

DCUSA DCP 164 Consultation Responses – Collated Comments

Question One	Do you understand the intent of the CP?	Working Group Comments
British Gas	Yes	Noted
EDF Energy	Yes	Noted
Electricity North West	Yes, we understand the intent of the CP.	Noted
Northern Powergrid	Yes	Noted
Npower	Yes	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Yes	Noted
SP Distribution & SP Manweb	Yes, we understand the intent of the CP.	Noted
SSE Energy Supply Ltd	Yes	Noted
The unofficial DCMF Website	Yes	Noted
UKPN	Yes.	Noted
Western Power Distribution	Yes	Noted
Question Two	Are you supportive of the principles established by this proposal?	Working Group Comments
British Gas	Yes	The Working Group noted that the majority

		of respondents to this question agreed that they were supportive of the principles of DCP 164.
EDF Energy	Definitely something needs to be done in order to control the changes made to the model so that it can be implemented in a timely manner.	Noted
Electricity North West	Yes, we support the principles established by the proposal.	Noted
Northern Powergrid	Yes	Noted
Npower	Yes	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Yes	Noted
SP Distribution & SP Manweb	Yes, we are supportive of the principles of the CP.	Noted
SSE Energy Supply Ltd	No. The new timetable has advantages, but it should only be advisory.	The Working Group noted that the issue with advisory guidance is that it is not black and white and thus it would not help the present situation and would not be in line with the intent of this CP. The Working Group agreed to include in the DCP 164 Change Report a note explaining that the Working Group do not agree with this view as it would undermine the intent of the CP. Action
The unofficial DCMF Website	I am partially supportive of the intent. I am not supportive of the principles of the proposed solution. See specific comments in answers to questions 5, 9, 10 and	Noted

	11.	
UKPN	Yes.	Noted
Western Power Distribution	Yes	Noted
Question Three	Are there any unintended consequences of this proposal?	Working Group Comments
British Gas	Not that we are aware of.	Noted
EDF Energy	Not that I am aware of, although the proposal does raise the question as to how we define an urgent CP in section 3.2.1	The Working Group discussed this comment and agreed that the timescales of DCP 164 should apply to urgent changes too. The group agreed that explicit text relating to urgent changes should not be included in the DCP 164 legal text.
Electricity North West	We are not aware of any unintended consequences of this proposal.	Noted
Northern Powergrid	None identified	Noted
Npower	Our main concern is that this would become the defacto timescale for implementation of methodology. We would encourage that it is made clear that working groups should have already established clear views on the potential impacts and the timescales of those impacts significantly ahead of this point in time. We would also suggest that regulatory direction to overrule this timescale be used only in extreme circumstances.	<p>The respondent clarified that this is a helpful timescale but they would not want it to become the defacto timescale.</p> <p>The Working Group discussed the regulatory direction element and considered whether clarification should be added to the legal text to say when it would be appropriate.</p> <p>The group concluded that Ofgem can choose when to make a direction, thus, even if guidance text was included in DCUSA it could be over ridden.</p>

Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Not that we are aware of.	Noted
SP Distribution & SP Manweb	No	Noted
SSE Energy Supply Ltd	It may slow down the progress of change proposals. In particular it may slow down the Smart Meter project.	CO took an action to ask SSE to provide clarification on its response to this question. It was noted that DCP 164 only relates to the charging methodology CPs and thus should not impact the smart meter roll out.
The unofficial DCMF Website	Yes. See specific comments in answers to questions 5, 9 and 10.	Noted
UKPN	Not that we are aware of	Noted
Western Power Distribution	No	Noted
Question Four	Do you agree with the Working Group's evaluation of the CP against the DCUSA objectives?	Working Group Comments
British Gas	Yes	Noted
EDF Energy	Yes it will promote efficiency and implementation of the agreement giving all parties advance notice of changes to the model in a timely manner.	Noted
Electricity North West	We agree with the Working Groups evaluation of the CP against the DCUSA objectives.	Noted
Northern Powergrid	Yes	Noted

Npower	Yes	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Yes	Noted
SP Distribution & SP Manweb	We agree with the working group's assessment that the CP better facilitates the DCUSA Objectives 2 & 3.	Noted
SSE Energy Supply Ltd	<p>No. The objectives may be met (as described by the Working Group) on some occasions, but circumstances could arise where the CP does not provide an appropriate solution.</p> <p>The DCUSA panel should always have the discretion to act in accordance with the prevailing circumstances when a Change Proposal is raised.</p>	<p>It was suggested that SSE may be suggesting that if the Panel has to make a change to the model then it should be able to do that regardless of the timescale.</p> <p>It was noted that if the authority deem something to be urgent enough to be implemented in the interim period then Parties would accept that.</p> <p>The Working Group agreed that more explanation needs to be provided in the Change Report, potentially outlining the timescales as they are at the moment. A timeline with the different cut off points should be included. Action</p> <p>It was agreed that in the DCP 164 Change Report it should be captured that after the 150 day deadline Change Reports cannot have an implementation date of the following April. Action</p>

		It was highlighted that DCP 164 is not trying to hold up the Change Process, it is aiming to ensure that a model incorporating approved changes is available in time to calculate indicative tariffs. It is not trying to stifle change but make change manageable.
The unofficial DCMF Website	No. See answer to question 5. This change would affect charging methodologies by reducing the flexibility of their governance so perhaps the charging objectives should be taken into account.	It was noted that the group has tried to take the charging objectives into account.
UKPN	Yes.	Noted
Western Power Distribution	Yes	Noted
Question Five	Do you consider that the proposal better facilitates the DCUSA Objectives? Please provide supporting information.	Working Group Comments
British Gas	We agree with the working group's evaluation.	Noted
EDF Energy	Anything that provides advance notice of any changes to the charging methodologies aids suppliers and customers which in turn facilitates effective competition (Obj 2). Having the models in a timely manner allows the DNOs to discharge their obligations from their distribution licences and implementation of this agreement (Obj 3 & 4).	Noted
Electricity North West	This change proposal better facilitates objective 2 as it increases the transparency of the charging process, by providing Distributors and Suppliers with advance notice of the model that will be used to produce tariffs.	Noted
Northern Powergrid	We agree that DCP 164 will facilitate DNO Parties in	Noted

	<p>producing indicative charges in line with licence condition 14 which will better meet DCUSA General Objective 3.</p> <p>DCP 164 will also give advance notice to Suppliers and Distributors of the methodology and charging models that will be used for charging. This will improve transparency and better meet DCUSA General Objective 2.</p>	
Npower	We consider that it better facilitates objective 2 of the DCUSA through providing a backstop date at which the market will know there are no significant changes thereby improving competition.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	The change proposal better facilitates the General Objectives because it gives advance notice and clarity to distributors, suppliers and generators the CDCM/EDCM models being used for the up and coming charging year. It allows distributors to produce their LC14 charging statements using the DCUSA approved charging model (with the changes) in a smoother manner.	Noted
SP Distribution & SP Manweb	We agree that DCP 164 facilitates objectives 2 & 3 by giving advance notice to Suppliers and Distributors of the methodology and charging models that will be used for charging. This will improve transparency, and efficiency.	Noted
SSE Energy Supply Ltd	No - for the reasons given in 4.	Noted
The unofficial DCMF Website	<p>Objectives 2, 3 and 4 might be better facilitated if there was no clause 14.12 allowing Ofgem to ride roughshod over the timescales.</p> <p>This might be outweighed by the damaging impact of the proposal on the flexibility of the governance of the charging methodologies and therefore on the ability of these methodologies to set fair and cost-reflective charges.</p>	<p>The group noted that they had discussed this point against an earlier consultation response.</p> <p>It was noted that Ofgem can, if it believes it to be appropriate, go against the timescales implemented by DCP 164. The issue that occurred for April 2013 tariffs was that DNOs did not have a model to</p>

		<p>calculate prices until after indicatives had been issued. The benefits of having a model in advance of when it is needed is considered by the group to be great.</p> <p>It was noted that SSE had also highlighted that certain changes may be cut out by deadlines.</p> <p>It was highlighted that the requirement to publish charges is a licence requirement not just a DCUSA requirement. Not having a model that can be used is a major issue.</p> <p>It was suggested that for all CPs it should be the Working Group and the Panel driving how urgent a CP is, so it would not be Ofgem riding roughshod over the time scales. It would be unlikely that Ofgem would intervene and direct that something be implemented with short timescales where the Working Group or the Panel has not indicated that the CP is urgently required.</p> <p>In response, it was suggested that DCP 130 might have been the most likely case where this would occur as there was a drive from the Scottish parliament for it to be implemented sooner rather than later, however, the DCP 130 Working Group were fully aware of this.</p>
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UKPN	<p>We believe that DCUSA objectives 2, 3 and 4 are bettered by this DCP, as this should ensure that going forward there is an effective and managed DCUSA process to deal with all charging related change proposals.</p> <p>We believe that this revised process should result in charges which will in themselves not restrict competition in the market, whilst also allowing DNO Parties to discharge their obligations in the Licence alongside the efficient administration of the agreement.</p>	Noted
Western Power Distribution	<p>General Objective 2: This will mean suppliers have a longer period to know which change proposals will be included in the UoS prices reducing one aspect of volatility and allowing them to forecast the prices more accurately at an earlier stage.</p> <p>General Objective 3: This will remove the need for DNOs to process several separate models due to not knowing which one they will be able to use to generate tariffs.</p>	Noted
Question Six	Do you agree that all models impacted by Schedule 16, Schedule 17 and Schedule 18 should be included in this CP?	Working Group Comments
British Gas	Yes	Noted
EDF Energy	Yes	Noted
Electricity North West	Yes, particularly as some of the models are inter-related and allowing some to be updated at a later stage could create inconsistencies.	Noted
Northern Powergrid	Yes	Noted

Npower	Yes	Noted
SP Distribution & SP Manweb	Yes, the CP should include all models.	Noted
SSE Energy Supply Ltd	No - for the reasons given above.	Noted
The unofficial DCMF Website	Yes, if the defects discussed elsewhere in this response are cured.	Noted
UKPN	Yes.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Yes	Noted
Western Power Distribution	Yes	Noted
Question Seven	If the HIDAM (DCP 133) and LDNO price disaggregation models (DCP 128 and DCP 129) are incorporated into DCUSA then it is the view of the Working Group that these should be subject to the provisions of DCP 164. Do you agree with this approach?	Working Group Comments
British Gas	Yes	Noted
EDF Energy	Yes	Noted
Electricity North West	Yes	Noted
Northern Powergrid	Yes - This would ensure consistency in the treatment of all models which are utilised in order to produce Use of System Charges	Noted

Npower	Yes. However, we would again encourage that any changes to them (in particularly the HIDAM) are notified prior to this date and impacts assessed.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Yes	Noted
SP Distribution & SP Manweb	Yes	Noted
SSE Energy Supply Ltd	No, although an advisory timetable for Change Proposals might be appropriate.	Noted
The unofficial DCMF Website	Yes, if the defects discussed elsewhere in this response are cured.	Noted
UKPN	Yes it is important that along with the charging models all other input models defined within these schedules are included.	Noted
Western Power Distribution	Yes	Noted
Question Eight	Do you agree that it is appropriate to limit changes to the charging methodology models to once a year?	Working Group Comments
British Gas	Yes	Noted
EDF Energy	This is in line with the Ofgem decision on that the only change to charges from April 2015 will be in April each year.	Noted
Electricity North West	Yes. This is consistent with the Ofgem decision on charging volatility.	Noted
Northern Powergrid	There is already an acceptance that any charging related changes will only be implemented on the 1 April each year, avoiding any mid-year changes where possible. This is a	Noted

	<p>requirement from the start of RIIO-ED1 as defined in Ofgem's decisions on charging volatility.</p> <p>This change does not limit changes to the methodology being developed and consulted upon throughout the year. It does facilitate the provision of a model which includes all approved methodology changed in a timely manner.</p>	
Npower	Yes. We would prefer a longer notice period and will encourage working groups to complete analysis significantly prior to this but consider it a suitable point at which to backstop any model changes.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Yes	Noted
SP Distribution & SP Manweb	Yes	Noted
SSE Energy Supply Ltd	Yes, but the DCUSA panel & OFGEM should have the discretion to implement changes at other times of the year.	Noted
The unofficial DCMF Website	No. The convenience benefits to distributors and suppliers of making all changes with effect from 1 April is outweighed by the risk of a major adverse effect on customers of continuing with a defective methodology for six months longer than necessary.	<p>It was noted that, as picked up by other respondents, there will not be mid-year price changes relating to methodology changes or any other reason going forward under RIIO-ED1.</p> <p>The CDCM has been under open governance for three years and many significant issues have been considered under the DCUSA Change Process in order to address these concerns and work is under way to address others.</p>

UKPN	Yes, this is also in line with the arrangements likely to apply under RIIO-ED1, which is likely to restrict price changes for DUoS as the only annual change from April 2015.	Noted
Western Power Distribution	Yes	Noted
Question Nine	Do you have any comments on the proposed legal text?	Working Group Comments
British Gas	No	Noted
EDF Energy	The only mention of a release of a model is 90days before publication of final charges. Although this would in effect be 130 days prior to the 1 st April it is not explicit what should be used for indicative charges.	It was noted that at its first meeting the Working Group had debated indicatives and finals. At this meeting it was noted that DCUSA specifies the rules for final charges where as the licence conditions specify the rules for indicative tariffs. The DCP 164 legal text can therefore only be defined in terms of final charges in the DCUSA legal text.
Electricity North West	We have reviewed the legal text and are happy with it.	Noted
Northern Powergrid	We understand the principles of the DCP, and why the legal text was tied into the publication of Final charges, as this notice period is defined in the DCUSA. However, we feel there is merit in looking at the alternative option that is linked to when charges are initially published (i.e. the notice period for the publication of charges (as defined in the Distribution Licence)). We have attached an alternative draft of the legal text and more information can be seen in our response to Q11.	Noted
Npower	No	Noted
Southern Electric	No	Noted

Power Distribution plc and Scottish Hydro Electric Power Distribution plc		
SP Distribution & SP Manweb	No	Noted
SSE Energy Supply Ltd	No	Noted
The unofficial DCMF Website	<p>Clause 14.12 emasculates the proposal by allowing Ofgem to ignore the managed process whenever it feels like it.</p> <p>As drafted, the legal text does not deliver a managed change process. It introduces rigidities in the development of change proposals without providing any effective protection against short-notice changes.</p> <p>The proposal provides no effective remedy for affected persons (particularly non-DCUSA parties) if the DCUSA panel and/or secretariat fails to meet the relevant deadlines.</p>	The group noted that they had discussed this area under earlier questions.
UKPN	The model is subservient to the methodology. The legal text should focus on changes to the methodology and what constraints should apply to those. The model impact should be referred to in light of that.	Noted
Western Power Distribution	No	Noted
Question 10	Do you agree with the proposed timescales as defined in the legal text? If not, please provide an alternative suggestion.	Working Group Comments
British Gas	We are agree with the use of days before notification but make the below observations.	It was noted that between the 150 days and 90 days period allows DCUSA to procure a model and gives DNOs time to

	<p>1. 150 days before the publication of final charges: Authority consent must be received by this date for the change proposal to be included in the model(s) for the up and coming charging year.</p> <p>We note that 150 days would currently require consent by 23 Sep each year. We suggest that 140 days may be more appropriate (3 Oct) which is closer to the original timeline included in the DCP (30 Sep).</p> <p>2. 90 days before the publication of final charges: the DCUSA must provide pre-release model(s) incorporating the relevant change proposals for the up and coming charging year.</p> <p>We note that 90 days would currently require publication of the pre-release models by 22 Nov each year. We suggest that 100 days may be more appropriate (12 Nov) which is closer to the original timeline included in the DCP (5 Nov).</p>	<p>carry out UAT testing.</p> <p>It was noted that under British Gas' suggestion two weeks would be lost from this period. The importance of having a correct model was noted and thus it was suggested that the more time afforded the better.</p>
EDF Energy	<p>Tying the dates into the publication of final charges confuses the issue especially if this date changes in the future.</p> <p>Setting the cut off dates as 30th September Authority consent has to be granted. 31st October Model pre-release Would simplify the legal text.</p>	<p>It was noted that this would simplify the legal text and the group had debated this at its previous meeting. However, the group had written the timescales in a way that ensures that they would not need to be amended should the publication date of final tariffs change.</p>
Electricity North West	We are happy with the proposed 150 day timescale.	Noted
Northern Powergrid	We agree with the timescales defined	Noted
Npower	Yes	Noted
Southern Electric	Yes	Noted

Power Distribution plc and Scottish Hydro Electric Power Distribution plc		
SP Distribution & SP Manweb	Yes	Noted
SSE Energy Supply Ltd	N/A	Noted
The unofficial DCMF Website	<p>The legal text does not seem to deliver the intent of the proposal. The intent is to have models two months before indicative charges are published, which is five months before a change comes into force. The legal text says 90 days before publication of final charges, which is only 130 days before the charges come into force. The working group's consultation does not seem to explain this apparent discrepancy.</p> <p>60 days sounds like a lot of time to create pre-release models. It might encourage post-approval arguments about what exactly has been approved. It would be better to set an expectation that good models (albeit not final ones because of interactions between DCPs) should be available before voting, and that final models should be prepared a short time after approval.</p> <p>The effect of the proposed legal text is to ask Ofgem to make a decision 190 days before implementation (except if Ofgem uses the clause 14.12 loophole). I think that this is too long: asking too much of Ofgem, and introducing too much rigidity into the process.</p> <p>The proposal works back from the implementation date to set target dates for decisions and models. This is the wrong way around. It would be better to mandate that implementation should be conditional on availability of</p>	<p>The group noted that it would review this comment when it considers the alternative solution against question 11.</p> <p>It was noted that experience has shown that the DCUSA process can take time to deliver an updated model. It is not just the time to create the model that needs to be considered but also the procurement of it. If in future less time is needed then the timescales associated with DCP 164 could be reduced by a future CP.</p> <p>It was noted that the respondents suggestion would create the maximum number of models possible.</p>

	models with sufficient notice. See answer to question 11 for an alternative suggestion.	
UKPN	Yes.	Noted
Western Power Distribution	We agree with the proposed timetable.	Noted
Question 11	Are there any alternative solutions or matters that should be considered?	Working Group Comments
British Gas	N/A	Noted
EDF Energy	See above	Noted
Electricity North West	No.	Noted
Northern Powergrid	<p>The purpose of the change was to ensure the DNOs have a pre-release model prior to publication of charges. The working group worked back from the DCUSA notification of final changes in mid-February, as this is defined in the DCUSA.</p> <p>However, if we are to future proof this change we need to consider that the licence requirement does not specifically reference "indicative charges" this is what they have become commonly known as. The Licence says that DNOs must provide 3 months' notice of any change to charges – this should be the reference point for the requirements.</p> <p>If this change is implemented as proposed and the licence period was subsequently changed to say 5 months' it would mean DNOs would have to publish in October rather than December, regardless of the DCUSA notice period and a model would not be available at this time.</p> <p>We therefore suggest that the legal drafting should remove reference to the "publication date of final charges" and should instead refer to "notice period for the publication of charges (as defined in the Distribution Licence)" The</p>	<p>It was noted that the Charging methodology is under DCUSA but the requirements for publication are defined under the licence which complicates the matter.</p> <p>It was highlighted that at the previous meeting it has been agreed that dates should not be included in the DCUSA as if the licence requirements changed a CP would be needed to update the DCUSA.</p> <p>It was noted that this suggested text would also address British Gas' concerns.</p> <p>The group agreed to incorporate the suggested legal text into the DCP 164 legal text.</p>

	<p>proposed legal text is shown below</p> <p>14.10 Change Proposals with Authority approval 90 days prior to the notice period for the publication of charges (as defined in the Distribution Licence) and an Implementation Date of the following April will be included in the model(s) released to apply for that April. Any Change Proposals that receive Authority approval less than 90 days prior to the publication of charges will not be included in the model(s) released to apply from the following April unless the Panel is directed to do so by the Authority under 14.12.</p> <p>14.11 DNO Parties will use the pre-release model(s) that is available a minimum of 50 days prior to the publication of charges, as provided by the DCUSA Panel.</p> <p>This also has the advantage of aligned closer to the timescales quoted in the change proposal</p>	
Npower	No	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	No Comments.	Noted
SP Distribution & SP Manweb	No	Noted
SSE Energy Supply Ltd	The CP does not address the confusion caused by multiple Change Proposals being processed simultaneously.	The group noted that in their view DCP 164 does reduce confusion as it ensures that all changes approved by a certain date get

		<p>incorporated in the final model.</p> <p>It was noted that the intent of the CP did not cover the interactions between Working groups.</p>
The unofficial DCMF Website	<p>A simpler and more effective way of meeting the intent would be to require that the implementation date of a charging methodology change be on the 1 April (or 1 October if the intent is modified to permit mid-year changes) that follows the expiry of a five-month period after publication of a set of modelling tools that implement that change.</p> <p>In the event that a change proposal is too urgent for these timescales, then this would need an explicit change to the timescale requirements in that urgent DCP, which would then be exposed to proper consultation and/or analysis (unlike a discretionary Ofgem direction to ignore the timescales as proposed by the current clause 14.12).</p>	<p>It was noted that Ofgem has the ability to direct a price change at any time during the year under emergency provisions.</p> <p>The group agreed to remove paragraph 14.12 (which gives Ofgem the ability to override the timescales) from the DCP 164 legal text.</p> <p>The group agreed to circulate a copy of the consultation responses and the revised legal text to respoondees and contract managers. It was agreed that a cover note should be included saying that these changes have been made in response to these comments and ask respondents if they are happy with the amendments.</p> <p>It was noted that if DNOs agreed that a change was urgent they could apply for a derogation from the DCP 164 clauses.</p>
UKPN	Not that we are aware of at this time.	Noted
Western Power Distribution	No	Noted
Question 12	Are you supportive of the proposed implementation date of the first release after Authority consent?	Working Group Comments
British Gas	Yes	Noted

EDF Energy	Yes	Noted
Electricity North West	Yes.	Noted
Northern Powergrid	Yes	Noted
Npower	Yes	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Yes	Noted
SP Distribution & SP Manweb	Yes we are supportive of the implementation date of the first release following Authority consent.	Noted
SSE Energy Supply Ltd	Yes, provided that the timescales for Change Proposals are only advisory.	Noted
The unofficial DCMF Website	Yes, if the defects discussed elsewhere in this response are cured.	Noted
UKPN	Yes it is important to have this change in place if agreed, before April 2014 charge setting commences, which will be towards the end of Q3 2013.	Noted
Western Power Distribution	Yes	Noted
Question 13	Please state any other comments or views on the Change Proposal.	Working Group Comments
British Gas	N/A	
EDF Energy	N/A	
Electricity North West	The proposed change relates to the charging models and provides Suppliers and DNOs with 150 days notice of the models that will be used for producing charges. However,	It was noted that the comment is referring to impacts on the inputs to the model rather than the model itself. The group

	<p>the methodology could still change after the 150 day model cut off which leaves a material uncertainty for DNOs and Suppliers trying to populate the model. The working group should consider whether it is appropriate to extend the 150 day notice to include all changes that affect Schedules 16, 17 and 18 rather than just model changes.</p>	<p>agreed that this would improve predictability and stability of DUoS Tariffs. Under the current DCUSA drafting DNOs could have a model but not have certainty over which inputs to use.</p> <p>As an example, it was noted that when calculating April 2013 indicative tariffs DNOs were unsure which asset values to use in the CDCM model as Ofgem had not made a decision on the 15 month notice period CP.</p> <p>The Working Group discussed including the model inputs within the DCP 164 legal text. It was noted that this could be included within the scope of DCP 164, however, having an appropriate model is the key issue. Applying the DCP 164 legal text to the inputs too may divert from this issue.</p> <p>It was agreed that the Working Group should seek industry views on whether this alternative proposal should be taken forward (i.e should models and input data be taken forward or just models?) Action</p> <p>RT took an action to confirm whether a CP form needs to be completed to raise an alternative solution. Action</p>
Northern Powergrid	As the proposer of this change we feel this will try to ensure that all parties are aware of and have visibility of the	Noted

	<p>methodology and associated models which will be used for charge setting.</p> <p>It is important that all parties take responsibility for ensuring the smooth running of the change process.</p> <p>This change will improve the process and lessen the burden on all parties (including Ofgem) in working up the changes, assessing the impact, passing to Ofgem for approval and having a model in time for charge setting in any one year.</p>	
Npower	N/A	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	N/A	
SP Distribution & SP Manweb	None	Noted
SSE Energy Supply Ltd	<p>During Elexon Change Proposals P272 & P280 it was claimed that the DCUSA change process is too slow, and is hindering progress on the Smart Meter project. This modification will slow down the change process still further, and is contrary to the perceived need to process Change Proposals more quickly.</p> <p>The modification is trying to mandate project timescales by reference to the requirement of the DCUSA parties. It does not allow for the possibility of conflicting requirements from other industry bodies such as Elexon, DECC, and OFGEM etc.</p> <p>Given that OFGEM have asked the industry to work together on Smart Meter issues, this does not seem appropriate. Decisions relating to timescales should take account of the requirement of the industry as a whole, rather than just the</p>	<p>It was noted that there is a clause in the legal text that allows the authority to direct a change where it needs to.</p> <p>It was also noted that very few smart metering related changes will impact distribution use of system changes.</p> <p>Smart metering has also been progressing for quite sometime, thus the number of last minute smart metering changes will be limited.</p> <p>An action was taken for CO to contact SSE to discuss the concerns that they raised in</p>

	requirements of the DCUSA parties.	their consultation response. Action
The unofficial DCMF Website	<p>The statement in paragraph 3.2.2 of the consultation paper that decisions on changes to charging methodologies can only be appealed by judicial review seems to contradict The Electricity and Gas Appeals (Designation and Exclusion) Order 2009. Ofgem's March 2013 proposed changes to the definition of part 1 and part 2 matters might also be relevant.</p> <p>If paragraph 3.2.4 of the consultation paper means that DNOs plan to leave it to the DCUSA secretariat to undertake all testing on models, then that seems a risky way for DNOs to comply with their licence obligations to implement approved methodologies correctly.</p>	<p>With regards to judicial review, it was noted that this was raised in the last Working Group meeting with regards to appealing an Ofgem decision on a part 1 matter. A DCUSA Panel member had advised that part 1 matters could only be appealed by judicial review. RT took an action to confirm this. Action</p> <p>The Working Group noted that they do not believe that there is an impact on DCP 164 by the code governance review. It was highlighted that there will need to be a review of the DCUSA as a whole with regards to the code governance review.</p> <p>With regards to the last paragraph, it was noted that it is not the secretariat's responsibility to test the models. The models are owned by the DCUSA panel and it is their right to ensure that they are tested. The panel can determine how the models are tested. DNOs and Suppliers would have an interest in testing the models.</p>
UKPN	N/A	
Western Power Distribution	N/A	