

DCUSA DCP 149 Consultation Responses – Collated Comments

Question One	Do you agree with the intent of DCP 149?	Working Group comments
British Gas	Yes- we support achieving commonality in billing practice	The Working Group noted that the majority of respondents agreed with the intent of DCP 149.
EDF Energy	Yes	
ENC	Yes	
ENWL	<p>We agree with the intent of this change proposal. Under Schedule 16 distributors have an obligation to quote their distribution time bands in clock time (para 41). It is our understanding that any bills that are sent out should therefore also be based on clock time. At the time of the CDCM introduction some distributors changed their processes to align to this and sought derogations at the time to comply.</p> <p>The situation highlighted in this change proposal places doubt as to whether the charges against each HH advance value is also misaligned by an hour during British Summer Time or is this catered for by their billing system?</p> <p>Such a misalignment will cause an additional burden of validation on suppliers.</p>	The Working Group noted the comments.
EON Energy	Yes	
Northern Powergrid	No	
Npower	Yes	
Scottish Power Energy Retail	Yes	
SP Manweb Plc and SP Distribution	Yes	

Ltd's		
SSE Power Distribution	No	
UKPN	Yes	
Western Power	Yes	
Question Two	Do you agree with the principles of DCP 149?	Working Group comments
British Gas	Yes- we support achieving commonality in billing practice	The Working Group noted that 2 DNOs responded simply with a "no"; therefore, there is not much to comment upon. However, it should be noted that Parties were not asked to provide supporting comments with this question.
EDF Energy	Yes	
ENC	Yes	
ENWL	Whilst we understand the principles of a common approach, and in our view a common approach should be provided without the need for such a change, this change proposal will ensure that clarification is provided subject to the comments made on the legal text.	
EON Energy	Yes	
Northern Powergrid	No	
Npower	Yes	
Scottish Power Energy Retail	Yes	

SP Manweb Plc and SP Distribution Ltd's	Yes	
SSE Power Distribution	No	
UKPN	Yes	
Western Power	Yes	
Question Three	Does the CP better facilitate the DCUSA General Objective 2? Please provide supporting comments.	Working Group comments
British Gas	Yes – Having a clear and consistent methodology for billing data will promote competition in the market, making the business rules and procedures easier to understand for new entrants.	The Working Group noted that the majority of respondents agreed that this CP better facilitates Objective 2.
EDF Energy	We are in support of this change. This will improve validation process and give accurate and easy supporting backup for customer billings.	
ENC	We agree with working groups assessment	
ENWL	<p>The theme of being restrictive to DCUSA parties in responding only to specific objectives is not helpful and as such we intend to comment against all of the general objectives.</p> <p>General objective 2 is better facilitated by ensuring that Suppliers do not need to have two forms of validation as they do now. It will also reduce costs for new entrants.</p> <p>Also General objective 3 may be better facilitated by ensuring that distributors comply with both the Licence and the codes contained within the Licence should the current practice be proven to be non compliant.</p>	The Working Group also agreed that ENWL raised a valid point concerning the CP being reviewed against all the Objectives. However, it was highlighted that the question does not preclude any Party from raising points about any of the Objectives, and Parties have done so in the past and ENWL did within

		its response to this question.
EON Energy	Yes. General Objective 2 is better facilitated as Suppliers will be better able to validate incoming invoices from Distributors as there will be a common approach. This was something that was envisaged when the common charging methodology was introduced in that the approach to charging should be common. A common approach makes it more transparent to new market entrants, as at present it is unclear what approach is adopted by Distributors prior to receiving an invoice.	
Northern Powergrid	N/A	
Npower	We believe that DCP 149 will better facilitate the DCUSA General Objective 2.	
Scottish Power Energy Retail	A consistent approach from all DNOs will be to the benefit of all suppliers, better facilitating effective completion and therefore General Objective 2.	
SP Manweb Plc and SP Distribution Ltd's	Yes, it facilitates consistency of practice across the Industry	
SSE Power Distribution	No	
UKPN	Yes	
Western Power	We agree it better facilitates General Objective 2 as it means suppliers don't have to build billing systems that can cope with two different clock-change methods.	
Question Four	Do you have any comments on the proposed legal drafting of DCP 149?	Working Group comments
British Gas	<p>We think the legal text needs to be amended so that the charging period is explicitly a clock time calendar month. Under the current proposed text the charging period could still be defined differently in the charging statement.</p> <p>Appendix B – DCP 149 Proposed Legal Text</p> <p>Clause 15</p> <p>15.6 In this Section 2A, in the Schedules when applied pursuant to this Section 2A, and in the terms</p>	CS from British Gas confirmed and noted that the suggested amendments will remove any grey areas around it being only a calendar month, the text says that it is a period defined as a clock time; but these amendments expands

	<p>defined in Clause 1 when used in this Section 2A or those Schedules, any reference to a “charging period” is a period defined in clock time and is, subject to any contrary indication, a reference to the period specified in the Relevant Charging Statement (or, if no period is specified therein, a calendar month) and in any case cannot include more than one clock time calendar month.</p> <p>Clause 36</p> <p>36.5 In this Section 2B, in the Schedules when applied pursuant to it, and in the relevant Bilateral Connection Agreement, any reference to a “charging period” is a period defined in clock time and is, subject to any contrary indication, a reference to the period specified in the Relevant Charging Statement (or, if no period is specified therein, a calendar month) and in any case cannot include more than one clock time calendar month.</p>	<p>upon that.</p> <p>The Working Group discussed this revision to the text, and concluded that this was a question for the DCUSA legal advisors.</p>
EDF Energy	No	
ENC	No	
ENWL	<p>We do not believe that the legal text is robust enough in that:</p> <ul style="list-style-type: none"> it still allows for a ‘contrary indication’ within the Relevant Charging Statement. Whilst clock time is helpful it is not quite precise, and there are a number of charging statements where clock time is irrelevant. The issue at hand is specific to HH Use of System Charges whereas this clause covers all of the charging statements. We agree that in the main a ‘charging period’ for HH Use of System Charges is a calendar month starting at midnight on the 1st of the month until midnight of the following month. A ‘charging period’ may also have a charge period start and end date that is not a calendar month e.g. due to a change of supplier or an MPAN being de-energised or disconnected. These instances may or may not be covered within the charging statements (perhaps they should) but is within the e-billing data items contained within the D2021 data flow and is an accepted practice by most distributors. This is an area for further discussion by the billing expert group. We would therefore caution any attempt to define ‘charging period’ any further than it currently is as this may have further repercussions elsewhere than just the issue at hand. Within the Balancing & Settlement Code (BSC), there is a definition of clock change: 	<p>The Working Group noted that these questions and suggestions should go to the DCUSA legal advisors.</p> <p>The Working Group agreed there may be some additional work on the definition of charging period.</p> <p>Within paragraph 21.2 it was suggested by a Working Group member that it should say “last” settlement day....</p> <p>The Working Group will examine all the comments and amendments in detail and decide upon a final version for the Change Report after receiving feedback from the DCUSA legal advisors.</p>

	<p>Clock Change": means a step change in local time in accordance with the beginning and ending of summer time in Great Britain as defined by the Summer Time Act 1972;</p> <p>Clock time is not really defined, but the process of handling the clock change process and the data received associated with it is within the BSC.</p> <p>The HHDC sends both the D0275 and the D0036 which contain the HH advances. The dates used to identify the period of consumption are different:</p> <p>D0275 uses Date (Midnight to Midnight UTC) which is defined as a calendar day, covering 24 hours (or 48 half hour periods) from midnight to midnight in GMT.</p> <p>Whereas the D0036 uses Settlement Date which is defined as the date on which energy is deemed to be used and must be later settled through BSC initial settlement/reconciliation or Scottish Settlements. Also known as the Trading Day (A Synonym to this is Settlement Day)</p> <p>Albeit both flows are accepted by parties distributors will use one or the other when processing the data to calculate the bill. Those that use the D0275 should, as we do, amend to the settlement calendar in order to bill in line with the British monthly calendar (inclusive of British Summer Time). This is the issue at hand.</p> <p>The legal text therefore needs to be cognisant of the fact that adding the additional words here would not prevent the issue at hand.</p> <p>It may be better to consider a change to clause 21 - Site Specific Billing and Payment.</p> <p>"21.2 As soon as is reasonably practicable after the end of the Settlement Day of each charging period the Company shall submit to the User an account specifying the Use of System Charges payable by or to the User for the whole or any part of that charging period. Such account shall be based on...."</p> <p>Settlement Day being a defined term in DCUSA which refers to the BSC. The BSC defines it as:</p> <p>"Settlement Day": means the period from 00:00 hours to 24:00 hours on each day;</p> <p>Alternatively, it may be that we look at 'clause 29 – Metering Equipment and Metering Data' and add</p>	
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	<p>a new clause after clause 29.5 where we obligate the Company to ensure that the data is aligned to a Settlement Day rather than days associated with GMT prior to being utilised in accordance with Clause 29.3 (Use of System Charges or network planning purposes)</p> <p>With regard to clause 36.5 we are not sure what benefit this adds, in that in the HH invoices between parties in this section are based on the same data that the embedded distributor billed their supplier and calculate their bill accordingly, but for consistency we can accept replication if there is an agreed change to clause 15.6.</p> <p>If our proposed change to clause 21.2 is accepted or indeed the legal text resides within Clause 21, then a reciprocal change to clause 44.2 should be made.</p> <p>Similarly if the legal text is assigned to clause 29 this needs to be replicated in clause 42.</p>	
EON Energy	No, we believe the current drafting works, subject to DCUSA lawyers review.	
Northern Powergrid	No	
Npower	No	
Scottish Power Energy Retail	No	
SP Manweb Plc and SP Distribution Ltd's	No	
SSE Power Distribution	No	
UKPN	No	
Western Power	No	
Question Five	Are you aware of any wider industry developments that may impact upon or be impacted by this CP? If so, please give details, and comment on whether the benefit of the change may outweigh	Working Group comments

	the potential impact and whether the duration of the change is likely to be limited.	
British Gas	No	
EDF Energy	No	
ENC	No	
ENWL	<p>There are a number of changes affecting billing</p> <p>The potential impact that smart metering may hold if the Balancing & Settlement Code P280 Modification is not accepted (resulting in more HH site specific bills) is one area of unknown and as indicated within responses to the withdrawn DCP103 (DUoS charges for sub 100kW HH settled sites), there may be a need for distributors to purchase new billing engines.</p> <p>If BSC P272 Modification is accepted this will also result in an increase in sites being billed in a site specific HH basis. This may impact distributor's ability to bill the potential doubling of invoices.</p> <p>The Methodology Issues Group sub group looking at the perceived discrepancy associated with billing the same site on HH or NHH tariffs may impact billing systems, the extent of which is currently not known.</p> <p>Some of the suite of changes within this pack will also impact billing in different ways dependent upon what distributors do now (e.g. DCP142, DCP143, DCP144, DCP146 and DCP148). This was alluded to within the minutes of the working group under minute 13.4 but once again it never found its way into the consultation documents.</p> <p>It may be sensible to move the implementation date to align with April 2014 where some of the above industry changes have this has their preferred implementation date to minimise the overall impact of change, however smart metering may be a bigger lever in seeking a deferral</p>	The Working Group noted the comments; however, none of the changes may be accepted so this CP should not be delayed pending the unknown decisions of other changes.
EON Energy	<p>Yes. There are many DCUSA DCPs that are aimed at improving the billing and subsequent validation processes of Distributors and Suppliers. The majority of costs associated with these are development costs to billing or validation tools. These costs are greatly reduced when more than one change can be undertaken at any time.</p> <p>The costs are all associated with NOT implementing this DCP. We estimate the development costs for each bespoke validation for this item to be approximately £4,000. To employ more validation staff £12,500 per annum per Distribution licence.</p>	

Northern Powergrid	None that we are aware of	
Npower	No	
Scottish Power Energy Retail	No	
SP Manweb Plc and SP Distribution Ltd's	No	
SSE Power Distribution	None known at present.	
UKPN	No	
Western Power	No	
Question Six	Do you agree with the implementation date of DCP 149?	Working Group comments
British Gas	Yes. We recognise that adjusting billing systems to accommodate small changes can be costly. We do not believe, however, this should be a reason to either reject the modification or delay the change implementation. DNOs in those circumstances should apply for derogations and seek to implement in an efficient fashion.	The Working Group noted that the majority of respondents agree with the implementation date of DCP 149.
EDF Energy	Yes	
ENC	Yes	
ENWL	As discussed in question 5 this question should be based on the potential changes currently being discussed within the industry and the impact that this change has on the affected parties. We would suggest that at the earliest April 2014, but if new billing systems are required it may be later and aligned to smart metering requirements.	The Working Group noted the comments.

EON Energy	Yes	
Northern Powergrid	No	
Npower	Yes	
Scottish Power Energy Retail	Yes	
SP Manweb Plc and SP Distribution Ltd's	Yes, SP Energy Networks already meet the requirements of this CP	
SSE Power Distribution	No	
UKPN	Yes	
Western Power	Yes	
Question Seven	Are there any alternative solutions or matters that should be considered by the Working Group?	Working Group comments
British Gas	No	
EDF Energy	No	
ENC	None that we are aware of	
ENWL	<p>Our alternative proposals are contained in our response to the legal text.</p> <p>Whilst we agree with this change proposal it is unfortunate that the working group's intentions (minute 6.3 – costs and impacts) have not been reflected within this consultation document. This lack of opportunity parties should have had by such an omission means that this change proposal cannot be assessed in a fair manner.</p> <p>We would suggest that it is essential that such information is requested by the working group so that such an assessment can be made and to aid the debate on whether this does in fact better facilitate</p>	<p>The Working Group noted the comments, and reiterated that any Party can provide whatever information they feel is appropriate within any Consultation document.</p> <p><i>**Post meeting note – Supplementary questions were sent</i></p>

	the DCUSA objectives.	<i>out to all respondents asking for this information.</i>
EON Energy	No. We believe the MIG working group have already discussed this widely and believe this to be the optimal solution.	
Northern Powergrid	None that we are aware of	
Npower	None that we are aware of.	
Scottish Power Energy Retail	No	
SP Manweb Plc and SP Distribution Ltd's	No	
SSE Power Distribution	<p>Page 3 – section 2.4 Same as DCP 148 which is not appropriate and needs amending.</p> <p>We feel this change would have discriminatory effect some distributors who will have to change their billing systems.</p>	<p>The Working Group noted that the first comment was in relation to a typographical error within the document.</p> <p>In regard to the second point, the Working Group noted that is why this has been raised as a Part 1 matter.</p>
UKPN	No	
Western Power	No	