

DCUSA DCP 216 Consultation responses – collated comments

Company	Confidential/ Anonymous	1. Do you understand the intent of the DCP 216?
Electricity North West	Non-confidential	Yes
Northern Powergrid	Non-confidential	Yes we understand the intent of the DCP 216.
SP Distribution / SP Manweb	Non-confidential	Yes SPEN understand the intent of DCP 216
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Yes.
UK Power Networks	Non-confidential	Yes.
Western Power Distribution (4 areas)	Non-confidential	Yes
Company	Confidential/ Anonymous	2. Are you supportive of the principles of the DCP 216?

Electricity North West	Non-confidential	Yes, making the model easier to understand for stakeholders and therefore more efficient is a beneficial change
Northern Powergrid	Non-confidential	Yes we are supportive of the principles of the change.
SP Distribution / SP Manweb	Non-confidential	Yes SPEN are supportive of the principles of DCP 216
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Yes.
UK Power Networks	Non-confidential	Yes.
Western Power Distribution (4 areas)	Non-confidential	Yes

Company	Confidential/ Anonymous	3. Do you have any comments on the proposed legal text?
Electricity North West	Non-confidential	No
Northern Powergrid	Non-confidential	No.

SP Distribution / SP Manweb	Non-confidential	No comments.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	No.
UK Power Networks	Non-confidential	We are comfortable with the changes, which are restricted to the date and model number as the format is not prescribed as part of the methodology.
Western Power Distribution (4 areas)	Non-confidential	No

Company	Confidential/ Anonymous	4. DNO Parties: Please confirm whether there is any change to the outputs obtained from the reformatted LRIC and FCP EDCM models?
Electricity North West	Non-confidential	We have populated the new model and confirm that it provides the same results as the existing LRIC EDCM model for Electricity North West.
Northern Powergrid	Non-confidential	We have populated the DCP 216 LRIC Model+r6903 with inputs used for final 2015/16 charges and can confirm that the core output remains unchanged for both of our Licence areas.
SP Distribution / SP Manweb	Non-confidential	SPEN confirm that there is no change to the outputs obtained from the reformatted FCP EDCM models.
Southern	Non-confidential	We have verified that the outputs are unchanged in the FCP EDCM model.

Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc		
UK Power Networks	Non-confidential	We have tested the LRIC version of the revised model for all three of our regions and have seen no changes to the outputs.
Western Power Distribution (4 areas)	Non-confidential	None seen

Company	Confidential/ Anonymous	5. Do you think that the new format of the amended EDCM¹ Model is beneficial?
Electricity North West	Non-confidential	Yes the format is easier to follow, being contained on one tab in the matrix format.
Northern Powergrid	Non-confidential	Yes, mainly the changes in the 'matrix' worksheet. This makes the calculations considerably easier to follow.
SP Distribution / SP Manweb	Non-confidential	Yes SPEN do think that the new format of the amended EDCM Model is beneficial.
Southern Electric Power Distribution plc and	Non-confidential	We believe that the calculations of the tariffs are easier to follow through than the current model

¹ Changes to the format of the amended EDCM Model should not change the calculation process.

Scottish Hydro Electric Power Distribution plc		
UK Power Networks	Non-confidential	Yes we believe that the new model format is beneficial as a result of it being easier to follow through the calculation for a customer's charge.
Western Power Distribution (4 areas)	Non-confidential	Yes

Company	Confidential/ Anonymous	6. Have you identified any further changes applicable to the reformatting of the EDCM model?
Electricity North West	Non-confidential	No
Northern Powergrid	Non-confidential	<p>We believe the format of the '11' input worksheet could be improved to better group inputs, as below:</p> <ul style="list-style-type: none"> • Data from the CDCM: <ul style="list-style-type: none"> ○ A single input table for network data linked to the CDCM (i.e. grouping inputs 1105, 1122, 1131 and 1135). ○ A separate table for financial information with O&M rate, direct costs, indirect costs, network rates, target revenue and exit charges linked to the CDCM. On top of this, it would seem logical to input the total target revenue and the transmission exit charges, rather than inputting the current 'target revenue less exit charges'. ○ A separate table for 'generation data' (GP, GL and connected capacity). ○ A separate table for days in year and hours in super-red.

		<ul style="list-style-type: none"> A single input table for NUFs cap and collars (rather than the separate 1133 and 1134 currently in use. <p>An example of this is provided in the attached workbook.</p>
SP Distribution / SP Manweb	Non-confidential	No further changes identified at this stage.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Matrix Tab: Column BJ should be set to 3 d.p. for super-red rate.
UK Power Networks	Non-confidential	No.
Western Power Distribution (4 areas)	Non-confidential	Yes

Company	Confidential/ Anonymous	7. Which DCUSA General Objectives does the CP better facilitate? Please provide supporting comments.
		<ol style="list-style-type: none"> The development, maintenance and operation by each of the DNO Parties and IDNO Parties of an efficient, co-ordinated, and economical Distribution System. The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent with that) the promotion of such competition in the sale, distribution and purchase of electricity. The efficient discharge by each of the DNO Parties and IDNO Parties of the

		<p>obligations imposed upon them by their Distribution Licences.</p> <p>4. The promotion of efficiency in the implementation and administration of this Agreement and the arrangements under it.</p> <p>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.</p>
Electricity North West	Non-confidential	This change proposal better meets general objective 1 as the amended model is more efficient in terms of reviewing for errors. The proposal also better meets general objective 2 as it increases transparency by making the model easier to understand and thereby better facilitating effective competition in the supply of electricity.
Northern Powergrid	Non-confidential	Given that the sensitive nature of the data in the EDCM model means that the models are not published, the interaction suppliers or end users have with the models is negligible, hence we believe the change is neutral to all DCUSA objectives. However, in making the models more transparent, this change may enable parties to gain better understanding of the methodologies and hence raise potentially beneficial changes in the future.
SP Distribution / SP Manweb	Non-confidential	SPEN agree with the working group that this CP better facilitates General Objective two.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	We agree with the Working Group that General Objective 2 is better facilitated.
UK Power Networks	Non-confidential	We believe that General Objective 4 is better facilitated by this change by improving the ease of use of the EDCM model for it's users.
Western Power	Non-confidential	Agree with Working Group

Distribution (4 areas)		
Company	Confidential/ Anonymous	8. Which DCUSA Charging Objectives does the CP better facilitate? Please provide supporting comments. <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	This change proposal better meets charging objective 1 as the amended model is more efficient in terms of reviewing for errors. The proposal also better meets charging objective 2 as it increases transparency by making the model easier to understand and thereby better facilitating effective competition in the supply of electricity.
Northern Powergrid	Non-confidential	As above.
SP Distribution /	Non-confidential	SPEN agree with the working group that this CP better facilitates Charging Objective two.

SP Manweb		
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	We agree with the Working Group that Charging Objective 2 is better facilitated.
UK Power Networks	Non-confidential	We believe that Charging Objective 4 is better facilitated by this change by improving the design of the EDCM model for the ease of use of it's users.
Western Power Distribution (4 areas)	Non-confidential	Agree with Working Group

Company	Confidential/ Anonymous	9. Are you aware of any wider industry developments that may impact upon or be impacted by this CP?
Electricity North West	Non-confidential	No
Northern Powergrid	Non-confidential	No, subject to the outcome of the ECDM review.
SP Distribution / SP Manweb	Non-confidential	SPEN are not aware of any wider industry developments that may impact upon or be impacted by this CP.
Southern Electric Power Distribution	Non-confidential	We are not aware of any.

plc and Scottish Hydro Electric Power Distribution plc		
UK Power Networks	Non-confidential	No.
Western Power Distribution (4 areas)	Non-confidential	No

Company	Confidential/ Anonymous	10. Do you have a preference on the date that DCP 216 is implemented into the DCUSA?
Electricity North West	Non-confidential	No
Northern Powergrid	Non-confidential	No.
SP Distribution / SP Manweb	Non-confidential	No preference.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	We agree with the Working Group that implementation should be in the next available DCUSA release.

UK Power Networks	Non-confidential	As this change does not change the outputs then we believe that this change can be implemented in the next DCUSA release after acceptance. This change is also a part 2 matter so would not require the approval of the Authority.
Western Power Distribution (4 areas)	Non-confidential	As soon as possible (April 2016)

Company	Confidential/ Anonymous	11. Are there any alternative solutions or matters that should be considered by the Working Group?
Electricity North West	Non-confidential	No
Northern Powergrid	Non-confidential	No.
SP Distribution / SP Manweb	Non-confidential	No.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	We are not aware of any.
UK Power Networks	Non-confidential	We have noted a change in format of the tariff tables (4501 & 6005), as a result the impact on the LC14 Charging Statement needs to be considered.
Western	Non-confidential	No

Power Distribution (4 areas)		
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