



DCUSA CHANGE REPORT

DCP 182 – REMOVAL OF DISCONNECTION NOTICE

Executive Summary

DCP 182 seeks to remove the requirement for a Disconnection Notice in accordance with Clause 6.1 of the DCUSA agreement (D0132) (Request for Disconnection) Notice from the Supplier to Distributor.

This document presents the Change Report for DCP 182 and invites respondents to vote on the proposed change.

1 PURPOSE

- 1.1 This document is issued in accordance with Clause 11.20 of the DCUSA, and details DCP 182 – ‘Removal of Disconnection Notice’. The voting process for the proposed variation and the timetable of the progression of the Change Proposal (CP) through the DCUSA Change Control Process is set out in this document.
- 1.2 Parties are invited to consider the proposed amendment (Attachment 1) and submit their votes using the Voting form (Attachment 2) to dcusa@electralink.co.uk by ~~[date]~~[9 January 2015](#).

2 BACKGROUND AND SUMMARY OF DCP 182

- 2.1 DCP 182 has been raised following approved change proposals under the Master Registration Agreement (MRA):
- MAP CP 0173¹ - this change introduces a new procedure to standardise the disconnections process, namely the MRA Agreed Procedure for Disconnections (MAP 21); and
 - DTC CP 3382² - this change implements data flow changes to support the MRA Agreed Procedure for Disconnections processes.
- 2.2 As a consequence of MAP CP 0173 and DTC CP 3382 physical disconnections (Bulk (more than one MPAN) and Individual MPAN) will become Distributor led. In reality this means [the disconnection notice has been replaced by a request for disconnection that is most likely be sent for logical disconnections](#) ~~that there should never be a need for the Supplier to send a Disconnection Notice to the Distributor, unless for a Logical Disconnection (redundancy of an additional MPAN or changes to Unmetered Supply Inventory, not requiring physical works).~~
- 2.3 DCP 182 intends to remove the requirement for a Disconnection Notice (D0132-Details of Disconnection of Supply) from the Supplier to Distributor within the DCUSA agreement.

¹ MAP CP 0173 - The MRA Agreed Procedure for Disconnections

² DTC CP 3382 - Notification of Physical Disconnections

2.4 At present there is an “entitlement” under DCUSA Section 2A, Clause 25 [and Schedule 2B and Schedule 2B](#), Section 3 [and 4](#), Clause 6.1 for the Customer (or the Registrant on behalf of the customer) to send a Disconnection Notice to the DNO Company requesting a Disconnection to be carried out. This requirement is based on the need for the Supplier to advise the Distributor in order that the work can be arranged and is in effect a Supplier-Led Disconnection notified by use of a D0132 Flow. It is considered that the entitlement for Suppliers to send a Disconnection Notice to Distributors should be removed.

2.5 The proposal is to amend/remove the relevant text within;

- Section 1A, Definitions and Interpretations
- Section 2A, Clause 25
- ~~—~~ [Schedule 2B, Section 3 Definitions](#)
- ~~—~~ [Schedule 2B, Section 4, Definitions](#)
- ~~—~~ [Schedule 2B, Section 3, Clause 6](#)
- ~~—~~ [Schedule 2B, Section 4, Clause 6](#)

3 WORKING GROUP

3.1 The DCUSA Panel established a Working Group to assess DCP 182. This Working Group consists of DNO, Supplier, Master Registration Agreement (MRA) and Ofgem representatives. Meetings were held in open session and the minutes and papers of each meeting are available on the DCUSA website – www.dcusa.co.uk.

3.2 The Working Group considered that where the Distributor notifies the Supplier that the Distributor will be disconnecting a premise, there is no need for the Supplier to send a D0132 dataflow in return requesting the Distributor to disconnect the premises. This CP seeks to remove the superfluous D0132 dataflow and administrative burden of this duplication of work.

- 3.3 Members noted that as a result of CP 0173 there is a new MRA Agreed Procedure (MAP) 21 document. MAP 21 removes the mandatory requirement for the Supplier to send a D0132 'Details of Disconnection of Supply' dataflow.
- 3.4 MRA Issue Form(MIF) 146 'Unmetered Supply (UMS) Disconnection Process'³ was raised to consider removing this requirement for the Supplier to send a D0132 dataflow in respect of UMS. The Group noted that the procedures are governed under the Balancing & Settlement Code (BSC).
- 3.5 Members considered that the D0132 dataflow will only be required when:
- (a) the Supplier receives the call from the customer for a physical disconnection and, with the customer's agreement, will send the D0132 flow to the DNO to notify them of the details of a customer who has enquired about a physical disconnection.
 - (b) the Supplier requests a logical disconnection.
- 3.6 The Working Group discussed the fact that the proposed legal text may make changes to the Green Deal legal text which was incorporated in the 24 January 2013 DCUSA release. The Working Group agreed to check with the DCUSA Legal Advisor whether permission would need to be sought from the Department of Energy and Climate Change (DECC) for these changes. The DCUSA Legal Advisor confirmed that permission would not be needed.

4 DCP 182 CONSULTATION

- 4.1 The DCP 182 consultation was issued on 22 October 2014 and eight responses were received.

[4.2](#) A summary of the responses received, and the Working Group's conclusions are set out below. The full set of responses and the Working Group's comments are provided in Attachment 5.

3

http://mrasco.com/staticfiles/document_download.php?document_id=3335&session=0sv5c3inumtkqjku4bademq93

Question 1 - Do you understand the intent of the CP?

~~4.24.3~~The Working Group noted that all eight respondents understood the intent of the CP.

Question 2 - Are you supportive of the principles established by this proposal?

~~4.34.4~~The Working Group noted that seven of the respondents were supportive of the principles established by this CP.

~~4.5~~ One respondent felt that this change would remove the right to send a disconnection notice in respect of a logical disconnection. The Working Group agreed that the proposal is not removing the right of a supplier to send a disconnection. Under MAP 21 they are still able to send a D0132 for a disconnection, but don't have to. For further clarification, the Working Group agreed [to reinstate some text concerning logical disconnections.](#)

~~4.4~~ ~~that the following sentence should be added at the end of clause 25.16 in the legal text – 'For the avoidance of doubt, there is a still the ability for the supplier to send a logical disconnection request'.~~

Question 3 – Are there any unintended consequences of this proposal?

~~4.54.6~~The Working Group noted that seven of the respondents expressed the opinion that there were no unintended consequences of this proposal.

~~4.64.7~~One respondent felt that the legal text for this change needs the insertion of indemnity from the company to the user against all costs, demands, claims, expenses, liability, loss, or damage caused as a consequence of Company disconnecting a premise, because the legal text proposed leaves the responsibility unclear. The consensus of the Working Group was that it was right to remove section 25.15 of DCUSA, covering indemnity. The reasoning behind this is because there is no indemnity from the supplier side because it is a distributor-led disconnection.

Question 4 – Do you consider the proposal better facilitates the DCUSA objectives?

~~4.74.8~~The Working Group noted that seven respondents agreed that the proposal better facilitates the DCUSA objectives. The following table provides a breakdown on which Objectives respondents specifically mentioned as being better facilitated:

DCUSA General	No. Of Respondents that
---------------	-------------------------

Objectives	agree it is better facilitated
Objective 1	3
Objective 2	0
Objective 3	0
Objective 4	5
Objective 5	0

4.84.9 One respondent expressed the opinion that the DCUSA objectives are not better facilitated because sending a notice has no impact on the maintenance and operation of a network, and believes that the CP may have an adverse effect as the ability of a User to request a logical disconnection has been removed and therefore Distributors may believe they have connection points existing that are no longer there.

Question 5 – Do you have any comments on the proposed legal text?

4.94.10 The Working Group noted that six respondents had no comments on the legal text.

4.104.11 One respondent expressed the opinion that they did not see any value with changing the existing wording in Clauses 25.19B and 25.19C because amending it to the new wording suggests the sending of the data but not necessarily what data is held in the system. The respondent also believes it would be cleaner to remove the definition for 'Disconnection Notice' in Schedule 2B as this meets the intent of DCP182, and proposed legal text for Clause 6.1 and 6.2 if the 'Disconnection Notice' definition is removed. The Working Group agreed that they did not need to amend the legal text for DCUSA, as suggested by the respondent.

4.114.12 One respondent felt that the amended legal text attached to the consultation was unclear and that Section 3 and Section 4 of Schedule 2B both contain similar text. Therefore, the Working Group amended the text. Therefore, clarification is required as to whether the intent is to change one or both sections. The Working Group agreed to contact UKPN to ask for expansion of the last two sentences in order to understand the issue UK Power Networks is trying to raise.

Question 6 – Are there any alternative solutions or matters that should be considered?

4.124.13 The Working Group noted that seven respondents identified no alternative solutions or matters and that one respondent felt that they had already expressed their views on this issue in previous questions.

Question 7 – Are you supportive of the proposed implementation date of the first release after Authority approval? If not, please provide your rationale.

4.134.14 The Working Group noted all respondents were supportive of the proposed implementation date.

Question 8 – Please state any other comments or views on the Change Proposal.

4.144.15 The Working Group noted all respondents did not have any other comments or views on the CP.

5 ASSESSMENT AGAINST THE DCUSA OBJECTIVES

5.1 The Working Group considers that the following DCUSA Objective is better facilitated by DCP 182.

General Objective One - The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Network

5.2 General Objective One is better facilitated as the duplication of Disconnection Notices leads to inefficiencies in terms of superfluous D0132 dataflow and the administrative burden associated with these. The removal of this requirement will lead to a consistent and standardised approach that is more efficient.

General Objective Four - The promotion of efficiency in the implementation and administration of this Agreement

- 5.3 General Objective Four is better facilitated as duplication of Disconnection Notices leads to inefficiencies in terms of superfluous D0132 dataflow and the administrative burden associated with these. The removal of this requirement will lead to a consistent and standardised approach that is more efficient.

6 DCP 182 - LEGAL DRAFTING

- 6.1 The draft legal text has been reviewed by the DCUSA Legal Advisor and is provided as Attachment 1.

~~6.2~~—The legal text amends the disconnection notice by the removal of the paragraph on the disconnection notice in DCUSA Section 1A and updates the paragraphs on the disconnection procedure in section 2A clauses 25.15, 25.15.1 and 25.15.2.

~~6.3~~—Additional amendments are made to clause 25.16 to add the ability of a User to act on behalf of a third party and for parties and to disconnect a meter point in accordance with the MRA. The sentence ‘For the avoidance of doubt, there is still the ability for the supplier to send a logical disconnection request’ is added for clarity that suppliers can send a disconnection notice if they wish to.

~~6.46.2~~In Clause 25.17 is amended as a consequence of the revised procedure. the inclusion of a the phrase ‘Disconnect the Metering Point or Metering System’ is added because the company is not obliged to send a disconnection notice, and references to set conditions where the company is not obliged to send a disconnection notice are removed.

~~6.56.3~~Clauses 25.18 and 25.19 are removed because they referred to condition around the use of disconnection notices.

~~6.66.4~~In Clause 25.19A references to ‘disconnection notices’ are removed and instead the ‘Company shall not be obliged to Disconnect the Metering Point’.

~~6.76.5~~In Clause 25.19B and 25.19C references to ‘identified in MPAS’ are replaced with ‘correctly notified to MPAS’.

~~6.86.6~~ In Clause 25.20 a reference to ‘in accordance with the Disconnection Notice’ is removed.

~~6.96.7~~ In Clauses 6.1 sections 3 and 4 ~~in DCUSA Clause 6~~ of Schedule 2B, the reference to the Registrant on behalf of the customer was removed.

7 ENVIRONMENTAL IMPACT

7.1 In accordance with DCUSA clause 11.14.6, the Working Group assessed whether there would be a material impact on greenhouse gas emissions if DCP 182 were implemented. The Working Group did not identify any material impact on greenhouse gas emissions from the implementation of this Change Proposal.

8 ENGAGEMENT WITH THE AUTHORITY

8.1 Ofgem has been fully engaged throughout the development of DCP 182 as a member of the Working Group.

9 IMPLEMENTATION

9.1 The implementation date proposed for DCP 182 is 1 April 2015. ~~{date}~~. The Working Group has selected this date based on the expected timescales to progress the CP.

10 PANEL RECOMMENDATION

10.1 The Panel approved this Change Report at its meeting on 17 December ~~25 November~~ **2014**. Detail what the Panel considered (levels of analysis, Parties eligible to vote, etc.)

10.2 The timetable for the progression of the CP:

Activity	Date
Change Report issued for voting	{date} <u>19 December 2014</u>
Voting closes	{date} <u>9 January 2014</u>
Change Declaration	{date} <u>13 January 2015</u>
Authority Determination	{date} <u>17 February 2015</u>
DCP 182 Implemented	{date} <u>1 April 2015</u>

11 NEXT STEPS

11.1 Parties are invited to consider the proposed amendment (Attachment 1) and submit their votes using the Voting form (Attachment 2) to dcusa@electralink.co.uk by ~~{date}~~ 9 January 2015.

11.2 If you have any questions about this paper or the DCUSA Change Process please contact the DCUSA by email to dcusa@electralink.co.uk or telephone 020 7432 2840.

ATTACHMENTS

- Attachment 1 – DCP 182 Legal Text
- Attachment 2 – Voting Form
- Attachment 3 – Change Proposal
- Attachment 4 – Consultation Document
- Attachment 5 – Collated Consultation Responses