

**DCUSA DCP 148 Consultation Responses – Collated Comments**

Question One	Do you agree with the intent of DCP 148?	Working Group Comments
British Gas	Yes	
EDF Energy	Yes	
ENC	Yes	
ENWL	<p>This change proposal is about limiting the options currently available to the distributor based on what an expert group deemed the most common approach and limiting the intent to such an option.</p> <p>The intent should have allowed a debate to take place to identify what the best and most cost effective solution would be for all parties impacted. A counter argument can be raised to say that adjustment billing is the correct approach and actually aligns with the Supercustomer DUoS approach where difference billing of previous settlement dates takes place via the reconciliation runs. Similarly there may be instances when either approach is acceptable. This limited intent prevents such a dialogue to take place.</p> <p>There is also an impact on the e-billing agreement which allows for such Invoice Types and as such would have to be updated if this change proposal was successful.</p>	<p>The Working Group noted the comments, and does not agree that there would be a cross governance issue.</p>

	Based on both limited intent and the potential to have cross governance issues emanating from such a change proposal we do not agree with this intent.	
EON Energy	Yes	
Northern PowerGrid	No	The Working group noted the comments, but highlighted that there was no reasons provided to elaborate as to why they do not support the intent of the CP.
Npower	Yes	
ScottishPower Energy Retail	Yes	
SP Manweb Plc and SP Distribution Ltd's	Yes	
SSE Energy Supply Ltd	Yes – for DNO and IDNO's to use credit/rebill rather than adjustment invoices	
SSE Power Distribution	No	The Working group noted the comments, but highlighted that there was no reasons provided to elaborate as to why they do not support the intent of the CP.
UKPN	Yes	
Western Power	Yes	
<b>Question Two</b>	<b>Do you agree with the principles of DCP 148?</b>	<b>Working Group Comments</b>

British Gas	Yes	
EDF Energy	Yes	
ENC	Yes	
ENWL	<p>The principle quotes the same rationale here as to other change proposals in this suite of change proposals. It is once again associated with one common approach irrespective of whether it is the most efficient, cost reflective solution.</p> <p>We use both the cancel/re-bill approach and adjustment bills both on paper and e-billing. When we rolled out e-billing we discussed our proposals with Suppliers and listened to how best they wished to receive the flows by removing the Invoice Type 'W – withdraw a previous invoice' option and gained acceptance that our approach to include the use of 'A – amend a previous invoice' was an acceptable practice. This was tested with suppliers in advance of implementation so that both parties were comfortable with the data being sent and various amendments were made at that time. To now have to undertake additional changes is not helpful, especially when no other option is allowed to be discussed.</p> <p>The justification states that “Different distributors adopt different approaches to changed data in HH billing.” This is true and does comply with what parties have agreed to in the e-billing arena. The correct governance area should be utilised for change especially when you consider that we have</p>	<p>The Working Group noted and discussed all the comments contained within this response. It was highlighted that this CP is trying to get to a common approach, and that this was discussed within the expert group.</p>

	over 99% of invoices sent out by e-billing.  We therefore do not support the principles for this change proposal.	
EON Energy	Yes	
Northern PowerGrid	No	The Working group noted the comments, but highlighted that there was no reasons provided to elaborate as to why they do not support the principles of the CP.
Npower	Yes	
ScottishPower Energy Retail	Yes	
SP Manweb Plc and SP Distribution Ltd's	Yes	
SSE Energy Supply Ltd	Yes	
SSE Power Distribution	No	
UKPN	Yes	
Western Power	Yes	
<b>Question Three</b>	<b>Does the CP better facilitate the DCUSA General Objective 2? Please provide supporting comments.</b>	<b>Working Group Comments</b>
British Gas	Yes - this change will increase the commonality across DNO's in the sending of and receipt of invoices. This will improve competition by making the business rules and procedures	

	easier to understand, including for new entrants.	
EDF Energy	We are in support of this change. This will benefit us to accurately interface various systems for electronic customer billing.	
ENC	We agree with the working group's assessment	
ENWL	<p>Once again a limited review of the objectives is being suggested when all of the objectives should be measured against it.</p> <p>There is an argument to say that General Objective 1 is not better facilitated due to increased costs with no perceived benefit.</p> <p>Regarding General Objective 2, we would argue that the supplier benefit of validation and common approach only benefits new entrants since the existing suppliers must already cater for the present situation and the benefit is only made if the new entrants pick up the potential cross governance concerns at the time that they wish to e-bill. Also we believe that this is based solely on the expert group members' view that this common approach is the best one based solely because it is the most common. No evidence has been provided by the expert group or from the working group that this is proven and there has been no request (although</p>	The Working Group noted that whilst DNOs have existing processes, this CP will mandate a common approach and not allow changes as the current situation currently does.

	<p>the minutes suggest that it should have been) to provide such evidence from parties within this consultation so overall a neutral impact on Objective 2.</p> <p>This also does not better facilitate General Objective 4 by potentially causing cross governance issues between agreements and the respective code/agreement administrators. Any changes to the e-billing flow catalogue should be agreed in their governance area and not in DCUSA.</p>	
EON Energy	<p>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.</p>	
Northern Power Grid	No	<p>The Working group noted the comments, but highlighted that there was no rationale provided to elaborate as to why they do not feel the Objectives are better facilitated.</p>
Npower	<p>We believe that DCP 148 will better facilitate the DCUSA General Objective 2.</p>	
ScottishPower Energy Retail	<p>The current variety of methods employed by DNOs mean that suppliers have to use different means by which to validate invoices. This is not an efficient way to operate. The change</p>	

	<p>will promote consistency across DNOs and therefore better facilitate General Objective 2.</p> <p>Invoicing the difference is unclear and does not always occur in the same month as the original invoice. The decision to credit the entire invoice and re-bill provides the simplest and most transparent solution, better facilitating General Objective 2.</p>	
SP Manweb Plc and SP Distribution Ltd's	Yes, we believe it is more correct to issue a full credit note for the original invoice value and then a new invoice for the new correct value.	
SSE Energy Supply Ltd	Yes - consistent billing approach from DNO / IDNO's	
SSE Power Distribution	No	The Working group noted the comments, but highlighted that there was no rationale provided to elaborate as to why they do not feel the Objectives are better facilitated.
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 different rebilling methods.	The Working Group noted the comment.
<b>Question Four</b>	<b>Do you have any comments on the proposed legal drafting of DCP 148?</b>	<b>Working Group Comments</b>
British Gas	No	
EDF Energy	No	

ENC	Due to the adjustment being raised against an individual MPAN it may be better for the legal text to confirm that “only the MPAN shall be credited” as currently the legal text could be interpreted in different ways.	The Working Group noted that one invoice can contain more than one MPAN, so if there was any changes made, the entire invoice would need credited and re-invoiced.
ENWL	<p>In our opinion this change proposal should be rejected. That said the legal text is flawed.</p> <p>It states ‘for whatever reason’, so why go on to specify particular instances?</p> <p>‘form’ should be ‘from’</p> <p>What is classed as “standing data”?</p> <p>“Credit note” is not a term used in “e-billing” as one of the ‘Invoice Types’. It is catered for by ‘C - Cancel a previous invoice’.</p> <p>The legal text will need to cater for both paper and e-billing scenarios.</p>	The Working Group noted that the legal text could be amended to remove “Standing Data”, and keep “for whatever reason”. These amendments will be taken into account during the review by the DCUSA legal advisor.
EON Energy	No, we believe the current drafting works, subject to DCUSA lawyers review.	
Northern Power Grid	No	
Npower	No	
ScottishPower Energy Retail	No	



SP Manweb Plc and SP Distribution Ltd's	Yes, we agree with the content but would highlight the typo in line 2 where it states "form" instead of "from".	The Working Group has noted this issue, and it will be corrected before the final version is issued to the DCUSA legal advisors.
SSE Energy Supply Ltd	No	
SSE Power Distribution	If there is a valid field in the data flow the CP should seek to change the flow so the field is removed.	The Working Group noted that a DCUSA CP cannot change the business rules as they are outside the governance, but any Party is free to raise a CP as they see fit.
UKPN	No	
Western Power	No	
<b>Question Five</b>	<b>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.</b>	<b>Working Group Comments</b>
British Gas	No	
EDF Energy	No	
ENC	No	
ENWL	How will such wording interact with DCP142 when the legal text of DCP142 has all sorts of Invoice Types quoted within it, including adjustment invoices? Both cannot be accepted or there will be an inconsistency between two approved change proposals.	The Working Group noted that this may be a housekeeping modification if both are accepted; however, both are to be assessed individually and on their own merits. Once the decisions are known for each CP the decision will be made to put through housekeeping CPs.

	<p>Likewise if DCP145 is supported what change if any is required to the legal text to ensure that paper and e-billing is catered for but governance is managed in the correct agreement.</p> <p>Similarly the methodology changes associated with the MIG sub group looking at the NHH/HH perceived discrepancies and the DCP151 and BSC P280 changes impact the billing area. To undertake a change six months prior to a potential further change in the same area is not helpful to all parties. It may therefore be sensible to defer this change proposal to the April 2014 date.</p> <p>However should P280 be rejected we would argue (as we do and in more detail in DCP146) that no changes to the billing functionality should be undertaken until a full understanding of the impact smart metering will have, and suppliers intentions to use HH settlements and the volumes associated with such is understood, so that distributors can undertake an impact assessment on their billing systems. It would therefore not be appropriate to undertake change in this area at a time of considerable uncertainty within the industry.</p>	<p>The Working Group noted that P280 has been rejected, and DCP 151 has been withdrawn from the DCUSA Change Process.</p>
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 Working Group noted the comments.</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 £1,000. To employ more validation staff £1,600 per annum per Distribution licence.	
Northern Power Grid	None that we are aware of	
Npower	No	
ScottishPower Energy Retail	No	
SP Manweb Plc and SP Distribution Ltd's	No	
SSE Energy Supply Ltd	No	
SSE Power Distribution	Yes – this directly opposes CP 145 which is intending to ensure that all distributors use the D2021 with the existing business rules and data item definitions.	The Working Group does not feel that this CP opposes DCP 145, and that only a certain number of the business rules would be applicable, and they would still have to be adhered to by Parties.
UKPN	No	
Western Power	No	
<b>Question Six</b>	<b>Do you agree with the implementation date of DCP 148?</b>	<b>Working Group Comments</b>
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.	
EDF Energy	Yes	
ENC	Yes	
ENWL	<p>There seems to be a number of variables that need to be sorted out regarding interpretation of the legal text in order to deliver a common approach as required. We would suggest that six months after the Ofgem determination is a better timescale.</p> <p>Alternatively, defer to April 2014 when there may be other billing changes dependent upon the outcome of DCP151, BSC P280 and the MIG NHH/HH sub group looking at methodology changes associated with the perceived discrepancy between NHH and HH tariffs.</p> <p>Finally as stated above, if P280 is rejected this should be deferred until an understanding of what impact smart metering will have on distributor billing systems.</p>	<p>The Working Group noted that a longer timescale (October 2013) would be beneficial to Parties and that is why that implementation date was chosen. The Working Group noted that the NHH/HH change is a methodology change, and this is a billing issue.</p>
EON Energy	Yes	
Northern Power Grid	No	<p>The Working group noted the comments, but highlighted that there was no rationale provided to elaborate as to why they do not agree with the</p>

		implementation date.
Npower	Yes	
ScottishPower 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	The Working group noted the comments, but highlighted that there was no rationale provided to elaborate as to why they do not agree with the implementation date.
SSE Energy Supply Ltd	Yes	
UKPN	Yes	
Western Power	Yes	
<b>Question Seven</b>	<b>Are there any alternative solutions or matters that should be considered by the Working Group?</b>	<b>Working Group Comments</b>
British Gas	No	
EDF Energy	No	
ENC	No	
ENWL	Para 2.4 of the Consultation document is not relevant to this change proposal. It is relevant to DCP146.  The interpretation of this change proposal on paper bills is	The Working Group noted that the comments regarding the Paragraph 2.4 and agreed that this was a typographical error within the document.

	<p>quite straight forward, however where e-billing is used we need to be clear on what Invoice Type is to be used. Based on the definition of the „Invoice Type“ our assumption is that when you state “raise a new account for the new value” those that e-bill must use „R – Replace a previous invoice with this new invoice“ rather than „N - new invoice“. Otherwise no history can be tracked. This assumption is based on the title of the Change Proposal which talks about rebilling, but we suspect this is not what is actually happening in practice, and as such not a true reflection of what should occur but more based on what is a common approach. We do not want any misunderstanding in this area when it comes to developing any changes to the IT system.</p> <p>We believe that this issue was raised as part of the whole issue surrounding e-billing changes which are based on frustration and further exacerbated by parties not raising changes to the e-billing User Group in order to resolve them. This is the forum that this change should have gone to, and certainly if DCP145 is approved this change proposal should be withdrawn and allow compliance to take place within the correct governance area.</p> <p>What rationale is there to support change apart from we want one common approach? Where is the data and cost benefit analysis to support it? We don’t even have a question identifying how distributors currently bill and what the impact</p>	<p>The Working Group noted that the next point comes back to the Business Rules which were discussed in earlier questions.</p>
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	<p>and cost of change would be (the latter being requested by the working group under minute 6.3).</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 the DCUSA objectives.</p> <p>We look forward to reviewing this request for information since 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.</p>	
EON Energy	No. We believe the MIG working group have already discussed this widely and believe this to be the optimal solution.	
Northern Power Grid	None that we are aware of	
Npower	None that we are aware of.	
ScottishPower Energy Retail	No	
SP Manweb Plc and SP Distribution Ltd's	No	
SSE Energy Supply Ltd	No	
SSE Power Distribution	DCP 145 and 148 should be reinvestigated with a view to a standardised use of the D2021 flow.	

UKPN	No	
Western Power	No	