

DCUSA DCP 262 Consultation responses – collated comments

Company	Confidential I/ Anonymous	1. Do you understand the intent of the CP? Provide supporting comments.	Working Group Comments
Electricity North West	Non-confidential	Yes	Noted
ESP Electricity	Non-confidential	Yes, ESPE understands the intent of DCP 262.	Noted
Northern Powergrid	Non-confidential	Yes, I understand the intent of the CP.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Yes.	Noted
SP Distribution plc and SP Manweb plc	Non-confidential	Yes	Noted
UK Power Networks	Non-confidential	No. The change is not required as DCUSA currently provides timescales for data submission and subsequent submission of account. We imagine that this issue has possibly arisen due to IDNOs or DNOs not following the process which was	The Working Group noted that the respondents view is based on the format for submitting templates and not the timescales. Attendees agreed that a new

		<p>originally put in place to manage this. The attached document which was the original concept presented to the DNO/IDNO working group on 5/2/2010 and details the expected process.</p>  <p>HH IDNO Portfolio_feb2010.do</p>	CP may be required to revise the template and format.
Western Power Distribution plc	Non-confidential	Yes – IDNO’s wish to improve the time some DNO’s can take to issue credit and rebills	Noted

Company	Confidential/ Anonymous	2. Are you supportive of the principles of the CP? Provide supporting comments.	Working Group Comments
Electricity North West	Non-confidential	Yes	Noted
ESP Electricity	Non-confidential	Yes, ESPE are supportive of the principles of DCP 262. Currently, the DCUSA is silent on HH in regard to a defined timeline for receiving a credit/re-invoice once revised data is submitted to the DNO. This causes concern for LDNOs because if credits and invoices are not received back in a timely manner, it can negatively affect cash flows within the organisation. By including a timeline for DNO credit/rebilling of revised data submissions in the DCUSA, it will allow payment timescales to be managed in a more effective and efficient manner for all Parties.	Noted
Northern Powergrid	Non-confidential	I am supportive of the principles of the CP.	Noted

Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Yes – we believe it is entirely reasonable to establish a timeline for credits and re-invoices under Schedule 19.	Noted
SP Distribution plc and SP Manweb plc	Non-confidential	Yes. It is reasonable for the DNO to issue revised invoices within 45 days of receipt of the data from the LDNO.	Noted
UK Power Networks	Non-confidential	No. We do not believe that the introduction of a defined timeline for DNOs to process credit/rebills is required. Schedule 19 (Portfolio Billing) states that 'The EDNO shall provide a report to the DNO Party, on or before the 15th day of each month' including 'any adjustments to data previously reported' and Clause 44 (Billing and Payment) states that 'As soon as is reasonably practicable after the end of each charging period, the Company shall submit to the User an account specifying the Use of System Charges payable for the whole or any part of that charging period; Therefore as long as the report provided by IDNOs contains any rebilling data, this should be processed at the same time under the existing DCUSA rules. The attached spreadsheet illustrates how we would expect to receive the data.	<p>The Working Group noted the process for submitting HH Billing data is within Schedule 19, however there is no template within the DCUSA. Currently DNOs and IDNOs use different reporting formats.</p> <p>It was suggested that Parties would want a standardised process for updating and submitting templates. The Working Group agreed that it will be beneficial to have one format of reporting however this is out of scope and will need a new CP</p>

		 HH Portfolio Billing Template.xlsx	
Western Power Distribution plc	Non-confidential	Yes I agree a time period should be specified	Noted

Company	Confidential/Anonymous	3. Do you agree with the proposed legal text? Provide supporting comments.	Working Group Comments
Electricity North West	Non-confidential	<p>No. The legal text should amend clause 44 rather than adding it to Schedule 19.</p> <p>Clause 44.2 indicates As soon as is reasonably practicable after the end of each charging period....”</p> <p>This clause refers to clause 43.6. Clause 43.6.2 C refers to schedule 19</p> <p>So the link to providing the data under Schedule 19 para 3.2 is catered for already.</p> <p>The issue at hand is trying to add further obligations to clause 44.2. It is this clause that should be amended and/or clarified by an addition clause referencing it.</p> <p>The suggestion of 45 days effectively means a bill needs to be generated at the end of the month on which the data was received so the clause could read:</p> <p>44.2A The Company shall use reasonable endeavours to</p>	<p>The Working Group agreed to amend Clause 44.2 rather than Schedule 19 of the DCUSA.</p> <p>It was agreed that ElectraLink is to check with the DCUSA legal advisor whether Clause 44.2 covers the proposed legal text and meets the CPs intent.</p>

		ensure that the accounts created pursuant to Clause 44.2 are submitted to the User within 30 days after the end of each charging period.	
ESP Electricity	Non- confidential	Yes, ESPE agrees with the proposed legal drafting as submitted by the Working Group. We feel that the proposed 45 day timeline should allow for any eventualities that a DNO may need to take into account whilst processing the revised data and issuing a credit/re-invoice to the LDNO.	Noted
Northern Powergrid	Non- confidential	I agree with the proposed legal text as 45 days is sufficient time for Northern Powergrid, as a DNO, to bill any revised HH data.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non- confidential	We agree with the proposed text and have no additional comments.	Noted
SP Distribution plc and SP Manweb plc	Non- confidential	Yes. The proposed legal text clearly defines the intent of CP 262.	Noted
UK Power Networks	Non- confidential	No. If any legal text is to be added this should be to remove any ambiguity in the existing process, for example by including a template of information relating to	

		the format of how the data is sent and more fully including prior month's adjustments.	
Western Power Distribution plc	Non-confidential	No – I disagree with “ within 45 days”	The Working Group noted the response and agreed to change the timescale to within 60 days to cover of every eventuality.

Company	Confidential/ Anonymous	4. Are you supportive of the proposed implementation date of 30 June 2016?	Working Group Comments
Electricity North West	Non-confidential	Whilst it is recognised that this is a scheduled release it may be best stating the first release after the Authority decision.	The Working Group noted the response and agreed to change the implementation date to first release after Party consent
- ESP Electricity	Non-confidential	Yes, we are supportive of the proposed implementation date.	
Northern Powergrid	Non-confidential	I am supportive of the proposed implementation date of 30 June 2016. Northern Powergrid will have everything required to be in place within this timescale.	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution	Non-confidential	Yes.	

plc			
SP Distribution plc and SP Manweb plc	Non-confidential	Yes.	
UK Power Networks	Non-confidential	No.	
Western Power Distribution plc	Non-confidential	Yes	

Company	Confidential/ Anonymous	5. DCP 262 was raised as a Part 1 matter as it impacts Schedule 19 which is defined as a Part 1 matter in Clause 9.4.3 The DCUSA Panel have recommended that this Change Proposal be developed as a Part 2 Matter as it is a self-governance issue. Do you believe that CP should be raised as a Part 1 or Part 2 Matter? Provide supporting comments.	Working Group Comments
Electricity North West	Non-confidential	<p>Schedule 19 is not referenced within Clause 9.4.3 which states:</p> <p>“it is likely to discriminate in its effects between one Party (or class of Parties) and another Party (or class of Parties)”</p> <p>If one party is not amending bills in what should be a sensible amount of time then it is impacting another party. Whether this is discriminatory is more difficult to ascertain if they are dealing with the process the same</p>	<p>The Working Group noted ENWL’s response that the CP could be progressed as a Part 1 matter if the proposed change impact other parties and processes.</p> <p>The group agreed with most of the respondents that the CP should be progressed as a Part 2 Matter as it is a self-Governance issue is only changing the credit rebill settlement timescale. The Change will not have a significant impact</p>

		<p>for all. The consultation is silent on how significant or widespread this is.</p> <p>That said supplier to distributor accounts have a clear timeline as to when bills are to be produced whereas distributor to distributor bills do not. Based on this it could be argued that it is a part 1 matter. If however the expectation is a groundswell of support to include clarification in this matter from the distributor community it would be sensible to raise as a part 2 matter to progress more quickly to a conclusion and avoid an Ofgem decision on a relatively simple and pragmatic matter.</p>	on DNO and IDNO Parties.
ESP Electricity	Non-confidential	<p>ESPE originally raised this CP as Part 1 Matter because commercial activities are specifically identified as a Part 1 matter in the DCUSA Clause 9.4.2D. Whilst we understand the Panel's opinion is that this could be managed as self-governance between Parties, we do not agree with this viewpoint.</p> <p>As the receipt of a credit/re-invoice can substantially impact the cash flow of IDNOs, we view this as a significant issue to address. These impacts could also potentially impact competition. It is therefore our belief is that the Authority should have the final say on matters which materially affect Parties. It is also our opinion that this is why commercial activities are included as a Part 1 matter.</p>	Noted
Northern Powergrid	Non-confidential	<p>I believe this CP should be progressed as a Part 2 matter. The CP is a self-governance issue and will not have any significant impact to either the DNO or IDNO parties.</p>	Noted

Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	We agree with the DCUSA Panel that this CP should be progressed as a Part 2 Matter. Categorisation can be very subjective and there is an arguable case for treatment of this CP as a Part 1 Matter. However, on balance, we do not feel that it adequately meets the criteria for Part 1 categorisation and this CP ought to be capable of resolution under self-governance, without reference to the Authority for decision.	Noted
SP Distribution plc and SP Manweb plc	Non-confidential	We would support the DCUSA panel decision that this be developed as a Part 2 matter.	Noted
UK Power Networks	Non-confidential	The change proposal does not meet any of the criteria set out within DCUSA clause 9.4 Part 1 Matters and therefore this is a Part 2 matter.	Noted
Western Power Distribution plc	Non-confidential	We believe this is a Part 2 matter as we agree with DCUSA and Ofgem that this is a self-governance issue	Noted

Company	Confidential/ Anonymous	6. Do you agree with the Working Group's view that 45 days from receipt of revised Half Hourly Data is an appropriate timescale for the credit/rebill exercise to be carried out by DNOs, if not please provide your detailed rationale?	Working Group Comments
Electricity	Non-	Our view is that we should deal with all bills that are	The group agreed that the timescales will

North West	confidential	produced and align them to a timeline be they new accounts or amendments to accounts. In other words whatever is provided in the 15 th of the month report is billed within a certain period. This avoids future issues should the main accounts start to be delayed since this change only covers amendments.	cover all billing and not just amendments. All billing will have to be completed within 60 days.
ESP Electricity	Non-confidential	ESPE feels that this is an appropriate timescale; however, this question will be best answered by the DNOs.	
Northern Powergrid	Non-confidential	I agree that with the Working Group's view of 45 days as an appropriate timescale. The 45 day timescale will give the DNOs sufficient time to be able to carry out the credit/rebill exercise.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	We agree with the 45 day period suggested.	Noted
SP Distribution plc and SP Manweb plc	Non-confidential	Yes.	Noted
UK Power Networks	Non-confidential	No. We feel that the current arrangements in place are sufficient and there is no requirement for a timeline to be	Noted

		added.	
Western Power Distribution plc	Non-confidential	<p>No – Whilst we always attempt to issue billing for all data received from IDNO’s on the next available billing run, 45 days from receipt does not allow for any problems with the data and having to withdraw billing and correct on the next billing run.</p> <p>e.g If we receive the data on the 15th of the month at the latest – we will next bill on the 3/4th of the following month – If there is an issue with the data on the billing run the invoice /credit note will be withdrawn and corrected for the next billing run which is the 3/4th of the following month –some 49 days later. If the data is received before the 15th then the number of days elapsed will be even greater.</p> <p>In essence 45 days allows for no contingency within our billing process.</p>	The Working Group agreed to update the timescale in the legal text to 60 days to cover of any exceptions.

Company	Confidential/ Anonymous	7. Do you believe that the DCP 262 change will have an impact on DNOs’ internal billing processes, if so please provide your rationale?	Working Group Comments
Electricity North West	Non-confidential	The current legal text is talking of calculating the difference and billing accordingly. We need to understand what is being asked for in order to determine costs in this area. Our current process is to incorporate the revised data into the calculation of the current month’s bill – we do not adjust the bill for the month the revised data relates to. The issue at hand is trying to ensure that billing is undertaken in a timely manner but is straying into billing process calculations.	<p>A member of the group suggested that the legal text should not only cover amendments but all billing. The text does not need to differentiate between amendments and the normal billing. The group agreed that the legal text should be updated to state that ‘All billing should be completed within 60 days.’</p> <p>It was agreed that ElectraLink will check</p>

			with the legal advisor that the text covers the whole billing process not just amendments.
ESP Electricity	Non-confidential	N/A	Noted
Northern Powergrid	Non-confidential	I believe that DCP 262 should not have a major impact on the DNO's internal billing processes, the change may cause a slight increase in billing preparation to be carried out but the impact should not be significant.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	From our perspective, we do not think there should be a material impact.	Noted
SP Distribution plc and SP Manweb plc	Non-confidential	No.	Noted
UK Power Networks	Non-confidential	Yes. The data provided for any credit rebilling exercise would need to be provided in the same report as the HH Specific Portfolio data to avoid any impact in terms of processing the data. If we need to process two reports each month	The group noted that the standardised format of data would simplify the process. It was highlighted that different types of templates are currently used to submit data.

		per IDNO, instead of one as at present, due to an additional credit/rebill report then this exercise would take twice as long to complete.	The Working Group supports the view that a separate CP should be raised to address the formatting of the billing templates in the DCUSA.
Western Power Distribution plc	Non-confidential	Yes – please see my rational above	Noted

Company	Confidential/ Anonymous	8. Are there any technical constraints within DNOs' billing systems that need to be taken into consideration? If so, please provide an impact analysis of the associated costs and timescales.	Working Group Comments
Electricity North West	Non-confidential	We are still evaluating the impact on our billing system if we need to amend our processes to cancel and rebill or credit/adjust specific bill periods rather than add such an amendment to the next bill.	CB explained that currently ENWL produce does not have a separate billing process for credit re-bills. The Working noted that this will be addressed by updating the legal text to include all billing not revised bills.
ESP Electricity	Non-confidential	N/A	
Northern Powergrid	Non-confidential	There are no technical constraints that need to be taken into consideration from Northern Powergrid's point of view as our billing system will be able to cope with this change.	Noted

Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	There are no material constraints in our case.	Noted
SP Distribution plc and SP Manweb plc	Non-confidential	No.	Noted
UK Power Networks	Non-confidential	Our systems rely on the IDNOs providing the data in the correct format using the template, and also within the set timescales shown in DCUSA Schedule 19. Any change to this process would require a system change which would involve a cost time to develop such a change. Our ball park estimate would be £30-50k and 3-6 months.	The Working Group noted that this is not a system or process change, this is simply setting a timeline. There were concerns that currently data is received in different formats and this should be a standardised process The Working Group noted the points raised are of scope for DCP 262 but should be addressed in a new CP.
Western Power Distribution plc	Non-confidential	NO	Noted

Company	Confidential/Anonymous	9. Do you consider that the proposal better facilitates the DCUSA General Objectives 2 and	Working Group Comments
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		4? Please provide supporting comments on these and any other relevant DCUSA General or Charging Objective that you feel would be impacted by DCP 262.	
Electricity North West	Non-confidential	This would better facilitate general objective 2 but is neutral on the rest.	Noted
ESP Electricity	Non-confidential	<p>ESPE agrees with the Working Group that DCUSA General Objectives 2 and 4 are better facilitated by the introduction of DCP 262.</p> <p>DCUSA General Objective 2 will be 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, and in some cases the LDNO is not being invoiced/credited for the difference by the DNO Party. This affects the LDNO's cash flow and can be considered a barrier to competition. In effect, LDNOs are supporting the DNO's cash flow.</p> <p>DCUSA General Objective 4 will be better facilitated as it 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 what is already explained and included within Schedule 19 for NHH invoices.</p>	Noted
Northern Powergrid	Non-confidential	<p>I feel that this CP does better facilitate the DCUSA General Objectives 2 and 4.</p> <p>Objective 2 is better facilitated as this CP should have a positive impact on the IDNO's by helping them to better manage their cash flow, which then promotes</p>	Noted

		<p>competition.</p> <p>Objective 4 is better facilitated as this CP puts a timescale on how long the DNO has to carry out the credit/rebill exercise which should then make the process more efficient.</p>	
<p>Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc</p>	<p>Non-confidential</p>	<p>We particularly feel that General Objective 4 is better facilitated, as the requirement to meet a reasonable timeline clearly enhances the efficiency of administration of DUoS billing/payment under the DCUSA.</p> <p>General Objective 2 is also better facilitated as the CP would remove an element of avoidable adverse treatment of Parties who are engaged in distribution competition.</p>	<p>Noted</p>
<p>SP Distribution plc and SP Manweb plc</p>	<p>Non-confidential</p>	<p>Yes.</p>	
<p>UK Power Networks</p>	<p>Non-confidential</p>	<p>No.</p> <p>DCUSA currently contains the steps that should be followed to show how this process is managed and should not cause a barrier to competition as stated within Objective 2. Again, with Objective 4, there is already a process in place within DCUSA which should remove the any impact to IDNOs cash flow</p>	<p>It was noted that this point has been addressed in the earlier responses and that updating the billing template would require a new CP to be raised.</p>
<p>Western Power</p>	<p>Non-confidential</p>	<p>Yes – I agree with this for the same reasons as listed in the change proposal</p>	<p>Noted</p>

Distribution plc			
Company	Confidential/ Anonymous	10. Are there any alternative solutions or matters that should be considered by the Working Group?	Working Group Comments
Electricity North West	Non-confidential	These are covered earlier	Noted
ESP Electricity	Non-confidential	Not at this time	noted
Northern Powergrid	Non-confidential	I am happy with the proposed solution and do not think that an alternative solution needs to be considered.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Not that we are aware of.	Noted
SP Distribution plc and SP Manweb plc	Non-confidential	No.	Noted
UK Power Networks	Non-confidential	Yes.	The Working Group noted that this point has been addressed regarding the need

		<p>We believe that although the proposed change is not required, there are some improvements that can be made to the current DCUSA text/process that would assist parties in managing this work</p> <p>The recommendation is that the template which is used by IDNOs to provide HH Portfolio data to DNOs is added to DCUSA as a schedule/appendix, together with clarity of population of prior months adjustments. Included within this consultation response is a proposed new version of this template and legal text</p> <p> DCP262 SCHEDULE 19.docx</p>	<p>for a new CP to standardise the process. The Working Group support that a new CP should be raised to address the format of the templates.</p>
Western Power Distribution plc	Non-confidential	I agree with the proposals principle- but believe the number of days should be 60 days to allow DNO's to have two billing attempts to issue the revised billing.	Noted

Company	Confidential / Anonymous	11. Are you aware of any wider industry developments that may impact upon or be impacted by this CP?	Working Group Comments
Electricity North West	Non-confidential	None that we are aware of	Noted
ESP Electricity	Non-confidential	ESPE are not aware of any impact on other changes currently being proposed in the industry.	Noted
Northern Powergrid	Non-confidential	I am not aware of any other industry developments that may impact upon or be impacted by this CP.	Noted

Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Not that we are aware of.	Noted
SP Distribution plc and SP Manweb plc	Non-confidential	No.	Noted
UK Power Networks	Non-confidential	No	Noted
Western Power Distribution plc	Non-confidential	NO	Noted