DCUSA DCP 248 Consultation Responses – collated comments

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| 1. Do you understand the intent of the DCP 248? |
| **Response Summary:** It was noted that all respondents understood the intent of DCP 248. The main additional comment was from ENWL regarding whether Options 2 to 4 meet the intent of the CP. |

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| 1. Are you supportive of the principles of DCP 248? |
| **Response Summary:** The working group noted that there was mixed support for the principles of DCP 248, with some Parties supportive of the proposal whilst others expressed concerns. |

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| 1. What is your preferred option (please provide your rationale):   • Option 1 - A 12 month grace period to allow retrospective reductions to MIC  • Option 2 – A 12 month grace period. Setting the MIC to zero for the first month, after which the first month’s maximum demand data could be used  • Option 3 – A 12 month grace period. Setting MIC to zero for the duration of the grace period.  • Option 4 – A 12 month grace period setting the MIC using any Maximum Demand data already available or estimated where no Maximum Demand data is available. |
| Response Summary:   * 11 respondents prefer Option 1. * No respondents prefer Option 2. * Three respondents prefer Option 3. * One respondent prefers Option 4. * One respondent does not support any of the options. |

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| 1. Which option do you consider provides the most/least level of protection against inappropriate capacity charges for customers affected by P272? |
| Response Summary:   * Eight respondents believe that option 1 provides the best protection (although some base this view on it being the only workable solution). * Four believe that option 3 provides the best protection. * One respondent believes that none provide protection and another that there is no difference between them. * Two respondents believe that option 1 provides the least protect. * One respondent believes that option 2 provides the least protection. |

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| 1. Do you have any comments on the proposed legal text for each of the options? |
| Response Summary:   * Seven respondents did not have any comments on the proposed legal text. * One respondent noted that only option 1 refers to what the MIC will be after 12 months. * Two respondents provided general comments and suggested amendments to the legal text for option 1. * Two respondents provided general comments and suggested amendments to the legal text for each of the options. * One respondent suggested creating a new Schedule in DCUSA rather than amending Schedule 16. |

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| 1. Do you consider that each of the four proposals better facilitates the DCUSA Objectives? Please give supporting reasons. |
| Response Summary:   * One respondent expected that DNOs would write to customers again to clarify the situation regarding excess capacity charges following the deferral of DCP 161. * One respondent suggested that Options 2, 3 & 4 better facilitate Charging Objective 3 than Option 1. * 7 respondents agreed that all of the options better facilitate the DCUSA Objectives, with two of the respondents suggesting that none of the options better facilitate Charging Objective 2 and one of the respondents suggesting that it may be too late to implement Options 2, 3 & 4. * Two respondents suggested that Options 2 and 3 do not better facilitate the DCUSA Objectives, with another respondent noting that Option 1 best facilitates the DCUSA Objectives. * Three respondents did not agree that the proposals better facilitate the DCUSA Objectives. |

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| 1. It is noted that P272 deadline has been extended which gives more time to liaise with customers to agree a MIC but the task is still a significant one. In light of the delay in P272, do you that agree that the protection of DCP 248 is still required? |
| Response Summary:   * 11 respondents agreed that the protection of DCP 248 is still required, with one respondent suggesting that a retrospective element (i.e. Option 1) would not be required following the deferral of DCP 161 and one respondent suggesting that an enduring protection is required. * Two respondents did not agree that the protection of DCP 248 is still required. * One respondent suggested that protection of DCP 248 has already been offered to PC5-8 customers when the letters were issued from DNOs. * One respondent commented on Clause 2.58. |

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| 1. Do you think that the current protection offered by the UOS charging statements with regards to incorrect charges offers the level of protection sought by this Change Proposal? |
| Response Summary:   * Eight respondents did not agree that the protection provided by UoS charging statements offers the level of protection sought by DCP 248. * One respondent agreed that the protection offered by UoS charging statements is sufficient. * One respondent suggested that the UoS charging statements are not relevant to DCP 248. |

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| 1. Are you supportive of the proposed implementation date - as soon as possible following Authority consent which may require an extra-ordinary release? |
| Response Summary:   * 13 respondents agreed with the proposed implementation date, with two respondents noting that they agreed as long as DCP 248 did not result in IT changes being required * Two respondents suggested that the implementation date should be determined by the outcome of the consultation. |

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| 1. In the DCP 248 legal text the protection offered by all of the options is limited to 12 months of a change in Measurement Class. Do you agree with this timescale? If not, please provide your rationale. |
| Response Summary: 11 respondents agreed that 12 months is a reasonable and appropriate timescale, with a suggestion made by four respondents to extend the timescale and a suggestion made by one respondent to shorten the timescale. |

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| 1. Do you believe that there should be an end date within the DCP 248 legal text and, if yes, what date should it be? |
| Response Summary:   * 7 respondents did not believe there should be an end date within the DCP 248 legal text, with a respondent specifically noting that an end date is not required for Option 1. * 6 respondents suggested end dates for inclusion within the legal text. |

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| 1. With regards to Option 1, do you agree with the Working Group’s view that customers that were not occupying the property at the time of the P272 migration are not entitled to back dating of their MIC? |
| Response Summary:   * Three respondents did not agree that customers that were not occupying the property at the time of the P272 migration should be excluded from back dated MICs. * 10 respondents agreed with the Working Group’s view with regarding the back dating the MIC for customers who were not occupying the property at the time of the P272 migration * One respondent suggested that customers should be able to agree an amended MIC back to the point when they became responsible for paying the energy bill. |

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| 1. With regards to Option 1, if a P272 impacted customer requests a change in MIC shortly before moving out of a property, how best do you see managing this process once the customer has left the property? And how significant an issue do you believe this is? |
| **Response Summary:** The below suggestions were made with regard to managing the process for customers who have changed their MIC shortly before moving out of the property:   * The grace period should not be offered * Change of MIC should only be offered where the customer occupies the property * Provisions of Paragraph 151A should apply for customers seeking retrospective amendments * Credit / re-bills should occur as per the supply contract * The complexities introduced by Option 1 in terms of backdating, would be mitigated by Option 3 * Cannot be mitigated as DNOs will not receive prior notice of a change of tenancy * A number of respondents suggested that this is not a significant issue |

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| 1. With regards to each option, are there any technical or resource constraints that need to be taken into consideration (and is there an associated cost)? |
| Response Summary: In terms of technical or resource constraints that need to be taken into consideration and there associated costs, the responses suggested the below:   * Option 1 could result in additional work for billing and validation systems and increased dispute, complaints and refunds due to the retrospective element. In addition, two respondents noted the manual effort involved in Option 1. * Two respondents agreed that Options 2 and 3 would be less resource intensive than Option 1 * Four respondents suggested that Options 2, 3 & 4 would lead to additional internal costs, with another respondent suggesting that these options would require significant changes to their billing system. * One respondent noted that additional costs will be incurred as a result of re-negotiating the MICs and issuing new connection agreements. |

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| 1. With regards to each option, are there any other constraints, for instance the need for DNOs to potentially agree connection agreements with a large proportion of the customers affected by P272 that you are concerned about? |
| **Response Summary:**   * One respondent raised concerns regarding Option 1, noting that customers need to be protected from the outset rather than required to enter into an agreement within 12 months. * One respondent did not agree that a new connection agreement needs to be signed for all P272 customers. * With regard to Options 2, 3 & 4, one respondent suggested that they did not expect such material impacts on the billing process. * One respondent noted that their biggest concern was the potential to cause unnecessary and unjustified confusion amongst customers through excessive complexity. * One respondent suggested that the change is too simplistic in its understanding of the MIC |

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| 1. With regards to each option, do you consider there to be a concern in relation to a customer being able to identify the need to amend their maximum import capacity with DNOs? Please provide supporting reasons. |
| Response Summary:   * One respondent noted the difficulties in engaging with EDCM customers on DUoS related matters, with six respondents noting the difficulties with customer understanding the concept of MIC. * One respondent suggested that there was not a concern with regard to Option 1 due to all customers having received an initial letter. * One respondent suggested mitigating the concern via continuous communications with the affected customers. * Two respondents suggested that if it is not provided, Suppliers should offer guidance to their end customers on the ability to renegotiate the agreed MIC. |

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| 1. With regards to Option 1, do you believe that there should be a materiality threshold such that there will not be a credit rebill if it is less than a certain value? |
| Response Summary:   * Six respondents agreed that there should be a materiality threshold with regard to Option 1. * Five respondents did not agree that there should be a materiality threshold with regard to Option 1. * Two respondents suggested that there should be a minimum retrospective adjustment threshold which should quality for re-billing based on kVA. * One respondent noted that there already have a materiality threshold in place which they would not want to change for P272 MPANs. |

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| 1. With regards to Option 1, if there were to be a materiality threshold, what do you believe it should be set at? |
| Response Summary: The below suggestions were received for materiality thresholds   * +/- £5 * £10 – with any smaller amounts being donated to charity * £20/month * £75 * £100/MPAN * 10 kVA * 11 kVA |

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| 1. Are there any alternative solutions or matters that should be considered by the Working Group? |
| Response Summary:   * Three respondents did not have any alternative solutions or matters that should be considered by the Working Group. * One respondent queried whether the change intends to apply to DNOs only and not to IDNOs. * Five respondents provided comments for the Working Group to consider. |