

DCUSA DCP 185 Consultation Responses – Collated Comments

Question One	Do you understand the intent of the CP?	Working Group Comments
WPD	Yes	Noted
Northern Powergrid	Yes	Noted
SSEPD	Yes	Noted
SP Distribution	Yes	Noted
ENWL	Yes, we understand the intent of the CP.	Noted
Question Two	Are you supportive of the principles established by this proposal?	Working Group Comments
WPD	Yes	Noted
Northern Powergrid	Yes	Noted
SSEPD	Yes	Noted
SP Distribution	Yes	Noted
ENWL	Yes, we are supportive of the principles.	Noted
Question Three	Are there any unintended consequences of this proposal?	Working Group Comments
WPD	No	Noted
Northern Powergrid	None that we are aware of	Noted
SSEPD	Not aware of any	Noted
SP Distribution	No, not that we have identified.	Noted
ENWL	None that we are aware of.	Noted

Question Four	Do you consider that the proposal better facilitates the DCUSA objectives?	Working Group Comments
WPD	Yes	Noted
Northern Powergrid	We agree with the working group's assessment	Noted
SSEPD	Yes, we agree with the comments made in paragraph 4.3 of the consultation paper.	Noted
SP Distribution	Yes, we agree with the working group that the following objectives are better facilitated: General objectives 1 & 3 CDCM objectives: 1,2 & 3	Noted
ENWL	Yes, we agree with the working groups assessment that DCUSA General Objectives One and Three are better facilitated as they promote development and ensure DNOs discharge their obligations in accordance with the distribution licence. We also agree that this DCP better facilitates DCUSA Charging Objectives One, Two and Three.	Noted
Question Five	Do you have any comments on the proposed legal text?	Working Group Comments
WPD	No	Noted
Northern Powergrid	No – we are comfortable with the revised drafting	Noted
SSEPD	No	Noted
SP Distribution	No	Noted
ENWL	No	Noted
Question Six	Are there any alternative solutions or matters that should be considered?	Working Group Comments
WPD	No	Noted

Northern Powergrid	None that we are aware of	Noted
SSEPD	Not aware of any	Noted
SP Distribution	Not that we have identified.	Noted
ENWL	No	Noted
Question Seven	Are you supportive of the proposed implementation date of 1 April 2015?	Working Group Comments
WPD	Yes	Noted
Northern Powergrid	Yes	Noted
SSEPD	Yes	Noted
SP Distribution	Yes	Noted
ENWL	Yes we are supportive of this date.	Noted
Question Eight	Please state any other comments or views on the Change Proposal.	Working Group Comments
WPD	No	Noted
Northern Powergrid	<p>We believe this issue was discussed in detail by the DCMF MIG and subsequently raised as a DCP. During those previous discussions it had been identified that there were practical difficulties in applying this discount in the case of negative scaling, i.e. where the residual revenue is negative and customers' charges are scaled down and this would result in a negative discount to the LDNO, meaning the charge would be increased rather than discounted. This has now been addressed.</p> <p>We agree that it is appropriate that the LDNO does not pay any charges that are associated with the assets that it provides, and therefore appropriate that LDNOs receive a discount from the indirect costs</p>	The Working Group noted that Northern Powergrid feels that the practical issues that have been had in the past have now been addressed.

	charge, as the charge to the LDNO should consider an appropriate, cost-reflective, allocation of all DNO costs to network activities both upstream and downstream of the point of connection.	
SSEPD	A number of EDCM change proposals and MIG EDCM discussions are currently being progressed, and this proposal may have to be reviewed in the future in light of the outcome of those discussions.	The Working Group noted that this statement might apply to any DCUSA Change Proposal. It was noted that the other DCUSA CPs currently in progress do not interact with DCP 185. The MIG EDCM review will be looking at a number of EDCM issues and from this there may be future changes that arise.
SP Distribution	Non at this time.	Noted
ENWL	As expected this change proposal only affects a small number of customer sites and is a minimum change.	Noted