

DCUSA CHANGE DECLARATION

DCP 196 - Panel Ability To Refer A Change Proposal To The DCUSA Standing Issues Group For Pre-Assessment

VOTING END DATE: 08 September 2014

DCP 196	WEIGHTED VOTING				
	DNO	IDNO	SUPPLIER	DISTRIBUTED GENERATOR	GAS SUPPLIER
CHANGE SOLUTION	Accept	Accept	Accept	n/a	n/a
IMPLEMENTATION DATE	Accept	Accept	Accept	n/a	n/a
RECOMMENDATION	<p>Change Solution – ACCEPT. In respect of each Party Category that was eligible to vote, the sum of the Weighted Votes of the Groups in that Party Category which voted to accept the change solution was more than 50% in all Categories.</p> <p>Implementation Date – ACCEPT. In respect of each Party Category that was eligible to vote, the sum of the Weighted Votes of the Groups in that Party Category which voted to accept the implementation date was more than 50% in all Categories.</p>				
PART ONE / PART TWO	Part One – Authority Determination Required				

PARTY	DCP 196 SOLUTION	DCP 196 IMPLEMENTATION DATE	WHICH DCUSA OBJECTIVE(S) IS BETTER FACILITATED?	COMMENTS
DNO PARTIES				
Electricity North West Ltd	Reject	Accept	<p>The only objective impacted here is General Objective 4 which we believe is negatively impacted.</p> <p>There are a number of points here to support this reasoning.</p> <p>There is an argument to say that there is no need to change the DCUSA document just the administrative process of notification to the Proposer as part of the rejection of the change proposal.</p> <p>There is a counter argument that says that the Panel have set up the Standing issues Group (SIG). Their terms of reference included under Schedule 7, para 2.1h states “carry out any other activity by the Panel.” They could therefore defer for further work under this schedule either directly or by discussion with the Proposer of the change proposal.</p> <p>Such a discussion associated with either of the above should form part of the Secretariat’s reasoning (as a critical friend) for the rejection of the change proposal covered under DCUSA clause 10.9 and that they have an option to :</p> <ul style="list-style-type: none"> • amend the submission themselves; or • request the Panel seek support from the SIG to assist their submission; or raise a DCUSA Issues Form themselves. <p>The attempt here to formalise this approach within DCUSA is also flawed.</p> <p>The addition of a comment box on the change proposal form regarding whether they would agree to the Panel deferring to the SIG is at best confusing and at worse belittling and is likely to be responded in the negative. Anyone saying they would not mind such a referral is likely to consider going there in the first place.</p> <p>If the issue is that:</p> <ul style="list-style-type: none"> • they do not know of the SIG; or • how to complete the form; 	None

			<p>then some form of reference to the SIG should be made on the change form indicating their terms of reference and what support they provide to the industry in this area rather than inferring that even if you complete this form it may be deferred to the SIG. This is not helpful.</p> <p>The legal text is taking this further than assisting in the change proposal submission process by suggesting that a pre-assessment be undertaken rather than support in the completion of the change proposal. This may result in duplication of work when it finally is assessed by the DCUSA Working Group which increases the administrative burden (especially if each group have different personnel).</p> <p>In summary it is the Secretariat's role to provide guidance associated with the completion of the change process and provide advice on other services that may assist the Proposer during such a development, and not for the DCUSA Panel to codify everything and infer the proposal is not fit for purpose by referring it to the SIG.</p> <p>When you read the legal text in its entirety the end result is that if the Proposer refuses to go to the SIG and they submit the change proposal having answered the previous points raised the existing process is being followed. So, on top of the additional SIG work we seem to be adding into the acceptance process additional DCUSA Panel time thereby increasing the DCUSA administrative process and making it less efficient.</p>	
Northern Powergrid - Northern Electric Distribution Ltd	Accept	Accept	DCUSA General Objective 4 is better facilitated by allowing change proposals wider pre-assessment by the DCUSA Standing Issues Group. This will ensure a more robust solution is put forward to the formal assessment process or a solution to an issue to be developed that does not necessarily involve a change to DCUSA. Either outcome leads to a more efficient use of the change process and therefore efficient administration of the DCUSA.	None
Northern Powergrid - Yorkshire Electricity Distribution plc	Accept	Accept		
Scottish Power - Manweb	Accept	Accept	We consider that DCUSA General Objective 4 is better facilitated.	N/A
Scottish Power - Distribution	Accept	Accept		
SSE - Scottish Hydro-	Accept	Accept	We agree with the argument set out in the Change Report that General Objective 4 is better	No

Electric Power Distribution plc			facilitated.	
SSE - Southern Electric Power Distribution plc	Accept	Accept		
UKPN - Eastern Power Networks	Reject	Reject	<p>We do not believe that any objectives are better facilitated by this change. The benefits of the proposed change are countered by the additional administrative burden and delay to new change proposals. We believe this change does not promote efficiency as required in the objectives.</p> <p>It is unclear how the Working Group believes Objective 4 to be better facilitated as the proposer may still submit the CP into the process or else may pass it to the SIG, incurring similar admin, albeit in a different group. It is only better facilitated if the proposer reworks the CP himself.</p>	N/A
UKPN - London Power Networks	Reject	Reject		
UKPN - South Eastern Power Networks	Reject	Reject		
Western Power Distribution - East Midlands plc	Accept	Accept	N/A	N/A
Western Power Distribution - South Wales plc	Accept	Accept		
Western Power Distribution - South West plc	Accept	Accept		
Western Power Distribution - West Midlands plc	Accept	Accept		
IDNO PARTIES				

GTC	Accept	Accept	Objective 4 is better facilitated as it will lead to better developed change proposals.	N/A
SUPPLIER PARTIES				
EON	Accept	Accept	We agree with the working group that objective 4 is better facilitated.	N/A
Npower	Accept	Accept	We believe that General Objective 4 will be better facilitated by allowing a wider pre-assessment of a CP by the DCUSA Standing Issues Group and will ensure that a more robust solution is put forward to the formal assessment process.	N/A
Scottish Power Energy Retail Ltd	Accept	Accept	Better Facilitates DCUSA General Objectives The promotion of efficiency in the implementation and administration of this Agreement and the arrangements under it.	N/A
SSE Energy Supply Ltd	Accept	Accept	Objective 4 is better facilitated by allowing a CP a wider pre-assessment by the DCUSA Standing Issues Group.	N/A
DISTRIBUTED GENERATOR PARTIES				
N/A				
GAS SUPPLIER PARTIES				
N/A				