

DCP 336 COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

Company	Confidential/ Anonymous	Q1: Do you understand the intent of DCP 336?	Working Group Comments
British Gas	Non-confidential	Yes	Noted
Electricity North West	Non-confidential	Yes, we understand the intent of this change.	Noted
Haven Power	Non-confidential	Yes	Noted
Npower Ltd	Non-confidential	Yes	Noted
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	Yes	Noted
Scottish and Southern Electricity Networks	Non-confidential	Yes	Noted
SP Distribution and SP Manweb	Non-confidential	Yes	Noted
UK Power Networks	Non-confidential	Yes	Noted
Anonymous	Anonymous	yes	Noted
Working Group Conclusions: The Working Group noted that all respondents understood the intent of DCP 336.			

Company	Confidential/ Anonymous	Q2: Are you supportive of the principles of DCP 336?	Working Group Comments
British Gas	Non-confidential	Yes	Noted
Electricity North West	Non-confidential	Yes, we are supportive of the principles of DCP 336.	Noted

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Haven Power	Non-confidential	Yes	Noted
Npower Ltd	Non-confidential	Yes	Noted
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	Partially. At this stage we only support item 3 which is to change the definition of electronic format to remove the specific reference to DVD. While we understand the process does need modernising; at this stage the solution has not been developed therefore feel it is un-necessary to update the agreement to include specific transfer mediums (i.e. CSV).	The Secretariat to seek clarity on response as .csv format is already specified in the legal text.
Scottish and Southern Electricity Networks	Non-confidential	<p>We support the principle of removing the requirement for the data to be provided on a DVD.</p> <p>In the longer term, we would support the principle of developing a more efficient and effective process for the provision of the data to interested parties.</p>	<p>The Working Group considered two other potential solutions:</p> <ol style="list-style-type: none"> 1. Electronic Format is redefined as per the suggested legal text (.csv) and the data would still be provided to Suppliers via the Nominated Central Source; and 2. Electronic Format is redefined as per the suggested legal text (.csv) and the data would be provided by the Nominated Central Source to the DCUSA Secretariat who would then upload to the DCUSA Website and issue a notification to Parties. <p>However, the Working Group agreed that their original proposed solution results in the cleanest most efficient process, meaning that it would be the Secretariat who undertakes the task and then publishes the results on the website. One major reason for this decision was that there appeared to be no real logic behind the obligation on DNOs to agree to the use of a third party for a single task.</p>

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SP Distribution and SP Manweb	Non-confidential	Yes	Noted
UK Power Networks	Non-confidential	Yes	Noted
Anonymous	Anonymous	Yes	Noted
Working Group Conclusions: The Working Group note that seven of the nine respondents were fully supportive of the principles of DCP 336 and the other two respondents were supportive of only one part of the solution related to the removal of a DVD being the medium by which the data is provided.			

Company	Confidential/ Anonymous	Q3: Do you agree with the proposed solution for this CP? Please provide your rationale.	Working Group Comments
British Gas	Non-confidential	Agree	Noted
Electricity North West	Non-confidential	Yes, centrally holding the file on a password protected webpage is low cost, low waste and easily accessed by the relevant parties.	Noted
Haven Power	Non-confidential	Yes – the DCUSA Website is a portal which Parties are comfortable in accessing, as well as downloading data from. The password protection in place makes this option a simple cost effective one.	Noted
Npower Ltd	Non-confidential	The solution seems pragmatic, however we think that more information is needed to clarify the cost implications of the DCUSA Secretariat co-ordinating the receipt of the information and making it available. The current wording of DCUSA stipulates that the information will be provided to suppliers “free of charge”. I note that under the legal text changes, these words are being deleted. These costs should be ring-fenced to DNO/IDNO parties.	<p>The Working Group considered the context with which the wording “free of charge” is used within the legal text and agreed that there are two distinct activities undertaken within the current process. One relates to obtaining the DVDs, placing the relevant data onto the DVDs and providing the DVDs.</p> <p>The second is the collation of the data received from the DNOs and IDNOs.</p>

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			<p>The Working Group agreed that if this CP is implemented, then the costs associated with obtaining DVDs, placing the relevant data onto the DVDs and providing the DVDs will no longer exist. Therefore, it would only be the costs for the collation of the data which is separate charge that currently the DNOs and IDNOs pay for via the Nominated Central Source.</p> <p>Working Group members noted that there is precedence for a specific element of the costs of the DCUSA being only attributable to a single Party Category. This being the case, the Working Group agreed that any potential costs that may need to be paid to the DCUSA Secretariat to complete this process are ringfenced to DNO and IDNO Parties only and that legal text should be included to this effect.</p>
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	Partially. At this stage we only support item 3 which is to change the definition of electronic format to remove the specific reference to DVD. While we understand the process does need modernising; at this stage the solution has not been developed therefore feel it is un-necessary to update the agreement to include specific transfer mediums (i.e. CSV).	The Secretariat to seek clarity on response as .csv format is already specified in the legal text.
Scottish and Southern Electricity Networks	Non-confidential	<p>We have some concerns with the proposal as it currently stands.</p> <p>DCP 336 goes beyond the desired intent of removing the requirement for a DVD. It proposes solutions that would need testing to prove feasibility before the CP is agreed.</p> <p>If approved as submitted, this CP will require DNOs (and the DCUSA Secretariat) to use a website-based solution (or other solution). Although the proposal is to use the DCUSA portal to which all parties have access, the processes required to transfer data to and from the website need to be developed and tested to demonstrate the effectiveness of the proposal.</p>	<p>The Working Group have reviewed the intent statement for the CP and do not agree that the solution goes above the original intent, however, as compared to the original discussion, it has been highlighted that further developments were required.</p> <p>The Secretariat to seek clarity on the process used to collate the data by the ENA and potentially ask to observe this.</p>

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		In addition, the CP proposes changes to administration processes (the replacement of the Nominated Central Source by the DCUSA Secretariat) that have not been evaluated.	
SP Distribution and SP Manweb	Non-confidential	Yes, the proposed solution provides an appropriate alternative to the current approach	Noted
UK Power Networks	Non-confidential	Yes, the proposed solution is as we put forward as part of the original change proposal. We believe this solution addresses the issues which this change has been raised to address in a logical and pragmatic way. However we believe that consideration where a single postcode is covered by two DNOs (cross border) needs to be addressed, currently the ENA will assign the DNO with the most customers on that postcode as the party responsible. The current proposed legal text does not include consideration of this situation.	As agreed in SSENs response, the Secretariat will seek clarity on the process used by the ENA to review how they assign postcodes that fall in to more than one DNO area. The legal text will be updated to reflect this process to ensure that it is clear.
Anonymous	Anonymous	Yes. A CD is out of date and generally available data makes much more sense	Noted
<p>Working Group Conclusions: The Working Group note that six of the nine respondents agreed with the proposed solution for DCP 336. Of the three remaining respondents, one highlighted a concern regarding the share of the costs being allocated across all Parties as compared to the status quo, being that charges are levied upon the DNO/IDNOs by the Nominated Central Source. The respondent suggested that the any additional costs for the Secretariat to undertake the task should be ring-fenced to DNOs/IDNOs, a recommendation to the DCUSA Panel will be made if there are any cost that are incurred by the DCUSA Secretariat. Another respondent suggested that the proposed solution “goes beyond the desired intent”, the Working Group have reviewed the intent and are comfortable that the solution does not go beyond the original intent.</p>			

Company	Confidential/ Anonymous	Q4: The data is currently provided in .csv file format, are Parties comfortable that this remains the same for the purpose of sharing this data? Please provide your rationale.	Working Group Comments
British Gas	Non-confidential	Comfortable for the data format to remain the same. Means that existing processes are maintained	Noted
Electricity North West	Non-confidential	Yes, it is a universal format and easy to create / edit.	Noted
Haven Power	Non-confidential	Yes, it should remain in the same format as parties have internal systems expecting this format.	Noted

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Npower Ltd	Non-confidential	We are keen to ensure that there is no change to the format of the data	Noted
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	CSV is the “lowest common denominator” as a data transfer format. XML or JSON formats could be used, allowing additional storage for metadata, such as publication dates, authors etc. However, these require more complex tools to process and report the information content. As such, these may not be appropriate at this time.	Working Group members highlighted that currently there is no desire to change the file format.
Scottish and Southern Electricity Networks	Non-confidential	Yes. The format is familiar and there is no need to change.	Noted
SP Distribution and SP Manweb	Non-confidential	We would prefer to have a more generic ‘suitable electronic format’ (to be agreed with the Company) rather than be tied into a ‘.csv’ format. Whilst ‘.csv’ may be a suitable format at present, we would be concerned it may be supplanted by a different format, potentially in the relatively near future, as per the current DVD requirement	Working Group members highlighted that currently there is no desire to change the file format.
UK Power Networks	Non-confidential	We believe that it is appropriate to leave the format unchanged. The continued use of a .csv file format is flexible allowing the data to be viewed using different applications which needs to continue.	Noted
Anonymous	Anonymous	Yes. It works, so why change?	Noted

Working Group Conclusions: The Working Group note that seven of the nine respondents were supportive of maintaining the current .csv file format for the purpose of sharing this data. Of the two other respondents, one suggested two other file formats but then suggested that these may not be appropriate at this time. The other respondent didn’t disagree with the use of the current format but suggested that the legal text shouldn’t define a specific format as then a Change Proposal would need to be raised to amend it in future as has been the case with DVDs. The Working Group have agreed that there is no desire to change the current file format and will maintain the status quo.

Company	Confidential/ Anonymous	Q5: Do you believe the Working Group should consider a different solution? If so, please provide your rationale.	Working Group Comments
British Gas	Non-confidential	We have not identified any different solutions	Noted
Electricity North West	Non-confidential	With the proposed solution meeting the intent of DCP 336 we do not believe the working group need to consider different solutions.	Noted

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Haven Power	Non-confidential	No	Noted
Npower Ltd	Non-confidential	We have no alternative suggestions to offer	Noted
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	No	Noted
Scottish and Southern Electricity Networks	Non-confidential	The solution proposed may be acceptable, but there is further work required to demonstrate that this is the case. The impact on current processes would also need to be assessed by those parties who would be affected (DCUSA Secretariat and Suppliers)	As above, the Secretariat will be reviewing the process with the ENA to determine that they are comfortable with what is required.
SP Distribution and SP Manweb	Non-confidential	No	Noted
UK Power Networks	Non-confidential	No.	Noted
Anonymous	Anonymous	No. Except to make sure that an update is communicated by email.	The Working Group suggested that this should be made clear within the Change Report for this CP but that it might not need to be stipulated within the legal text itself.
<p>Working Group Conclusions: The Working Group noted that none of the respondents believed the Working Group should consider a different solution. One respondent suggested that further work was required to demonstrate that the proposed changes are acceptable. Another respondent highlighted that they'd want any updates to be communicated by email. The Working Group have agreed that further work will be carried out in respect to the Secretariat's understanding of the process that is required, and further consideration will be given to the legal text to ensure that the process of communication is clear.</p>			

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Company	Confidential/ Anonymous	Q6: Do you have any comments on the proposed legal text for DCP 336? Please provide your rationale.	Working Group Comments
British Gas	Non-confidential	No comments	Noted
Electricity North West	Non-confidential	We would suggest to future proof the process that we limit the definition in 13.2 of the data, for example <i>"The Secretariat will publish on the Website, a spreadsheet in csv. Format, that contains the collated information."</i> Could be replaced with <i>'The Secretariat will publish the collated data, free of charge, in an electronic format'</i> or alternatively <i>"The Secretariat will publish the collated data on the Website"</i> .	Noted The Working Group are happy to retain the use of .csv file format as per the status quo.
Haven Power	Non-confidential	No	Noted
Npower Ltd	Non-confidential	We think that the legal text needs amending to make it clear that suppliers will not have to contribute to the costs arising from this work being done by the DCUSA Secretariat	The Working Group discussed that the use of "free of charge" within the legal text refers to the cost of providing a DVD and the postage costs when sending the information to the Suppliers. The administration costs for this service are separate charges that currently the DNOs and IDNOs pay for via the Nominated Central Source. The Working Group agreed that there would be a clause included in the legal text to explicitly state that any costs incurred for this process would be ring-fenced to the DNO/IDNO Parties
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	Partially. At this stage we only support item 3 which is to change the definition of electronic format to remove the specific reference to DVD. While we understand the process does need modernising; at this stage the solution has not been developed therefore feel it is un-necessary to update the agreement to include specific transfer mediums (i.e. CSV).	As above, the Secretariat to seek clarity on response as .csv format is already specified in the legal text.
Scottish and Southern Electricity Networks	Non-confidential	The proposed legal text is based on the premise of delivering a specific solution (use of DCUSA website) and changing the process of data collation, neither of which have been fully evaluated.	The Working Group agreed that there would be a clause included in the legal text to explicitly state that any costs incurred for

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		<p>I would prefer that the only change is to the definition of "electronic format", (currently at 13.4 (d)) which would read "a file containing the relevant information in ".csv" format.</p> <p>This would allow flexibility should there be a need to use an alternative means of distributing the data.</p> <p>Also, the reference in 13.2 to the data being 'provided free of charge' has been removed. This may have been the intention as the costs of distributing data have been removed, but it may be worth keeping a statement on these lines.</p>	<p>this process would be ring-fenced to the DNO/IDNO Parties.</p> <p>The changes from Nominated Central Source to the Secretariat will be retained as the Working Group believe that this is the best route to take for this CP and the Secretariat will be ensuring that they are aware of what is required of them.</p>
SP Distribution and SP Manweb	Non-confidential	No	Noted
UK Power Networks	Non-confidential	We believe that the minimal changes to the legal text are appropriate.	Noted
Anonymous	Anonymous	None	Noted

Working Group Conclusions: The Working Group note that five of the nine respondents had no comments on the legal text for DCP 336. Of those that had comments, the Working Group noted some common themes, being that the current legal text states that the collated data will be provided free of charge and some respondents have concerns about the removal of this text. Further to this one respondent suggested that any costs associated with the provision of this task by the Secretariat should only be attributable to DNOs/IDNOs and not Suppliers. Two respondents also re-iterated earlier comments around the use of the .csv file format. An extra clause will be included within the legal text to set out that the any charges will be ring-fenced to DNO and IDNO Parties only.

Company	Confidential/ Anonymous	Q7: Which of the DCUSA General Objectives does this CP better facilitate? Please provide supporting comments.	Working Group Comments
British Gas	Non-confidential	<p>Case to be made that better facilitates the following:</p> <p>1 The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks</p> <p>3 The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences</p> <p>4 The promotion of efficiency in the implementation and administration of this Agreement</p>	Noted support for General Objectives 1, 3 and 4.

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		<p>By moving to a solution whereby Suppliers can access the rota block code data from the DCUSA website will:</p> <ul style="list-style-type: none"> • Make a more efficient process as individual DVD's will not need to be posted out • Enable DNO's to meet their licence conditions concerning maintaining consumers Suppliers 	
Electricity North West	Non-confidential	We believe that the increased efficiency through ease of access, availability would positively impact General Objectives 1, 3 and 4.	Noted support for 1, 3 and 4
Haven Power	Non-confidential	We agree with the Workgroup that Objectives 1, 3 and 4 are better facilitated by DCP 336 for the reasons stated in the consultation document.	Noted support for 1, 3 and 4
Npower Ltd	Non-confidential	I agree that DCUSA General Objectives 1 and 3 are met. I am unable to comment on DCUSA General Objective 4, as it is unclear whether any costs will be incurred by supplier parties, and the costs of this work being done by the DCUSA Secretariat are unknown	<p>Noted support for 1 and 3.</p> <p>4 – unclear – the Working Group note that this point has been raised in response to other questions. The Working Group will ensure that any costing information will be detailed in the Change Report for the change and any potential charges will be ring-fenced to DNO/IDNO Parties.</p>
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	No material change. The change we are proposing (definition change only) would better facilitate general objective 4, the promotion of efficiency in the implementation and administration of the DCUSA. It will also allow the DNO/Suppliers to work on developing the detail of a solution which is fit for the current Cyber Security Climate.	<p>Noted</p> <p>As above, the Secretariat to seek clarity on response as .csv format is already specified in the legal text.</p>
Scottish and Southern Electricity Networks	Non-confidential	DCUSA general objectives 1, 3, 4 could be facilitated by improvements in the process described in Schedule 8 Clause 13, but this CP may not achieve this if the above concerns are not addressed.	<p>Noted support for 1, 3 and 4 if above comments are addressed.</p> <p>The SSEN Working Group representative highlighted that any above comments and concerns have been addressed when reviewing the responses to the consultation.</p>

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SP Distribution and SP Manweb	Non-confidential	General Objectives 1, 3 and 4 are better facilitated. This change will ensure the continued visibility of this information and allow obligations to be met efficiently	Noted support for 1, 3 and 4
UK Power Networks	Non-confidential	As the proposer of this change we believe that it will better facilitate DCUSA General Objectives one, three and four as a result of revising the arrangements for the communication of the rota disconnection data. By having this data made available to Parties through a website download rather than using a DVD, as a result of modern PCs no longer utilising a DVD format, it will ensure that all Parties have sufficient visibility of this data.	Noted support for 1, 3 and 4
Anonymous	Anonymous	N/A	Noted

Working Group Conclusions:

Respondent	Objective 1	Objective 3	Objective 4
1.	Yes	Yes	Yes
2.	Yes	Yes	Yes
3.	Yes	Yes	Yes
4.	Yes	Yes	No comment (dependent on any costs incurred)
5.	No comment	No comment	Yes (dependent on their solution)
6.	Yes	Yes	Yes (if concerns addressed)
7.	Yes	Yes	Yes
8.	Yes	Yes	Yes
9.	Did not answer	Did not answer	Did not answer
TOTAL (9)	YES=7	YES=7	Yes=6, MAYBE=2

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Company	Confidential/ Anonymous	Q8: Are you aware of any wider industry developments that may impact upon or be impacted by this CP?	Working Group Comments
British Gas	Non-confidential	No	Noted
Electricity North West	Non-confidential	No.	Noted
Haven Power	Non-confidential	No	Noted
Npower Ltd	Non-confidential	No	Noted
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	No	Noted
Scottish and Southern Electricity Networks	Non-confidential	The data is currently collated by the "Nominated Central Source" (NCS). This gives DNOs control over the compiled data, and they can then use it for other purposes e.g. single emergency number 105, "who is my network operator" website look-ups. The process for achieving this under the terms of this CP has not been considered.	The Working Group agree that DNOs are able to share the data with other interested parties if it is requested if they do not have access to the DCUSA Website. There are no GDPR implications as there is no personal data being shared.
SP Distribution and SP Manweb	Non-confidential	No	Noted
UK Power Networks	Non-confidential	No.	Noted
Anonymous	Anonymous	None	Noted
<p>Working Group Conclusions: The Working Group note that eight of the nine respondents were not aware of any wider industry developments that may impact upon or be impacted by DCP 336. One respondent noted that the status quo approach means that DNOs are able to use the compiled data for other purposes and that this may not be the case with the proposed solution, however, the Working Group agree that DNOs are able to share the data with other interested parties if it is requested.</p>			

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Company	Confidential/ Anonymous	Q9: The proposed implementation date for DCP 336 is the first DCUSA Release following Party approval. Do you agree with the proposed implementation date? Please provide your rationale.	Working Group Comments
British Gas	Non-confidential	We agree with the proposed implementation date	Noted
Electricity North West	Non-confidential	The proposed implementation date seems appropriate, taking into consideration that the information is due to be produced soon, so the method used could be changed from 2020 onwards.	Noted
Haven Power	Non-confidential	Yes	Noted
Npower Ltd	Non-confidential	Yes	Noted
Northern Powergrid on behalf of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc	Non-confidential	Yes. In reality, there is no material change required to the process.	Noted
Scottish and Southern Electricity Networks	Non-confidential	The implementation of any change to this process needs to be timed to avoid the annual data gathering cycle. This has already begun for 2019.	Noted
SP Distribution and SP Manweb	Non-confidential	Yes	Noted
UK Power Networks	Non-confidential	Yes, it would be useful to revise these arrangements ASAP to ensure that this data is viewable by all.	Noted
Anonymous	Anonymous	Agreed. No real change, just a different source	Noted
<p>Working Group Conclusions: The Working Group note that all respondents agreed with the proposed implementation date, with a couple suggesting that the Working Group consider timing it to avoid conflict with the data gathering for 2019. The Working Group agreed to be cognisant of any conflict and note, as did those respondents themselves that this process has already started and so it is unlikely that a conflict will arise.</p>			