system cost and charging complexity.</li> <li>• We do not support option 1b, but it is preferred over option 1a as it does not mix HH settled consumption and NHH settled consumption.</li> </ul> <p>Option 1c:</p> <ul style="list-style-type: none"> <li>• System development estimated at 6 months and &gt;£100k</li> <li>• Loss of transparency of settlement combination costs</li> <li>• The use of pseudo LLFCs and PCs for billing adds complexity to charging arrangements</li> <li>• Requires transitional arrangements which could add to system cost and charging complexity.</li> </ul>
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		<ul style="list-style-type: none"> <li>• It is not clear whether retaining consumption split by PC adds anything.</li> <li>• We do not support option 1c, but it is preferred over option 1a as it does not mix HH settled consumption and NHH settled consumption.</li> </ul> <p>Option 1d:</p> <ul style="list-style-type: none"> <li>• System development estimated at 6 months and &gt;£100k</li> <li>• Loss of transparency of settlement combination costs</li> <li>• The use of pseudo LLFCs for billing adds complexity to charging arrangements</li> <li>• Requires transitional arrangements which could add to system cost and charging complexity.</li> <li>• We do not support option 1d, but it is preferred over option 1a as it does not mix HH settled consumption and NHH settled consumption.</li> </ul>
EDF Energy	Non-confidential	<p>Option 1d has a smaller impact on the system as it builds on existing functionality used for P300.</p> <p>Options 1a, 1b and 1c have similar impact on SONET. The cost for this option will depend on the transitional arrangements that are chosen to implement the change. The below shows a high level estimate for the likely cost of each combination of options for upgrading SONET.</p> <p>Transition 1 – 10-12k, plus additional internal additional IT costs + Testing of System, approximately £10k to 15k  Transition 2 – 10-12k, plus additional internal additional IT costs + Testing of System, approximately £10k to 15k  Transition 3 – 20-25k, plus additional internal additional IT costs + Testing of System, approximately £10k to 15k  Transition 4 – 10-12k, plus additional internal additional IT costs + Testing of System, approximately £10k to 15k</p> <p>Customers should also bear in mind that each of these options would require Elexon to use mapping data, and that where mapping data does not exist there is a risk that data is missing from the D0030 dataflows.</p>

		Option 2 would not require any central system changes but changes would be required to SONET in the development of validation of seasonal UMS DUoS charges. The cost impact is smaller, approximately £7k +£5k for system testing.
First Utility	Non-confidential	First Utility strongly supports the centralised approach as Elexon can provide more transparency to the whole process.
Northern Powergrid on behalf of Northern Powergrid (Yorkshire) Plc and Northern Powergrid (Northeast) Limited	Non-confidential	<p>We do not support any of the Centralised approach options. We do not see the value in excluding existing settlement combinations from the D0030 and replacing these with pseudo combinations. For all of options 1a-c, we would incur costs associated with changes to our billing system to allow the use of pseudo Profile Class (PC), Line Loss Factor Class (LLFC) and Standard Settlement Class (SSC) values. The costs associated with system changes for option 1d would be lower as only pseudo time pattern regime values would be used. The Distributor approach has the lowest implementation cost.</p> <p>Options 1a-c are similar, with increasing transparency achieved from a-c with a corresponding increase in complexity and D0030 file-size. We feel option b has the right balance if any of these options were to be used.</p> <p>The five options, in <b><u>reverse</u></b> order of preference are:</p> <ul style="list-style-type: none"> <li>• Option 1a – we do not support the mixing of actual half hourly (HH) consumption data with HH profiled data as this reduces transparency.</li> <li>• Option 1c – if the centralised approach is to be pursued, we would welcome the simplicity gained from using option 1b.</li> <li>• Option 1b – of the centralised options using pseudo data LLFC and SSCs, we feel that this option has the right balance of transparency and simplicity.</li> <li>• Option 1d – of the centralised approach options we favour 1d over the remainder as it represents a more simple approach with the lowest implementation cost. For the avoidance of doubt, we do not support any of options 1a-d, but simply feel that 1d represents the ‘least-worst’ option for the centralised approach.</li> </ul>

		Option 2 – This approach has the least system impact and provides the most transparent data as the existing settlement combinations will continue to be used. Suppliers will be able to validate the data in the D0242 dataflow using the published Distributor time bands.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	It appears that Options 1 a – 1d inclusive will require changes to our DUoS billing system, to deal with pseudo PC, LLFC & SSC values. We are concerned about data mapping using these pseudos and potential resultant under-recoveries. This could be perceived as a limitation on our ability to correctly set and recover revenues for/from all customer groups.
SP Distribution and SP Manweb	Non-confidential	We do not support options 1a, 1b and 1c. The main reasons for this are as follows; they do not retain the relationship between D0030 data and MPRS data and does not give parties details at the lowest possible level. These 3 options require ELEXON to use mapping data and if mapping data does not exist, there is a risk that data is missing from the D0030 or D0314 flows. Our estimated cost for Option (1a) is £35k to £60k, Option (1b) is £25k to £45k and Option (1c) is £80k to £110k.
SSE Energy Supply	Non-confidential	<p>Option 1a – This option does not offer enough visibility for reporting or validation purposes.</p> <p>Option 1b – This option appears to be a more balanced solution, however, there are concerns that have not been addressed yet with regards to the SVAA allocating volume to tariffs.</p> <p>Option 1c – This option does not differ enough from option 1c and aggregating to PC is not required to distinguish between customer groups, this will already be done by tariff and measurement quantity.</p> <p>Option 1d – With the data split to this level of granularity this option has the potential to increase the size of the D0030, granularity that is not necessary required to achieve the goal of billing DUoS charges.</p>
The Electricity Network Company	Non-confidential	All the potential centralised options are considerable projects to ensure that they work correctly. We believe that there are wider implications which need to be considered on all centralised approaches.



		<p>One of our main concerns with the centralised approach is the use of pseudo industry data which is not contained in MDD. By using data which is not contained in MDD most distributors and suppliers have little or no method against which they can validate the data that they are being sent. It is important that the working group, along with the BSC and Elexon, considers how the data will be available for parties to view and how they will be able to use this in the validation of data flows received. This includes LLFCs, PCs and TPRs. Option 1d causes the most concern in relation to the level of pseudo data that would be required to facilitate it.</p> <p>We also believe that the structure of the D0030 (any reference in this paragraph to the D0030 includes reference to the D0242) flow needs to be considered in relation to the solution and not just with respect to the transitional period. If new data is introduced or pseudo data is used to populate the D0030 then a much wider view of the D0030 should be taken. Parallel DTC changes will be required in order to facilitate the needs of data transfer between SVAA, distributors and suppliers. Our concern is that if this change is viewed within the confines of the DCUSA then it may lead to issues for parties implementing any changes.</p> <p>Option 1a provides the fewest concerns in relation to the above as it might be a more straightforward D0030 flow change. Less information will be included whilst still reaching the outcome required. We are concerned that this option may require further changes when full HH settlement is considered and therefore it cannot be considered to be a viable option going forward.</p>
UK Power Networks	Non-Confidential	Options 1a – 1c would all aggregate the settlement combinations which would significantly reduce the visibility which parties (especially DNOs) would have of the data, should further analysis of any data be necessary. As stated above we are supportive of option 1d, as this approach does not aggregate the data in the same way, but does utilise an existing approach. By using the existing LLFC/PC but with the red, amber, green time bands and black, yellow, green time bands, suppliers are given visibility of the volumes and customer numbers for any LLFC/PC and can reconcile those.
Western Power Distribution plc	Non-confidential	<ol style="list-style-type: none"> <li>1) Option 2 - See above</li> <li>2) Option 1d has a smaller impact than 1a, b,c on the system and appears to only require pseudo TPR's, this retains the link between data on the D0030 and data in MPRS. There is a risk that data is missed from the revised D0030 and any future changes to the way that data is mapped could require additional BSC modifications.</li> </ol>

		<p>3) Options 1a, 1b and 1c have similar impact on DURABILL (WPD DUOS Billing System). If any of options are selected, changes will be required to DURABILL to allow the use of pseudo PC, LLFC and SSC values. The required changes would be similar to those made when aggregated HH Tariffs were introduced. As per current HH aggregated data billing, no validation against MDD will be possible. As the data in the D0030 would no longer represent actual combinations of PC, LLFC and SSC, there would be no way to link the data in the data flow back to MPRS. Hence it would no longer be possible to use some DURABILL reports. Each of these options would require Elexon to use mapping data, and that where mapping data does not exist, there is a risk that data is missing from the D0030 or D0314 data flows and that income cannot be recovered.</p> <p>The costs for options 1a-d are detailed below and are also determined by the 4 interim solutions</p> <table border="1"> <thead> <tr> <th colspan="2">Option 1a-c</th><th>Option 1d</th></tr> </thead> <tbody> <tr> <td>Option i</td><td>£45,000 - £60,000</td><td>£35,000 - £40,000</td></tr> <tr> <td>Option ii</td><td>£35,000 - £45,000</td><td>£25,000 - £30,000</td></tr> <tr> <td>Option iii</td><td>£90,000 - £110,000</td><td>£80,000 - £95,000</td></tr> <tr> <td>Option iv</td><td>£35,000 - £40,000</td><td>£20,000 - £25,000</td></tr> </tbody> </table> <p>These costs would be shared by all durabill users.</p>	Option 1a-c		Option 1d	Option i	£45,000 - £60,000	£35,000 - £40,000	Option ii	£35,000 - £45,000	£25,000 - £30,000	Option iii	£90,000 - £110,000	£80,000 - £95,000	Option iv	£35,000 - £40,000	£20,000 - £25,000
Option 1a-c		Option 1d															
Option i	£45,000 - £60,000	£35,000 - £40,000															
Option ii	£35,000 - £45,000	£25,000 - £30,000															
Option iii	£90,000 - £110,000	£80,000 - £95,000															
Option iv	£35,000 - £40,000	£20,000 - £25,000															

Company	Confidential/ Anonymous	3. What do you consider is the development timescale required for each of these options? Please provide your rationale.
British Gas	Non-confidential	Any changes to the structure of the D0030 (including new headers) will require IS supported system changes. For our own systems we estimate a development timescale of 6 months with a cost of at least £100k for any of the centralised approaches.
EDF Energy	Non-confidential	Changes required for all of the above options can be delivered in time for the proposed April 2019 implementation date.
First Utility	Non-confidential	The development timescales required for each of the options are all pretty similar from a

		validation point of view the only difference is the amount of data the validation query has to read.
Northern Powergrid on behalf of Northern Powergrid (Yorkshire) Plc and Northern Powergrid (Northeast) Limited	Non-confidential	<p>Centralised Approach</p> <ul style="list-style-type: none"> <li>From an internal perspective, we would be able to make the necessary changes to our billing system for implementation in April 2019. However, we would require a period of time for testing following the completion of central system changes.</li> </ul> <p>Distributor Approach</p> <ul style="list-style-type: none"> <li>Requires no structural redevelopment as the functionality already exists to breakdown the data by using de-linked tariffs in our billing system. This approach would be available in time for 2019/20 charging year.</li> </ul>
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Concentrating on our preferred option (Option 2): this can be in place for go-live on 1 <sup>st</sup> April 2019, based on information provided by the Developer.
SP Distribution and SP Manweb	Non-confidential	Changes for ALL of the Options can be delivered in time for the proposed 01 April 2019 implementation date.
SSE Energy Supply	Non-confidential	The go-live date of April 2019 tariff year is achievable.
The Electricity Network Company	Non-confidential	We consider that the development timescale for each of these options would be more considerable than the period undertaken for the P300 customers. It is our belief that all of the options would take a minimum of 12 months to be developed (taking into account changes to systems, LLFCs, PCs, data validation rules and so on). This then means it would be a race against time to ensure that the April 2018 implementation date is met – it would

		more than likely become an April 2019 implementation date. Therefore meaning that there is only 1-2 years of potential use before all customers (under the Smart Meter rollout) are capable of actual HH metering.
UK Power Networks	Non-Confidential	To deliver option 1d we would be able to implement within the notice period provided for tariff changes, however for the other options we estimate that we would potentially need a two year window to facilitate and test the changes required to our systems. As the implementation date of this change is not until April 2019 it is likely that all options could be delivered within that timescale. However we believe that the distributor approach would have the longest lead time and present the greatest risk.
Western Power Distribution plc	Non-confidential	Changes required for all of the above options can be delivered in time for the proposed 01 April 2019 implementation date.

Company	Confidential/ Anonymous	4. Distributors: What approaches will you be taking to the LLFCs for each of these options? Please refer to paragraph 4.4 of this RFI.
British Gas	Non-confidential	n/a
EDF Energy	Non-confidential	n/a
First Utility	Non-confidential	No comment.
Northern Powergrid on behalf of Northern Powergrid (Yorkshire) Plc and Northern Powergrid	Non-confidential	<p>Centralised Approaches:</p> <p>We would use pseudo LLFCs, with a mapping provided to Elexon for options 1a-c. This would result in a loss of transparency as LLFCs used for billing would no longer be registered in MDD. Option 1d would remove the reliance on pseudo LLFCs.</p> <p>Distributor Approach:</p> <p>We would retain and continue billing against the existing registered LLFCs.</p>

(Northeast) Limited		
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	We are currently considering this, and are minded to issue new LLFCs. If new LLFCs were issued, they would negate the need for pseudo LLFCs in options 1a – 1d, if any of these options were adopted for this DCP. We will make a final decision on this point in due course.
SP Distribution and SP Manweb	Non-confidential	For our preferred Distributor controlled non-centralised option and our second option, the centralised Option D there is NO need to create new LLFC. For the other options, we will require to create a single new LLFC for each new tariff. <b>We would NOT be prepared to change every LLFC to a new LLFC.</b>
SSE Energy Supply	Non-confidential	N/A
The Electricity Network Company	Non-confidential	<p>There are several things that need to be considered before we would be able to make a reasonable assumption as to the approach that we, as a distributor, would take to LLFCs. We note the assertion in the RFI document that we would have to both create new pseudo LLFCs and retain old LLFCs. We would question whether this is necessary. We note that on customers associated with measurement class F&amp;G under P300 we have created new LLFCs and migrated customers to those LLFCs upon the change of measurement class event.</p> <p>If we are to follow the process that was undertaken for P300 then we would create new LLFCs and associated data in order to allow Elexon to undertake central aggregation of data and we would migrate MPANs to these LLFCs. We would like to highlight that this would be a considerable piece of systems work which may be required to be undertaken by our MPAS service provider. The new LLFCs created should not be pseudo LLFCs but should be a new set of separate ‘actual’ LLFCs that will be included within the MDD catalogue. We would also welcome clarification on whether all MPANs can/will be moved onto Profile Classes F&amp;G if taking the P300 approach.</p>

UK Power Networks	Non-Confidential	Options 1a – 1c all aggregate the settlement combinations so would likely require new (or pseudo) LLFCs to be created. We disagree with the consultation paper as we believe the creation of new LLFCs would not be necessary with option 1d, which would continue to use the existing LLFCs. This is also true for the Distributor approach.
Western Power Distribution plc	Non-confidential	We would prefer not to have to change our LLF 's due to the volumes involved, However we understand this may be preferable to using pseudo LLF's which in turn will cause problems with MDD and gateway validation of files received. This is another reason we prefer to adopt Option 2 , where none of this is required and we just charge in line with our published RAG/BYG published times

Company	Confidential/ Anonymous	5. If DCP 268 is implemented with central system changes (i.e. any of options 1a-1d) an approach will be required for transition to the new arrangements. Please advise which transitional approach option, i, ii, or iii is your preferred approach? Please see Section 5 of this RFI.
British Gas	Non-confidential	<p>All of the transitional approaches have drawbacks. Including the data twice on the D0030 (approach i) runs the risk of double counting and could also affect regulatory reporting.</p> <p>The other options are likely to require additional system costs. Our system development estimates provided above simply take into account the need to accommodate a revised D0030 structure (including the addition of new headers) – it is quite likely that the need to facilitate transitional arrangements for a long period of time (up to 28 months) will add complexity and cost to the required solution which we have not been able to estimate.</p>
EDF Energy	Non-confidential	<p>Option ii would have the least impact on the system. Customers may wish to consider that dataflow version numbers are only usually incremented when there is a structural change to a dataflow.</p> <p>However, there is a fourth option suggested by SCS as follows:</p> <p><u>Option iv</u></p> <p>Customers may wish to suggest a fourth option where the version of the D0030 remains the same, and Elexon populates the dataflows with the current Settlement Class data for Settlement Dates before the implementation date, and with only aggregated data for Settlement Dates on or after the implementation date.</p>

First Utility	Non-confidential	We do not believe that a new flow would be required. Instead, since the D0030 meets the requirements, implementing a new flow version would be much simpler.
Northern Powergrid on behalf of Northern Powergrid (Yorkshire) Plc and Northern Powergrid (Northeast) Limited	Non-confidential	<p>We favour option ii for the transitional arrangements. This would require a minor change to our billing system to allow the new flow version to be used and to include validation that the settlement date and flow version are as expected (i.e. new flow version for settlement dates after implementation; old flow version for settlement dates before implementation).</p> <p>Option iii for implementation would result in a disproportionate increase in implementation costs, whilst option i results in a loss of transparency and potential double billing.</p>
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	We would support Option ii, as we believe this would be least disruptive to our system.
SP Distribution and SP Manweb	Non-confidential	<p>Of the 3 options identified, our preferred option is option (ii). Our understanding is that this is a Version number only change and there is no structure change at all. This would involve some changes to our billing system, but this has the least impact and therefore least cost. <b>Can the WG clarify if the D0242 and D0315 flow version numbers would also need to change?</b></p> <p>As indicated on the RFI, option (i ) has the risk of double counting and we are not supportive of this option.</p> <p>Option (iii) introduces new data flows. This would require creation of a complete new billing module and package to create the statements. This option is the most expensive and is the least preferred.</p>

		<b>We would like to suggest an Option (iv) as our preferred option.</b> This option is where the Version of the D0030 and D0314 flows remains the same, and ELEXON populates the flows with the current settlement class data for settlement dates before the implementation date and with only aggregated data for settlement dates on or after the implementation date.
SSE Energy Supply	Non-confidential	Option II (Define a new dataflow version of the D0030 that would be used for settlement dates from 1 April 2019 onwards) would have the smallest impact on settlement systems, however, if the D0030 flow structure remains the same, the creation of a new version of the flow seems unnecessary as the SVAA would populate the dataflows with the current Settlement Class data for Settlement Dates before the implementation date, and with only aggregated data for Settlement Dates on or after the implementation date.
The Electricity Network Company	Non-confidential	<p>Option iii would result in the best enduring solution as it is bespoke to the information required to facilitate the new billing methods (i.e. it can remove the PC from the flow so we don't need to create a pseudo PC or something that would trip validation). It does, however, mean the largest system development and would mean supporting two different flows in our DUoS billing system concurrently for 14 months.</p> <p>Option i has the least impact in the transitional period but It could lead to errors in that time and doesn't fit the enduring solution particularly well.</p> <p>Option ii is the least desirable option as there are no clear advantages over either option i or iii. The slight change to the D0030 flow would result in a significant amount of work, for minimal actual change.</p>
UK Power Networks	Non-Confidential	The transitional approaches i, ii, and iii all appear to have billing accuracy risk and system cost impacts. However, if option 1d was chosen then the existing D0030 could be used without a need for any transitional approach. We believe that if the implementation of this change was agreed to be 1 April 2019 then any data in the D0030 for settlement dates up to and including 31 March 2019 would be under the existing arrangements, and any data for settlement dates from 1 April 2019 would be under the new approach. This would have the benefit of having minimal costs, as it is already used for this purpose as a result of DCP179 and P300.
Western Power Distribution plc	Non-confidential	Of the 3 options, option ii would have the least impact on the system. Although it is not clear whether the D0242 & D0315 flow version numbers would also need to change



		A fourth option could be considered where the version of the D0030 and D0314 flows remain the same, and Elexon populates the flows with the current settlement class data for settlement dates before the implementation date, and with only aggregated data for settlement dates on or after the implementation date.
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Company	Confidential/ Anonymous	6. If DCP 268 is implemented with the Distributor approach, are you able to cater for the transitional arrangements as detailed in paragraph 6.5?
British Gas	Non-confidential	n/a
EDF Energy	Non-confidential	Yes, SONET tariffs are already applied at a settlement date level so no changes would be required to cope with the transition from TPR based tariffs to de-linked tariffs.
First Utility	Non-confidential	Yes.
Northern Powergrid on behalf of Northern Powergrid (Yorkshire) Plc and Northern Powergrid (Northeast) Limited	Non-confidential	Yes we believe this can be done with minimal system changes.
Southern Electric Power Distribution plc and Scottish Hydro Electric	Non-confidential	Yes, our tariffs are already applied at a settlement date level so no changes would be required for the transition from TPR based tariffs to de-linked tariffs.

Power Distribution plc		
SP Distribution and SP Manweb	Non-confidential	Yes. DURABILL tariffs are already applied at a settlement date level so no changes would be required to cope with the transition from TPR based tariffs to de-linked tariffs.
SSE Energy Supply	Non-confidential	Yes, within settlement systems tariffs are applied at a settlement date level, therefore no changes would be required to cope with the transition from TPR based tariffs to de-linked tariffs.
The Electricity Network Company	Non-confidential	A significant time period would be required to introduce any transitional arrangements. We would be required to introduce a new process for the new data (in order to aggregate in). Further processes would need to be developed to support the utilisation of the existing flow for this purpose. It is our belief that following the Distributor approach would lead to substantial difficulties in systems implementation.
UK Power Networks	Non-Confidential	As stated earlier in this response, the distributor approach would require significant system and process changes for UK Power Networks; as a result we would need to incorporate this into any transitional arrangement solution which would be an additional cost, and add to development time.
Western Power Distribution plc	Non-confidential	Yes, DURABILL tariffs are already applied at a settlement date level so no changes would be required to cope with the transition from TPR based tariffs to de-linked tariffs.

Company	Confidential/ Anonymous	7. Are there any alternative solutions or unintended consequences that should be considered by the Working Group?
British Gas	Non-confidential	n/a
EDF Energy	Non-confidential	<p>Should any of the Option 1 solutions be selected, customers may need to make changes to the software that processes incoming dataflows from the DTN. Dataflows may contain data that is not in MDD and therefore may fail validation.</p> <p>If the Distributor based solution is selected, customers may also wish to consider whether it would make more sense to get Elexon to adopt the same approach for Profile Class 0 data in the D0030. If de-linking is used for the</p>

		billing of all NHH data on the D0030 then it might make sense to do this for Profile Class 0 data which would fit into the original aims of Common Distribution Charging Methodology (CDCM).
First Utility	Non-confidential	We support this modification, however it is important to note that for some customers there may be greater volatility in over and under recovery of DUoS revenues, with the move from the current charging approach (which includes a fixed charge per MPAN per day) to adopting the RAG model.
Northern Powergrid on behalf of Northern Powergrid (Yorkshire) Plc and Northern Powergrid (Northeast) Limited	Non-confidential	Under the Distributor approach, we would like the Working Group to clarify whether the new arrangements would also be implemented for P300 LLFCs to remove the current reliance on pseudo SSC/TPRs.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	<p>Should any of the Option 1 solutions be selected, customers may need to make changes to the software that processes incoming data flows from the DTN. Data flows may contain data that is not in MDD and therefore may fail validation.</p> <p>If the Distributor based solution is selected, customers may also wish to consider whether changes can be made to the provision of Profile Class 0 data in the D0030 and D0314. The current solution, where Elexon split this data between RAG time bands, was put in place as some parties could not perform this split themselves. If de-linking is used for all NHH data on the D0030, distributors may want to start doing this for the Profile Class 0 data instead of Elexon.</p>
SP Distribution and SP Manweb	Non-confidential	Should any of the Option 1 Centralised solutions be selected, customers may need to make changes to the software that processes incoming data flows from the DTN. Data flows may contain data that is not in MDD and therefore may fail validation. If Distributors approach is adopted, the DNOs may want to consider whether

		<p>changes can be made to the provision of Profile Class 0 data in the D0030 and D0314. If de-linking is used for all NHH data on the flows, distributors may want to start doing this for the Profile Class 0 data instead of ELEXON.</p> <p>As per point 2 of this document we have expressed our opinion that options 1a, 1b and 1c will not give parties details at the lowest possible level. We would like to highlight that DNOs use NHH Settlement data as part of the Line Loss Factor calculation process. This process requires Settlement data to be grouped at voltage level and the LLFC is used to achieve this. DNOs would be unable to determine the voltage from the aggregation being proposed in options 1a, 1b and 1c.</p> <p>Line Loss Factors are submitted to Elexon for audit and approval and we wonder if Elexon personnel involved in this working group process are aware of the impact of options 1a, 1b and 1c on the calculation of Line Loss Factors.</p>
SSE Energy Supply	Non-confidential	<p>It is a concern that with a centralised approach, where there are mapping issues there is no solution for allocation to a default tariff. Would the data just not appear in the D0030? This then poses another question – who would these types of issues be queried with (responsibility) – the DNO or the SVAA? Only option 2 appears to cater for this issue.</p>
The Electricity Network Company	Non-confidential	<p>The working group need to consider the possibility that P339 may introduce TPRs and SSCs into MDD which cover measurement classes F&amp;G. This could be used to inform the solution for the new data.</p> <p>It should also be noted that this change was not identified by Ofgem as one that led to the removal of barriers to elective HH settlement. We agree with Ofgem's position and believe that there are other changes that should take priority over DCP268.</p>
UK Power Networks	Non-Confidential	<p>We believe that a further solution to consider would be based upon option 1d, and utilise a pseudo SSC and TPR (which follows the approach taken with DCP179 and P300), and not just a pseudo TPR as specified in the suggested approach for option 1d in the RFI. A significant benefit of this approach would be that fewer combinations would need to be included in the D0030 to Distributors.</p>

Western Power Distribution plc	Non-confidential	<p>Should any of the Option 1 solutions be selected, we may need to make changes to the software that processes incoming data flows from the DTN. Data flows may contain data that is not in MDD and therefore may fail validation or alternatively we will have to turn off validation for these flows.</p> <p>If the Distributor based solution is selected, the working group may wish to consider whether changes can be made to the provision of Profile Class 0 data in the D0030 and D0314. The current solution, where Elexon split this data between RAG time bands, was put in place as some parties could not perform this split themselves. If de-linking is used for all NHH data on the D0030, distributors may want to start doing this for the Profile Class 0 data instead of Elexon.</p>
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