

DCUSA DCP 021 Consultation Responses – Collated Comments

Question One	Does the proposed CP better facilitate the DCUSA Objectives? Please state which objective(s) and provide support for your comments and views by suitable reasons, evidence and explanations where possible.
CE Electric UK	The proposed CP better facilitates Objective 4 – the promotion of efficiency in the administration of this agreement. It does this by ensuring the DCUSA is up to date and fully reflects previous associated changes.
Central Networks	<p>Yes, the proposal better facilitates all the DCUSA objectives by:</p> <ul style="list-style-type: none"> • Ensuring that the DCUSA is accurate and fully reflects the licence changes • Providing further clarity, consistency and transparency of the services covered by the relevant charging statements • Implementing an enduring solution to facilitate the enhanced regime put into place by the revision to the SLC 4a statement
EDF Energy Networks	Objective 3.1.4 in terms of giving consistency of approach between the two sections of DCUSA.
Electricity North West Limited	<p>“The promotion of efficiency in the implementation and administration of this Agreement” is better facilitated because it will ensure that the DCUSA fully reflects the changes into Section 2B, as introduced into Section 2A by DCP009 that would have been applied if Section 2B was in DCUSA at that time and as such is good housekeeping.</p> <p>The efficient discharge by distributors of the obligations imposed upon them by their licence is also improved by complying with our Licence obligations and providing further clarity, consistency and transparency of the services covered by the Relevant Charging Statements.</p>
Scottish Hydro Electric Power Distribution plc and Southern Electric Power Distribution plc	<p>We consider that DCUSA Objectives 3 and 4 shall be better facilitated by the CP by ensuring that the DCUSA is:</p> <ul style="list-style-type: none"> • a more accurate document and which encompasses the recent Licence amendments; and,

	<ul style="list-style-type: none"> provides sufficient transparency on the nature and scope of the services comprised by the DNO's Relevant Charging Statements;
RWE Npower Group	The Proposed CP will better facilitate the following DCUSA Objective: "The Promotion of efficiency in the implementation and administration of this Agreement".
ScottishPower Energy Retail Ltd	Yes – those listed within the change proposal.
SP Distribution / SP Manweb	Yes. The promotion of efficiency in the implementation and administration of this Agreement.
SSE Supply	We feel that objectives 3 & 4 of DCUSA shall be better facilitated by ensuring that DCUSA more accurately reflects the recent Licence amendments and provides enough visibility on the nature and scope of the services in the DNO's Relevant Charging Statements.
The Electricity Network Company	The promotion of efficiency in the implementation and administration of this Agreement. The change will ensure the DCUSA is accurate and reflects licence conditions.
Western Power Distribution	We believe the proposal as developed by the Working Group better facilitates the following DCUSA objectives: 3.1.3 The proposal allows us to better discharge our licence obligation by providing improved clarity and transparency in relation to the services covered by the relevant charging statement. 3.1.4 The proposal ensures that the DCUSA properly reflects the DCP009 work in section 2B.
Question Two	Are there any other alternative solutions you would like to be considered by the DCP 021 Working Group?
CE Electric UK	No
Central Networks	No.
EDF Energy Networks	No.
Electricity North West Limited	None.
RWE Npower Group	No

Scottish Hydro Electric Power Distribution plc and Southern Electric Power Distribution plc	None.
ScottishPower Energy Retail Ltd	No.
SP Distribution / SP Manweb	No
SSE Supply	No
The Electricity Network Company	No
Western Power Distribution	No.
Question Three	Please indicate if you expect to incur any costs to support the CP (particularly where these are related to internal system changes)
CE Electric UK	We do not expect to incur any costs in supporting the CP
Central Networks	No.
EDF Energy Networks	No.
Electricity North West Limited	None.
RWE Npower Group	No
Scottish Hydro Electric Power Distribution plc and Southern Electric Power Distribution plc CE Electric UK	We do not anticipate any significant, long run costs.
ScottishPower Energy Retail Ltd	No costs expected.
SP Distribution / SP Manweb	None anticipated
SSE Supply	We do not expect to incur any significant costs.
The Electricity Network Company	No

Western Power Distribution	Whilst we do not envisage any system changes as a result of this proposal there will however be an administrative burden in its implementation.
Question Four	Do you support the proposed implementation date of 06 November 2008? Please state alternative if applicable
CE Electric UK	Yes
Central Networks	Yes.
EDF Energy Networks	Yes.
Electricity North West Limited	Yes.
RWE Npower Group	Yes
Scottish Hydro Electric Power Distribution plc and Southern Electric Power Distribution plc	Yes.
ScottishPower Energy Retail Ltd	Yes.
SP Distribution / SP Manweb	Yes
SSE Supply	Yes
The Electricity Network Company	Yes
Western Power Distribution	None.
Question Five	Are you satisfied with the proposed amendment to Clause 19.1 which seeks to differentiate between the services provided under Section 2A and Section 2B of the DCUSA? Supplier Parties in particular are asked to provide a response to this question.
CE Electric UK	Yes, it appears to do so; however we would be interested in the comments of other parties.
Central Networks	Yes.
EDF Energy Networks	Yes – this is merely clarifying the applicability of the clause to 2A.

Electricity North West Limited	Not applicable.
RWE Npower Group	Yes.
Scottish Hydro Electric Power Distribution plc and Southern Electric Power Distribution plc	Yes.
ScottishPower Energy Retail Ltd	Yes.
SP Distribution / SP Manweb	N/A
SSE Supply	Yes.
The Electricity Network Company	Yes
Western Power Distribution	No comment.
Question Six	Please state any other comments or views on the Change Proposal
CE Electric UK	This appears to be sensible housekeeping that updates the DCUSA to reflect the changes brought about by Change Proposals that have been running concurrently that affect the same parts of the document.
Central Networks	-
EDF Energy Networks	None.
Electricity North West Limited	This change proposal should be based on the 'old' Licence conditions. The changes that came into effect on the 1 st June to the Distribution Licence should be subject to a separate change request.
RWE Npower Group	As we stated in our response to DCP20, we believe that the change process needs to be reviewed, in light of the requirement for this CP, in order to ensure that a more robust change process is put in place to handle concurrent changes on the same area of Code in the future.
Scottish Hydro Electric Power Distribution plc and Southern Electric Power Distribution plc	N/A
ScottishPower Energy Retail Ltd	As most of the changes impacting suppliers were worked through as part of the DCP 009

	change process we have little issue with this change.
SP Distribution / SP Manweb	Given the timing of the proposed implementation date it would seem sensible that the drafting of the Change Proposal reflected the output of the Distribution Licence Review, i.e. the reference to Condition 4A of the Distribution Licence is no longer accurate.
SSE Supply	N/A
The Electricity Network Company	None
Western Power Distribution	None.