

DCUSA DCP 152 Consultation Responses – Collated Comments

Question One	Do you understand the intent of the CP?	Working Group Comments
British Gas	Yes	The Working Group noted that all respondents understood the intent of the CP.
Electricity North West	Yes	
Northern Powergrid	Yes	
SmartestEnergy Ltd	Yes	
SP Distribution and SP Manweb	Yes	
SSEPD	Yes.	
UK Power Networks	Yes, the intent of the change proposal is to incorporate the combined demand and generation EDCM into DCUSA.	
WPD	Yes	
Question Two	Are you supportive of the principles of the CP?	Working Group Comments
British Gas	Yes	The Working Group noted that all respondents are supportive of the principles of the CP.
Electricity North West	Yes	
Northern Powergrid	Yes	
SmartestEnergy Ltd	Yes	
SP Distribution and SP Manweb	Yes	
SSEPD	Yes	
UK Power Networks	Yes we are supportive of the principles of the change proposal, in that it will allow DNOs to fulfil their licence requirement to place the methodology into DCUSA. Also once incorporated into DCUSA it will allow parties to DCUSA to raise change proposals to the methodology where appropriate.	
WPD	Yes	
Question Three	Do you consider that the proposal better facilitates the DCUSA General	Working Group Comments

	and Charging Objectives? Please provide supporting information.	
British Gas	We agree with the working group's assessment that the change proposal better facilitates general objectives 1-3 for the reasons provided in the consultation. We are less convinced that general objective 4 is better facilitated. We found the legal text difficult to follow and feel that it would be clearer to separate the methodologies for demand and generation charges into different sections rather than intersperse them as proposed. The singular term EDCM Connectee always needs to be interpreted as the context requires to understand whether the method is referring to import sites or export sites.	The Working Group noted that when progressing the EDCM it was developed to charge sites, which can be a mix of demand and generation, therefore, it is beneficial to have it in one methodology and one model.
Electricity North West	Yes, the new methodology better meets the DCUSA general and charging objectives through the introduction of a common methodology which is more cost reflective.	Noted
Northern Powergrid	We agree with the working groups assessment	Noted
SmartestEnergy Ltd	CDCM objective 2 & General Objective 2 due to the fact that this change will improve consistency and add clarity	Noted
SP Distribution and SP Manweb	Yes, we agree with the working group's assessment.	Noted
SSEPD	Yes, we agree with the working group's assessment that the DCP better facilitates the DCUSA general objectives 1-4 for the reasons raised in the consultation report.	Noted
UK Power Networks	Yes. Incorporating the methodology into DCUSA will facilitate the discharge of an obligation imposed on the DNOs in their Distribution licence. Licence condition 22.A.2, requires the DNOs to incorporate the EDCM for export charges into the DCUSA by 1 April 2013. Implementing the EDCM for export charges as a combined methodology with the EDCM for demand also promotes efficiency in the implementation and administration of the agreement by ensuring that	The Working Group noted that the methodology, if approved by Ofgem, is being incorporated into the DCUSA.

	only one model is used for the calculation of charges to designated EHV properties.	
WPD	We agree that it better facilitates General Objectives 1, 3 and 4, and CDCM Objectives 1,3 and 4.	Noted
Question Four	Do you consider that the proposed drafting properly reflects the methodology submitted by DNOs to Ofgem for approval on 1 June 2012?	Working Group Comments
British Gas	It seems to, however if it has changed it would have been useful to understand where changes have been made and why.	<p>The Working Group noted that details of where the methodology had changed had been provided with the consultation document. It was also noted that there have not been any changes to the legal drafting since the methodology was submitted to Ofgem on 1 June.</p> <p>The Working Group agreed to contact the respondent to seek clarification on their response to this question to ensure that it had been correctly interpreted by the group.</p>
Electricity North West	Yes	Noted
Northern Powergrid	Yes	Noted
SmartestEnergy Ltd	Yes	Noted
SP Distribution and SP Manweb	Yes.	Noted

SSEPD	Yes	Noted
UK Power Networks	Yes we consider that the proposed drafting does reflect the methodology submitted to Ofgem.	Noted
WPD	Yes	Noted
Question Five	Do you support the Working Group's view that no consequential changes are required to the CDCM in order to implement the EDCM?	Working Group Comments
British Gas	Yes	Noted
Electricity North West	Yes. However, it should be noted that for completeness, the HVS import and export tariffs should be removed from the CDCM.	The Working Group noted that it had previously been agreed that this would be completed as a separate Change Proposal.
Northern Powergrid	Yes	Noted
SmartestEnergy Ltd	Yes	Noted
SP Distribution and SP Manweb	Yes	Noted
SSEPD	Yes	Noted
UK Power Networks	We support the view that no consequential changes are required to the CDCM to implement the combined EDCM.	Noted
WPD	Yes	Noted
Question Six	Are there any other matters that should be considered by the Working Group?	Working Group Comments
British Gas	<p>We have a few comments of detail on the legal text that the working group may wish to consider:</p> <ol style="list-style-type: none"> 1. Para 3.2 (both schedules) – we note that this constitutes a change to the demand methodology. We are not convinced it should be included in this DCP. Also, is this revised demand methodology consistent with para 14.5? 2. Para 6.1 (schedule 17 only): we note that if DCP 139 is approved 	<p>The Working Group noted the following in relation to each point:</p> <ol style="list-style-type: none"> 1. There is no change in methodology, this is clarification to reflect all connection configurations.

	<p>this paragraph will not be valid and will need to be amended.</p> <ol style="list-style-type: none"> 3. Para 11.1 (schedule 17 only): change 'would' to 'does' 4. Para 20.6 (both schedules): this para is silent on the treatment proposed for Connectees that have an agreement with the DNO to export power during supergrid transformer (SGT) outage conditions. Are they not charged for excess or are they charged a different value for excess? Also in the second last line, suggest including "export capacity" after "maximum". 5. Para 20.7 (both schedules): In the second last line, suggest including "import capacity" after "maximum". 6. Fig 10 on page 88 (schedule 17 only): needs to be updated to remove the Demand (Generation) Analysis 7. Para 2 on page 108 (schedule 17 only): tables 6 & 7 should actually be table 14 & 15 <p>Para 1 & 2 on page 116 (schedule 17 only): item references may need to be updated once redundant items are removed from table 16.</p>	<p>The Working Group noted that the model has been tested and there is no impact on Import Charges. The group agreed to contact the respondent to clarify this point.</p> <ol style="list-style-type: none"> 2. The working group notes this but cannot amend the legal text to account for another DCP that has not yet been approved. 3. Agreed to change legal text 4. Exceeded capacity charges would not be applied to connectees that have an agreement with the DNO to export power during SGT conditions. Agree to amend legal text to including "export capacity" after "maximum". 5. Agreed to change legal text 6. Agree to the change 7. Agreed to change legal text 8. Noted
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Electricity North West	No	Noted
Northern Powergrid	A finalised version of the user guide to be issued once this change is approved.	It was noted that the User Manual is not part of the DCUSA. The group agreed that Reckon should be asked to update the User Manual, as Part of CMG Work Stream B.
SmartestEnergy Ltd	No	Noted
SP Distribution and SP Manweb	<p>The user manual may need to be updated to further clarify section 12.2 of the legal text. The paragraphs relating to the totals of Pre 2005 capacity, 2005-2010 capacity and Post 2010 capacity which states that these are “adjusted for part year generators”.</p> <p>New customers connecting during the charging year are included as per current methodology with the days not a customer etc. included in the model.</p> <p>Reckon confirm that this also relates to existing customers who will de-energise or disconnect during the year – the number of days they will not be a customer also needs to be included in the model.</p>	See response to Northern Powergrid comment.
SSEPD	We welcome Ofgem’s early decision so that we can implement the change in time for the indicative 13/14.	Noted
UK Power Networks	We do not foresee any further matters that should be considered by the working group.	Noted
WPD	No	Noted