

DCUSA DCP 210 Consultation responses – collated comments

Company	Confidential/ Anonymous	1. Do you understand the intent of the CP?
Electricity North West	Non-confidential	Yes.
Northern Powergrid	Non-confidential	Yes
Scottish Power Energy Retail Ltd	Non-confidential	YES
SmartestEnergy	Non-confidential	Yes- it is to address the inflexibility of the assessment timetable.
SP Distribution / SP Manweb	Non-confidential	Yes
UK Power Networks	Non-confidential	Yes
WPD	Non-confidential	Yes
SSEPD	Non-confidential	Yes
Company	Confidential/ Anonymous	2. Are you supportive of the principles established by this proposal?
Electricity North West	Non-confidential	Yes.

Northern Powergrid	Non-confidential	Yes
Scottish Power Energy Retail Ltd	Non-confidential	YES
SmartestEnergy	Non-confidential	Yes
SP Distribution / SP Manweb	Non-confidential	Yes
UK Power Networks	Non-confidential	We agree with the principle to reduce the requirement on the Panel to repeatedly approve extension periods to changes that are reasonably expected to take longer than the existing 40 working day maximum extension periods.
WPD	Non-confidential	Yes
SSEPD	Non-confidential	Yes

Company	Confidential/ Anonymous	3. Do you believe that there should be a maximum defined assessment period timescale within the DCUSA, or should the assessment period be determined by the Panel?
Electricity North West	Non-confidential	<p>The Panel are accountable for the assessment period. They must retain ultimate decision making on determining the assessment timetable be it defined periods before further review or based on information from working group members in determining the length of period required. In order to do this they need information on the type of change, its complexity and how much earlier work has already been undertaken (either by the Proposer or industry working groups such as the Methodology Issues Group).</p> <p>The current process provides some form of flexibility to the Panel in providing an 'up to' 60 Working Days assessment timetable with updates thereafter on an 'up to' 40 Working Day extension periods. However the reason for this change is that a significant number of change proposals are being</p>

		<p>brought back to the Panel for extensions. This is creating an administrative burden.</p> <p>The 'maximum defined period' approach is not an approach we would advocate because you are limiting the time available to the working group in developing the change. Delivering to a deadline can have the effect of either delaying change (i.e. it could have been delivered earlier) or rushing change (not sufficient time). In the latter it may be that the best solution cannot be developed in time, or may not be identified due to lack of discussion/consultation resulting in a sub-optimal solution. This approach is likely to increase the administrative burden on DCUSA because further change proposals may be required in the future or the use of 'kick back' powers both by the DCUSA Panel and/or Ofgem are invoked, resulting in further work by the working group or the change proposal is rejected due to insufficient evidence to justify the change. This approach is therefore not workable.</p> <p>We still support the need for the DCUSA Panel to manage the change process and determine the assessment timetable including any revisions to it.</p>
Northern Powergrid	Non-confidential	The assessment period should be determined by the panel.
Scottish Power Energy Retail Ltd	Non-confidential	We believe that the initial assessment period should be decided by the Panel. To assist the Panel, the Working Group could set out a clear timetable from the first meeting as part of revised terms of reference and present this to the panel with justification.
SmartestEnergy	Non-confidential	We do not mind a value being inserted into the code (though one more realistic than the current one). However, we note that even if a maximum is defined it will more likely be an indicator/guidance as if changes require longer times to assess they will inevitably receive the extensions or be sent back.
SP Distribution / SP Manweb	Non-confidential	We consider it appropriate that the assessment period be determined by the Panel, where appropriate based on recommendations provided by the relevant working group.
UK Power Networks	Non-confidential	We believe that the timetable originally established for an Assessment Process by the Panel should have a maximum period which should remain at 60 working days. The Working Group should request an extension to this timetable as soon as they are aware that one will be required and the Panel should then be able to grant an extension, with no defined maximum, taking into account the

		timetable provided by the Working Group. Therefore the original timetable would have a maximum but the overall assessment period would not.
WPD	Non-confidential	Yes
SSEPD	Non-confidential	We believe that a maximum defined period should be maintained within the DCUSA as it helps to indicate the timetable boundaries and progress a CP is expected to achieve in most cases. However, the current maximum assessment period seems unrealistically tight and we believe it should be amended.

Company	Confidential/ Anonymous	4. Of the three options identified by the Working Group, do you have a preferred option? Please provide your rationale.
Electricity North West	Non-confidential	<p>Option 1 depends on the value chosen. Anything less than the current values will increase the administrative burden, anything greater will reduce it. It is not helpful when the Panel know that the change proposal will be back for further extensions based on the amount of work still needed in developing the solution so it becomes a more mechanistic process rather than a true understanding of when the change will reach the Change Report stage.</p> <p>The Panel are not experts in everything DCUSA and it would be helpful if input from the working group, having regard for the complexity of the change, is obtained in determining the length of time needed to complete the process. Option 2 provides for additional information from the working group in determining such a timescale. This should also provide some element of buy-in by the working group because they have been involved in the process.</p> <p>If the change proposal has not been completed by this timescale, reasons for the delay should be provided and a re-assessment of the change proposal timetable provided so that the Panel can determine the extension period. It is expected that if the initial timetable was reasonably accurate the existing 'up to 40 Working Days' should be sufficient for each extension period so that it can be closely monitored. If further than this is required the 40 Working Day timetable will at least be provided with an update and what has occurred between the two periods to ensure that sufficient activity is taking place to bring the change proposal assessment period to a close.</p> <p>Option 3 allows the initial 60 Working Day period for the working group to be formed and hold an</p>

		<p>initial if not two meetings prior to the review period. This will allow the working group more time to consider the options and likely impact on the industry in order to develop a more robust plan. It should be noted that 38% of change proposals are completed within three months. Under option 2 they would have to recommend a detailed timetable for all changes even those completed relatively quickly whereas option 3 means they only have to recommend a detailed timetable for 62% of changes. We however believe that the Working Group terms of reference needs to be adhered with when seeking an extension i.e. providing a clear justification of the change together with a timetable to complete the change process. The wording may need to be amended whereby the working group's initial assessment of the timetable changes but this may be down to interpretation. It is worth a consideration.</p> <p>In summary our view is that option 3 is the better option, followed by Option 2 and then option 1.</p>
Northern Powergrid	Non-confidential	Our preference is for option 3 which allows the working group to scope out the issues associated with the change proposal and, if an extension is required, the group will have a clearer idea of how much additional time is likely to be required.
Scottish Power Energy Retail Ltd	Non-confidential	From the three options provided our preference would be for Option 2
SmartestEnergy	Non-confidential	Option 1 or 2 seems most sensible. As the average number of working days highlighted is more than 60 working days it does not appear sensible to retain this value even if there is subsequently more flexibility.
SP Distribution / SP Manweb	Non-confidential	<p>Preferred Option 2.</p> <p>We support the principals of DCP210 in seeking to introduce a more flexible approach which is based on the complexity, significance and urgency of proposals. We believe Option 2 best achieves this.</p>
UK Power Networks	Non-confidential	We prefer option 3 retaining the 60 Working Days for the initial period, during which the Working Group must request an extension if required. This will allow the Working Group sufficient time to properly determine the total time which will be required to complete the Assessment Process. However, they should submit a request for an extension period to the Panel as soon as they are

		<p>aware that one will be required.</p> <p>Changes which are completed within 60 Working Days do not currently require a review by the Panel after the initial assessment. It would not better the objectives to select option 2 which requires a second review by the Panel for all changes. The requirement to submit the request for an extension as soon as possible can be incorporated into Option 3 without introducing this additional burden.</p> <p>An additional benefit could be incorporated into this change to require the timetable to be published following Panel agreement of an extension period which would give all Parties greater visibility of when it is likely to be implemented.</p>
WPD	Non-confidential	<p>Option 3, although based on other information in the consultation perhaps this initial period should be increased to 6 months. This option will give the best balance between reducing the administrative load and encouraging the working groups to expedite their changes. In addition there should be another limit imposed on the overall duration of any change, say 2 years, at which point the change should be automatically withdrawn.</p>
SSEPD	Non-confidential	<p>We prefer Option 1, with maximum values amended to reflect our suggestions in Q5.</p> <p>We believe that maximum periods have a value in setting expectations of progress to the Proposer and the Working Group. However, these values have to be realistic to allow for reasonable development timetables. Where any extension is required, Clause 10.2 of the standard Working Group Terms of Reference should be enforced, requiring a clear justification for the extension and a revised timetable for the CP, to maintain a degree of discipline in the process.</p>

Company	Confidential/ Anonymous	<p>5. If fixed maximum values are to be included in the DCUSA, what values would you recommend for:</p> <ul style="list-style-type: none"> • The initial assessment period (currently up to 60 Working Days) • The extension period (currently up to 40 Working Days) <p>Please provide your rationale.</p>
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Electricity North West	Non-confidential	<p>The initial assessment period should be 'up to 120 Working Days'</p> <p>This almost ties in with the Elexon timetable and is around the average for the general change proposals. The other types of proposals have been more prolonged but they are the relatively new additions to the DCUSA and for various reasons have been delayed in their development so it is expected that this timescale will reduce over time.</p> <p>The extension periods should be retained at 'up to 40 Working Days'. Even if the timetable is longer than this, it places the proposal 'on watch' since it has already been longer than expected.</p>
Northern Powergrid	Non-confidential	<p>Whereas we are happy for a fixed maximum value to be applied to the initial assessment period we believe the extension period should be determined by the working group, based on the complexity and nature of the change proposal, and decided upon by the panel.</p>
Scottish Power Energy Retail Ltd	Non-confidential	<p>The analyses provided reports that 42% of Change proposals require extensions this would suggest that the initial assessment period of 60 Working days from an administration point of view is ineffective. Difficult to put a number to however if the average change takes 144 working days to progress to voting then we need to use this number as a guide/starting point for any decision made.</p> <p>We recommend that clause 11.12 (section 1C) that alludes to the Panel determining successive periods of up to 40 Working Days should remain thus allowing the Panel to manage and support the requirements of those Change Proposal that are either; put on Hold, complex and/or require Models.</p>
SmartestEnergy	Non-confidential	<p>We would be happy with the average number of working days being used, as long as outliers are removed from the data set used to determine this value.</p>
SP Distribution / SP Manweb	Non-confidential	<p>We do not consider it appropriate that fixed maximum values are included, rather that this should be assessed on a case by case basis depending on the nature and urgency of the change proposal.</p>
UK Power Networks	Non-confidential	<p>60 Working Days for the initial assessment period is the maximum reasonable period. Any changes taking longer than this to complete should have a timetable published to advise Parties when the</p>

		assessment period is expected to be completed.
WPD	Non-confidential	The initial assessment period should be 6 months based on data provided in the Consultation and the extension period should not be defined and a limit should be placed on the total duration, See Q4.
SSEPD	Non-confidential	<p>Our suggested values for these periods in the DCUSA text are:</p> <p>Initial assessment period: up to 120 Working Days</p> <p>Extension period: up to 90 Working Days</p> <p>Please note that these are expressed as 'up to' values and we suggest that in practice, the full periods should only be applied to 'complex' CPs.</p> <p>In practice, for 'standard' CPs we suggest the Panel might wish to allocate lesser periods of up to 90 Working Days for initial assessments and 40 Working Days for extensions.</p> <p>We have assumed in proposing these values that Clause 10.2 of the WG Terms of Reference would be enforced, to ensure that any lengthy extension period was properly justified.</p>

Company	Confidential/ Anonymous	6. Do you have any comments on the proposed legal text for options 1, 2 and 3?
Electricity North West	Non-confidential	<p>Option 1 just changes the values so no need to amend any further.</p> <p>Option 2 is acceptable in that it defines when the Panel will make a decision, the decision being theirs having due consideration of the working group timetable identified in the first meeting and that of a Proposer (should it be provided). It necessitates further work to the working group terms of reference and perhaps a change to the change proposal template to include a view of how long the assessment process should take.</p> <p>Option 3 effectively provides the Panel with unlimited review periods after the initial 60 Working Days whereby it is expected that some form of timetable has been developed. There is an argument</p>

		to say that the legal text that has been added is not required since it is covered by 'having regard to any information.....' but we can see the benefit of its inclusion so that that the Working Group understand their obligations. We agree with the deleted text.
Northern Powergrid	Non-confidential	No.
Scottish Power Energy Retail Ltd	Non-confidential	NO
SmartestEnergy	Non-confidential	No.
SP Distribution / SP Manweb	Non-confidential	None
UK Power Networks	Non-confidential	Option 3 should include a requirement for the Working Group to request the extension as soon as they know it is required.
WPD	Non-confidential	No
SSEPD	Non-confidential	No

Company	Confidential/ Anonymous	7. The Working Group discussed whether to codify the assessment timescales by change type (e.g. CDCM, EDCM, CCCM, general) but felt that this would not be appropriate as the type of change does not necessarily relate to its complexity. Do you agree?
Electricity North West	Non-confidential	Yes, we agree with the Working Group. There can be complex and non complex changes associated with any type of change, be they general or any of the methodology sections so it seems inappropriate to set differing timescales based on 'change type' as suggested in the question.

Northern Powergrid	Non-confidential	Yes we agree that the type of change does not necessarily relate to the complexity.
Scottish Power Energy Retail Ltd	Non-confidential	n/a
SmartestEnergy	Non-confidential	Yes.
SP Distribution / SP Manweb	Non-confidential	Yes
UK Power Networks	Non-confidential	Yes.
WPD plc.	Non-confidential	Yes
SSEPD	Non-confidential	We do not feel this is appropriate as, for example, some CDCM and EDCM changes are relatively minor (virtually housekeeping level) whereas others are very complex and may require development of models, multiple consultations, etc.

Company	Confidential/ Anonymous	8. Do you consider that the proposal better facilitates the DCUSA objectives?
Electricity North West	Non-confidential	As the Proposer of this change proposal our view is that it better facilitates General Objective 4 by reducing the administrative burden of the change process.
Northern Powergrid	Non-confidential	We believe DCUSA General Objective 4 is better facilitated as it will make the DCUSA administration more effective, reducing time to prepare and review documentation for Panel meetings and providing more flexibility to the Panel when managing change.
Scottish	Non-confidential	The promotion of efficiency in the implementation and administration of this Agreement

Power Energy Retail Ltd		
SmartestEnergy	Non-confidential	We agree with the working group that it better facilitates objective 4.
SP Distribution / SP Manweb	Non-confidential	We agree with the working group's assessment of the DCUSA objectives; that this CP better facilitates DCUSA General Objective 4. As it will reflect the specific requirements of each individual change proposal resulting in a more effective, and flexible administration of the CP.
UK Power Networks	Non-confidential	General Objective 4 is better facilitated by this change by removing an inefficient administrative burden from the Panel.
WPD	Non-confidential	This change better facilitates General Objectives 1 and 4.
SSEPD	Non-confidential	We believe that the CP better facilitates General Objective 4.

Company	Confidential/ Anonymous	9. Do you believe that it would be helpful if, on the Change Proposal form, the proposer indicates how long they would expect the assessment period to be for the proposal?
Electricity North West	Non-confidential	Yes, it would be helpful to understand this and also whether there is a key date that does need to be reached so that the information can be built into the overall assessment of the timetable required.
Northern Powergrid	Non-confidential	No, it is not always possible to decide, when drafting the change proposal, how long it is likely to take as the proposer may not know what likely issues may be raised.
Scottish Power Energy Retail Ltd	Non-confidential	I agree that the proposer could give an indication of expected timelines around the assessment period and believe that this may prove useful in both setting expectations of the Working group and assisting the panel with their decision. I also understand that we should be mindful that the set timelines may be modified during the Change proposal process.

SmartestEnergy	Non-confidential	It could be useful to give them that opportunity.
SP Distribution / SP Manweb	Non-confidential	This could be included as an optional field.
UK Power Networks	Non-confidential	No, as the proposer may not know the time it will take or may propose an unreasonably short period to force through their change. Option 3 overcomes this problem as the expert Working Group would be better placed to make this decision and all Party categories having the option to provide input.
WPD	Non-confidential	Yes
SSEPD	Non-confidential	Yes - it would be helpful for a draft timetable to be submitted to guide the Panel and show if the development timetable had been adequately considered by the Proposer. It is reasonable to expect that this requirement may result in more attention being directed towards management of timetables overall.

Company	Confidential/ Anonymous	10. Should the Working Group maintain a timetable showing expected timescales for the progression of the CP? This timetable would be submitted to the DCUSA Panel each time an extension is requested.
Electricity North West	Non-confidential	<p>Yes, the Working Group should be delivering against their timetable or the alternative timetable provided by the Panel if modified in any way.</p> <p>Not only should the timetable be submitted but also any deviance to it provided to the Panel against the initial timetable so that an understanding of the delay is known. Where it is obvious that a change in timetable is required this should be identified at the earliest opportunity rather than waiting for a review period.</p>
Northern Powergrid	Non-confidential	Yes
Scottish Power Energy	Non-confidential	A working group timetable could assist in the focus of the workgroup and confirm expectations for both the Panel and Work Group.

Retail Ltd		
SmartestEnergy	Non-confidential	We think that it is good practice to be mindful of the timing and ensure that CPs are progressed in a timely manner and therefore support the maintenance of a timetable.
SP Distribution / SP Manweb	Non-confidential	Yes
UK Power Networks	Non-confidential	All Working Groups are required to submit a timetable when requesting an extension in the existing Working Group Terms of Reference. This should be maintained by the Working Group throughout the Assessment Process and submitted to Panel with a request for an extension as soon as it is identified that an extension to the current timetable will be required (either following the initial assessment period or a previous extension period).
WPD	Non-confidential	Yes
SSEPD	Non-confidential	Yes – timetables should be maintained at all stages of a CP, to monitor progress and for more realism with development period expectations.

Company	Confidential/Anonymous	11. Are there any unintended consequences of this proposal?
Electricity North West	Non-confidential	No
Northern Powergrid	Non-confidential	None that we are aware of.
Scottish Power Energy Retail Ltd	Non-confidential	Not aware of any at this time

SmartestEnergy	Non-confidential	We do not believe that parties will be slack in their approach to CPs because of the additional flexibility in managing the timeline.
SP Distribution / SP Manweb	Non-confidential	None we are aware of.
SP Distribution / SP Manweb	Non-confidential	None we are aware of.
UK Power Networks	Non-confidential	The impact of this change on "in flight" changes needs to be considered.
WPD	Non-confidential	No
SSEPD	Non-confidential	Not that we are aware of.

Company	Confidential/ Anonymous	12. Are there any alternative solutions or matters that should be considered?
Electricity North West	Non-confidential	<p>The only alternative we considered was to leave it to the Panel and build the process into the terms of reference of the Working Group and at the DCUSA Panel we have a report indicating progress of each change proposal and whether on target or not (red/amber/green) approach.</p> <p>This would mean that the Proposer's legal text suggestion is used for the initial assessment together with the deletion of</p> <p>"The overall timetable for an Assessment Process may, where the Panel so determines, be extended beyond the original limit of 60 Working Days by successive periods of up to 40 Working Days."</p> <p>from clause 11.12.</p> <p>This may not be acceptable since it relies on the Panel, secretariat and Working Groups working together with no defined timetable to refer back to until the Panel notifies of such a timetable. The terms of reference to support such a change will need to be amended to cater for this. That said</p>

		some of the codes adopt this approach.
Northern Powergrid	Non-confidential	No
Scottish Power Energy Retail Ltd	Non-confidential	No
SmartestEnergy	Non-confidential	None that are obvious to us.
SP Distribution / SP Manweb	Non-confidential	None
UK Power Networks	Non-confidential	Changes to the Working Group Terms of Reference should be considered to include adding a requirement for Working Groups to request an extension as soon as they are aware one is required.
WPD	Non-confidential	See Q4 & Q5
SSEPD	Non-confidential	Not that we are aware of.

Company	Confidential/ Anonymous	13. The proposed implementation is date 1 April 2015. Do you agree with this proposed date?
Electricity North West	Non-confidential	Yes. This seems to be thought through even though this is not a normal release date it is a date where change does and will occur in 2015.
Northern Powergrid	Non-confidential	Yes
Scottish	Non-confidential	YES

Power Energy Retail Ltd		
SmartestEnergy	Non-confidential	Yes.
SP Distribution / SP Manweb	Non-confidential	Yes
UK Power Networks	Non-confidential	Yes.
WPD	Non-confidential	Yes
SSEPD	Non-confidential	Yes

Company	Confidential/ Anonymous	14. Are there any road blocks that are slowing the DCUSA Working Group process down? From your experience of DCUSA changes and other Code changes, are there any improvements that you would recommend to the process?
Electricity North West	Non-confidential	<p>The modelling support was one delay that now has been resolved.</p> <p>The length of time between meetings is a contributing factor in that at the end of most meetings you then start to decide when next to meet. This usually works out between three and four weeks hence. This is because the planning stage looks at the next actions rather than at a defined timetable to deliver the change.</p> <p>If we involve the Working group in determining their work plan up front at the first meeting we are more likely to see success against that timetable rather than the protracted nature of change under the existing process.</p> <p>The Chair of each Working Group will need to manage the timetable or seek amendments due to whatever the reasoning (e.g. unforeseen circumstances, the need to consult again) and report the need for extensions and what the revised timetable would look like. This in reality is what should be</p>

		<p>happening now.</p> <p>The Secretariat report needs to reflect progress against plan rather than where they are up to in the process.</p>
Northern Powergrid	Non-confidential	It may be beneficial for prospective working group members to be briefed on how the DCUSA process, voting and assessment against objectives etc. works.
Scottish Power Energy Retail Ltd	Non-confidential	<p>Could we consider a pragmatic approach to the length of Work Group Meetings and consider capping these at 2/3 hours maximum. I believe this could be beneficial to focus work group parties and avoid any unnecessary deviation from the scope of the change proposal.</p> <p>Consultations vary in size and information requested. Categorising the consultation required to support the Change Proposal could perhaps assist the panel to decide on timelines and allow industry parties to prioritise.</p>
SmartestEnergy	Non-confidential	No
SP Distribution / SP Manweb	Non-confidential	None we are aware of.
UK Power Networks	Non-confidential	The Working Group process is sometimes slowed down by availability of the Working Group members which may be in part due to their involvement with several Working Groups. Further consideration to planning could improve availability.
WPD	Non-confidential	Working group meetings should have a defined end as well as start time which should be adhered to. This would encourage the chair to keeping the meeting on track and mean that the members would be able fit meetings into their calendars without being concerned that they have to allocate half a day or more. This would mean meetings could be scheduled sooner thus reducing the total duration of the CP.

SSEPD	Non-confidential	<p>The development of 'alternative' CPs has become more common and in some cases has led to considerable delays in concluding assessment periods.</p> <p>The possible emergence of alternatives is generally very difficult to predict until the Working Group have significantly progressed a CP, typically through at least one consultation. They cannot reasonably be allowed for in a Proposer's initial timetable or in the Panel's consideration of an appropriate assessment period.</p> <p>Perhaps the terms under which alternative CPs may be developed should be reviewed, with particular respect to timetables and in consideration of unreasonable adverse effects on the progress of the original CP.</p>
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Company	Confidential/ Anonymous	15. Please state any other comments or views on the Change Proposal.
Electricity North West	Non-confidential	None
Northern Powergrid	Non-confidential	None
Scottish Power Energy Retail Ltd	Non-confidential	No further Comments
SmartestEnergy	Non-confidential	N/A
SP Distribution / SP Manweb	Non-confidential	None.
UK Power Networks	Non-confidential	N/a

WPD	Non-confidential	None.
SSEPD	Non-confidential	N/A