

DCUSA CHANGE DECLARATION

DCP 018 – Clarification of provision of metering data

VOTING DATE: 02 October 2008

DCP 018/A	WEIGHTED VOTING		
	DNO	IDNO	SUPPLIER
CHANGE SOLUTION – DCP 018	ACCEPT	ACCEPT	REJECT
CHANGE SOLUTION – DCP 018A	REJECT	REJECT	ACCEPT
IMPLEMENTATION DATE	ACCEPT	ACCEPT	ACCEPT
RECOMMENDATION	<p>Change Solution DCP 018 – REJECT 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 less than 50% in all Categories.</p> <p>Change Solution DCP 018A – REJECT 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 less than 50% in all Categories.</p> <p>Implementation Date – ACCEPT 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 greater 50% in all Categories.</p>		
PART ONE / PART TWO	Part One – Authority Determination Required		

PARTY	DCP018 (A / R)	DCP 018A (A/R)	IMPLEMENTATION DATE (A/R)	COMMENTS
DNO PARTIES				
Central Networks East	REJECT	REJECT	ACCEPT	<p>Central Networks believes that the Change Proposal if implemented would be counter to the economical operation of a distribution network as it is likely that in the future, data of a greater degree of granularity will be available from for example Smart Metering. Such data may therefore assist a DNO to more proactively manage its network. It is also Central Networks' view that the Change Proposal if implemented could act as a barrier to entry for any new IDNO entrant.</p> <p>Central Networks also notes that the Change Proposal if implemented, any charges a DNO/IDNO would pay for additional data would be reflected in its Use of System Charges to suppliers and hence ultimately passed through to the end customer.</p>
Central Networks West	REJECT	REJECT	ACCEPT	See above
EDF Energy Networks (EPN) plc	ACCEPT	REJECT	ACCEPT	DCP 018 is a reasonable update to reflect current practise and to give clarity to new entrants as to the nature of data which must be provided (the previous drafting being outdated).

				DCP 018A would introduce a right to charge under DCUSA for the provision of data. This has not been enjoyed previously despite the form and nature of the data provided having evolved since 1998. It should also be noted that this is data which the distributor needs for billing, operations and regulatory reporting. If this CP were to be accepted it would give a position where charges can be levied under DCUSA as a result of decisions taken under the governance of other codes such as the BSC or MRA (which may not be obliged to consider such impacts in assessing changes). This is inappropriate and where the decisions taken under a code cause a cost impact or a desire to charge, that issue should properly be addressed under those codes.
EDF Energy Networks (LPN) plc	ACCEPT	REJECT	ACCEPT	See above
EDF Energy Networks (SPN) plc	ACCEPT	REJECT	ACCEPT	See above
Electricity North West Limited	ACCEPT	REJECT	ACCEPT	The title of the Change Proposal is 'clarification of provision of metering data'. The developed DCP018 by the working group provides for such a clarification and as such better facilitates the DCUSA Objective:

				<p><i>the promotion of efficiency in the implementation and administration of this agreement</i> by making it clear what metering data will be provided rather than the current terminology which could be interpreted in different ways. It also tidies up the legal text picking up some housekeeping changes.</p> <p>This alternative proposal (DCP)18B) takes the Change Proposal further in attempting to only allow data currently being provided to be free of charge and any additional data, even if agreed by the industry through other codes (which is currently available free of charge), to be charged for. This is different to what current practice is and is not in line with the title of the change proposal. In other words current practice for the last ten years is having a line drawn across it and any additional requests for data will allow suppliers to have the ability to charge of its provision if they so wish.</p> <p>This will have a negative impact on: <i>“the development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical</i></p>
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				<p><i>Distribution Networks;</i> because this adds additional costs to manage the operation, design and planning of the distribution system.</p> <p>Added to this is the fact that some suppliers may charge and some may not. Additional costs in negotiating Bilateral Connection agreements for those that do wish to charge and the development of business processes needed to cater for such instances.</p> <p>This will also be a detriment to IDNO's if they choose to request such data (since they will have no mechanism to recover such costs).</p> <p>Overall this will result in a negative impact on <i>"the facilitation of effective competition in the generation and supply of electricity and (so far as is consistent therewith) the promotion of such competition in the sale, distribution and purchase of electricity"</i>.</p>
Northern Electric Distribution Ltd	ACCEPT	REJECT	ACCEPT	We think that the introduction of a commercial framework to charge distributors is a significant issue. The DCUSA was created for DNOs to charge suppliers, not the other way around. We do not believe that the

				development of 'supplier to distributor relationships' should be considered as part of this change proposal and would be better considered separately.
SP Distribution	ACCEPT	REJECT	ACCEPT	
SP Manweb	ACCEPT	REJECT	ACCEPT	
Southern Electric Power Distribution plc	ACCEPT	REJECT	ACCEPT	
Scottish Hydro Electric Power Distribution plc	ACCEPT	REJECT	ACCEPT	
Western Power Distribution (South Wales)	ACCEPT	REJECT	ACCEPT	
Western Power Distribution (South West)	ACCEPT	REJECT	ACCEPT	
Yorkshire Electricity Distribution plc	ACCEPT	REJECT	ACCEPT	We think that the introduction of a commercial framework to charge distributors is a significant issue. The DCUSA was created for DNOs to charge suppliers, not the other way around. We do not believe that the development of 'supplier to distributor relationships' should be considered as part of this change proposal and would be better considered separately.
IDNO PARTIES				

<p>The Electricity Network Company</p>	<p>ACCEPT</p>	<p>REJECT</p>	<p>ACCEPT</p>	<p>DCP 18 has adopted the key points made in the alternative proposal we submitted consequent to the consultation. it is important to consider the comments we made in respect of the consultation and in submitting our alternative proposal in conjunction with this response. In summary the DCUSA is established pursuant to Distribution Licence Conditions 12 and 22, i.e. the licence obligation placed on distributors to offer terms for use of system. Therefore, we believe it is entirely inappropriate for the charges that suppliers (or suppliers agents) want to charge within this document. Additionally, we believe the proposal we have submitted is consistent with the Balancing and Settlement Code in that suppliers are required to provide certain information at no cost to the distributor. We are of the view that the original change proposal was submitted as a direct consequence of the raising of BSC modification proposal P222. The heading of the change proposal submitted by EON was "Clarification of provision of metering data". The change proposal did not set out as its intent</p>
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				<p>to introduce charging for data provided to distributors by suppliers. We recognise there is merit in clarifying what is meant by the term <i>'[data] of a type which prior to 1 August 1998 the operators of the Distribution Network received without charge from suppliers'</i>. The drafting of this term originates from the original model DUoSA developed for market opening. Since that time the industry has developed. Importantly the pooling and settlement agreement has been replaced by the BSC; this prescribes in a number of places the information to be provided to distributors at no cost. DCP18 has been developed to reflect the requirements that already exist in the BSC.</p> <p>We accept that distributors should not have an open book to request any type of information the distributor requests. However, it is reasonable that distributors should have access to relevant information that relates to the use of their distribution system. If a supplier believes a distributor's request is unreasonable then dispute provision are available.</p>
<p>SUPPLIER PARTIES</p>				

SSE Energy Supply Limited	ACCEPT	REJECT	ACCEPT	
ScottishPower Energy Retail	REJECT	ACCEPT	ACCEPT	ScottishPower Energy Retail believe that implementation of DCP 018A will provide sufficient clarity to DCUSA drafting that Suppliers can charge reasonable costs for the provision of additional data requests received from Distributors.
RWE Npower Group	REJECT	ACCEPT	ACCEPT	<p>As we outlined in our DCP18 Consultation response we are supportive of DCP18A for the following reasons:</p> <ul style="list-style-type: none"> o DCP18A clearly defines what metering data is provided by Users to Companies free of charge. This clear definition will be of benefit to all parties, but in particular to new entrants to the market. o DCP18A clarifies that Users may charge Companies for any additional/bespoke data requirements over and above those that are defined as being provided free of charge. This increased clarity will be of benefit to all parties, but in particular to new entrants who will clearly

				<p>be able to identify those data items that are provided free of charge and those data items for which a reasonable charge may be incurred. The provision of this information will assist all parties, but in particular new entrants, in calculating their data requirement costs.</p> <p>Whilst we acknowledge that DCP18A introduces a new principle (Suppliers charging Distributors), which has not historically existed within DCUSA or its predecessors (the DUoS Agreements) , we believe that it would be a natural progression for the DCUSA Document to evolve to also cover Supplier to Distributor relationships in the future.</p>
E.ON UK	REJECT	ACCEPT	ACCEPT	<p>Although we believe that the current wording of DCUSA allows suppliers to charge for any additional data that is not currently specified as being free we believe this change clarifies that ability. We believe that by making it clear that Distributors should pay the reasonable costs of providing that data that it encourages them to only request data that is the most cost effective industry wide solution to any perceived problem. At present there</p>

				<p>is a perverse incentive for them to seek solutions that result in suppliers paying the costs. As part of their allowed income they are able to recover the costs associated with maintaining their networks and if requiring additional data helps to make this more efficient then the cost should be borne by distributors as they are already recovering income to pay for this.</p>
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