






DCUSA Change Report		At what stage is this document in the process?
<h1>DCP 385:</h1> <h2>No Retrospective Capacity Reductions</h2> <p><i>Date Raised: 25 March 2021</i></p> <p><i>Proposer: Peter Waymont</i></p> <p><i>Company Name: Eastern Power Networks</i></p> <p><i>Party Representation: DNO</i></p>	01 – Change Proposal	
	02 – Consultation	
	03 – Change Report	
	04 – Change Declaration	
<p>Purpose of Change Proposal:</p> <p>To amend the National Terms of Connection (NTC) to state that Capacity reductions cannot be retrospective.</p>		
	<p>This document is issued in accordance with Clause 11.20 of the DCUSA, and details DCP 385: 'No Retrospective Capacity Reductions.'</p> <p>Parties are invited to consider the proposed amendment (Attachment 1) and submit their votes using the Voting form (Attachment 2) to dcusa@electralink.co.uk by 13 August 2021.</p> <p>The voting process for the proposed variation and the timetable of the progression of the Change Proposal (CP) through the DCUSA Change Control Process is set out in this document.</p> <p>If you have any questions about this paper or the DCUSA Change Process, please contact the DCUSA by email to dcusa@electralink.co.uk or telephone 020 7432 3008.</p>	
	<p>Impacted Parties: DNOs and IDNOs</p>	
	<p>Impacted Clauses: Schedule 2B</p>	

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Timetable		 Any questions?
The timetable for the progression of the CP is as follows:		
Change Proposal timetable		
Activity	Date	
Initial Assessment Report	21 April 2021	
Change Report Approved by Panel	21 July 2021	
Change Report issued for Voting	23 July 2021	
Party Voting Closes	13 August 2021	
Change Declaration Issued to Parties	16 August 2021	

1 Executive Summary

What?

- 1.1 Amend Schedule 2B (the NTC) so that it is clearer to customers that backdating capacity reductions is not permitted.

Why?

- 1.5 We are seeing increasing numbers of customers who, having received their supply invoices, often backdated for a number of months, suddenly face capacity charges that may be in excess of their demand. Had they received their bills in a timely manner, they could have taken action to reduce their capacity sooner.
- 1.6 On contacting their supplier about this, these customers are sometimes told that capacity reductions are nothing to do with the supplier and they must contact the distributor about back dating reductions.
- 1.7 However, in accordance with the Charging Methodology (Schedule 16 para 150) and with the Charging Statements, any changes are only applied going forwards.
- 1.8 This is because capacity charges reflect the availability of the network to the customer and we cannot go back in time and make it less available.

How?

- 1.9 By adding terms into the NTC to clarify and give greater visibility that reductions in capacity cannot be applied retrospectively.

2 Governance

Justification Part 2 Matter

- 2.1 This Change Proposal is classed as a Part 2 Matter as it is of a housekeeping nature – it adds already published information into the NTC for additional visibility.

Requested Next Steps

- 2.2 The Panel considered that the Proposer has carried out the level of analysis required to enable Parties to understand the impact of the proposed amendment and to vote on DCP 385.
- 2.3 The DCUSA Panel recommends that this CP be issued to Parties for voting for a period of 15 Working Days.

3 Why Change?

- 3.1 To improve customer experience by giving additional visibility of the policy regarding capacity reductions, which is already stated in both the Charging Methodology and the Charging Statement.

Part B: Code Specific Details

4 Solution

- 4.1 The legal text below showcases the amendments being made to DCUSA to ensure that Schedule 2B (the NTC) it is clearer to customers that backdating capacity reductions is not permitted.

5 Code Specific Matters

Reference Documents

None

6 Relevant 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 document.
- 6.2 The Proposer considers that the following DCUSA General Objectives are better facilitated by DCP 385.

DCUSA General Objectives Please tick the relevant boxes.	Identified impact
<input type="checkbox"/> 1 The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks	None
<input checked="" type="checkbox"/> 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
<input checked="" type="checkbox"/> 3 The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences	Positive
<input type="checkbox"/> 4 The promotion of efficiency in the implementation and administration of the DCUSA	None
<input type="checkbox"/> 5 Compliance with the EU Internal Market Regulation and any relevant legallybinding decisions of the European Commission and/or the Agency for the Cooperation of Energy Regulators.	None
It helps to discharge the Licence condition whereby the distributors have to comply with their charging methodology and charge in accordance with their charging statements.	

- 6.3 This change will enable DCUSA to better reflect the current legislation and therefore has a positive impacts on DCUSA General Objectives Two and Three.

7 Impacts & Other Considerations

Does this Change Proposal impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

- 7.1 There is no impact on any of the current SCRs or any other industry change projects.

Does this Change Proposal Impact Other Codes?

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"/>

Consideration of Wider Industry Impacts

There are no wider industry impacts.

Confidentiality

There are no confidentiality concerns.

8 Implementation

Proposed Implementation Date

- 8.1 DCP 385 will aim to be implemented in the first DCUSA release, following Party approval.

9 Legal Text

- 9.1 The legal text for DCP 385 has been recommended by the Proposer and reviewed by the DCUSA legal advisor.

Legal Text

Add New Clause 12.13A in Section 3 of Schedule 2B -

“No reduction in the Maximum Import Capacity or the Maximum Export Capacity pursuant to Clause 12.12 shall have effect prior to the first day of the month following the date of the notice properly given

under Clause 12.12, stating the required capacity (being, if the reduction initially requested is not agreed, the request for the reduction which is subsequently agreed)."

Add New Clause 13.7A in Section 4 of Schedule 2B -

"No reduction in the Maximum Import Capacity or the Maximum Export Capacity pursuant to Clause 13.6 shall have effect prior to the first day of the month following the date of the notice properly given under Clause 13.6, stating the required capacity (being, if the reduction initially requested is not agreed, the request for the reduction which is subsequently agreed)."

Text Commentary

Gives clarity in the NTC of the approach to variations of MIC/MEC.

10 Recommendations

Panel's Recommendation

- 10.1 The Panel approved this Change Report on 21 July 2021. The Panel considered that the Proposer has carried out the level of analysis required to enable Parties to understand the impact of the proposed amendment and to vote on DCP 385.
- 10.2 The Panel have recommended this report be issued for voting and DCUSA Parties should consider whether they wish to submit views regarding this CP. The Voting Form can be found in Attachment 2.

11 Attachments

- Attachment 1 – DCP 385 Legal Text
- Attachment 2 – DCP 385 Voting Form
- Attachment 3 – DCP 385 Change Proposal Form