

DCUSA DCP 131 Consultation Responses – Collated Comments

Question One	Do you understand the intent of the CP?	Working Group Comments
British Gas	Yes	The Working Group noted that all respondents understood the intent of DCP 131.
EDF Energy	Yes	
GTC	Yes	
Northern Powergrid	Yes	
Scottish and Southern Energy Power Distribution	Yes	
SP Energy Networks	Yes, we understand the intent of the CP.	
SSE Energy Supply Ltd	Yes	
UK Power Networks	Yes	
Western Power	Yes	
Question Two	Are you supportive of its principles?	
British Gas	Yes	The Working Group noted that all respondents are supportive of DCP 131's principles.
EDF Energy	Yes	
GTC	Yes	
Northern Powergrid	Yes	
SSE Energy Supply Ltd	Yes	

Scottish and Southern Energy Power Distribution	Yes	
SP Energy Networks	Yes, we are supportive of its principles.	
UK Power Networks	Yes	
Western Power	Yes	
Question Three	Does the CP facilitate DCUSA General Objectives? Please provide supporting comments	
British Gas	<p>We agree with the view of the working group that objective 2 is better facilitated by improving the transparency and predictability of important (and potentially volatile) data items in the CDCM. By making visible the 3 years of data that is used in the calculation of the average for load characteristics and peaking probabilities, users of the CDCM will be in a better position to predict future changes to tariffs.</p> <p>We also agree with the view of the working group that objective 3 is better facilitated. This issue was raised at the annual review meeting of the CDCM, and therefore the change proposal better meets DCUSA General Objective 3 by satisfying the licence obligation on DNOs to review the charging methodology and bring about changes to improve the methodology.</p>	
EDF Energy	<p>This CP does facilitate DCUSA general objectives as this will enable transparency of data used in calculations as defined in DCUSA.</p> <p>4. The promotion of efficiency in the implementation and</p>	The Working Group noted this point and discussed that Objective 4 is linked to the efficiency of the Agreement and not the User; it was therefore decided that this Objective would not be applicable

	administration of this Agreement and the arrangements under it.	to DCP 131.
GTC	Yes	
Northern Powergrid	Yes – We agree with the working group’s assessment.	
SSE Energy Supply Ltd	Yes, for the reasons given in the consultation document.	
SP Energy Networks	We agree with the assessment that the CP facilitates DCUSA General Objectives 2 and 3.	
Scottish and Southern Energy Power Distribution	In our view this Change Proposal facilitates Objective 2 as any data trends over the three years will be evident. It would also allow DNOs to better fulfil their obligations under Objective 3.	
UK Power Networks	It provides greater visibility of the numbers behind the inputs to the CDCM, allowing parties to identify trends in the data to assist in being able to manage future volatility in tariffs, thus does facilitate the DCUSA objectives.	
Western Power	<p>The change proposal better meets general objective two by improving the transparency and predictability of important (and potentially volatile) data items in the CDCM.</p> <p>We do not agree that it improves objective three as it does not impact the methodology therefore cannot be said to improve the methodology.</p>	The Working Group noted this point.
Question Four	The working group considers that providing this additional information will add transparency and predictability to DUoS charges whilst requiring little additional resource to the process of producing the ARP. Do you agree? Please give	

	supporting reasons.	
British Gas	This question is for DNO's to answer, but we would expect that the additional information will require little resource to provide since the data must be readily available to provide the input to the CDCM.	The Working Group noted that all respondents agreed that this additional information required by DCP 131 will take little additional resource in producing the ARP; and transparency and predictability will be improved. It was noted that no Parties raised any concerns about adding additional work, and all agreed about transparency being improved.
EDF Energy	The CP is asking for publication of information that will already be used by the DNOs to calculate the average number and therefore there will be little additional resource needed to add these numbers to the ARP.	
GTC	We agree that the CP would aid transparency & predictability but we would be unable to comment on the resource required by DNO's to produce this data.	
SSE Energy Supply Ltd	Yes. It will be easier for Suppliers to trace the cause of unexpected price changes. The distributors should already have the information required to complete the new tables.	
Scottish and Southern Energy Power Distribution	We agree that transparency would be improved.	
SP Energy Networks	Yes we agree that providing the additional information adds transparency.	
Northern Powergrid	Yes – it will make it more transparent about how the 3 year averages have been calculated for the inputs in question.	
UK Power Networks	Yes we agree with the working groups assumption, as the DNO will already have this data for the relevant years and it is	

	simply making that available as part of the ARP.	
Western Power	Yes	
Question Five	For DNOs: The revised ARP is attached as Appendix C. It has been tested by the working group which has shown that there is no impact on the functionality of the spreadsheet, do you agree with their assessment?	
British Gas	<p>The addition of the new tab containing the 3 years of data for the relevant tables has not impacted the functionality of the ARP, however we note that there seems to have been an unintended change in functionality in the CDCM Volume Forecasts tab. Previously this tab included formulae that allowed DNOs and users to flex the high level volume growth assumptions for future years, however in the updated version provided with the consultation, this functionality has been removed. We would prefer to have this functionality returned in the default model and then individual DNOs can choose to overwrite the formula driven forecasts with hardcoded forecasts if they wish.</p> <p>We include with our response a version of the template with these formulae included once more.</p>	<p>The Working Group discussed this response and agreed that the ARP would be amended to restore the original functionality, and only make the changes that DCP 131 will require should it be approved by Parties.</p> <p>Once the CP has been approved by Parties the ARP will be updated to reflect these changes and will be published on the DCUSA website. DNOs will then populate the ARP as per the DCUSA guidelines and requirements.</p>
EDF Energy	N/A	
GTC	N/A	
Northern Powergrid	Yes – there was an issue with the macros in the initial version of the ARP circulated, but the updated version functioned as expected.	The Working Group noted that this point was discussed and solved during the Consultation phase, and no further action is required.

SSE Energy Supply Ltd	N/A	
Scottish and Southern Energy Power Distribution	Yes, the functionality of the spreadsheet is not affected by the inclusion of the 'smoothed input' sheet.	
SP Energy Networks	Yes we agree with the working group's assessment.	
UK Power Networks	Yes we are happy that the revisions to the ARP have no impact upon the functionality of the spreadsheet.	
Western Power	Yes	
Question Six	<p>The following changes have been made to the ARP:</p> <p>A new sheet has been added (Smoothed Input Details) to capture the information required by this DCP.</p> <p>A new row has been added to the Overview sheet to capture the overview of this additional sheet.</p> <p>Have you got any comments or suggestions on the revised format of the revised ARP?</p>	
British Gas	As per above, the version of the ARP published with the consultation has removed some functionality from the CDCM Volume Forecasts tab which seems to be an oversight given the changes listed above. This functionality should be added back to the template.	<p>The Working Group discussed this response and agreed that the ARP would be amended to restore the original functionality, and only make the changes that DCP 131 will require should it be approved by Parties.</p> <p>Once the CP has been approved by Parties the ARP will be updated to reflect these changes and will be published on the DCUSA website. DNOs will then populate the ARP as per the DCUSA guidelines and</p>

		requirements.
EDF Energy	No	
GTC	No	
Northern Powergrid	<p>The revised format of the ARP meets the intent of the change proposal.</p> <p>The only build that could be considered is to include some validation between the 'Smoothed Input Details' worksheet and the 'CDCM Forecast Data' worksheet to ensure that consistency is maintained between the two worksheets.</p>	<p>The Working Group discussed this point, and thought that this would be a useful addition for the "DNO Checklist tab" contained within the ARP. It was agreed that it should be added above 'number 12' in the ARP, and it should state "Ensure that the data is consistent between 'CDCM Forecast Data' sheet and 'Smoothed Input Details' sheet.</p> <p>This will be added into the amended ARP if DCP 131 is approved by Parties.</p>
SSE Energy Supply Ltd	No	
Scottish and Southern Energy Power Distribution	The revised ARP is good in that there has been little change to the original format, so consistency has been maintained and the additional sheet is self explanatory.	
SP Energy Networks	None	
UK Power Networks	No we are satisfied with the revisions made to the ARP.	
Western Power	No	
Question Seven	Do you have any comments on the proposed legal text?	
British Gas	No	The Working Group noted that there were no additional comments on the legal text from respondents.

EDF Energy	No	
GTC	No	
Northern Powergrid	Not at this time.	
SSE Energy Supply Ltd	No	
Scottish and Southern Energy Power Distribution	No	
SP Energy Networks	None	
UK Power Networks	The legal text appears to be correct in order to deliver the necessary change of requirements.	
Western Power	No	
Question Eight	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.	
British Gas	DCP 135 is going through open governance which will alter the format and functionality of the CDCM and therefore will require a further consequential change to the format and functionality of the ARP, but we don't think that should hold up the progression of this change proposal as the two are not linked.	The Working Group discussed this response and noted that all CPs going through the Change Process have to be judged on their own individual merits. The only time you would need to consider another CP's impacts would be if that CP has been approved and is awaiting implementation.

EDF Energy	No	
GTC	No	
Northern Powergrid	There are a number of CDCM related changes being considered at the moment but none that we believe would have a material impact on this proposal.	The Working Group noted this point, and also referred to their earlier response about only having to consider CPs that have been approved and are awaiting implementation.
SP Energy Networks	None	
SSE Energy Supply Ltd	No	
Scottish and Southern Energy Power Distribution	We are currently not aware of any industry developments that would have an impact.	
UK Power Networks	No there are no other changes that we are aware of.	
Western Power	No	
Question Nine	Are you supportive of the proposed implementation date of 1 November 2012?	
British Gas	Yes	The Working Group noted that all respondents were supportive of the implementation date of DCP 131
EDF Energy	Yes this date will enable the information to be included in the ARP sent out with Indicative charges for 1 st April 2012.	
GTC	Yes	
Northern Powergrid	Yes	

SSE Energy Supply Ltd	Yes	
Scottish and Southern Energy Power Distribution	Yes	
SP Energy Networks	Yes	
UK Power Networks	Yes this would be a logical date, but does this align with a scheduled DCUSA release?	The Working Group noted this point, and ElectraLink confirmed that this will be done within the first release following approval in order to meet the implementation date.
Western Power	Yes	
Question 10	Are there any alternative solutions or matters that should be considered by the Working Group?	
British Gas	No	The Working Group noted that there were no further solutions identified by the respondents.
EDF Energy	Not that we are aware of.	
GTC	N/A	
Northern Powergrid	Not that we are aware of at this time.	
SSE Energy Supply Ltd	No	
Scottish and Southern Energy Power Distribution	Not at this time.	
SP Energy Networks	None	
UK Power Networks	No	

Western Power	No	
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