

DCUSA Change Proposal Form

This form is issued in accordance with Clause 10.5 of the DCUSA.

Completed forms should be returned to dcusa@electralink.co.uk for assessment by the DCUSA Panel.
Failure to complete all parts of the form may result in it being rejected by the DCUSA Panel.

- PART A – Mandatory for all Change Proposals
- PART B – Mandatory for Non Charging Methodologies Proposals
- PART C – Mandatory for Charging Methodologies Proposals
- PART D – Guidance Notes

PART A - MANDATORY FOR ALL CHANGE PROPOSALS

Document Control	
CP Status	Standard
CP Number	DCP 182
Date of submission	24/6/13
Attachments	
Originator Details	
Company Name	SP Energy Networks
Originator Name	Gillian Miller
Category	DNO
Email Address	GMiller@scottishpower.com
Phone Number	0141 614 1994
Change Proposal Details	
CP Title	Removal of Disconnection Notice
Impacted parties	DNO/SUPPLIER/IDNO
Impacted Clause(s)	6.1
Part 1 / Part 2 Matter	Part 1
Related Change Proposals	
Change Proposal Intent	
Removal of 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.	
Business Justification and Market Benefits	
<p>At present there is an “entitlement” under DCUSA 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.</p> <p>The Industry process has changed significantly recently with the introduction of WP 151 where Distribution-Led Disconnections for Bulk MPAN sites were agreed. In such cases, Distributors now notify all relevant Suppliers that a disconnection of their registered MPANs is to be carried out. However, despite there being no need for Suppliers to notify Distributors, several Suppliers insisted on sending a Disconnection Notice as perceived required under DCUSA 6.1. SPEN believe that this is a completely unnecessary step in the revised Distributor-Led Disconnection Process, creating superfluous data flows and considerable administrative burdens/costs in identifying and dealing with the duplication of information</p>	

requests.

SPEN consider 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 change proposals under MAP CP 0173, 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.

SPEN believe that it would be prudent to plan to amend/remove the relevant text within Schedule 2B Section 6 of the DCUSA where Distributor-Led disconnections are occurring. 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.

This Change Proposal has been deemed a Part 1 matter.

Proposed Solution and Draft Legal Text

Amendment of clause 6.1 of the DCUSA,

Original

6.1 The Customer(or the Registrant on behalf of the customer) shall be entitled to send to the company a Disconnection Notice providing an explanation for why there is no reasonably foreseeable future use for the Connection Point, and specifying the date on which the Disconnection is required.

Proposed

6.1 Where the disconnection is considered to be Supplier Led then the Customer(or Registrant on behalf of the customer)shall be entitled to sent to the company a Disconnection Notice providing an explanation for why there is no reasonably foreseeable future use for the Connection Point.~~,-Where the Disconnection is Distributor led then there is no requirement for the Supplier to send the Disconnection Notice.~~

Original

6.2 Unless the Company reasonably considers that it is not permitted to Disconnect the Connection point in accordance with the Act or the Electricity Distribution Licence, , the Company shall (on, or as soon as reasonably practicable after, the date specified in the Disconnection Notice) remove the Connection Equipment from the Property. The Customer acknowledges that it may not be practicable to remove the equipment on the date specified, or for some time thereafter. The Customer shall pay to the Company forthwith upon demand an amount equal to the reasonable costs and expenses incurred by the Company in removing the Connection Equipment.

Proposed

6.2 Unless the Supplier or the Company reasonably considers that it is not permitted to Disconnect the Connection point in accordance with the Act or the Electricity Distribution Licence, , the Company shall ~~(on, or as soon as reasonably practicable after, the date specified in the Disconnection Notice)~~ remove the Connection Equipment from the Property. () ~~The Customer acknowledges that it may not be practicable to remove the equipment on the date specified, or for some time thereafter~~ The Customer shall pay to the Company forthwith upon demand an amount equal to the reasonable costs and expenses incurred by the Company in removing the Connection Equipment.

Proposed Implementation Date

First release after approval

Impact on Other Codes

Please tick the relevant boxes and provide any supporting information.

BSC	x
CUSC	<input type="checkbox"/>
Grid Code	<input type="checkbox"/>
MRA	<input type="checkbox"/>
Other	<input type="checkbox"/>
None	<input type="checkbox"/>

If other please specify

Consideration of Wider Industry Impacts

Environmental Impact

Confidentiality

DCUSA Objectives

General Objectives:

Please tick the relevant boxes.

- ☒ 1 The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks
- ☐ 2 The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent therewith) the promotion of such competition in the sale, distribution and purchase of electricity
- ☐ 3 The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences
- ☒ 4 The promotion of efficiency in the implementation and administration of this Agreement
- ☐ 5 Compliance with the Regulation on Cross-Border Exchange in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.

Rationale for better facilitation of the DCUSA Objectives identified above

Duplication of Disconnection Notices leads to inefficiencies and removal of this requirement will lead to a consistent and standardised approach.

PART C – MANDATORY FOR CHARGING METHODOLOGIES PROPOSALS

DCUSA Charging Objectives

Please tick the relevant boxes.

Charging Objectives:

- ☐ 1 that compliance by each DNO Party with the Charging Methodologies facilitates the discharge by the DNO Party of the obligations imposed on it under the Act and by its Distribution Licence
- ☐ 2 that compliance by each DNO Party with the Charging Methodologies facilitates competition in the generation and supply of electricity and will not restrict, distort, or prevent competition in the transmission or distribution of electricity or in participation in the operation of an Interconnector (as defined in the Distribution Licences)
- ☐ 3 that compliance by each DNO Party with the Charging Methodologies results in charges which, so far as is reasonably practicable after taking account of implementation costs, reflect the costs incurred, or reasonably expected to be incurred, by the DNO Party in its Distribution Business
- ☐ 4 that, so far as is consistent with Clauses 3.2.1 to 3.2.3, the Charging Methodologies, so far as is

<p>reasonably practicable, properly take account of developments in each DNO Party's Distribution Business</p> <p><input type="checkbox"/> 5 that compliance by each DNO Party with the Charging Methodologies facilitates compliance with the Regulation on Cross-Border Exchange in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.</p> <p><u>General Objectives:</u></p> <p><input type="checkbox"/> 1 The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks</p> <p><input type="checkbox"/> 2 The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent therewith) the promotion of such competition in the sale, distribution and purchase of electricity</p> <p><input type="checkbox"/> 3 The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences</p> <p><input type="checkbox"/> 4 The promotion of efficiency in the implementation and administration of this Agreement</p> <p><input type="checkbox"/> 5 Compliance with the Regulation on Cross-Border Exchange in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.</p>
Rationale for better facilitation of the DCUSA Objectives identified above
<p><u>Charging Objectives:</u></p> <p><u>General Objectives:</u></p>
Has this issue been discussed at any other industry forums? If so please specify and provide supporting documentation

PART D – GUIDANCE NOTES FOR COMPLETING THE FORM

Data Field	Guidance
Attachments	Append any proposed legal text or supporting documentation in order to better support / explain the CP.
Change Proposal Intent	Outline the issue the CP is seeking to address. Please note that the intent of the CP cannot be altered once submitted.
Confidentiality	Clearly indicate if any parts of this Change Proposal Form are to remain confidential to DCUSA Panel (and any subsequent DCUSA Working Group) and Ofgem
CP Status	A CP may be deemed 'urgent' in accordance with Clause 10.4.8 of the DCUSA. The proposer should give supporting reasons.

DCUSA General Objectives	Indicate which of the DCUSA Objectives will be better facilitated by the Change Proposal.
DCUSA Charging Objectives	Indicate which of the DCUSA Charging Objectives will be better facilitated by the Change Proposal. Please note that a CDCM or EDCM change may also facilitate the DCUSA General objectives.
Draft Legal Text	Insert proposed legal drafting (change marked against any existing DCUSA drafting). The Change Proposal Intent will take precedence in the event of any inconsistency.
Environmental Impact	Indicate whether it is likely that there would be a material impact on greenhouse gas emissions as a result of the proposed variation being made. Please see Ofgem Guidance .
Impact of Wider Industry Change	Indicate whether this Change Proposal will be impacted by or have an impact upon wider industry developments. If an impact is identified, explain why the benefit of the Change Proposal may outweigh the potential impact and indicate the likely duration of the Change.
Part 1 / Part 2 Matter	A CP must be categorised as a Part 1 or Part 2 matter in accordance with Clause 10.4.7 of the DCUSA. All Part 1 matters require Authority Consent.
Proposed Implementation Date	The Change can be implemented in February, June, and November of each year.
Proposed Solution	Outline the proposed solution for addressing the stated intent of the CP. The Change Proposal Intent will take precedence in the event of any inconsistency. A DCUSA Working Group may develop alternative solutions.
Rationale for DCUSA Objectives	Provide supporting reasons and information (including any initial analysis that supports your views) to demonstrate why the CP will better facilitate each of the DCUSA Objectives identified.
Related Change Proposals	Indicate if the CP is related to or impacts any CP already in the DCUSA or other industry change process.