

DCUSA DCP 148 Supplementary Questions Responses – Collated Comments

Question One	How will DCP 148 affect your organisation? Please provide supporting comments.	Working Group Comments
British Gas	No impact	
EDF Energy	Our billing system does not currently support “adjusting” units and therefore creates manual work and possible delays and errors in customer billings.	
ENWL	<p>The impact on our organisation will result in a change to the billing system to limit the choice available to us when amending a bill. That choice is still open to interpretation where e-billing is concerned over the choice of ‘Invoice Type’. It is essential that this is agreed in advance of any changes to billing systems. This would not be the case if the change proposal had been undertaken in the correct governance area.</p> <p>We undertake a cancel/rebill approach and an amendment to the previous invoice dependent upon a set of conditions. The billing system will therefore need to be changed in order to ensure</p>	<p>The Working Group noted that regardless of where this issue was raised, and the same solution was agreed, the same changes would need to be made resulting in the same net effect.</p>

	that the only option is to cancel and rebill.	
GTC	There will be no impact as we already employ this process	The Working Group noted the comments
Northern Power Grid	Northern Powergrid currently bill raises half hourly reconciliation invoices on an invoice/credit the difference basis. DCP148 were approved we would need to significantly redevelop the way in which our billing system generates reconciliation invoices.	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 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	No impact.	
SSE Energy Supply	This will mean that all DNO/IDNO’s will use the Credit/rebill process ensuring a consistent approach.	
UKPN	We already do credit/re-bill so no impact	
WPD	This does not affect our organisation.	
Question Two	Will there be any associated costs with implementing DCP 148? Please provide supporting comments.	Working Group Comments

British Gas	No	
EDF Energy	No system changes will be required, however resources currently spending time on non value added will be better utilised in providing better service and accurate data to customers.	
ENWL	<p>One off costs The system impact will be in the order of a large change (50-100 man days) together with significant testing and project management required from the business. This is probably a cost in the region of £50k-£70k.</p> <p>Business costs As long as we obtain a common approach to what values are required on the e-billing data flow we believe that there are minimal business impacts.</p>	The Working Group noted the comments.
GTC	No	
Northern Power Grid	Yes. Our billing system will need to be redeveloped and we envisage indicative costs of c. £500k. This cost includes both hardware and software development	The Working Group discussed these comments, and it was explained by NPG that the major issues come with the historic data. The Working Group then queried if there could be a derogation applied regarding not going through the historic data. It was also noted that this total includes man days, hardware and software changes.
Scottish Power Energy Retail	We would not envisage incurring any additional	

	costs as a result of implementing these DCPs.	
SSE Distribution	No	
SSE Energy Supply	No	
UKPN	No foreseen cost	
WPD	There are no costs to our organisation.	