

DCUSA DCP 009 Consultation Responses – Collated Comments

Question One	Does the proposed CP better facilitate the DCUSA Objectives? Please state which objective(s) and give supporting comments.
British Gas	No
EDF Energy Customers	Yes - objective 3.1.3 – the efficient discharge by the DNO parties and IDNO Parties of obligations imposed upon them in their Distribution Licences. The revisions to SLC4A have a direct impact on DCUSA and the CP facilitates the alignment of DCUSA with the revised Supply Licence.
Scottish Power Energy Retail	Yes - Agree with the objectives highlighted in the change documentation
Western Power Distribution South West & Western Power Distribution South Wales	Yes - This proposal improves clarity and transparency in the provision of services covered by the relevant charging statement and better facilitates DCUSA objective 3.1.3.
Question Two	Are there any other alternative solutions you would like to be considered by the DCP 009 Working Group?
British Gas	The definition of Miscellaneous Services is too wide and would leave Suppliers exposed to any new charges being imposed without agreement.
Question Three	Please indicate if you expect to incur any costs to support the CP (particularly where these are related to internal system changes)
British Gas	Any new charges falling within the scope of Miscellaneous Charges will now require credit cover.
Scottish Power Energy Retail	Small increase in costs is expected but more details cannot be provided at this time.
Western Power Distribution South West & Western Power Distribution South Wales	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 28 February 2008? (please state alternative if applicable)
British Gas	No
EDF Energy Customers	Yes

Scottish Power Energy Retail	Although we support the change we, we do so only to tie in with ISG & COG recommendations.
Western Power Distribution South West & Western Power Distribution South Wales	We have concerns regarding the implementation of this proposal and believe there should be a review of the implementation process to ensure there is a consistent well managed approach across all companies.
Question Five	Please state any other comments or views on the Change Proposal
British Gas	Not all services provided by Distributors are provided under a license obligation. Therefore some miscellaneous services could be commercially negotiated and credit cover terms may differ. The CP does not cater for these situations.
RWE Npower	<p>In general, we understand and agree the need to re-draft the DCUSA in order to incorporate any substantive change to SLC4a statements. However after further detailed review we do not feel that DCP009 in its current form is adequate in this respect.</p> <p>We believe that the definition of Miscellaneous Services as currently drafted within DCP009 remains too broad. Fundamentally we believe that the types of Miscellaneous Charges should be listed together with the contractual basis for each type of charge. The proposed definition in DCP 009 is far too vague, and gives no indication of the contractual basis for any such charges.</p> <p>Looking at the suggested drafting of clause 19.2.2, simply placing the term Miscellaneous Services into a list of <u>agreements</u> pursuant to which charges are made clearly does not work, either grammatically or logically. This error in fact nicely demonstrates the failure to properly identify the contractual basis for Miscellaneous Charges.</p> <p>I am sorry if this response appears wholly negative, but we feel it is essential that if Miscellaneous Services are to be introduced as part of the charging statements, there is some basis on which suppliers can properly validate the charges levied.</p>
Scottish Power Energy Retail	If this DCP is approved there must be improvements to the transactional billing process & timescales to aid validation.