

DCUSA DCP 181 CHANGE DECLARATION

VOTING END DATE: 12 FEBRUARY 2016

DCP 181- PREVIOUS CONNECTION TERMS ENDURING	WEIGHTED VOTING				
	DNO	IDNO	SUPPLIER	DISTRIBUTED GENERATOR	GAS SUPPLIER
CHANGE SOLUTION	Accept	n/a	Reject	n/a	n/a
IMPLEMENTATION DATE	Accept	n/a	Reject	n/a	n/a
RECOMMENDATION	<p>Part 1 Matter Change Solution – Reject. For the majority of the Party Categories that were eligible to vote, the sum of the Weighted Votes of the Groups in each Party Category which voted to accept the change solution was less than 50%.</p> <p>Implementation Date – Reject. For the majority of the Party Categories that were eligible to vote, the sum of the Weighted Votes of the Groups in each Party Category which voted to accept the implementation date was less than 50%.</p>				
PART ONE / PART TWO	Part One – Authority Determination Required				

PARTY	SOLUTION (A / R)	IMPLEMENTATION DATE (A / R)	WHICH DCUSA OBJECTIVE(S) IS BETTER FACILITATED?	COMMENTS
DNO PARTIES				

Electricity North West	Accept	Accept	We believe that general objective one is better facilitated in that it ensures that an efficient network is maintained. As stated by the working group the risk of reinforcement due to a customer not being bound by previous terms is avoided.	This change proposal has been developed over the last few years; it is pleasing to see it reach the voting stage.
Northern Powergrid (Northeast) Ltd	Accept	Accept	<p>The CP better meets DCUSA General Objective One by ensuring that the risk of reinforcement due to a customer not being bound by previous terms is avoided.</p> <p>The CP better meets General Objective Two because it facilitates competition in supply by allowing:</p> <ul style="list-style-type: none"> • less strict terms to apply to generators who are willing to accept non-standard terms and • Better management of the network by constraining certain connections thus allowing more connections to the network. 	None
Northern Powergrid (Yorkshire) Plc	Accept	Accept		
SP Distribution	Accept	Accept	We agree with the working group assessment that DCUSA General Objectives 1 and 2 were better facilitated by this change.	None.
SP Manweb	Accept	Accept		

Southern Electric Power Distribution plc	Accept	Accept	The CP better facilitates General Objective 1 as incoming parties will be bound to terms and any site-specific conditions which have been agreed with a previous owner/occupier, maintaining continuity of established parameters.	n/a
Scottish Hydro Electric Power Distribution plc	Accept	Accept		
Eastern Power Networks	Accept	Accept	Objective 1 is achieved because the risk of reinforcement due to a customer not being bound by previous terms is avoided. Objective 2 is achieved because generators may require, and increasingly so for larger LV and higher voltage generators, the types of connection that have non-standard terms and the alternative of registering interests with the Land Registry would take time and greater expense as part of the connection process to achieve the same outcome. The proposed solution therefore leads to greater efficiency and hence promotes competition.	We consider this a crucial measure to protect the network against unconstrained export with which it cannot cope. The constraint was accepted by the party for whom the connection was provided to avoid heavy reinforcement costs. Subsequent comers must not have the advantage of unconstrained export in these circumstances. Such connections are the result of an innovative treatment and if the arrangements are not perpetuated such innovations are unlikely to occur.
London Power Networks	Accept	Accept		
South Eastern Power Networks	Accept	Accept		
Western Power Distribution (South West) plc	Accept	Accept	DCUSA General Objective 1; The development, maintenance and operation by each of the DNO Parties and IDNO Parties of an efficient, co-	None
Western Power Distribution (South Wales) plc	Accept	Accept		

Western Power Distribution (West Midlands) plc	Accept	Accept	ordinated, and economical Distribution System, is better facilitated by this change as it will serve to reduce the requirement to reinforce the network due a customer not being bound by the previous terms of the connection Agreement
Western Power Distribution (East Midlands) plc	Accept	Accept	

IDNO PARTIES				
n/a	n/a	n/a	n/a	n/a

SUPPLIER PARTIES				
British Gas	Reject	Reject	n/a	<p>We do not believe this modification better facilitates the general DCUSA objectives. In particular, we find the opposite to be true of General Objective 2</p> <p>2 “The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent with that) the promotion of such competition in the sale, distribution and purchase of electricity.”</p> <p>As an industry we are moving towards transparency and openness with our customers. This has been the goal of</p>

				<p>British Gas for some time, and the protections for customers are formally being enshrined in formal regulations.</p> <p>The implementation of this modification could have potential harm for some customers, specifically micro business. As an example a large energy intensive user could move out of a warehouse with their industrial equipment, and be replaced by a SME or Micro Business, under this modification there are no restrictions or caveats to protect these customers. In the Supply Licence Conditions, standards of conduct (SLC 7B), it is required that:</p> <p>7B.4</p> <p>(a) the licensee behaves and carries out any actions in a Fair, honest, transparent, appropriate and professional manner;</p> <p>(b) the licensee provides information (whether in Writing or orally) to each Micro Business Consumer which:</p> <p>(i) is complete, accurate and not misleading (in terms of the information provided or omitted);</p> <p>(ii) is communicated (and, if provided in Writing, drafted) in plain and intelligible language;</p>
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				<p>We do not believe it is possible to adhere to the requirement of the Supply Licence Condition and implement modification DCP 181; it is our duty to ensure any material changes to the customer’s terms are clearly described and signposted to ensure the transparency and accuracy of information is provided to the customer.</p> <p>British Gas also rejects the proposed timescales of the modification; we would support a 6 month notification of the change if approved.</p>
npower	accept	accept	We believe that DCUSA general objectives 1 & 2 will be better facilitated by this change.	

DISTRIBUTED GENERATOR PARTIES

n/a	n/a	n/a	n/a	n/a
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GAS SUPPLIER PARTIES

n/a	n/a	n/a	n/a	n/a
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