



DCUSA Change Report

DCP 147 - Preventing UoS Invoices Containing
Non-UoS Elements

1 PURPOSE

- 1.1 This document is issued in accordance with Clause 11.20 of the DCUSA and details DCP 147 – Preventing UoS Invoices Containing Non-UoS Elements.
- 1.2 The voting process for the proposed variation and the timetable of the progression of the Change Proposal (CP) through the DCUSA Change Control Process is set out in this document.
- 1.3 Parties are invited to consider the proposed legal drafting amendments (Appendix B) and submit their votes using the form attached as Appendix E to dcusa@electralink.co.uk no later than 7 December 2012.

2 BACKGROUND

- 2.1 DCP 147 has been raised by E.On Energy as a result of the work undertaken by the DCMF MIG Annual Review Billing Supergroup. That group was established to determine best practices in DUoS billing and to facilitate moving the Industry towards such practices in order that Distributors adopt a common approach to billing.
- 2.2 The intent is to ensure that any Distributors that wish to invoice charges that are not pure Use of System (UoS), such as Revenue Protection or Metering, do so outside of UoS invoices as transactional charges.
- 2.3 The DCMF MIG Annual Review Billing Supergroup has assessed different approaches used by Distributors under current practices and has determined its view of the optimal common approach that should be adopted in relation to the matter stated within the intent of DCP 147.
- 2.4 The group felt that by having a common approach to billing will make it easier for Suppliers to build validation routines and provides transparency for new entrants.
- 2.5 Some DNOs include items that should be transactionally charged within the UoS invoices. This leads to a different cash flow for these items than DCUSA permits.
- 2.6 This CP has been deemed a Part 1 matter as it is likely to discriminate in its effect upon Parties as some Distributors may have changes to make to their billing systems while others may not.

3 DCP 147 – WORKING GROUP

- 3.1 The DCUSA Panel established a Working Group to assess and refine DCP 147. The Working Group met on three occasions and was comprised of Suppliers, DNO Parties and Ofgem representations.
- 3.2 Meetings were held in open session and the minutes and papers of each meeting are available on the DCUSA website – www.dcusa.co.uk.

4 DCP 147 – CONSULTATION

- 4.1 The Working Group carried out a Consultation to give Parties an opportunity to review and comment on DCP 147. There were 13 responses received from Parties and these are documented in Appendix C.
- 4.2 The majority of the responses to the consultation were supportive of the intent and the principles of DCP 147. The Working Group discussed each response and its comments are summarised alongside the collated Consultation responses in Appendix C.
- 4.3 A summary of the responses received, and the Working Group's conclusions are set out below:

Question 1 - Do you agree with the intent of DCP 147?

- 4.4 The Working Group noted that the majority of respondents, except for two DNO Parties, agree with the intent of DCP 147.

Respondent Party Type	Yes	No
DNOs	4	2
Suppliers	6	0
IDNO	1	0

- 4.5 One DNO respondent, who did not agree with the intent of the CP, noted that no formal disputes have been raised under the current billing process.
- 4.6 The Working Group highlighted that whilst there may have not been any formal disputes raised in regard to this topic, it still causes an issue with Suppliers.
- 4.7 Another DNO Respondent explained that from a Use of System Charges perspective we agree that services such as Meter Asset Provision (MAP) and Revenue Protection are not, and should not, be classed as Use of

System.

- 4.8 When considering MAP charges, it was explained that they only provide MAP services covered by the Distribution Licence Condition 36, and as such any future reference is referred to as Legacy MAP rather than a general MAP provision.
- 4.9 It was also noted by the respondent that there is no argument over Revenue Protection Services being covered by Transactional Charges; there is also probably no argument over non-Legacy MAP charges in that they are covered by a separate bi-lateral agreement.
- 4.10 It was further explained that there is no clear indication as to how Legacy MAP charges can be invoiced within DCUSA. It was noted that whilst they were looking through their Legacy MAP Charging Statement and DCUSA there is a case that it can be recovered by using the same approach to invoicing Use of System.
- 4.11 It was highlighted that Legacy MAP charges has a charging statement that is approved by Ofgem. Their statement states that the recovery of such charges will be via Supercustomer billing in accordance with a Standard Settlement Class combination for Users who are signatories to DCUSA.
- 4.12 The recovery of such charges is therefore via the "Non Half Hourly DUoS Report" and as such provides an automatic daily charge within a tariff that contains both Use of System and MAP charges.
- 4.13 It was therefore noted that they would argue that they are allowed to recover such charges via this approach and as such disagree with the intent of DCP 147.
- 4.14 The Working Group noted that this DNO is the only Distributor that recovers their legacy MAP charges via the DUoS charges.
- 4.15 The Working Group also highlighted that Use of System charges has 14 day payment terms, and transactional charges do not and should have 30 day payment terms. It was explained that since this is on the same invoice, it reduces the time frame for these types of charges to be paid by Suppliers.
- 4.16 It was reiterated that the intent of DCP 147 is to have consistent

procedures in order to have a common approach by all DNOs. The CP does not say that their current method is incorrect; DCP 147 would change it to be common among all DNOs.

Question 2 - Do you agree with the principles of DCP 147?

4.17 The Working Group noted that the majority of respondents, except for two DNO Parties, agree with the principles of DCP 147.

Respondent Party Type	Yes	No
DNOs	4	2
Suppliers	6	0
IDNO	1	0

4.18 One DNO respondent noted that the principles for DCP 147 are once again “a common approach to billing makes it easier for suppliers to build validation routines and provides transparency for new entrants”, and the reasoning being given is also about the impact the payment terms has on such a situation.

4.19 They concur that for transactional services such as Revenue Protection what is not clear is what the common approach is for MAP charges. It is assumed that it is via a transactional invoice hence the legal text indicating as such but how is this to be calculated, and where is the cost benefit analysis to say that it is the best and cheaper option for such a service to be charged in this manner. The respondent noted that such information and analysis should be undertaken as part of this working group.

4.20 The Working Group noted that only two DNOs are impacted by this issue.

4.21 It was also explained that there are other impacts associated with this CP, including credit cover and possible duplication of costs.

4.22 It was noted that one Supplier Party provided associated costs of not implementing this CP.

Question 3 - Does the CP better facilitate the DCUSA General Objective 2, and the DCUSA Charging Objectives 1 and 3? Please provide supporting comments.

4.23 The Working Group agreed that DCUSA General Objectives 2 was better

facilitated by DCP 144.

4.24 The following table outlined the respondents' views on which Objectives are facilitated by the CP:

DCUSA General Objectives	General Objective	DCUSA Charging Objectives	Charging Objective
Objective 1	0	Objective 1	8
Objective 2	10	Objective 2	0
Objective 3	0	Objective 3	8
Objective 4	0	Objective 4	0
Objective 5	0	Objective 5	0

4.25 The Working Group noted that 10 of the 13 respondents agreed that DCP 147 better facilitates DCUSA General Objective 2; and 8 of the 13 respondents agreed that DCP 147 also better facilitates DCUSA Charging Objectives 1 and 3.

4.26 One respondent noted that they felt that this was a limited review of the objectives which is being suggested when all of the objectives should be measured against the CP.

4.27 The Working Group agreed that it is 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.

4.28 The same respondent also noted that they would like to understand why the change proposal form has been altered to that submitted to the DCUSA Panel in July to include additional objectives which the Working Group thought was relevant. They explained that whilst this has been challenged by the Working Group the original change proposal form should not have been altered.

4.29 The Working Group noted it was amended from comments received during the first Working Group meeting. The Working Group felt the other Objectives should also be added in as they determined they would also be better facilitated by this CP. However, as a point of administrative clarity, these will be removed from the CP form, and it will contain only the original one Objective listed.

4.30 However, it was reiterated that this does not change the view of the Working Group in regard to the other Objectives. It will just be noted that

it was determined within the meeting that they are in agreement to such fact.

- 4.31 The respondent then explained that in their opinion the DCUSA General Objective 2 will increase the costs of competition (for both Suppliers and Distributors) in handling and verifying the transactional invoice at the expense of a common approach yet to be understood or communicated to Distributors. It was further noted that this will also negatively impact Distributor competition due to a common approach being adopted rather than allowing Distributors any such differentiation; and overall a negative impact on this object.
- 4.32 The Working Group did not agree with the point that this would inhibit competition in Distributors, as legacy MAPs. The Working Group also does understand how maintaining the status quo increases competition.
- 4.33 The respondent then explained that for DCUSA General Objective 3, they would argue that this will be negatively impacted by this change in that an efficient discharge of their Licence obligation by dictating how to charge will be inefficient due to a current accurate, automated process becoming a manual process for the billing of each and every supplier by a separate invoice each month.
- 4.34 The Working Group discussed this point raised and could not determine why this has to be a manual process, and queried why this could not be an automated process. It was also noted that there is no other DNO which adds these charges to their UoS invoice.
- 4.35 One Supplier Party noted that the CP will ensure the correct allocation of charges and that those which are not related to DUoS are excluded from DUoS invoices. This will provide for more accurate DUoS invoicing which will in turn better facilitate General Objective 2.
- 4.36 The respondent also noted that the inclusion of non-UoS transactional charges (such as revenue protection) by a DNO within charges otherwise derived through the Charging Methodologies is not compliant with its obligations under the Act and by its Distribution Licence. DCP 147 will prevent this from being possible and in doing so better facilitates DCUSA Charging Objective 1.
- 4.37 It was also explained by this respondent that the costs associated with

non-UoS transactions cannot reasonably be described as those incurred by the DNO Party in its Distribution Business activities. This change will prevent this from being possible and so better facilitates DCUSA Charging Objective 3.

- 4.38 One DNO Party noted that whilst they agree it better facilitates General Objective 2 as it means Suppliers don't have to build billing systems that can cope with items that should be on a separate invoice. However they do not agree that it better facilitates DCUSA Charging Objectives 1 or 3 as it has no bearing at all on the charging methodology, which does not cover non-UoS charges, nor does it explicitly, forbid other charges to be included on the same invoice.
- 4.39 The Working Group discussed that DCP 147 will remedy a breach of the Charging Methodology, and it was further noted by a DNO Party that this still does not affect the Charging Objectives.
- 4.40 The Working Group noted the points raised during this discussion.
- 4.41 Another Supplier Party noted that DCUSA 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.
- 4.42 It further explained that DCUSA Charging Objective 1 is better facilitated as they believe that by charging non-UoS charges as part of use of system invoices is contrary to their Licence and DCUSA, in that these are transactional charges and therefore subject to 30 days payment terms and not use of system charges which are subject to 14 day payment terms.
- 4.43 It was also noted that DCUSA Charging Objective 3 is better facilitated in that any Distributor that charges these transactional charges as part of the Use of System charge is in breach of the CDCM. They note that one Distributor has recently changed their charging statement to state that these charges are included in their Use of System charge. They noted that they believe this was never brought to the attention of the DCMF and that

it presumably has been approved by Ofgem. They would like to understand why this change was approved by Ofgem in the light that it breaches the DCUSA.

- 4.44 The Working Group discussed these points and noted that this respondent also raised a query for Ofgem at the end of their response. The Ofgem representative was present at the Working Group meeting and took this issue away for more consideration.

Question 4 - Do you have any comments on the proposed legal drafting of DCP 147?

- 4.45 The Working Group noted that 11 of the 13 respondents did not have any comments on the legal drafting.
- 4.46 One DNO Party provided some alternative drafting for the legal text, and the Working Group agreed to pass these amendments to Wragge & Co during the legal review at which time the most robust set of text will be drafted.
- 4.47 One respondent noted that this change has been raised as a Part 1 matter so clause 9.5.2 will need to be updated to reflect such a situation.
- 4.48 The Working Group did not agree with this point, it was explained that this a Part 1 change that does not introduce or affect a Part 1 clause. The change could potentially have different impacts on different Parties, which could be viewed as discriminatory and that this was the criteria used in determining it was a Part 1 matter.
- 4.49 As a Part 1 matter, this will ensure that the CP will go to Ofgem for final determination; which the Proposer and Working Group felt was the correct process.

Question 5 - Do you believe revenue protection and metering costs are transactional charges and should not be within the UoS invoices? Please provide supporting comments.

- 4.50 One Supplier Party Respondent noted that the separation of transactional will provide accurate UoS charges. In terms of site specific charges, DCP 147 will better reflect the accuracy of charges between UoS and Metering and will have Cash flow implications as transactional charges are on 30

days payment terms. Customers will benefit with clear visibility of charges and avoid the risk of duplicated transactional charges.

- 4.51 Another Supplier Party noted that yes, as described in the common format of charging statement agreed by Distributors under the DCMF. It was noted that as they understand it there is only one Distributor charging each of these charges as part of their Use of System charges all others treat them correctly as transactional charges.
- 4.52 One DNO Party noted that they agree that revenue protection services and the costs associated with them are transactional by their very nature and should not be recovered as part of Use of System.
- 4.53 They further noted that in their opinion Legacy MAP charges are however not transactional. There is no actual activity undertaken each and every month associated with what is effectively a rental of the meter. The approach to the recovery of such a charge either by a separate bill or a bill that contains both Use of System and MAP charges should be subject to a cost benefit analysis.
- 4.54 The Working Group differs in the view that this is a transactional charge, and some members feel that including these is a breach of the CDCM. Regardless of the cost/benefit analysis the majority of the Working Group are of this opinion.

Question 6 - Do you believe that both of these revenue protection and metering costs should be under the 30 day payment terms instead of the 14 day UoS payment terms? Please provide supporting comments.

- 4.55 The Working Group noted that the majority of respondents, 12 of the 13 respondents, agree that revenue protection and metering costs should be under the 30 day payment terms instead of the 14 day UoS terms.
- 4.56 One IDNO Party noted that they believe these elements should be under the same terms as any other transactional charges. In addition, any Party who wishes for these cost types to be under the 14 day payment terms should make the case for doing so with supporting evidence at industry level.
- 4.57 A Supplier Party highlighted that by definition these must be transactional as they relate to certain sites only as not all sites are subject to these

charges. Both charges are not compulsory services provided by the Distributor and do not relate to the use of the Network.

- 4.58 One DNO Party noted that in their opinion Revenue Protection should be on a 30 days payment terms, whilst Legacy MAP charges should be on 14 days payment terms. They explained that whilst it is not part of Use of System, it is also not a transactional activity. There is an argument that our current approach is the most cost effective and cost reflective recovery of such a Licence obligation for both Parties even including the fact that such a recovery impacts the Supplier with a potential extra 16 days loss of cash flow and the interest associated with it.
- 4.59 They further noted that in their opinion, when one compares the cost of undertaking the Supplier validation of such invoices and the payment processing of such invoices, the interest lost would be far less if not removed completely. Such an analysis needs to be undertaken by parties in their assessment of this change proposal and as such should have been requested as part of this consultation.
- 4.60 The Working Group noted that the intent of the CP is to have one consistent approach to this issue. Whether or not we agree that it is a transactional charge; the question becomes why one DNO should have these on 14 day payment terms when no other DNO does, as other MAP charges are 30 day terms.
- 4.61 The Working Group also highlighted that in their opinion these charges are not a UoS charge.

Question 7 - 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 the potential impact and whether the duration of the change is likely to be limited.

- 4.62 The Working Group noted that the majority of respondents were not aware of any other impacts on the CP.
- 4.63 One DNO Party noted that the introduction of competition in this area as resulted in a halving of the number of meters for which we are responsible via our Legacy MAP service. The smart metering roll out will mean that by 2019 we should see little if any revenue in this area. It would seem

sensible not to consider change in this area for what will be a depleting impact on suppliers.

4.64 The Working Group noted that all Parties affected could apply for derogation to Ofgem as required by their individual situations.

4.65 A Supplier Party noted that 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.

4.66 The Working Group noted the comments.

Question 8 - Do you agree with the implementation date of DCP 147?

4.67 The Working Group noted that the majority of respondents, 11 of 13, agreed with the implementation date of DCP 147.

Respondent Party Type	Yes	No
DNOs	4	2
Suppliers	5	1
IDNO	1	0

4.68 One Supplier Party noted that they recognise that adjusting billing systems to accommodate small changes can be costly. They do, however, not believe 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.

4.69 One DNO Party noted that they believe that any implementation date needs to consider the development of a common approach to the structure of the MAP charges. Including areas like whether there are these daily counts or a report of volumes at the end of the month, or what do Suppliers currently receive from Distributors for this service. They noted that they do not want to be in a position of developing a change only to be then hit with a further change on similar grounds to this suite of changes whereby suppliers inform us that we are not adopting a common approach to the production of MAP charges.

4.70 The Working Group noted that to their knowledge no Supplier has raised an

issue about how they receive MAP charges.

- 4.71 One Supplier also noted that they did not support the implementation date because implementation at the start of a financial year would be better as this would provide consistency throughout the year.

Question 9 - Are there any alternative solutions or matters that should be considered by the Working Group?

- 4.72 The Working Group noted that the majority of respondents, 12 of the 13 Respondents, were not aware of any other solutions or matters that the Working Group should consider.
- 4.73 One DNO Party noted that what they consider to be not clear is who does what now and what the impact of this change proposal is on Industry Parties. They highlighted that without such analysis no case is made for change apart from the expert working group view that this is best because it is most common.
- 4.74 The Working Group noted that the purpose of the having an expert Billing group was to define/assess/develop the issues. It was also explained that within the group it was discussed which option would have the smallest impacts on Parties.
- 4.75 The Working Group noted that this change has been raised because of an issue that is present; and that only one respondent is from an individual viewpoint rather than a majority viewpoint.
- 4.76 It was highlighted that this CP is about what should be included within Use of System charges, and to remove any ambiguity.

5 SUPPLEMENTARY QUESTIONS

- 5.1 The Working Group agreed to ask Parties for additional information in the form of Supplementary Questions in order to allow Parties to provide the impacts and materiality of implementing DCP 147. There were 10 responses received from Parties and are documented in Appendix D.
- 5.2 The Working Group discussed each response and its comments are summarised alongside the collated Consultation responses.
- 5.3 A summary of the responses received, and the Working Group's

conclusions are set out below:

Question 1 - How will DCP 147 affect your organisation? Please provide supporting comments.

- 5.4 The Working Group noted that the majority of respondents, 8 of 10 respondents, would not be impacted by the implementation of this CP.
- 5.5 One Supplier Party noted that this change 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 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. This reduction in the costs incurred by parties will help to facilitate effective competition in the supply of electricity.
- 5.6 Another Supplier Party noted that they would benefit from DCP147 as this would enable them to implement a common approach to the set-up of tariffs and validation of invoices across all DNOs. The requirement for manual work around would be removed.
- 5.7 One DNO Party noted that Revenue Protection charges are included within our non-half hourly use of system charge. If the charge was disaggregated then they would need an alternative billing mechanism to bill this charge.
- 5.8 Another DNO Party noted that the change would result in a move away from their current billing process whereby a bill contains both Use of System and Meter Asset Provision (MAP) charges to that of the change proposal via a transactional charge. This therefore would have the following affect on their company:
- A need to amend the MAP charging statement and obtain Ofgem approval.
 - Amend the tariff arrangements associated with those that have the MAP charges forming part of them.
 - Produce a report covering off the monthly MAP charges (a report that may be simple (i.e. a report run on a specific date) or complex (a report run on a daily basis and aggregated over the month) dependent upon a common approach being agreed);
 - Run the report on a monthly basis;
 - Produce invoices on a monthly basis for all Suppliers;
 - Undertake additional debt follow up processes; and
 - Undertake additional cash remittance processes.

5.9 The Working Group discussed these points and noted the comments.

Question 2 - Will there be any associated costs with implementing DCP 147? Please provide supporting comments.

5.10 The Working Group noted that there are impacts on two DNOs and the comments are noted below for each respective company.

5.11 One DNO Party noted that the associated cost will be dependent on the chosen billing mechanism, but could be around £50k.

5.12 The Working Group confirmed that this figure covers both stopping the existing procedures and introducing the new procedures into practice.

5.13 Another DNO Party broke their costs down between One-Off costs and Business Costs.

One Off Costs

5.14 The respondent noted that this will involve the production of an amended MAP charging statement and the approval from Ofgem. Once approved they would need to manually amend the tariff charges at the appropriate time. This is likely to take 2-3 days effort dependent upon whether there are any queries raised by Ofgem at the time.

5.15 The production of the report will need to involve a series of discussions, either under this change proposal or bi-laterally with suppliers so that we have one common approach associated with the report. This may take 5-10 days effort over a number of weeks.

5.16 The production of the report may be very simple or very complex and it could be in the region of £1k to £5k dependent upon the complexity.

Business costs

5.17 The Respondent then noted that since this is a new process they will have over 50 new transactional bills to be raised on a monthly basis. Dependent upon the agreed solution this could be a simple bill raised based on a date within a month and the supplier pays based on the volume attributable at that time but as if it was for the whole month. Alternatively it could be more complex in that we may need to understand the volumes by supplier for each day and provide such volumes and price on a daily basis.

- 5.18 The Respondent then explained that they will need to produce the bill, print and despatch. Once they have sent this out, they would need to include this in the debt follow up processes and clearance of such once paid. Dependent upon how much manual intervention is required the impact is in the region of an additional 0.5-0.75 FTE. It is expected that this will need to be replicated in part at the supplier end in receiving and processing the invoice for payment.
- 5.19 The Working Group discussed and noted the response. It was noted by the Working Group, in regard to this point, that this practice already replicated at the Supplier end as they have to have systems in place that coincide with the DNOs invoicing.

6 PROPOSED LEGAL TEXT

- 6.1 The proposed legal drafting of DCP 147 has been considered by the Working Group, and reviewed by Wragge & Co, and is attached as Appendix B.

7 DCP 147 – WORKING GROUP CONCLUSIONS

- 7.1 The Working Group's conclusion, reflecting Party opinion as presented in the Consultation responses and Supplementary Questions, is that proposed drafting meets the intent of DCP 147 and therefore should be issued for voting and Party determination.

8 EVALUATION AGAINST THE DCUSA OBJECTIVES

- 8.1 The majority of the Working Group considers that the following DCUSA General Objective is better facilitated by DCP 147:

General Objective 2¹ – Better Facilitated.

- 8.2 The majority of the Working Group considers that the following DCUSA Charging Objectives 1 and 3 are better facilitated by DCP 147:

Charging Objective 1² – Better Facilitated.

Charging Objective 3³ – Better Facilitated.

¹ The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent therewith) the promotion of such competition in the sale, distribution and purchase of electricity

² that compliance by each DNO Party with the Charging Methodologies facilitates the discharge by the DNO Party of the obligations imposed on it under the Act and by its Distribution Licence

- 8.3 The Working Group agrees that DCP 147 will promote consistency and transparency in the methods faced by Suppliers.

9 IMPLEMENTATION

- 9.1 DCP 147 is classified as a Part 1 matter in accordance with Clause 9.4.2 (B) of the Agreement, and therefore will go to the Authority for determination after the voting process has completed.
- 9.2 The implementation date, subject to Authority approval, is 1 October 2013.

10 ENGAGEMENT WITH THE AUTHORITY

- 10.1 Ofgem has been fully engaged throughout the development of DCP 147 as a member of the Working Group.

11 PANEL RECOMMENDATION

- 11.1 The Panel approved this Change Report on 21 November 2012. The Panel considered that the Working Group had carried out the level of analysis required to enable Parties to understand the impact of the proposed amendment and to vote on DCP 147.
- 11.2 The timetable for the progression of the Change Proposals is set out below:

Activity	Date
Change Report issued for voting	23 November 2012
Voting closes	7 December 2012
Change Declaration	11 December 2012
Authority Decision	18 January 2013
CP Implemented	1 October 2013

³ that compliance by each DNO Party with the Charging Methodologies results in charges which, so far as is reasonably practicable after taking account of implementation costs, reflect the costs incurred, or reasonably expected to be incurred, by the DNO Party in its Distribution Business

12 APPENDICES:

- Appendix A – DCP 147 Change Proposal
- Appendix B – DCP 147 Proposed Legal Drafting
- Appendix C – DCP 147 Consultation Documents
- Appendix D – DCP 147 Supplementary Questions
- Appendix E - DCP 147 Voting Form