

DCUSA CHANGE REPORT	
<b>CHANGE PROPOSAL</b>	DCP 055 'Provision of Annual Rota Block Data To Suppliers'
<b>DATE OF ISSUE</b>	22 February 2010
<b>ISSUED TO</b>	DCUSA Contract Managers
<b>PARTIES ENTITLED TO VOTE</b>	All Parties
<b>RETURN DEADLINE (Voting End Date)</b>	08 March 2010 – <a href="mailto:DCUSA@electralink.co.uk">DCUSA@electralink.co.uk</a>

## 1 PURPOSE

- 1.1 This document is issued in accordance with Clause 11.20 of the DCUSA. The Change Report details DCP 055 'Provision of Annual Rota Block Data to Suppliers'. 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.
- 1.2 Parties are invited to consider the proposed amendment attached as Appendix A and submit votes using the form attached as Appendix B to [dcusa@electralink.co.uk](mailto:dcusa@electralink.co.uk) by 08 March 2010.

## 2 DCP 055 – PROVISION OF ANNUAL ROTA BLOCK DATA TO SUPPLIERS

- 2.1 DCP 055 was raised by Scottish Power Energy Retail Limited (SPERL) following discussions at the DCUSA Standing Issues Group (SIG).
- 2.2 In accordance with Schedule 8 of the DCUSA, Distributors are required to produce a rota block identifiers report annually. Upon receipt of the information Suppliers are required to use reasonable endeavours to publish the relevant rota block identifier on customer bills.
- 2.3 Although the requirements are set out in the DCUSA, the mechanism for the collation and distribution of the data, and the format for publishing the data, are not specified. In 2009 the DNO data was collated centrally by the Electricity Networks Association (ENA) and a single disk in a standard format was distributed to Suppliers. IDNOs provided the data individually directly to Suppliers.
- 2.4 SPERL identified that the data disk provided in 2009 has proved problematic for Suppliers to load automatically as it contained duplicate or invalid and incomplete postcodes. The format of the data provided had changed from that distributed in 2008 without prior discussion with Suppliers.
- 2.5 DCP 055 therefore proposes amending the DCUSA to place an obligation on all DNO and IDNOs to ensure that Suppliers receive rota block data from a single source in a recognised and validated format. This will allow a

central body to validate all postcode data before compiling the file to be sent to Suppliers.

- 2.6 The DCUSA Panel considered the CP at its meeting on 21 October 2009 and established a Working Group to assess and develop the CP. The DCP 055 Working Group comprised representatives from Supplier and Distributor Parties as well as the ENA. The DCP 055 Working Group has met on 2 occasions and the minutes and papers of the DCP 055 Working Group meetings are available on the [DCUSA Website](#).

### 3 DCP 055 CONSULTATION

- 3.1 The DCP 055 consultation was issued to all DCUSA Parties and the ENA on 20 November 2009 for a period of 12 Working Days. 14 responses were received.

- Question one: Do you understand the intent of the CP and are you supportive of its Principles?

- 3.2 All respondents confirmed that they understood the intent of the Change Proposal and are supportive of its principles.

- Question Two: Does the proposed CP better facilitate the DCUSA Objectives?

- 3.3 The majority of respondents indicated that DCUSA Objectives 1<sup>1</sup>, 3<sup>2</sup> and 4<sup>3</sup> will be better facilitated by the implementation of the CP. British Gas, ESP Electricity and the ENA highlighted Objectives 1 and 3 noting that Suppliers have a DCUSA obligation to print customer's rota disconnection code on their bills and that the CP will improve the quality of data provided by DNO and IDNO Parties. stated that the Change Proposal will better facilitate Objectives 1, 3 and 4, noting that the CP seeks to amend the DCUSA such that all DNO and IDNOs have an obligation placed on them to ensure that all Suppliers receive rota block data from a single source in a recognised and validated format which will allow a central body to validate all postcode data before completing the email to be sent to Suppliers.

- 3.4 Central Networks, IPNL, GTC and Western Power Networks considered that as well as Objectives 1 and 3, Objective 4 will also be better facilitated as the CP will clarify the Rota Load requirements under Schedule 8 of the DCUSA.

- Question Three: Distributors – Have you had any issues with compiling and sending annual rota block data to the ENA? Please give examples of the type and size of issues you have had.

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<sup>1</sup> The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks;

<sup>2</sup> The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences; and

<sup>3</sup> The promotion of efficiency in the implementation and administration of this Agreement.

- 3.5 The majority of DNOs stated that they did not have any issues with compiling and sending data to ENA but all IDNOs reported problems. ESP Electricity Ltd noted that it does not provide block data to the ENA as it considers that as the Rota Block is identified to Post Code area it may cause confusion for customers if the block differed to that of the host DNO.
- 3.6 GTC identified that it is dependent on the host DNO providing it with the information in a timely fashion and that communication varies between DNOs. GTC also highlighted that the ENA has refused to accept data from non ENA members.
- 3.7 IPNL [as above] noted that it has consistently received comments from DNOs that they struggle to identify embedded networks and despite cross checking they are not always able to do so. IPNL further noted that it is not able to provide the level of detail required and that there is no documented process for the provision of data. The IDNO also identified the lack of communication between different departments (regulatory and operational) within the DNOs as an issue and noted that the contact information provided by the ENA is inaccurate or that the nominated contact is not aware of the procedure to be followed.
- Question Four: Suppliers - Have you experienced issues with the rota block data received from the ENA?
- 3.8 All but one Supplier respondent noted that they had experienced issues in regards to Rota Block Data received from the ENA. The main issues reported related to the format of the data and the quality of the data (duplicate information and invalid post codes). Suppliers also identified that the data issued by the ENA does not include IDNO data and noted issues with the format of IDNO data that is submitted directly to them.
- Question Five: What is your preferred format for receipt of the data?
- 3.9 Supplier responses indicated a desire for a standard industry format and E.ON UK proposed that this should reflect the format originally agreed with the implementation of the CP as its systems were built to that specification. British Gas provided a detailed specification for postcode format and requested that duplicate data should be removed before the disk is issued. Respondents generally considered that so long as the data issues are resolved .csv or html solutions are acceptable.
- Question Six: Do you believe the central agent for the compilation of the rota block data should be the ENA?
- 3.10 Respondents agreed that the compilation should be carried out by a central body and Distributors generally considered that the ENA should provide this function. IDNO support was dependent on their data being included by the ENA and them being involved in the development of procedures. Some respondents highlighted the issues experienced to date as a cause for concern and noted that the ENA does not have any contractual obligations under the DCUSA.
- Question Seven: Should a Code of Practice, which provides guidance on the type of format and means of sending rota block data, be incorporated

into the DCUSA or should the format and method of delivery be written into the DCUSA?

- 3.11 Consultation responses were equally divided. Those favouring a Code of Practice noted that it offered a more flexible approach whilst those favouring the DCUSA considered that the concept of CoPs has not yet been developed for the DCUSA and that incorporation in the Agreement would add clarity for Parties.
- Question Eight: Would you welcome the development of rota block data being available through a website, instead of a CD?
- 3.12 The majority of responses indicated that parties would welcome the development of Rota Block Data being available through a website instead of a CD as long as the content was accurate and consistent.
- Question Nine: Who should fund the costs of collation and distribution of information?
- 3.13 The majority of responses agreed that Suppliers should carry the cost for the publication of the data on customer bills and that DNOs should fund the cost of collation and distribution of information based on customer numbers as per the current process. Some respondents suggested that IDNOs should also fund the collation exercise as their data will be included going forward and the ENA proposed that the current mechanism continue with a small charge also being made to IDNOs.
- Question Ten: Are there any alternative solutions or matters that should be considered by the Working Group?
- 3.14 Respondents outlined a number of proposed alternative solutions. Central Networks, the Energy Networks Association, Independent Power Networks, Southern Electric Power Distribution, SSE Energy Supply Limited and Western Power Distribution all suggested that a more reliable solution would be to identify Load Blocks by MPAN rather than Postcode. E.ON also suggested that there should be a validation process to ensure the accuracy of the data being submitted to Suppliers. ESP Electricity suggested that the Rota Blocks for IDNO sites should mirror those of the host DNOs to reduce confusion for customers and ESP and GTC also suggested that DNOs should be mandated to provide this information to IDNOs.
- Question Eleven: Are you supportive of the proposed implementation date of June 2010?
- 3.15 The majority of respondents were supportive of the proposed implementation date assuming that any necessary changes to requirements could be reviewed and developed by that time.
- Question Twelve: Please state any other comments or views on the Change proposal.
- 3.16 Central Networks recognised inaccuracies in postcode data have developed over a period of time and that the historical reasons for this should be taken into account. It proposed that a practical approach should be taken to remove inaccuracies with a reasonable amount of effort and

that mechanisms should be introduced to manage any ongoing inaccuracies.

- 3.17 Southern Electric Power Distribution and Scottish Hypo Electric Power Distribution questioned the requirement for the CP noting that DNOs are planning to change the process for data delivery for 2010 which may remove the issues identified.

#### **4 WORKING GROUP CONCLUSIONS**

- 4.1 The Working Group concluded that it is supportive of the intent of DCP 055.

##### DCUSA Objectives

- 4.2 The Working Group agreed that DCUSA Objectives 1, 3 and 4 will be better facilitated by the implementation of the CP. Members concluded that the CP will facilitate Objective 1 as it will place a joint obligation on Distributors to ensure Suppliers are able to publish data that, should the rota disconnections process be required, will enable customers to accurately ascertain when they will be affected. Placing a joint obligation onto Distributors and Suppliers facilitates the efficient management of any rota disconnection event.
- 4.3 The Working Group considered that Objective 3 will be better facilitated as the CP will enable DNO and IDNO parties to more efficiently discharge the Licence requirement for the DCUSA to provide for arrangements and procedures in respect of the activities of system demand control.
- 4.4 The Working Group agreed that the CP will also facilitate DCUSA Objective 4 by increasing efficiency in the implementation and administration of the Agreement. The original rota block requirements were implemented in DCP 010 and this CP seeks to clarify the requirements such that Suppliers receive rota block load detail from a single source in a recognised and validated format which will increase the efficiency of the processes set out in Schedule 8.

##### DCUSA Drafting

- 4.5 The DCUSA drafting currently requires Distributors to provide rota block data to Suppliers on an annual basis but does not specify a mechanism for doing so. The Working Group has concluded that DCP 055 should place an obligation on all Distributors to ensure that Suppliers receive rota block data from a single central source in a recognised and validated format. Distributors will be required to validate and submit data in compliance with an agreed format to allow a central source to compile a single file to be sent to all Suppliers.

##### Collation and Distribution of Data

- 4.6 The Working Group has concluded that the DCUSA should specify that the data be collated and distributed by a single central source but that the body should not be specified in the Agreement. In practice it is anticipated that this role will continue to be provided by the ENA which has confirmed it is able to meet the requirements set out in the DCUSA and will compare

data across all the companies to ensure that overall data validation is effective as possible.

#### Data Format

- 4.7 The Working Group has concluded that the data issued to Suppliers will be provided in an electronic format showing each relevant postcode with the applicable Alpha Identifier and DNO ID in separate columns. The electronic format will be defined as a DVD containing all Postcode & Alpha Identifiers by Distributors in .csv format.

#### Funding

- 4.8 The Working Group has concluded that the requirement to publish data on customer bills should continue to be funded by Suppliers as per the current arrangements. The costs for the collation and distribution of data should be funded by all Distributors (DNO and IDNO) at no additional cost to Suppliers. The ENA has indicated that if it performs the central role costs will be split on a customer number basis.

#### Future Developments

- 4.9 The Working Group concluded that the high level requirements for collation of the data by a single source and the format for distributing the data should be specified in the DCUSA. It did not consider that drafting a Code of Practice setting out the detailed process for the management of the process was necessary at this stage. The Working Group noted that any Party could raise a further CP if it wanted to progress the matter.
- 4.10 The Working Group noted that a number of Parties had suggested the development of a web based solution for publishing, viewing and downloading the data. The Working Group agreed that there may be benefits in such a solution but that it would incur additional costs. The Working Group noted that any Party could raise a further CP if it wanted to progress the matter.
- 4.11 The ENA has stated that if it is asked to carry out the role of the "single source" it will to explore the opportunity of developing a web based solution to provide a more effective and efficient solution and that it is also considering, in the future, developing the process to link MPANs to an Alpha Identifier.

#### Implementation Date

- 4.12 The Working Group agreed that the CP would not require any detailed system or process changes for Parties and that the implementation date of 26 June 2010 is achievable.

### **5 WORKING GROUP RECOMMENDATION**

- 5.1 The Working Group recommended that the Change Report should be issued to all Parties for 10 Working Days.

## **6 PROPOSED AMENDMENT AND LEGAL DRAFTING**

- 6.1 The proposed legal drafting of DCP 055 has been reviewed by Wragge and Co and is attached as Appendix A.

## **7 PANEL RECOMMENDATION**

- 7.1 The Panel approved the DCP 055 Change Report on 17 February 2010. The Panel supported the conclusions reached by the DCP 055 Working Group.
- 7.2 In accordance with Clause 12.4 of the DCUSA the Panel has determined that DCP 055 should be issued to all Parties for voting for a period of 10 Working Days.
- 7.3 The timetable for the progression of the Change Proposal is set out below:

<b>ACTIVITY</b>	<b>DATE</b>
Party Voting	22 Feb – 08 March 2010
Change Declaration	09 March 2010
Authority Consent	10 March – 15 April 2010
Implementation	26 June 2010

### **Appendices:**

- A. DCP 055 – Legal Text
- B. Voting Form