DCUSA

DCUSA DCP 344 Change declaration
Voting end date: 11 March 2022

DCP 344	WEIGHTED VOTING				
	DNO	IDNO	SUPPLIER	CVA REGISTRANTS[1]	GAS SUPPLIER[2]
CHANGE SOLUTION	Accept	Reject	Accept	N/A	N/A
IMPLEMENTATION DATE	Accept	Reject	Accept	N/A	N/A
RECOMMENDATION	**Change Solution – Accept** With regards to DCP 344, the Parties' recommendation to the Authority is that the change solution is accepted. For the majority of the Party Categories that were eligible to vote, the sum of the Weighted Votes of the Groups in each Party Category which voted to accept the change solution was more than 50%. **Implementation Date – Accept** The Parties' recommendation to the Authority is that the implementation date is accepted. For the majority of the Party Categories that were eligible to vote, the sum of the Weighted Votes of the Groups in each Party Category which voted to accept the implementation date was more than 50%				

1 This Party Category was not eligible to vote on this CP

2 This Party Category was not eligible to vote on this CP

PART ONE / PART TWO	**Part One** – Authority Determination Required

PARTY	SOLUTION (A / R)	IMPLEMENTATION DATE (A / R)	WHICH DCUSA OBJECTIVE(S) IS BETTER FACILITATED?	COMMENTS
DNO PARTIES				
Electricity Northwest Limited	Accept	Accept	2 – The facilitation of effective competition in the generation and supply of electricity and the promotion of such competition. 4 – The promotion of efficiency in the implementation and administration of the DCUSA	Our preference is the second option as this would result in the benefit of a single consistent approach, and new entrants would have clarity on the costs in this area. In addition, the existing e-billing system is a proven system and the format of the D2021 is well understood and works for those parties that currently use it. There is also minimal impact for current users whilst they switch all Suppliers currently using the manual option to e-billing, but we expect this to be a fairly straightforward process. However, we do note that the implementation of this change proposal would lead to DCUSA Parties funding a DUoS e-billing service provided under contact by ElectraLink and that the estimate for this service provision is £565k.
Northern Powergrid (Northeast) PLC	Accept	Accept	The promotion of efficiency in the implementation and administration of this Agreement and the arrangements under it.	None.
Northern Powergrid (Yorkshire) PLC	Accept	Accept		
Eastern Power Networks	Accept	Accept	Objective 4	Although this will cause costs to increase, this is outweighed by the benefit of having a single process for HH (site specific) DUoS invoices and more automated remittancing.
London Power Networks	Accept	Accept		

South Eastern Power Networks	Accept	Accept		

IDNO PARTIES				
BUUK	Reject	Reject	We are not able to accept the proposed solution at this stage as we consider it to be too prescriptive and not allowing for open procurement, limiting the Parties to ElectraLink's e-billing service as the only option. Throughout the entire process, ElectraLink's e-billing Service was the only alternative to manual billing presented. Not at any stage of this change proposal process was there a serious discussion regarding a potential tendering process amongst the members. We believe that the affected Parties should be offered the opportunity to choose the best and/ or the cheapest company that could deliver the same, or a similar solution, based on the available information at the time. We appreciate that the proposed e-billing service has already been adopted by some DNOs and suppliers, however, we believe this service should not be treated as the only solution that could help the Parties to move forward from manual billing.	We have serious concerns over the nature of the solution of this change proposal and how the DCUSA panel will be required to only negotiate with a single provider for the provision of the service. We feel that this leaves the DCUSA board and DCUSA limited exposed to costs which they cannot control as it is legally obliged to procure a service. The fact that the provider of the service which they must procure it from is also the administrator for DCUSA only adds further to the complexities of this solution and we believe that it raises questions about competition which the change report does not properly address.
Energy Assets Networks Ltd	Reject	Reject	Whilst we agree that a common format for invoice delivery would support DCUSA General Objective 4, we do not accept that the proposed solution is an appropriate, transparent or cost-effective solution.	The solution proposed sets a dangerous precedent by introducing a legal obligation on Parties to, under governance, contract with a service that has not been through an open tender process (as with previous services procured on behalf of code e.g. TRAS and DUoS modelling). As a result, it is unknown whether the e-billing service proposed is

				the most efficient and cost effective solution. We are also concerned that there is no detail or sufficient clarity on the future contract renewal process and what would happen if Electralink decided to not offer the service in future years (apart from revert back to 'manual' billing).
Last Mile Electricity	Reject	Reject	We do not believe any of the relevant objectives are satisfied under DCP 344.	We are concerned that the proposal mandates a commercial solution which is not open for tender. Currently parties have the option of utilising the e-billing service where they feel it is economic and efficient for them to do so. We acknowledge that service obligations have been introduced previously but these are subject to a tender process to ensure the optimal solution is used. This issue is further compounded with the service being owned and operated by the Code Administrator which if mandatory, presents a conflict of interest. For these reasons, we are unable to support this proposal and would recommend that a tender exercise is carried out for e-billing services to ensure the optimal and most efficient solution is used before seeking to make such service mandatory for all parties.
LEEP ELECTRICITY NETWORKS LIMITED	Reject	Reject	Charging objective 1	After wider consultation and reflection on this proposed change it has become apparent that the benefits of this change are slim against the MPAN's we hold that this would impact and therefore the main party that would benefit from this is Suppliers; in which case it would be more palatable if Suppliers covered the additional costs for this. It has also become apparent that the proposed solution hasn't gone through a competitive tendering process to provide visibility of wider solutions and associated costs which

				would provide more comfort that the proposed solution is the best fit for the problem highlighted.
ESP Electricity	Reject	Reject	We do not think the DCUSA objectives are better facilitated by this change.	We do not accept the proposed solution on the basis outlined below: 1) Firstly, Electralink's DUoS e-billing system is proposed to be used but there is no rationale provided as to whether it presents value for money from a service provision perspective and whether it is the best product in the market for this purpose. More broadly, as these costs are ultimately borne by electricity consumers, we would seek to ensure the option chosen presents the best value at lowest cost so that end consumers are funding the most optimal commercial solution if one is to be imposed on code parties, particularly where it is not ordinarily economic for code parties to utilise as has been the case historically for the e-billing service. 2) We believe there should be an element of business separation from the code administrator and a critical service that's being mandated by the code. We are unable to take a view on the cost and commercial negotiations undertaken in the set-up of the service and note that ordinarily, the code signatories would have had a say on these matters through their constituency representatives. 3) We do not utilise the current e-billing system and have not faced any of the issues noted by the proposer. The modification has been raised to provide consistency for Supplier parties (particularly large Suppliers as noted in the

				Change Report) and for their benefit. In this case, we do not agree that Distributors should shoulder the costs for this service. More broadly, the modification appears to socialise the costs for those that already use the existing service to other DNO/IDNO/Supplier parties that don't currently use the system. We believe this to be inappropriate.
UK Power Distribution	Reject	Reject	[No entry]	• The legal text of the solution is prescriptive to the e-billing service provided by ElectraLink and is not open to tender. • Inability to produce a cost-benefit analysis is the absence of cost information
Optimal Power Networks Ltd	Accept	Accept	4 - Improved cross-party industry administration providing potential market efficiencies.	

SUPPLIER PARTIES				
Utilita Energy Limited	Accept	Accept	DCUSA general objectives one, two and four will be better facilitated by this modification DCP344. The introduction of the e-billing service so that it is available to all parties will ensure new market entrants are able to operate as efficiently as parties who have long since been in the market.	N/A
SE Energy Supply Limited	Accept	Accept	We believe that DCUSA objective 4 will be better facilitated as this change will improve efficiency in the implementation and administration of the DCUSA.	We fully support the proposal for DCUSA Ltd to procure the DUoS e-billing service from ElectraLink so that all DCUSA Parties use the service.
BRITISH GAS TRADING LIMITED	Accept	Accept	We agree that DCP 344 will better facilitate DCUSA General Objective 4 as it seeks to	Ideally we would like a 12 month lead time before this change is implemented due to other

			deliver a solution that addresses inefficiencies in current processes that lead to avoidable errors and unnecessary risk.	competing IS priorities this year. We will need to develop some changes to enable all Use of System invoices to be validated using the D2021.

CVA REGISTRANT PARTIES				
N/A				

GAS SUPPLIER PARTIES				
N/A				