

DCUSA DCP 010 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.
British Gas	<p>The communication to customers of details of when they are off supply both in an emergency and planned situation has always been carried out by the DNOs.</p> <p>No information on planned or emergency supply faults has ever been formally passed to suppliers to enable them to manage customer enquiries.</p> <p>We understand that the scenario envisaged where rota disconnections would be required is very specific and in under these circumstances suppliers could be impacted due to the high call volumes experienced. We would therefore accept that the “development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated and economical Distribution Networks” is better facilitated by the CP.</p>
Central Networks (East and West)	<p>Yes, whilst we believe all three DCUSA objectives are clearly pertinent “The development, maintenance and operation by the DNO/IDNO parties of efficient, co-ordinated and economical networks” is the most appropriate.</p> <p>DCP010 is a clear example where a co-ordinated approach by ALL DCUSA parties to a potentially significant market issue will facilitate enhanced Industry focus and customer awareness; DCP010 represents both an efficient and economic solution.</p>
E.ON UK	Yes. See original CP.
EDF Energy Customers	<p>1. The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated and economical Distribution Networks;</p> <p>By placing a joint obligation onto Distribution Business's and suppliers this change facilitates the efficient management of any rota disconnection event.</p> <p>2. The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences</p> <p>This change facilitates the delivery of an economic and practical solution to the issue of</p>

	providing customers with their alpha block id for use during a rota disconnection event.
EDF Energy Networks	<p>The first objective regarding efficient, co-ordinated and economic distribution networks is fulfilled by the ability of network operators to work together in managing load issues and through the efficient, co-ordinated and economic management of customer phone calls.</p> <p>The third objective regarding discharge of license obligations is fulfilled by improving the handling of this communication, making it more efficient. Moreover the License Condition concerning DCUSA specifically states that DCUSA should provide for arrangements and procedures in respect of the activities of system demand control and so this enhances those already included.</p>
Electricity North West Limited	<p>Distributors are obliged to provide notice in advance of any Rota Disconnection to any effected Customer. This Change Proposal provides for the Rota Block identifier to be provided to Suppliers for them to then place the information on the Customers bill or statement. This therefore improves DCUSA objective:</p> <p><i>3.1.3 the efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences;</i></p> <p>By providing such information to a wider audience in advance of any emergency provision so that Customers understand which Rota Block they belong to should such a notice be served. It should also reduce the number of calls that Distributors and Suppliers may receive from Customers enquiring about which Rota Block they belong to when this occurs.</p>
GTC (on behalf of the Electricity Network Company)	Yes. Agreed as stated in the proposal.
National Grid	National Grid would like to convey support for this change proposal and agrees with the proposer that it will allow for a co-ordinated and more effective approach to managing an emergency and better facilitates DCUSA objectives 1, 2 and 3.
RWE npower	The provision by DNO's of the alpha load block identifier information to Suppliers, for Suppliers to print upon customer's bills, will help to ensure that DCUSA Objectives 1 (<i>The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated and economical Distribution Networks</i>) and 3 (<i>The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences</i>) are better facilitated.

Scottish Power Distribution	<p>1. The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks;</p> <p>2. The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences; and</p> <p>3. The promotion of efficiency in the implementation and administration of this Agreement.</p> <p>The proposal may be considered to better facilitate DCUSA objective 1 above by assisting in the effective management of rota disconnections should these become necessary.</p> <p>Distributors hold this information by postcode rather than by MPAN, and there needs to be agreement on a cost-effective means of communicating the data to suppliers in a way in which the latter can readily process.</p>
Scottish Power Energy Retail	<p>3.1.1. The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks;</p> <p>3.1.4 The promotion of efficiency in the implementation and administration of this Agreement.</p> <p>The change proposal will ensure a consistent approach to the publication of block alpha identifiers information on supplier bills, which will ensure a degree of certainty for consumers and businesses in appropriate emergency supply situations. It will aid clarity of procedure and administration between DNO, IDNO and supplier parties in terms of the type, content and timing of the provision of information for rota disconnection alpha identifiers.</p>
Question Two	Following the annual provision of data by DNOs, what implementation time is required by Suppliers to publish the block alpha identifiers on all bills?
British Gas	2 months
E.ON UK	We would expect to be in a position to print the alpha block identifiers on the next customer invoice statement 3 months after receipt of the first data.
EDF Energy Customers	EDF Energy already publish the alpha block identifier on customer bills, unless there are major changes to the structure of the data currently provided implementation should be within one month.

RWE npower	<p>The initial fulfilment will involve changes to our systems for which the approval, design and development is expected to take @ 6 months, therefore the proposed implementation date for DCP10 will be challenging.</p> <p>Once this initial development work has been undertaken however, providing that the format of the data does not change each year, we anticipate that it should take only a few days to refresh the information for re-publication on customer's bills. This is on the assumption that there is no requirement to check for differences between the data previously held and the new data provided.</p>
Scottish Power Energy Retail	We would estimate approximately 3 months would be required to publish the block alpha identifiers onto our billing systems for domestic and non-domestic customers once the initial changes have been implemented.
Question Three	How do you envisage the obligation being fulfilled by domestic or multi site customers
British Gas	Non-domestic and multi-site customers receive their bills in many different formats. For the majority of customers we do not see any major problems in implementing this proposal. However where customers receive bills via EDI we may need to look at an alternative method of communicating the block code.
Central Networks (East & West)	In these scenarios's clearly a customer bill will not always be sufficient and may need to be supplemented with further customer communication. The supplier in the form of key account managers may be able to facilitate in this process? If an enquiry from a multi site customer or agent of is received then Central Networks will manage the enquiry in the same manner as any other customer.
E.ON UK	Either on the individual invoices statements or in a separate communication to a named contact for multi site customers.
EDF Energy Networks	The key principle is to minimise the number of customers who need to telephone to enquire as to which block they are in. The aim is to use the bill as a way to communicate with the majority of customers in a standardised way. We recognise that this may mean that a small proportion of customers may need to be advised via a format other than the standard.

RWE npower	<p>We are assuming that our responsibility would be fulfilled by providing the block alpha identifier to the Head Office in receipt of the overall group bill. The identifier could be provided on either the single site bills or single site summaries included as backing data with the group bill. Clarity on the limits of the Suppliers responsibility is required.</p> <p>A similar situation occurs where a consultant receives the bill on behalf of the end customer. Our assumption is that the Supplier's obligation would be fulfilled by providing the block alpha identifier information to the consultant for them to pass on to the end customer.</p>
Scottish Power Energy Retail	<p>The alpha identifiers should appear at site level billing for all domestic and non-domestic sites. This notification is required and appropriate as different sites will potentially come under different identifiers and be off supply at different times.</p> <p>For multi-site customers that receive a site level bill, each site will receive a bill and each bill will contain the alpha identifier as currently proposed in the consultation. Where a non-domestic customer has requested that site billing functionality is switched off, suppliers should provide a summary which details site identifiers and their respective alpha identifiers once annually by an agreed date.</p> <p>ScottishPower would not agree that there should be additional non-domestic multi-site requirement, although individual suppliers have varying commercial contractual billing arrangements for group sites with different customers and may choose to go beyond this proposed minimum requirement. Anything beyond the above proposal should not be prescribed.</p>
Question Four	Do you envisage any issues with the process for specific customer or bill types (e.g. pre-payment customers, online bills)?
British Gas	Prepayment customers receive an annual statement which could be amended to include the block code. We should be able to include the block code on our on-line billing system.
Central Networks (East and West)	No
E.ON UK	None currently identified
EDF Energy Networks	The key principle is to minimise the number of customers who need to enquire as to which block they are in. The aim is to use the bill as a way to communicate with the majority of customers. It is recognised that this may mean that a small proportion of customers cannot be

	advised through their bills in the exact same way.
RWE npower	<p>Our process for on-line billing will not pose any specific problems.</p> <p>Some pre-payment customers only receive an Annual Statement which poses a risk that they may not have received communication of the identifier for almost 12 months, and that they may have mislaid the statement. There is also the risk with such customers that, should their identifier change within the year, the information they have may be out of date for a large part of the year, depending upon the timescales of when their Statement is sent and when the data changed.</p>
Scottish Power Energy Retail	<p>For domestic customers, all ScottishPower payment methods share a very similar bill design format and we currently accommodate the population of the Rota block identifier in the upper third of the front page of the bill. Although this has already been implemented onto domestic customer bills and bills produced through our domestic billing engine, some work would be required to implement this for non-domestic customers. On-line domestic customers obtain a view their bill that replicates what would be viewed on a paper bill and so the identifier is also currently available for on-line domestic customers in the same location as currently available on the off-line bill.</p> <p>We have a number of non-domestic customers who prefer to receive billing information electronically. There would be significant IT development changes required to accommodate the on-line inclusion of the alpha identifier and therefore ScottishPower would require a derogation extending the implementation date for this small group of customers.</p>
Question Five	Is the description of the proposed position of the alpha identifier sufficient?
British Gas	Yes
Central Networks (East and West)	From the distributor perspective then a generalised location on the front of the bill will sufficient to direct customer enquiries as and when they arise. This is clearly more of an issue to Suppliers in the format requirements for customer bills. It should be recognised that a number of suppliers have already implemented changes to accommodate alpha identifier detail to customer bills and moving to a specific location will undoubtedly involve further costs.
E.ON UK	Yes

EDF Energy Customers.	Yes
EDF Energy Networks	Yes this creates a suitable standard.
RWE npower	Yes, the proposed position is clear without being unduly restrictive. We are assuming that the font, size and colour of the identifier will not be prescribed.
Scottish and Southern Energy Power Distribution.	I strongly propose that it [the Alpha Identifier] must be directly under the address lines, so it can be easily and uniformly found by all customers.
Scottish Power Energy Retail	The description is adequate and supported by ScottishPower. We would clarify however, that on our domestic bill we currently preface the use of the alpha identifier, which is contained within a box, with the word "block". Whilst we don't believe it is necessary to mandate this, we believe that this aids customer recognition of the block identifier and would prefer to keep this preface.
Question Six	Should any customer groups (e.g. customers with a medical need, customers who use Braille or audio invoicing) be excluded from the requirement?
British Gas	The timescales for implementing changes to non-standard billing formats such as Braille or audio invoicing will be longer than the standard solution. A full impact assessment on all non-standard formats has not been carried out at this time.
Central Networks (East and West)	No it is important that a consistent approach is adopted for all our customer groups and no one should be excluded. From an organisational perspective Central Networks need a clear business process and data population criteria to manage this activity, exclusion of certain customer groups would make the process over complicated and potentially confusing to ALL.
E.ON UK	Braille or audio bills may need to be excluded as the information would need to be explained unnecessarily ahead of an emergency situation.
EDF Energy Networks	The key principle is to minimise the number of customers who need to enquire as to which block they are in. The aim is to use the bill as a way to communicate with the majority of customers. It is recognised that this may mean that a small proportion of customers cannot be advised through their bills in the exact same way.
RWE npower	From a Supplier's perspective, we believe that only customers who receive a standard paper

	<p>invoice or an on-line invoice should be included within the requirements.</p> <p>We do not believe that it is appropriate that customers who receive a Braille invoice or an audio invoice should be included within the requirements, as inclusion of the rota load block identifier on these customers bills could create unnecessary cause for concern (eg what terminology could we employ on an audio bill that would not cause the customer undue concern?). We believe that DNO's should give consideration as to whether other methods of communicating the alpha load block information to these subsets of customers should be undertaken.</p> <p>Other customer types requiring further consideration are Unmetered Supplies customers and Priority Service Register Customers.</p> <p>Requirements for these customers needs to be clearly defined.</p>
Scottish Power Energy Retail	<p>The vast majority of special needs customers receive the same bill format as domestic customers. We believe that where reasonably practical, suppliers should attempt to include this information on domestic and business billing. From a practical perspective it might be easier for those customers in receipt of an audio invoice or Braille bill to contact their DNO or Supplier should circumstances require it. This will ensure that the obligation remains manageable and will avoid unnecessary customer confusion in normal circumstances.</p>
Question Seven	Are there any other alternative solutions that would better facilitate the DCUSA Objectives which you would like to be considered by the DCP 010 Working Group?
Electricity North West Limited	<p>Yes.</p> <p>13. Notification and publication of rota load block alpha identifiers: <u>ROTA BLOCK ALPHA IDENTIFIERS</u></p> <p>13.1 The Company DNOs shall annually by the end of every July publish and provide to the User suppliers and IDNOs in a suitable format the alpha identifier of the rota block for all Customers customers in connected to their Distribution System network area. This alpha</p>

	<p>identifier should be associated with the <u>Customer's</u>seustomers MPAN <u>and/or</u> Post Code.</p> <p>13.2 The <u>User</u>user shall, within 30 working <u>Working days</u> Days of receipt of this information, be in a position to provide this alpha identifier to the <u>Customer</u>customer upon their electricity invoice or schedule. This identifier should be located on the front top third of the invoice or schedule of the <u>Customer's</u>seustomers bill, and shall be a single letter contained in a square box.</p> <p>The reason for this alternative proposal is to ensure that both DNO and IDNO's provide this information. DNO's will not have sufficient information on IDNO customers and their specific post code information to act on their behalf. Also Users are looking to receive this data as close to the production of their winter bills. If we say up to the end of July it gives us six months to produce and could be delivered at any time during this window. If July is too restricted we could say e.g. in the second quarter of the calendar year.</p>
Question Eight	Please indicate if you expect to incur any costs to support the CP (particularly where these are related to internal system changes)
British Gas	<p>Yes we expect to incur costs to both residential and commercial billing systems.</p> <p>Exact costs not available until full impact assessment carried out but likely to be in the region of £150k</p>
E.ON UK	Yes we expect to incur costs in putting this proposal into effect.
Central Networks (East and West)	<p>Prior to DCP010 Central Networks similar to other organisations had committed a considerable amount of time and effort to a workable "Rota Load Shedding" solution and in this respect a significant amount of work has already been undertaken.</p> <p>That said the development of internal processes to manage customer enquiries; the provision of accurate customer data and the enduring maintenance of that data represents a sizeable investment. In preparation for the June 2008 implementation Central Networks have committed to a range of data quality related initiatives, these will continue for the foreseeable future.</p>

EDF Energy Networks	There are no significant additional costs if the data is provided in the same way and to the same degree of accuracy as the existing data provision. A simple link between post code and block letter, whilst having some inherent inaccuracies, is a pragmatic way of communicating this to a large majority of the population so as to make the communications burden more manageable should the need to implement a demand management regime ever arise.
GTC (on behalf of the Electricity Network Company)	Yes. We are waiting for information from the ENA on the prescribed format of the data submission to define the bespoke extract reports.
Scottish Power Energy Retail	We anticipate some non-domestic system development costs and UAT costs associated with the implementation of this CP. We also expect annual one-off 'upload' costs. These costs aren't currently available and will depend on the detailed DCUSA requirement.
RWE npower	Yes, we would expect to incur costs for internal system changes to enable the identifier to be shown on the bill. It is also expected that there will be ongoing costs each year to accommodate the refresh of the data. There may also be costs associated with checking new gains and populating the identifier on these.
Question Nine	Assuming that the solution is accepted, do you support the proposed implementation date of 26 June 2008?
Electricity North West Limited	No. DNOs may well have already provided an update to the ENA during 2008. The data contained within it will have been provided to the Users. The amount of rework inclusive of the work that the ENA need to carry out to produce the consolidated data would not be justified. It may also be difficult for an IDNO to meet such a tight deadline if no such identifier has been provided to them in the past.
EDF Energy Customers	Yes
British Gas	To enable all systems to be made compliant we would require a minimum of 6 months notice from acceptance of the change proposal.
Scottish Power Distribution	Yes
RWE npower	It will be a challenge to implement the system and process changes required by June 2008, but we will make all reasonable endeavours to meet this date.
E.ON UK	Yes

EDF Energy Networks	Yes
GTC (on behalf of the Electricity Network Company)	Yes
Scottish Power Energy Retail	Subject to a detailed non-domestic IT review of the final requirement and the provision of the DNO disc at least 3 months before the implementation date, the proposed date of 26 June 08 seems acceptable. It should be made clear that this is the implementation date of the solution onto Suppliers billing systems and not the communication date from Suppliers to customers, which will vary depending on billing frequency and customer profiles.
Central Networks (East and West)	Central Networks are supportive of a June 2008 implementation of this CP
Question Ten	Please state any other comments or views on the Change Proposal
British Gas	<p>The above comments have been based on the CP as drafted at present.</p> <p>This assumes a reasonable endeavours obligation on suppliers to print the customers block code on the bill where we are able to match a post code provided by the DNO to a supply address. If the solution was changed to obligate a match to MPAN this would make the system changes much more complicated and would add cost and may impact the implementation timescales.</p>
RWE npower	<p>Further clarity is needed on the intention of the suggested wording obligating Suppliers to be in a position to provide the RDI to the customer upon their electricity invoice within 30 WD of receiving the RDI from the Distributor. Does this mean that the data has to be refreshed within 30 WDs of receipt, or that the communication has to be sent out within 30 WDs of receipt?</p> <p>Will the data be provided by MPAN or Postcode?</p> <p>When reviewing the data on the DVD published in 2007, we identified that there are a number of postcodes that have been assigned more than 1 alpha load block identifier, and there are also numerous postcodes which have do not yet appear to have been assigned an alpha load block identifier, despite being established sites (ie not new builds). It would be beneficial if such data quality issues could be resolved before implementation of this CP.</p> <p>If Unmetered Sites are to be included within scope, it would be beneficial to resolve issues with the quality of the data held in the UMSO data inventories prior to implementation also.</p>

GTC (on behalf of the Electricity Network Company)	<p>DNO's currently have different views on the need and method to provide IDNO's with the rota identifiers.</p> <p>We believe this should form part of the CUOSA information for each connected network. This will enable the IDNOs to fulfil their licence obligations and enable us to provide the relevant rota identifiers on an MPAN basis.</p> <p>The requirement for DNOs to provide this information to IDNOs should be mandated for each Point of Connection between an IDNO and DNO as the emergence of new post codes on IDNO networks may not be captured by the DNO.</p>
CE Electric UK	<p>CE is the ownership company of YEDL and NEDL. We support the proposal for the publication of the rota load shed load block on customer bills as we believe it will enhance the information flow for customers in the unlikely event of rota disconnections. We see it as a useful method of aiding communication across a wide range of customers in the event of significant system emergency.</p>
National Grid	<p>National Grid welcomes the consultation document on DCP010 - Notification and publication of rota load block alpha identifiers. National Grid would like to convey support for this change proposal and agrees with the proposer that it will allow for a co-ordinated and more effective approach to managing an emergency and better facilitates DCUSA objectives 1, 2 and 3. In addition, this change proposal is also strongly supported by the Energy Emergencies Executive Committee (E3C).</p>