

## 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

<b>Document Control</b>	
CP Status	Standard
CP Number	DCP 262
Date of submission	13 January 2016
Attachments	[See Guidance Note 1]
<b>Originator Details</b>	
Company Name	ESPE
Originator Name	Michael Walls
Category	IDNO
Email Address	michaelw@espipelines.com
Phone Number	01372 225506
<b>Change Proposal Details</b>	
CP Title	Schedule 19 Credit/Re-invoice for HH Specific Data
Impacted parties	DNOs and IDNOs
Impacted Clause(s)	Schedule 19,
Part 1 / Part 2 Matter	Part 1
Provide your rationale why you consider this change is a Part 1 or Part 2 Matter	Impacts Schedule 19 which is defined as a Part 1 matter in Clause 9.5.5
Related Change Proposals	[See Guidance Note 3]
<b>Change Proposal Intent</b>	
To include a timeline for a credit/re-invoice from DNOs to LDNOs upon the receipt of updated HH DUoS data.	
<b>Business Justification and Market Benefits</b>	
<p>On a monthly basis and based on consumption data received by the LDNO, the LDNOs provides a HH Data Report to the DNO Party. Currently, LDNOs provide HH data to the DNOs by the 15th of each month to allow the DNOs to produce invoices/credit notes to LDNOs for DUoS. When revised HH consumption data is received from the relevant DC, in line with the billing arrangements in Clause 19 (Section 1B) Clause 44 (Section 2B), this can result in the need for a further invoice, or a credit being required from the DNOs to the LDNOs. DCUSA is silent on HH in regard to a defined timeline for receiving a credit/re-invoice once revised data is submitted.</p> <p>In practice, the DNOs appear to process some data efficiently, but in some cases we are still waiting for credit notes or invoices to be raised several months later. This is causing us concern</p>	

as it can negatively affect cash flow within the organisation. By including a timeline this situation will be able to managed in a more effective manner.

**Proposed Solution and Draft Legal Text**

New Paragraph in Schedule 19, 3.5 - Where revised HH Data Reports are submitted by the EDNO to the DNO Party, and the Use of System Charges are different from those previously billed, the DNO Party shall calculate such difference and shall submit an invoice for such difference within [14] days.

\*The Working Group can decide whether 14 days is appropriate or whether another value should be considered.

**Proposed Implementation Date**

Next DCUSA Release after approval

**Impact on Other Codes**

Please tick the relevant boxes and provide any supporting information.

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

If other please specify

**Consideration of Wider Industry Impacts**

N/A

**Environmental Impact**

N/A

**Confidentiality**

[See Guidance Note 8]

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

## DCUSA Objectives

### General Objectives:

Please tick the relevant boxes. [See Guidance Note 9]

- 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**

DCUSA General Objective 4 will be better facilitated as it the introduction of this change will provide IDNOs and DNOs a clear timeline of how best to manage credit/re-invoicing for HH invoices. This will positively impact IDNOs by helping to better manage cash flows, and also providing DNOs a timeline of when to have this information produced and issued to the IDNOs. This efficiency will match that is already explained within Schedule 19 for NHH invoices.

DCUSA Objective 2 is better facilitated as the introduction of this change promotes effective competition. Due to the fact that LDNOs have settled the difference in Charges with Supplier Parties, in some cases the LDNO is not being invoiced/credited for the difference by the DNO Party. This affects the LDNO's cashflow and can be considered a barrier to competition. In effect, LDNOs are supporting the DNO's cashflow.

## **PART C – MANDATORY FOR CHARGING METHODOLOGIES CHANGE PROPOSALS**

### DCUSA Charging Objectives

Please tick the relevant boxes. [See Guidance Note 11]

#### 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**

[See Guidance Note 10]

Charging Objectives:

General Objectives:

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

N/A

**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
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<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>	<p>Outline the proposed solution for addressing the stated intent of the CP. The Change Proposal Intent will take precedence in the event of any inconsistency. A DCUSA Working Group may develop alternative solutions. The plain English description of the proposed solution should include the changes or additions to existing DCUSA Clauses (including Clause numbers).</p> <p>Insert proposed legal drafting (change marked against any existing DCUSA drafting) which enacts the intent of the solution. The legal text will be reviewed by the Working Group (if convened) and is likely to be subject to legal review as part of its progress through the DCUSA change process.</p>
<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>	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.
<b>7</b>	<b>Environmental Impact</b>	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> .

<b>8</b>	<b>Confidentiality</b>	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.
<b>9</b>	<b>DCUSA General Objectives</b>	Indicate which of the DCUSA Objectives will be better facilitated by the Change Proposal.
<b>10</b>	<b>Detailed Rationale for DCUSA Objectives</b>	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.
<b>11</b>	<b>DCUSA Charging Objectives</b>	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.