

DCUSA DCP 145 Supplementary Questions Responses – Collated Comments

Question One	How will DCP 145 affect your organisation? Please provide supporting comments.	Working Group Comments
British Gas	No impact.	
EDF Energy	Manual bills raised by DNO create extra manual data entry work for validation purposes. The manual data entry is subject to high level of “human” errors, especially if the invoices are delayed in post.	
ENWL	<p>The impact on the organisation as a consequence of this change proposal depends entirely on suppliers and whether they place us in breach of DCUSA for any non-compliance associated with the e-billing documentation.</p> <p>There are issues at present where some distributors do not populate the data flow as per the data catalogue which will result in such a breach.</p> <p>There are other issues where a common approach is being requested and where such a common approach is agreed, any resultant non compliance would be a breach of DCUSA should this change proposal be accepted.</p> <p>We submitted a document to the expert group considering three issues were suppliers are seeking commonality when populating the data flow. The issues were:</p> <ul style="list-style-type: none"> ▪ Issue 05.3 – population of the data item ‘maximum demand 1 in this charge period’ is being populated in 	The Working Group noted this CP is not about placing any DNO into breach of the DCUSA, but to get a common practice in place.

	<p>kW and in kVA. The data catalogue indicates kVA and is an optional field;</p> <ul style="list-style-type: none"> ▪ Issue 05.4 - data item 'Maximum Demand 1 in this Period' is either always populated or only being populated if this value exceeds the 'Agreed Supply Capacity 1'. This field is also optional; and • Issue 05.5 - When the charge period is for less than a whole month some Distributors populate the 'Charge Period From Date' and 'Charge Period To Date' with the first day and the last day of the month even though they bill the correct number of days in the charge lines, whereas other Distributors populate the actual charge period dates. <p>Within the documentation it suggested changes to the data flow items and the introduction of some business rules surrounding the population together with updating the terminology of some outdated titles of data items. If these are approved any non compliance would be a breach of DCUSA.</p>	
Northern Power Grid	This would be dependent on what additional developments are required in order to provide a common approach to billing and whether data items within the current data flow move from an optional to a mandatory state.	The Working Group noted the comments.
Scottish Power Energy Retail	<p>We have provided a joint response to the supplementary questions to DCPs 141, 142, 144 – 149 as we believe the same answer applies to each change.</p> <p>These changes will encourage consistency across all DNOs. Under current arrangements suppliers are required to manage manual workarounds to cater for the different processes employed by some DNOs. This requires manual intervention</p>	

	<p>and time which in turn incurs cost. Successful implementation of these changes will reduce the need for manual intervention and in turn reduce the costs to suppliers. As stated in our previous response this reduction in the costs incurred by parties will help to facilitate effective competition in the supply of electricity.</p> <p>With reference to DCP 141 only we do not understand why the legal text has been amended to now say “DNO Parties who do not use de-linking....” and why such a distinction has been made. We are unsure why a DNO using de-linking should treat an invalid settlement class any different from one who does not. As above, the main benefit of these changes is that consistency helps reduce complexity and brings down costs associated with manual workarounds. The success of this is reduced if exceptions are made without sufficient justification.</p>	
SSE Distribution	SSEPD believe a new change proposal should be raised in place of DCP 145 and DCP 148. To investigate the use of D2021 flows as a whole.	The Working Group noted these comments, however, highlighted that this does show the impact on their organisation as the question asked.
SSE Energy Supply	The D2021's that we receive will be consistent from all parties and comply with its business rules and data flow and data item definitions	
UKPN	We believe we are compliant so no impact	
WPD	This does not affect our organisation.	

Question Two	Will there be any associated costs with implementing DCP 145? Please provide supporting comments.	
British Gas	No	
EDF Energy	NO costs are directly involved as systems will not need to be configured, especially taking into account that only a few DNO are adopting this inconsistent approach. This will save our company resource time which can be better utilised for data quality improvements.	
ENWL	<p>If there is:</p> <ul style="list-style-type: none"> • any non compliance; or • any differing understandings associated with the population of the data flow; or • a need to change or clarify business rules associated with the data structure of the D2021; <p>This should go through due e-billing governance and if approved we have an obligation to deliver such a change whether this change proposal is accepted or not.</p> <p>We believe that such an obligation is also placed on suppliers regarding any changes to the D2026 structure, and we believe suppliers do honour such an obligation.</p> <p>We therefore believe that there is no cost impact associated with this change proposal.</p>	The Working Group noted the comments.
Northern Power Grid	Associated costs would be dependent upon which data items were to be made mandatory and the volume of these changes which affect Northern Powergrid.	The Working Group noted the comments.

Scottish Power Energy Retail	We would not envisage incurring any additional costs as a result of implementing these DCPs.	
SSE Distribution	N/A	
SSE Energy Supply	None	
UKPN	No foreseen cost	
WPD	There are no costs to our organisation.	