










DCUSA Change Declaration		At what stage is this document in the process?
<h1>DCP 376</h1> <h2>Provision of Customer Residual Charging Bands to Suppliers</h2> <p><i>Date raised:</i> 21 October 2020</p> <p><i>Proposer Name:</i> Tom Cadge</p> <p><i>Company Name:</i> The Electricity Network Company</p> <p><i>Company Category:</i> Independent Distribution Network Operator</p>		01 – Change Proposal
		02 – Consultation
		03 – Change Report
		04 – Change Declaration
<h3>Purpose of Change Proposal</h3> <p>The purpose of this Change Proposal is to mandate DNO/IDNO parties to provide a data extract of the residual charging band that customers will be assigned to in accordance with Schedule 32 of the DCUSA. This change is intended to give all Suppliers a view of which residual band all customers subject to a residual charging band have been assigned to. This will be prior to those customers being migrated to the relevant LLFC and this will be provided on an enduring basis for each onshore transmission price control period.</p> <p>This document provides the DCUSA Change Declaration for DCP 376.</p>		
	<p>DCUSA Parties have voted on DCUSA Change Proposal (DCP) 376 with the outcome being a decision on whether or not the Change Proposal (CP) is to be accepted and the proposed variation to the DCUSA made accordingly.</p> <p>The DCUSA Parties consolidated votes are provided as Attachment 3.</p>	
	<p>For DCP 376, DCUSA Parties have voted to:</p> <ul style="list-style-type: none"> • Accept the proposed variation (solution); and • Accept the implementation date. 	
	<p>Impacted Parties: DNOs, IDNOs and Suppliers</p>	
	<p>Impacted Clauses: Schedule 32, paragraph 3.5 and new paragraph created.</p>	

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Timeline		<div><div>Contact:</div><div>Code Administrator</div></div> <div><div></div><div>DCUSA@electralink.co.uk</div></div> <div><div></div><div>020 7432 3011</div></div> <div><div>Proposer:</div><div>Tom Cadge</div></div> <div><div></div><div>thomas.cadge@bu-uk.co.uk</div></div> <div><div></div><div>07855 270460</div></div>
The timetable for the progression of the CP is as follows:		
Change Proposal timetable		
Activity	Date	
Initial Assessment Report	04 November 2020	
Change Report Approved by Panel	18 November 2020	
Change Report issued for Voting	20 November 2020	
Party Voting Closes	11 December 2020	
Change Declaration Issued to Parties	14 December 2020	
Implementation	21 December 2020	

1 Summary

What?

- 1.1 Suppliers need to know the residual charging band of a metering point so that they are able to accurately forecast the DUoS and TNUoS charges applicable to that metering point. The enduring solution for Suppliers to be able to identify this is through the LLFC assigned to the metering point which is available to all Suppliers via ECOES. For the initial band setting process, and for each subsequent band setting thereafter, there is a gap between the metering point being allocated to a band and this information being reflected in the LLFC. This will cause issues where Suppliers are unable to accurately identify the network charges for which a metering point is liable so that they may include those costs in a quote provided to the customer associated with the metering point. To resolve this, it is proposed that each distributor be required to send to Suppliers a list of all MPANs after they have been allocated to a charging band for the subsequent price control.

Why?

- 1.2 This change should be made to ensure that all distributors are required to provide the necessary information to facilitate effective competition in the supply of electricity. Whilst it is possible that some DNO/IDNO Parties may be able to provide this information in the absence of this Change Proposal the Proposer is concerned that the provision of this information on a bilateral basis, without being mandated, may have data protection implications for the distributor under both GDPR and the Utilities Act 2000. However, these concerns are alleviated by mandating that all distributors will provide the information to Suppliers as this provides a legal requirement to process the data (through the lawful basis to process in GDPR and through Section 105(3)(c) of the Utilities Act 2000).. Although this is a Change Proposal to enable competition in supply, the Proposer is not aware that any Supplier has come forward to raise this Change Proposal but believes that it is in the best interests of consumers.

How?

- 1.3 It is proposed that the existing solution for each revision of charging bands (under Paragraph 3.5 of Schedule 32) is amended so that it applies to all MPANs being provided to all Supplier Parties. This amended Paragraph 3.5 will then be copied to create a new Paragraph 2.5 in Schedule 32 which mirrors this obligation for the initial band setting process. The exact mechanics of the provision of this information are not prescribed in the existing legal text so this Change Proposal does not seek to introduce such definition. However, it is anticipated that data will be shared to Supplier Party Contract Managers through an excel spreadsheet.

2 Governance

Justification for treating as a Part 2 Matter

- 2.1 DCP 376 is being treated as a Part 2 Matter as it does not meet the criteria set out in the guidance section of this document to be considered a Part 1 matter.

Justification for CP being considered Urgent

- 2.2 DCP 376 is being treated as an urgent change as it meets the criteria set out in clause 10.7 and 10.7.1. That is to say “it relates to a current issue that if not urgently addressed may cause significant adverse commercial impact on parties (or a class of Party), electricity and/or any other person”. The Proposer believes that if this is not addressed then it may mean that Suppliers are commercially disadvantaged as they are unable to accurately determine DUoS (and TNUoS) charges applicable to a metering point so will be less likely to be able to win new metering points that they are not currently registered to. This will also have an impact on all commercial customers who may be limited in their choice of Supplier.

Next Steps

- 2.3 DCUSA Parties voted to accept DCP 376 and as such, it will be implemented in line with Section 8 below.

3 Why Change?

Background of DCP 376

- 3.1 The DCUSA (under Paragraph 3.5 of Schedule 32) requires distributors to provide, following the creation of each set of new charging bands prior to each Onshore Transmission Price Control, a list of MPANs and their new charging band to the Supplier who is registered to the metering point. The DCUSA is silent on the provision of this information for the initial charging band creation exercise.
- 3.2 DCP 376 is required to ensure that realising the benefits of the targeted charging review is not delayed. If Suppliers are unable to determine which residual charging band a metering point has been assigned to then they are not going to be able to accurately forecast the DUoS and TNUoS charges applicable to that metering point. Although the method by which Suppliers quote for metering points is commercially sensitive, the Proposer believes that prospective Suppliers would be at a disadvantage without widely available network charges. The absence of accurate network charges for commercial metering points for Suppliers which are not registered to the metering point is likely to cause an imbalance of information which will be detrimental to competition in supply.

Part B: Code Specific Details

4 Code Specific Matters

Reference Documents

- 4.1 None.



5 Solution

- 5.1 To create an obligation for distributors to provide the results of the initial residual charging band allocation process to Suppliers, including a list of all non-domestic MPANs and their new charging band as well as the provisional LLFC ID.
- 5.2 It is proposed to also alter the enduring solution (under Paragraph 3.5 of Schedule 32) by removing the requirement to only send data to the Supplier which is the Registrant of the MPAN. The result of this is that each Supplier Party will receive a list of each and every MPAN associated with a Non-Domestic Premises, identifying the charging band to which each MPAN has been allocated. It should be noted that the LLFC ID, will not form part of the enduring process

6 Relevant Objectives

Assessment Against the DCUSA Objectives

- 6.1 For a DCUSA Change Proposal to be approved it must be demonstrated that it better facilitates the DCUSA Objectives. There are five General Objectives and six Charging Objectives. The full list of objectives is documented in the DCUSA.
- 6.2 The Proposer considers that the following DCUSA General Objectives are better facilitated by DCP 376.

	DCUSA General Objectives	Identified impact
	1. The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks	None
	2. 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	Positive
	3. The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences	None
	4. The promotion of efficiency in the implementation and administration of the DCUSA	None
	5. Compliance with the Regulation on Cross-Border Exchange in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	None

- 6.3 DCP 376 will better facilitate DCUSA General Objective 2 as without this change, a Supplier will be unable to determine which residual charging band a metering point has been assigned to, where a Supplier is not the current Registrant for a metering point. This means that Suppliers will be unable to accurately forecast the DUoS charges applicable to a metering point, and therefore, they will also be unable to provide an accurate quote to a prospective customer who is interested in switching Suppliers. This creates an imbalance of information between the Supplier who is currently the Registrant for a metering point and any competing Supplier, which is detrimental to competition in supply.

7 Impacts & Other Considerations

Impacts on any Significant Code Review (SCR) or other significant industry change projects

- 7.1 The Proposer does not believe that this CP impacts upon any current SCR or other significant industry change projects.

Consideration of Wider Industry Impacts

- 7.2 The issue of provision of information by DNO/IDNO Parties to Supplier Parties has been discussed extensively at Energy Networks Association led forums which were made up of distributor, ESO, industry code and Supplier representatives and by the Targeted Charging Review Implementation Steering Group which is made up of distributor, ESO and industry code representatives. No party has raised an objection to this Change Proposal at any of those forums and all representatives at the TCR Implementation Steering Group believe that this Change Proposal should be raised.

Impacts Other Codes

- 7.3 The Proposer does not consider that there are any impacts to any other 'Industry Codes' as a result of the implementation of this CP.

BSC	<input type="checkbox"/>
CUSC	<input type="checkbox"/>
Grid Code	<input type="checkbox"/>
MRA	<input type="checkbox"/>
SEC	<input type="checkbox"/>
Other	<input type="checkbox"/>
None	<input checked="" type="checkbox"/>

Consumer Impacts

- 7.4 This change does not impact consumers.

Environmental Impacts

- 7.5 In accordance with DCUSA Clause 11.14.6, the Proposer assessed whether there would be a material impact on greenhouse gas emissions if DCP 376 were implemented. The Proposer did not identify any material impact on greenhouse gas emissions from the implementation of this Change Proposal.

8 Implementation

- 8.1 If approved by Parties, DCP 376 will be implemented by extraordinary release, which will be set for five working days following Party approval and which will be 21 December 2020.

9 Legal Text

Text Commentary

- 9.1 The legal text for DCP 376 has been recommended by the Proposer and reviewed by the DCUSA legal advisor and is provided as Attachment 1.
- 9.2 DCP 376 creates a new obligation for distributors to provide the results of the initial residual charging band allocation process to Suppliers, including a list of all non-domestic MPANs and their new charging band as well as the provisional LLFC ID.

Insert a new paragraph 2.5 in Schedule 32 as follows:

2.5 On or before 31 December 2020, each DNO/IDNO Party shall provide each Supplier Party with a list of each and every MPAN associated with a Non-Domestic Premises that is connected to the DNO/IDNO Party's Distribution System, identifying the charging band to which each such MPAN has been allocated, the LLFC Id which is assigned to the MPAN, and the provisional LLFC Id which will be assigned to the MPAN with effect from 1 April 2022.

- 9.3 It is proposed to also alter the enduring solution (under Paragraph 3.5 of Schedule 32) by removing the requirement to only send data to the Supplier which is the Registrant of the MPAN.

Amend paragraph 3.5 in Schedule 32 as follows:

- 3.5 On or before 30 June following the 31 March referred to in Paragraph 3.1, each DNO/IDNO Party shall provide each Supplier Party with a list of each and every MPAN associated with a Non-Domestic Premises ~~that is connected to the DNO/IDNO Party's Distribution System for which that Supplier Party is (at or around the time the list is provided) the Registrant,~~ identifying the charging band to which each such MPAN has been allocated (in accordance with the allocation rules in Paragraph 4).

10 Voting

- 10.1 The 376 Change Report was issued to DCUSA Parties for Voting on 20 November 2020.

Part 2 Matter: Authority Decision is not Required

DCP 376 Proposed Variation (Solution) Decision

10.2 For the majority of the Party Categories that were eligible to vote:

- the number of groups in each Party Category which voted to accept the proposed variation was more than 65% of the total number of Groups in that Party Category which voted; and
- the sum of the Weighted Votes of the Groups in each Party Category which voted to accept the proposed variation was more than 65%

10.3 DCUSA Parties have voted to **accept** the proposed variation (solution) of DCP 376.

DCP 376 Implementation Date Decision

10.4 For the majority of the Party Categories that were eligible to vote:

- the number of groups in each Party Category which voted to accept the implementation date was more than 65% of the total number of groups in that Party Category which voted; and
- the sum of the Weighted Votes of the Groups in each Party Category which voted to accept the implementation date was more than 65%.

10.5 DCUSA Parties have voted to **accept** the implementation date of DCP 376

The table below sets out the outcome of the votes that were received in respect of the DCP 376 Change Report that was issued on 20 November 2020 for a period of 15 working days.

DCP 376	WEIGHTED VOTING				
	DNO	IDNO	SUPPLIER	CVA REGISTRANT	GAS SUPPLIER
CHANGE SOLUTION	Accept	Accept	Accept	Not Eligible	Not Eligible
IMPLEMENTATION DATE	Accept	Accept	Accept	Not Eligible	Not Eligible

11 Recommendations

DCUSA Parties

11.1 DCUSA Parties have voted on DCP 376, with the outcome being a decision to accept the Change Proposal and thus the proposed variation to the DCUSA will be made accordingly.

12 Attachments

- Attachment 1 – DCP 376 Legal Text
- Attachment 2 – DCP 376 Change Proposal Form
- Attachment 3 – DCP 376 Consolidated Party Votes