

DCUSA CHANGE DECLARATION

DCP 111 – E-Billing for Site Specific Bills

VOTING DATE: 20 June 2012

DCP 111	WEIGHTED VOTING		
	DNO	IDNO	SUPPLIER
CHANGE SOLUTION	Accept	Reject	Accept
IMPLEMENTATION DATE	Reject	Reject	Accept
RECOMMENDATION	<p>Change Solution – Reject. In respect of each Party Category that was eligible to vote, the number of Groups in that Party Category which voted to accept the Change Solution was not greater than 65% of the total number of Groups in all Party Categories which voted; and</p> <p>The sum of the Weighted Votes of those Groups in each Party Category which voted to accept the Change Solution was not greater than 65% in all Party Categories which voted.</p> <p>Implementation Date – Reject. In respect of each Party Category that was eligible to vote, the number of Groups in that Party Category which voted to accept the Change Solution was not greater than 65% of the total number of Groups in all Party Categories which voted; and</p> <p>The sum of the Weighted Votes of those Groups in each Party Category which voted to accept the Change Solution was not greater than 65% in all Party Categories which voted.</p>		

PART ONE / PART TWO	Part Two – Authority Determination Not Required
---------------------	---

PARTY	SOLUTION (A / R)	IMPLEMENTATION DATE (A/R)	COMMENTS
DNO PARTIES			
Eastern Power Networks	Accept	Reject	Suggest an 8 day lead time is unrealistic for both senders and recipients. Suggest early 2013 would be more acceptable.
London Power Networks	Accept	Reject	See comment for Eastern Power Network.
South Eastern Power Networks	Accept	Reject	See comment for Eastern Power Network.
Electricity North West Limited	Accept	Accept	N/A
Northern Powergrid (Northeast) Limited	Accept	Accept	N/A
Northern Powergrid (Yorkshire) plc	Accept	Accept	N/A
SP Distribution	Accept	Accept	We would wish to retain the right to issue copy accounts by email attachments/paper.
SP Manweb	Accept	Accept	See comment for SP Distribution.
Southern Electric Power Distribution plc	Reject	Reject	Whilst we agree that e-billing has definite efficiency benefits and is to be encouraged, we do not believe that it is

			necessary, appropriate or prudent to remove all alternative means of billing from the DCUSA. In our view the implementation date is unduly short for a change which has no particular urgency attached to it.
Scottish Hydro Electric Power Distribution plc	Reject	Reject	See comment for Southern Electric Power Distribution plc.
Western Power Distribution (East Midlands) Plc	Accept	Accept	N/A
Western Power Distribution (South Wales)	Accept	Accept	N/A
Western Power Distribution (South West)	Accept	Accept	N/A
Western Power Distribution (West Midlands) Plc	Accept	Accept	N/A
IDNO PARTIES			
Independent Power Networks Limited	Reject	Reject	N/A
ESP Electricity Limited	Reject	Reject	To reiterate our earlier consultation response, we believe that until the specification for the D2021 flow is tightened up and not left open to interpretation by Parties (as is currently the case and identified as an issue in the DCMF MIG with lack of commonality of

			<p>application of the D2021), it is impossible to specify the relevant changes to our billing system with any confidence. We would be reluctant to update our billing system until a defined and robust specification for the flow is in place.</p> <p>In addition to the above, we do not believe it is appropriate to oblige parties to sign up to a commercial service (i.e. Electralink’s E-Billing service).</p>
<p>The Electricity Network Company</p>	<p>Reject</p>	<p>Reject</p>	<p>In line with our earlier consultation response we have significant issues over the mandating of the use of this e-billing data flow by DCUSA. Firstly, the data flow is currently sent by some DNOs and suppliers through bilateral agreements. As such the e-billing data flow has no governance arrangements. Separately, DCUSA (nor the MRA, nor the BSC), own the intellectual property rights over the use of this flow. Also it is inappropriate for the DCUSA to impose the use of a flow where there is no mechanism for parties to recover the costs. Whilst we accept that some suppliers benefit from receiving this flow where they require its’ use it should be on a “User Pays” basis (which should include recovery of fixed costs).</p> <p>Because IDNOs and smaller suppliers have a low volume of HH MPAN’s, the</p>

			<p>introduction of this change proposal would impose significant unrecoverable costs on a per MPAN basis. Therefore, whilst the solution may increase efficiency where there are large volumes, it only serves to increase costs for smaller suppliers and distributors. For such parties we believe that the process we already follow is cost effective</p> <p>Additionally, with the advent of the roll out of smart metering, we believe it is premature to impose such solutions when more enduring solutions may be developed in the near future.</p>
<p>Energetics Electricity</p>	<p>Reject</p>	<p>Reject</p>	<p>Energetics Electricity reject this proposal on the following points:</p> <ul style="list-style-type: none"> • The cost to our business in implementing changes to our billing engine to accommodate these proposals is prohibitive to a Company of our size. • The benefits perceived by the proposers with respect to time and cost would certainly be outweighed by the costs and impact to Energetics Electricity. • DCUSA Objective 2 may be compromised by this proposal, as it would certainly place a burden on our business to compete

			<p>effectively in this market if we have to make substantial changes to our systems.</p> <ul style="list-style-type: none"> Manually putting information into a D2021 flow on our DTN Gateway also introduces the potential of human error into the process, which negates any perceived error reduction elsewhere.
UK Power Networks (IDNO)	Accept	Reject	N/A
SUPPLIER PARTIES			
British Gas	Accept	Accept	N/A
GDF SUEZ Marketing Limited	Accept	Accept	N/A
EDF Energy	Accept	Accept	<p>We agree in principle that the CP should be implemented and we support the proposals. However , in our opinion there should be NO threshold on MPAN's , as once the Electronic IT billing system is developed , it does not matter if you use the system for generating D2021 for 1 MPAN or a 1000 MPAN.</p> <p>Implementation date – The date of implementation of April 2014 should be made as the Final mandatory date for implementation. DNO/IDNO should be encouraged or given the option to bring this forward to at least June 2013.</p>

			If we are going to consider the implementation date of April 2014, we should take into account the D2026 flows along with this consultation/ Implementation.
E.ON	Accept	Accept	N/A
Scottish Power Energy Retail Ltd	Accept	Accept	N/A
SSE Energy Supply Ltd	-	Rejected	Whilst we are generally supportive of this Change Proposal and would like to see D2021 as the primary billing method from DNO's and IDNO's, we already receive the vast majority of our invoices via D2021. The efficiency savings we could save could be outweighed by the risk / cost incurred by other parties in the industry.
Npower	Accept	Accept	E-Billing (electronic billing) is more efficient and cost effective than those sent by email, fax and post. There may be further benefit to the Industry if the number of half-hourly settled sites were to increase as a result of potential Balancing and Settlement Code modifications.