



DCUSA CONSULTATION

DCP 182 - Removal of Disconnection Notice

1 PURPOSE

- 1.1 The Distribution Connection and Use of System Agreement (DCUSA) is a multi-party contract between electricity Distributors and electricity Suppliers and large Generators. Parties to the DCUSA can raise Change Proposals (CPs) to amend the Agreement with the consent of other Parties and (where applicable) the Authority.
- 1.2 This document is a Consultation issued to DNO, IDNO, Suppliers, Consumer Focus, ELEXON, any other interested Parties and the Authority in accordance with Clause 11.14 of the DCUSA seeking industry views on 'DCP 182 – Removal of Disconnection Notice'. Respondents are invited to consider the questions set out below and submit comments using the form provided as Attachment 1 or via the online response form which is available on the following webpage:
- 1.3 Responses should be submitted online or emailed to DCUSA@electralink.co.uk by **DAY, MONTH YEAR**.

2 Background of DCP 182 – Removal of Disconnection Notice

~~2.1~~ This CP intends 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 Change is a consequence of the approved change proposals under the Master Registration Agreement (MRA), MAP CP 0173 and DTC CP 3382, where all disconnections (Bulk & Individual) will become Distributor led. In reality this means that there should never be a need for the Supplier to send a Disconnection Notice to the Distributor, unless for a Logical Disconnection (De-registration of redundant MPANs not requiring physical works).

~~2.12.2~~ This CP intends to remove the requirement for a Disconnection Notice (D0132-Request for Disconnection) from the Supplier to Distributor within the DCUSA agreement.

~~2.22.3~~ At present there is an "entitlement" under DCUSA [Section 2A, Clause 25 and Schedule 2B, Section 3](#), 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 requirement (entitlement) for Suppliers to send a Disconnection Notice to Distributors should be removed. Presently this should be for all cases where the DNO has already notified the Supplier of their awareness of the need for a disconnection. This need for change is further evidenced by the current approved change proposals under MAP CP 0173 and DTC CP 3382, where, if approved, ALL disconnections (Bulk & Individual) will become Distributor Led, meaning in reality that there should never be a need

for the Supplier to send a Disconnection Notice to the DNO, unless for Logical Disconnection of MPANs.

- 2.4 The proposal is to amend/remove the relevant text within Section 2A, Clause 25 and Definitions in Schedule 2B section 3, Schedule 2B, Section 3, Section Clause 6 and Section 1A Definition interpretations, of the DCUSA where Distributor-led disconnections are occurring.

~~2.32.5 This means that the change is still effective and relevant regardless of whether MAP CP 0173 is approved: i.e. if it was only applicable for any Distributor Led Disconnections, this means that this will apply to bulk disconnections at present and can also apply to individual disconnections if they should eventually be included as Distributor Led per the CP proposals.~~

Comment [RT1]: The MRA changes need to be better explained. Refer to MAP21 and CP0173 and ensure that the two are tied together for clarity. ACTION: Electralink

3 Working Group Assessment of DCP 182

- 3.1 The DCUSA Panel established a Working Group to assess DCP 182. This Working Group consists of DNO, MRASCo and Ofgem representatives.

3.2 ~~The Working Group felt the change was needed to required due to an remove an unnecessary administrative burden if the DCUSA is left unchanged as a consequence of the MRA changes they believed could be removed by this CP. The Meter Registration Agreement (MRA) CP 0173 means requests for single site and bulk disconnections to become Distributor led unless it is a logical disconnection. The Working Group Members~~ 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 ~~for~~ the Distributor to disconnect the premises. This CP seeks to remove the superfluous D0132 dataflow and administrative burden of this duplication of work.

Comment [RT2]: To be captured in paragraph 2.5

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 'Request for Disconnection of Supply' dataflow.

~~3.3.4~~ MIF 146 'Unmetered Supply (UMS) Disconnection Process' was raised to consider will also be removing this requirement for the Supplier to send a D0132 dataflow in respect of UMS. The Group noted that the procedures are governed requirements are covered under the Balancing & Settlement Code (BSC).

~~3.43.5~~ Members considered that the **D0132 dataflow will only be required when (a) the Supplier receives the call from the customer for the 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 that the customer who has enquired about a physical disconnection.**

(b)The D0132 will be required from tthe Supplier requests a logical disconnection. for the remaining notifications process for logical disconnections.

3.53.6 The Working Group discussed the fact that the proposed legal text ~~would~~ 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 Wragge & Co. whether permission would need to be sought from the Department of Energy and Climate Change (DECC) for these changes. The DCUSA Legal Advisor ~~it was confirmed that permission would not be needed.~~

4 Assessment against the DCUSA Objectives

4.1 For a DCUSA Change Proposal to be approved it must be demonstrated that it better meets the DCUSA Objectives. There are five General DCUSA Objectives and five Charging Objectives. The full list of objectives is documented in the CP form provided as Attachment 1.

4.1 The Working Group has assessed the CP against the DCUSA objectives and the Working Group members agree that the following DCUSA Objectives are 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
- **General Objective Four** - The promotion of efficiency in the implementation and administration of this Agreement

- 4.2 The duplication of Disconnection Notices leads to inefficiencies in terms of superfluous D0132 dataflow and the administrative burden associated with these. ~~And~~ the removal of this requirement will lead to a consistent and standardised approach that is more efficient.

5 DCP 182 – Removal of Disconnection Notice – Legal Drafting

- 5.1 The DCP 182 legal text is provided as Attachment 2. This text amends DCUSA Section 1A, Definitions and Interpretations, Section 2A Clause 25, Schedule 2B and Schedule 6, Section 3, Definitions and Clause 6.

6 Implementation Date

- 6.1 The proposed implementation date for DCP 182 is ~~01 October 2014~~ the first release after authority approval.

7 DCP 182 – Consultation Questions

7.1 The Working Group is seeking responses to the following consultation questions.

Question Number	Question
1	Do you understand the intent of the CP?
2	Are you supportive of the principles established by this proposal?
3	Are there any unintended consequences of this proposal?
4	Do you consider that the proposal better facilitates the DCUSA objectives?
5	Do you have any comments on the proposed legal text?
6	Are there any alternative solutions or matters that should be considered?
7	Are you supportive of the proposed implementation date of of the first release after Authority approval? October 2014? <u>If not, please provide your rationale.</u>
8	Please state any other comments or views on the Change Proposal.

~~7.17.2~~ Responses should be submitted using Attachment 3 to dcusa@electralink.co.uk no later than **DAY, MONTH YEAR**.

~~7.27.3~~ Responses, or any part thereof, can be provided in confidence. Parties are asked to clearly indicate any parts of a response that are to be treated confidentially.

8 NEXT STEPS

- 8.1 Responses to the Consultation will be reviewed by the DCP 182 Working Group who will use the responses to aid them in the progression of the CP.
- 8.2 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 3016.

ATTACHMENTS

- Attachment 1 – DCP 182 Change Proposal
- Attachment 2 – DCP 182 Legal Text
- Attachment 3 – Consultation Response Form