

DCUSA CHANGE DECLARATION

DCP 084 – User Requirements associated with Provision of Customer Usage Information

VOTING DATE: 03 February 2012

DCP 084	WEIGHTED VOTING			
	DNO	IDNO / OTSO	SUPPLIER	DG
CHANGE SOLUTION	Accept	Reject	Reject	N/A
IMPLEMENTATION DATE	Accept	Reject	Reject	N/A
RECOMMENDATION	<p>Change Solution – Reject.</p> <p>In respect of each Party Category that was eligible to vote, the sum of the Weighted Votes of the Groups in that Party Category which voted to accept the change solution was not greater than 50% in all Categories that voted.</p> <p>Implementation Date – Reject.</p> <p>In respect of each Party Category that was eligible to vote, the sum of the Weighted Votes of the Groups in that Party Category which voted to accept the implementation date was not greater than 50% in all Categories that voted.</p>			
PART ONE	Part One – Authority Determination Required			

PARTY	SOLUTION (A / R)	IMPLEMENTATION DATE (A/R)	COMMENTS
DNO PARTIES			
Eastern Power Networks plc	Reject	Reject	N/A
London Power Networks plc	Reject	Reject	N/A
South Eastern Power Networks plc	Reject	Reject	N/A
Electricity North West Limited	Accept	Accept	N/A
Northern Power Grid (Northeast)	Accept	Accept	N/A
Northern Power Grid (Yorkshire)	Accept	Accept	N/A
Southern Electric Power Distribution plc	Accept	Accept	N/A
Scottish Hydro Electric Power Distribution plc	Accept	Accept	N/A
SP Distribution	Accept	Accept	No further comments to those provided in response to the earlier consultation.
SP Manweb	Accept	Accept	Same as SP Distribution
Western Power Distribution (East Midlands) plc	Accept	Accept	N/A
Western Power Distribution (South Wales)	Accept	Accept	N/A
Western Power Distribution (South	Accept	Accept	N/A

West)			
Western Power Distribution (West Midlands) plc	Accept	Accept	N/A
IDNO PARTIES			
UK Power Networks (IDNO) Ltd	Reject	Reject	N/A
SUPPLIER PARTIES			
British Gas	Reject	Reject	N/A
EDF Energy	Reject	Reject	We do not feel that this information in the short term will be of any use to DNOs as they are in a better position to see the consumptions across their DNO area than suppliers are. As over/under recoveries are short term-reactions in order to recover allowed revenue our customers are unpredictable and long term trends do not reflect this unpredictability.
EON	Reject	Reject	We have a number of concerns with this CP and will try to deal with them individually. <ul style="list-style-type: none"> 1. Intent of the original CP. <p>The final proposals differ from the original intent of the CP in that the intent clearly states it is seeking to place obligations on the Supplier community to provide data to</p>

			<p>DNOs. The working group have decided that only a limited number of the Supplier community should provide anything without any justification within the Change Report as to why they have deviated from the Original Intent. Secondly the intent also states that this CP is looking to improve the drafting of DCP066A, this CP does not do this it introduces new clauses to the DCUSA.</p> <p>2. Working group not addressed consultation responses.</p> <p>On many occasions points have been raised in both consultations that have not been addressed in either the change report or the consultation response summary. A prime example of this is comment 84 in the first consultation summary. The working group comment is that they would add a section in the change report to address the concern raised by E.ON. However the change report just re-states our concern in paragraph 4.5 of the change report</p>
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			<p>and does nothing to address the issue or provide any analysis.</p> <p>E.ON raised concerns regarding the points raised in 1. above, we can see that the working group noted this in the consultation summary, but have not addressed it or commented on it so we are forced to raise it again in this response.</p> <p>We cannot see from the change report why the working group believe data should be submitted on a national basis for use in calculating a regional charge. This information is being requested from only a proportion of the supplier community, this can only lead to confusion and therefore less accurate prediction of charges.</p> <p>3. E.ON assessment against the DCUSA objectives</p> <p>The working group have provided no justification as to their decision with regard to whether the objectives are better facilitated or not. We will provide justification as to our views below.</p>
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			<p>Objective 1</p> <p>This CP has a detrimental effect on objective 1 as the data being requested is incomplete as is not from all of the Supplier community and is not supplied on a regional basis. It is based on a Suppliers view of how many units they believe their customers will use. This varies on a regional basis and on the density of their customers in a region. It will also depend on the Suppliers view of their likely customer base in the future. This can only lead to the possibility of double counting or possibility six times the actual figure. By excluding smaller niche Suppliers they may also be missing large volumes of data.</p> <p>Objective 2</p> <p>This CP is detrimental to objective 2 and may also be anti competitive. This CP will create an extra burden in terms of cost and time on only a proportion of the Supplier community. It therefore is likely to distort competition within the Supplier community. We would also like to understand Ofgem’s view on whether this is inherently anti competitive.</p>
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			<p>Objective 3</p> <p>This CP is detrimental to objective 3. Similar to objective 1 incomplete and duplicated information can only lead to less accurate calculation of charges so more likely to under/over recover charges and more likely to have to adjust prices midyear.</p> <p>Objective 4</p> <p>No impact</p> <p>4. Implementation date.</p> <p>This is not achievable as this information is not held in the format required and will need internal system changes to produce. This will need 6-9 months development</p>
Haven Power	Reject	Reject	N/A
Scottish Power Energy Retail Ltd	Reject	Reject	<p>As a supplier we are willing to provide data wherever possible to aid DNOs in their calculations. However, this CP appears to be adding little value or clarity. During the working group process discussions took place on whether the data was to be based on a supplier's portfolio or on the supplier's view of changes to the UK energy consumption as a whole. The legal text does not state which it should be. If it is on a supplier's portfolio, a DNO would have to carry out considerable analysis to break</p>

			<p>down a UK view to the supplier's portfolio in each DNO group.</p> <p>If the data is to be based on a supplier's portfolio the working group has not addresses the commercial sensitivities.</p> <p>As mentioned during the working group, we feel that the information at a UK level is available from a number of 3rd party contractors, not just suppliers and we are of the opinion that DNOs are currently provided with this information as a matter of course.</p> <p>Given our points above we cannot support this change. Further, as it will take some changes to our processes to provide the information we require more than 3 months implementation time.</p>
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