

## DCP 411

### ‘Charging De-energised Sites’

#### COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

Company	Confidential/ Anonymous	1. Do you understand the intent of the CP?	Working Group Comments
The Electricity Network Company Limited	Non-confidential	<p>Partially. We believe the intend of EPN is to introduce a DUoS charge to de-energised sites who are on site-specific or aggregated billing as it is believed that those specific customers withhold the contracted capacity from being used by other customers.</p> <p>However, we believe that it is not clear whether this Change Proposal intends to include the sites that are yet to be energised too, which, by definition, are categorised as ‘de-energised’ customers, even though there is no capacity to be unlocked for other customers since the sites are in the process of being built and have the contracted capacity allocated for those specific sites.</p> <p>We note that the intention is that this change should apply to ‘traded’ meter points but, in our experience meter points may be registered as traded well before they are energised with a meter.</p>	<p>The Working Group noted the concerns. The Working Group discussed the intent of the Change Proposal and agreed that it was to charge customers who’ve “become de-energised”, not those customers registering an MPAN for the first time.</p> <p>The working Group agreed for an action to be taken by the Chair to understand the industry requirements relating to registering and trading MPANs, particularly the dates when the status of MPANs may change.</p>
ScottishPower Energy Retail Ltd	Non-confidential	Yes.	
British Gas	Non-confidential	Yes – we understand the intent of DCP 411	
Npower Commerical Gas Limited (NATP)	Non-confidential	Yes	

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& Eon Next Limited (EOND)			
UK Power Networks	Non-confidential	Yes	
Power Data Associates Ltd	Non-confidential	Yes	
OVO Energy	Non-confidential	This CP seeks to charge DUoS for all de-energised MPANs.	The Working Group discussed the intent of the Change Proposal and agreed that it was to charge customers who’ve “become de-energised”, not those customers registering an MPAN for the first time.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Yes	
Northern Powergrid	Non-confidential	Yes	

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Electricity North West	Non-confidential	Yes.	
SSE Energy Solutions	Non-confidential	Yes, we do.	
<p><b>Working Group Conclusions:</b></p> <p>Further work is required to understand the process of MPAN registration and when MPANs will change to a traded status. The Working Group agreed that the intent of the Change Proposal is to charge customers who de-energise an MPAN whilst still retaining the capacity, not to charge customers registering an MPAN for the first time.</p>			

Company	Confidential/ Anonymous	2. Are you supportive of the principle of the CP?	Working Group Comments
The Electricity Network Company Limited	Non-confidential	<p>We are not supportive of this Change Proposal as we believe implementing this modification under the mentioned circumstances would leave the distributors exposed to several risks and would drive too many unnecessary ramifications. See answer to question 8 for more details.</p> <p>We also do not believe that the solution for this change proposal introduces cost reflective charges and disagree with the assertion in the consultation document that the unit rates recover the costs which relate to the ongoing use of the network. We believe that unit rates are set to recover all asset and operational costs of the deeper network, whereas the fixed and</p>	<p>The Working Group discussed this and determined that it is not correct to say that the residual revenue is recovered from fixed and unit charges in LPN, making it different to other DNO regions. LPN is currently the only DNO to have negative residual (i.e., the forward looking cost calculated is greater than the allowed revenue). As a result, instead of costs being added</p>

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		<p>capacity charges related to all costs associated with the local network (this is derived through the use of the standing charge factors in the CDCM). Fixed charges also include residual charges (with the exception of LPN which has residual charges in the fixed and unit rates). It is unclear why de-energised customers should be required to pay for local assets and the residual charge but not for deeper assets above their voltage of connection.</p>	<p>to the fixed charge (as would currently be the case for all other DNO regions), the fixed charge is reduced, this can also require the unit charge to be reduced to ensure the correct amount of revenue is recovered from each group of customers.</p> <p>The Working Group agreed it would be beneficial to get more information about this response, for which an action was taken.</p>
ScottishPower Energy Retail Ltd	Non-confidential	<p>No, it places a financial burden onto suppliers that they may be unlikely to pass on to the end user.</p>	<p>The Working Group noted this concern.</p>
British Gas	Non-confidential	<p>No , Whilst we recognise there may be an issue where larger de-energised sites have unused allocated capacity we do not agree that the best way to resolve this is to charge all de-energised sites fixed and capacity charges in full.</p> <p>The solution as proposed would also apply equally to both site specific billed customers aggregated billed customers alike. However we do not agree that aggregated billed customers “reserve” capacity on the network therefore any solution should only be applied for site specific billed customers.</p>	<p>The Working Group recognises there are both site-specific and aggregated customers and these may end up getting the same treatment or different treatment, depending on the solution arrived at by the Working Group.</p>

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Npower Commerical Gas Limited (NATP) & Eon Next Limited (EOND)	Non- confidential	Whilst we understand the intent of this CP we are not supportive of the principle of DUoS charging on de-energised sites.	The Working Group noted this response.
UK Power Networks	Non- confidential	Yes	
Power Data Associates Ltd	Non- confidential	Yes	
OVO Energy	Non- confidential	OVO is not supportive of the principle of the CP. The cost to serve customers with energised MPANs is markedly different to those which are de-energised. Furthermore, there are other mitigating actions that could be undertaken to lessen the volume of de-energised sites: such as data cleansing.	The Working Group is not clear on what data cleansing is being referred to, but discussed that it could be the incorrect energisation status held (e.g., a site with a status of de-energised is in fact energised, or vice versa).
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non- confidential	A qualified “Yes” – we need to clearly understand any impacts on all customer groups, especially vulnerable customers	The Working Group recognises the difference between customers on site-specific billing versus aggregated, and as per a previous answer, these may be treated differently.

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Northern Powergrid	Non-confidential	<p>No.</p> <p>This CP states that “De-energised sites, with site-specific billing, are able to retain capacity on the network without being charged for it under the current methodologies”, however this is incorrect.</p> <p>In the minutes of DCP181 ‘Previous Connection Terms Enduring’ it states the following</p> <p>3.1 The Working Group queried whether the obligation to maintain the connection could also be interpreted as an obligation to maintain the capacity of the connection.</p> <p>3.2 DB [Deirdre Bell, Ofgem] advised that Ofgem’s interpretation is that the DNO has the obligation to maintain the physical connection but not to maintain the capacity of the connection. There is a difference between the physical connection and the contractual connection.</p> <p>This implies that it is the connection itself that must be maintained when a site is de-energised, not the capacity.</p> <p>We also are unsure how ‘de-energised customers should be charged fixed and capacity charges in full’ (para 1.6) when they may no longer have a contract with the original supplier and may well have no responsibility for the premises.</p> <p>In addition DNOs may not use the agreed capacities, but rather the actual maximum demand on the network to assess the load on the network and</p>	The Working Group noted this.
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		the need for reinforcement. If a site is de-energised it will not be contributing to the load on the network and therefore will not impact whether the area of the network requires reinforcement.	
Electricity North West	Non-confidential	Yes.	
SSE Energy Solutions	Non-confidential	<p>It appears to us that the proposal is founded on two principles/aims:</p> <p>a) the first principle being that customers should not be able to open-endedly reserve network capacity they don't require, thereby preventing other network users from accessing that capacity. We are supportive of this.</p> <p>b) the second principle being charging fairness across network users in terms of contributing to network maintenance. We are also supportive of this but in terms of the proposed approach, we consider that there are a number of practical issues to consider.</p> <p>It would be helpful if the proposer could clarify whether they are seeking to achieve one or both, so that the solution(s) can be tailored accordingly.</p> <p>We would also welcome clarity about whether EDCM customers are to be covered by the proposal (which only refers to a clause in the CDCM to be amended).</p>	<p>The Working Group recognises that the two principles may require different solutions and that there may be different means of achieving this, with different outcomes for different customer groups, and will consider this as it progresses this change proposal.</p> <p>The starting point for the Change Proposal was that customers should not be able to endlessly reserve capacity (principle a) with charging fairness across network users (principle b) being a by-product of that. It was discussed that, as change proposal develops, it may cover off both.</p> <p>The Working Group discussed that the legal text does not pull these customers out for EDCM, so was not included in the proposal, but it could</p>

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			<p>be added in to make it clearer. The Working Group agreed that, ideally, the legal text should make clear that EDCM customers do get charged. It was agreed that as this proposal moves forward, it should be addressed.</p>
<p>Working Group Conclusions:</p>			

Company	Confidential/ Anonymous	3. To Suppliers, do you currently charge any de-energised customers? If so, in which circumstances does this occur?	Working Group Comments
ScottishPower Energy Retail Ltd	Non-confidential	No we not to charge for de-energised sites – impossible to justify a Supplier charging for a service that is unusable for its intended purpose.	The Working Group was unclear what was meant by ‘unusable’. The working Group discussed that this may be confusion with disconnection, which cannot be reversed, whereas de-energisation can.
British Gas	Non-confidential	In certain circumstances where the meter is still in-situ customers can be charged to recover meter rental charges.	This was noted by the Working Group.

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Npower Commerical Gas Limited (NATP) & Eon Next Limited (EOND)	Non- confidential	<p>Within our I&amp;C business we bill certain de-energised consumers however this is currently only intended to facilitate the recovery of supplier agent costs for HH customers who have previously taken a supply of electricity prior to de-energisation.</p> <p>We do not bill de-energised NHH, Domestic or SME customer segments at this time.</p>	The Working Group recognises the market segmentation issue highlighted by this.
OVO Energy	Non- confidential	OVO is evaluating the charges applied to de-energised customers as a result of this CP	This was noted by the Working Group.
SSE Energy Solutions	Non- confidential	Once an account is de-energised, our system is set to stop all billing activity and all charges cease. No further charges are passed onto the customer	This was noted by the Working Group.
Working Group Conclusions:			

Company	Confidential/ Anonymous	4. Whether you already charge de-energised customers or not, what would be the challenges of passing de-energised DUoS charges onto de-energised customers under the current Proposal? Please provide your rationale.	Working Group Comments
The Electricity Network	Non- confidential	We believe this question is not relevant for distributors, but suppliers instead as they would be exposed to changes to the Central System changes and Billing System changes.	

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Company Limited			
ScottishPower Energy Retail Ltd	Non-confidential	<p>Several challenges</p> <ul style="list-style-type: none"> <li>• As point 3 above, the Supplier is responsible for collating industry costs and providing the Customer with a 1 stop shop service for they Electricity usage and service</li> <li>• Suppliers need and use a certain amount of leverage to ensure customers pay their invoices and leverage is the ability to de-energise supply points for non payment. It essentially removes the ability for Suppliers to protect themselves. This will lead to higher costs to Customers as they seek to offset this increase in risk by ensuring these costs are recovered up front. Mosts Customers will not benefit.</li> <li>• If these standing costs are still applied (which have increased since the introduction of TCR), we note in many cases these can be long term vacant sites, which means the ‘cost signals’ are unlikely to work</li> <li>• Many of these supplies have been de-energised for a significant period of time. It will be near impossible to find out who the responsible party is and even when that can be achieved, actually recovering the costs for an unusable service will be impossible. Would a better solution not be for the DNO to disconnect the MPAN.</li> </ul>	<p>The Working Group recognises the difficulties faced by suppliers. It was discussed that if the treatments for different segments are not the same, these points may need to be reviewed again considering that decision.</p>
British Gas	Non-confidential	<p>There are a number of scenarios which cover de-energised sites. Where sites remain vacant and there is no end “customer” residing at the property we would need to attempt to pass charges onto the legal owner of the property. We believe this would be problematic . Firstly identifying the legal owner could be difficult and the only way for us to recover DUoS charges</p>	<p>The Working Group recognises the difficulties faced by suppliers. The Working Group discussed an additional scenario, regarding long-term vacant sites.</p>

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		<p>may be to resort to legal action, the costs of which may outweigh the amount of charges we are attempting to recover. The proposal could ultimately just put more cost onto Suppliers which could result in being recovered from all customers and would be inefficient for the industry.</p>	<p>The Working Group discussed potential other avenues for resolution, and will consider these as this Change Proposal progresses.</p> <p>A Working Group member highlighted that the administrative costs for suppliers will increase, likely to be spread across all customers.</p>
<p>Npower Commerical Gas Limited (NATP) &amp; Eon Next Limited (EOND)</p>	<p>Non-confidential</p>	<p>The lack of a deemed contract, this situation arises if a change of owner/occupier occurs after a site is de-energised or if metering a new connection is to be arranged on a deemed contract. This is because our interpretation of the electricity act is that a supplier is deemed to have contracted with an owner/occupier when they began to supply electricity, for which we believe cannot be the case for any de-energised Mpan's that have not taken a supply of electricity unless an agreed contract is in place.</p> <p>We are also of the opinion that charging vulnerable domestic customers DUoS de-energised charges may result in consumer harm if suppliers receive the fixed cost charge applicable to the domestic DUoS tariff, this is on the basis that historically such issues have arisen in the gas market which led to Ofgem challenging suppliers to not levy a standing charge to vulnerable consumers who do not use gas &amp; who have not entered into an express contract as outlined in its open letter clarifying the treatment of domestic households that do not use gas on 28/05/15. We attach a copy of the open letter for the work group's consideration and recommend that Ofgem engagement is required whilst the CP is under development in order</p>	<p>The Working Group recognises the difficulty identified in the legislation. It was discussed that legal advice could be sought at a later date, depending on how the Change Proposal progresses.</p> <p>The Working Group considered that this problem may be addressed depending on what treatments are applied to each segment (e.g., if aggregated was not to be charged). It was noted that the Ofgem letter potentially sets a precedent for due discrimination in favour of treating this customer segment fairly (letter not solely on vulnerable customers, but implies the practices are for customers in vulnerable situations). It was noted</p>

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		<p>to understand if the same treatment should be extended to domestic electricity consumers.</p> <p>In addition to the above we would need to develop new de-energised products and undertake system development to enable the capability to bill all electricity consumers de-energised rates, which would mostly be informed by the network bills we receive. This would also lead to further challenges with suppliers' bad debt position because the effect of charging DUoS on de-energised sites would also see further debt being accrued on customer accounts where de-energisation of the site has been actioned due to non-payment, currently this action largely prevents more debt accruing until debt resolution has been agreed however if this CP is approved it would make this action less effective.</p>	<p>by the Working Group that customers who would not normally be considered vulnerable could find themselves in a vulnerable situation (i.e., it is transient vulnerability based on a specific scenario or circumstances) which would need to be considered.</p>
OVO Energy	Non-confidential	<p>A new tariff would need to be created to charge de-energised sites. There is no guarantee that these costs would be able to be recovered from these sites as there is a likelihood that they are vacant. This would therefore place a financial burden on suppliers, as they may potentially struggle to pass increased DUoS costs to the customer. If bad debt overall is increased, then energised customers would end up being the main payers of de-energised customers DUoS, through bad debt mutualisation. We assume this change is overall revenue neutral, the idea being to move some cost away from energised and towards de-energised, so this would be very inefficient and have no net benefit to the energised customers.</p>	<p>The Working Group noted the concerns about debt and the spreading of costs.</p> <p>The Working Group considered that an impact assessment may need to be undertaken to fully understand the impact of any potential solutions.</p>
SSE Energy Solutions	Non-confidential	<p>To be able to effectively charge a customer, suppliers will need to know who the customer is. This is not always the case for de-energised sites in</p>	<p>This was noted by the Working Group.</p>

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		<p>our portfolio due to various factors such as Change of Supply and Change of Tenancy.</p> <p>There are also issue charging known customers who are currently under debt collection activity or are undergoing theft investigations.</p> <p>There is also the added complexity of billing arrangements for de-energised customers.</p> <p>This would require a significant change to current systems to enable continuation of charges after the property has been de-energised.</p> <p>We believe a data cleansing exercise is needed to understand the level of truly deenergised sites. This would require both the DNO and Supplier community to assess the records they have to determine whether the property has in fact been disconnected.</p> <p>We also need to consider the impact to the next customer where a property is disconnected after de-energisation and the capacity is then removed.</p>	<p>This was noted by the Working Group.</p> <p>This was noted by the Working Group.</p> <p>This was noted by the Working Group.</p> <p>The Working Group considered that it would need to understand the feasibility, scale and impact of any data cleanse activity. (e.g., what information exists and how complex/resource intensive it would be to perform a cleanse of the data). It was agreed that this could form the basis of a question for a follow-on consultation.</p> <p>This was noted by the Working Group. It was discussed that this impact may be lessened by the Access SCR.</p>
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		<p>It would also be useful to explore the consequences to the customer for not paying these proposed charges, how can this be encouraged and what motivation is there for these customers to pay these charges?</p> <p>It needs to be considered that some of these customers have been de-energised for a number of years, without charge. There will be a significant backlash from consumers regarding an additional charge for a site which is not consuming electricity.</p> <p>In summary, before advocating a solution, we would welcome greater clarity on who inconnection with de-energised premises can be held legally liable for the electricity bill, especially if the original customer is no longer in situ and if no electricity is actually supplied.</p> <p>We are keen that situations are avoided where debts might be accrued which would be uncollectable, and end up being socialised across all DUoS payers.</p>	<p>This was noted by the Working Group.</p> <p>This was noted by the Working Group. It was discussed that, as with all changes, there are winners and losers in these situations.</p> <p>This was noted by the Working Group.</p> <p>This was noted by the Working Group.</p>
Working Group Conclusions:			

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Company	Confidential/ Anonymous	5. Can you think of any alternative solutions to the one proposed? Please provide your rationale.	Working Group Comments
The Electricity Network Company Limited	Non-confidential	<p>No. We do not believe that the overall benefits of incorporating DUoS charges to de-energised sites would outweigh the complications and the potential corresponding risks.</p> <p>We think that under the new connection charging rules it is possible for distributors to assess their network more holistically without needing to ‘reserve’ the capacity for an individual, de-energised customer at a point on the network and to reinforce the network when this becomes required through new customers connecting or through the de-energised customer re-energising their supply. This will require more active management of the network and customers but will lead to the best outcomes for customers.</p>	This was noted by the Working Group.
ScottishPower Energy Retail Ltd	Non-confidential	<p>There is reference to the National Connection terms in the change but we believe that many, if not most, of the site specific de-energised capacity and standing charges will have an associated Site Specific Connection Agreement which could allow DNOs to take back ownership on this front, i.e. include in their Site Specific Connection agreements a clause to state that if de-energised for x period of time, it will be deemed to be redundant and therefore the user gives up the right to the capacity etc.</p> <p>There is a possible change to the National Connection terms which may also work – i.e. if a supply is de-energised for x period of time, on the grounds of maintaining a cost effective and efficient network, the DNO will have the power to withdraw a capacity. There may also be health and safety justifications.</p>	The Working Group agreed to consider a solution via the National Terms of Connection.

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		DNOs should be responsible for cleansing their long term de-energised portfolios (with the help of Suppliers and MOPs).	
British Gas	Non-confidential	<p>We believe a better solution would be for a process to be agreed whereby DNOs could re-allocate capacity. Following approval of DCP 115, DCUSA already contains provisions to deal differently with energised and de-energised sites. Clauses 12.11A and 12.11B below state:</p> <p>“12.11A If at any time the Connection Point is De-energised for a continuous period exceeding 6 months, then the Company may (at any time thereafter while the Connection Point is De-energised, and having due regard to all the circumstances) give notice to the Customer that it considers that the connection is no longer required and request that the Customer responds in writing within 30 Working Days. Such notice must refer to the Company’s right to Disconnect the Connection Point if it is not reasonable in all the circumstances for the Company to maintain it.</p> <p>12.11B Where the Company (having taken into account any representations and alternative proposals received from the Customer within the period referred to in Clause 12.11A) reasonably considers that the Company is not required under the Act to maintain the connection in respect of the Premises, then the Company may (save where the Customer has referred the matter to the Authority pursuant to the Act, and pending determination by the Authority) give notice to the Customer in compliance with section 17(3) of the Act and thereafter Disconnect the Connection Point thereby terminating this Agreement.”</p>	The Working Group discussed this and considered whether the removal of capacity rather than disconnection was a viable alternative to be explored later via an amendment to the National Terms of Connection.

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		<p>We note that the DCP 411 proposal states that “ The National Terms of Connection, at Section 3 ,do not allow DNOs to remove capacity except with the agreement of the customer.” The drafting implemented by DCP 115 would appear to already give DNOs the right to disconnect the Connection Point if no representations are received from the Customer. We would question why Clause 12.11B does not already provide a solution to problem articulated under DCP 411.</p>	
<p>Npower Commerical Gas Limited (NATP) &amp; Eon Next Limited (EOND)</p>	<p>Non- confidential</p>	<p>This CP is partly considering an issue whereby booked capacity is not being surrendered meaning de-energised customers can continue to reserve network capacity at no charge, but energised customers receive capacity charges which is unfair treatment of all cusotmers. As capacity also forms the basis of Residual charges allocated it should be clarified if a customer surrenders capacity do they also qualify for a residual banding re-allocation should the capacity reduction reflect a significant change as defined under exceptional circumstances in schedule 32 If so this may allow a de-energised site to move down to residual band 1 however this is still a residual cost allocation reflective of energised sites as it does not prevent a comparative residual charge even if the booked capacity is set to zero by a revised customer connection agreement when de-energised.</p> <p>This arises because a de-energised site would not be considered as a non-final demand site currently, so could not move into a non-residual DUoS tariff to avoid the residual costs despite clearly signalling the customer has no intentions to take up any network capacity and conversely no final demand in either KWh or KVA, so it seems unreasonable that the residual costs remain applicable.</p>	<p>The Working Group agreed that both options (treating as non-residual/changing customer to non-final demand) would be discussed as potential solutions moving forwards.</p>

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		As such we feel that de-energised site customers relinquishing all booked capacity should be treated as non-final demand as part of this CP so should consider extending the criteria under DCUSA schedule 32 5A to enable a de-energised site to be re-classified to a non-final demand site, extending the Non-Final Demand Site definition and where appropriate, the inclusion of a non-final demand certificate within the connection agreement changes agreed between the customer & DNO.	
UK Power Networks	Non-confidential	No, as proposer we raised this change to remove the restriction of not charging for de-energised sites within DCUSA. Furthermore a change will be required to the appropriate dataflows which are currently being developed as part of MHHS, and so the timing of this change was to ensure that the new dataflows include this data from the start, and remove the need for a further change being required at a later date. Even if this change was to be rejected, the inclusion of data relating to de-energised sites will be useful for verification and validation going forward.	The Working Group noted this and agreed that it would be advantageous to have the count of de-energised sites in the new flows, even if not charged for.
Power Data Associates Ltd	Non-confidential	No	
OVO Energy	Non-confidential	Surely the cost, if there is a cost, of holding de-energised sites is lower than energised - so DUoS costs are not a fair charge to be applied. If there is a cost that needs to be recovered a new, lower charge might be needed. These fixed charges would need to be proportionate and should not include recovery of SoLR costs.	The Working Group agreed that further clarification of this response would be useful.
Northern Powergrid	Non-confidential	No.	

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Electricity North West	Non-confidential	<p>On de-energisation is the ‘customer’ asked whether they need the associated capacity for the site?</p> <p>Will the solution for this DCP apply irrespective of why the connection has been de-energised ie for debt, theft, safety or customer request?</p>	<p>The Working Group discussed that suppliers may not currently ask customers if they wish to retain the capacity but could do so and could direct the customer to the DNO. If this Change Proposal progresses in such a way as these customers could get charged for capacity, it may drive the customer to act.</p> <p>The Working Group noted that the reasons could include customers in vulnerable situations, and would need to consider this.</p>
SSE Energy Solutions	Non-confidential	<p>We think that the aims of the proposal ought to be clarified (as per our response to q.2), so that to solution(s) can be tailored accordingly. This might result in combined/hybrid options.</p> <p><i>Release of unused capacity</i> To release unused network capacity for other users, we think that DCUSA, Schedule 2B, Section 3, sub-section 12 (limitation of capacity, 12.11A quoted in full below) which was developed under DCP115 and which typically applies to large industrial/commercial customers, may already enable the release of longer-term unused capacity by facilitating the eventual disconnection of de-energised customers, thereby freeing up capacity in that way.</p>	<p>This was noted by the Working Group.</p> <p>This was noted by the Working Group</p>

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		<p>We are keen to understand whether this existing provision already achieves the first aim the proposer seeks to address. If not, then the Working Group could consider clarifying/strengthening the provision.</p> <p>“12.11A If at any time the Connection Point is De-energised for a continuous period exceeding 6 months, then the Company may (at any time thereafter while the Connection Point is De-energised, and having due regard to all the circumstances) give notice to the Customer that it considers that the connection is no longer required and request that the Customer responds in writing within 30 Working Days. Such notice must refer to the Company’s right to Disconnect the Connection Point if it is not reasonable in all the circumstances for the Company to maintain it.”</p> <p><i>Practical issues – alternatives</i></p> <p>As set out in our answer 4., there are a number of circumstances where we don’t consider it practical or fair for suppliers to retrieve network charges from de-energised customers and be liable for potentially uncollectable charges.</p> <p>a) The connection agreement is put in place by the DNO who is contracted by the customer to install a service. Within these connection agreements, it could be stated more clearly that a customer may be better off handing back unused capacity instead of receiving charges for it. In essence, use or lose it.</p> <p>b) Should there be a de-energisation at the premises, there is nothing to stop the DNO billing the customer directly. This could be an option to be explored.</p>	<p>This was noted by the Working Group.</p> <p>The Working Group noted the option for the DNO to bill the customer, but discussed the scale of the change alongside the customer experience</p>
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		<p>c) There needs to be considerations for intermittent customers, for example, seasonal businesses (Xmas Shops etc). These would be de-energised and remain as such until the supply was required for the next season.</p> <p>d) Provisions for de-energised back-up supplies also need to be considered, in particular those which are on their own separate connection agreement.</p> <p><i>Charging fairness</i> In order to improve charging fairness, we think it would be helpful to compare how deenergised customers are treated at transmission level.</p> <p><i>In summary</i> We consider that a combination of network distributors' disconnection powers and network charging provisions should be explored to assess what options are best able to achieve the aims of this proposal.</p>	<p>impacts, and agreed it was out of scope of this change proposal.</p> <p>The Working Group noted this for metered sites. It was discussed that this should not be a problem for UMS once P434 delivers combined with market-wide half hourly delivers.</p> <p>As above (excl. point about unmetered).</p> <p>There is ongoing work to understand the impacts at Transmission Level.</p>
Working Group Conclusions:			

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Company	Confidential/ Anonymous	8. Could there be adverse effects by removing the current provision of not charging de-energised sites? Please provide your rationale.	Working Group Comments
The Electricity Network Company Limited	Non-confidential	<p>Yes, we believe that removing de-energised sites from being exempt from DUoS charges will bring undesired outcomes.</p> <p>The most impactful consequence we believe this change will bring is disincentivising new customers from wanting to register until the latest possible moment. For new sites (such as housing developments) the supplier currently registers all customers at once and then they get energised as their individual contracted period approaches, by exposing new customers to DUoS charges will drive them to leave registering to the last minute, which, as a result, will bring a high risk of them forgetting to do so, not to mention the risk of errors and data issues, thus unnecessarily complicating the entire process. This is likely to add cost to customers.</p> <p>Furthermore, not registering in time due to errors and data issues, as well as forgetting, will unavoidably lead to more cases of theft of energy.</p>	<p>This was noted by the Working Group.</p> <p>This was noted by the Working Group. The Working Group discussed, as in for previous responses, that the intent was not to charge new connection customers. The Working Group will consider this when progressing the Change Proposal.</p> <p>The Working Group would like more clarification on this point.</p>
ScottishPower Energy Retail Ltd	Non-confidential	<p>As above, if Suppliers will be exposed to more charges than they will be able to recover. It could lead to Supplier failures or increased charges across their customer base.</p> <p>As the overall revenue income from DNOs does not change, what this potentially saves in DUoS charges will be increased by Supplier charges.</p>	This was noted by the Working Group.

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British Gas	Non-confidential	See response to question 4	
Npower Commerical Gas Limited (NATP) & Eon Next Limited (EOND)	Non-confidential	There are likely to adverse impacts on customers in financial difficulty as one of the reasons for de-energising os often due to inability to agree to resolution of account debt.De-energising for non-payment is often a last resorting action that a supplier will undertake Debt positions worsen which may lead to more supplier failures, increased pressures on bad debt, cash recovery & cost for DUoS credit provisions.	This was noted by the Working Group.
UK Power Networks	Non-confidential	No we do not believe there is. We have had evidence from customers of suppliers that do charge for de-energised sites.	This was noted by the Working Group.
Power Data Associates Ltd	Non-confidential	No	
OVO Energy	Non-confidential	As above, this could negatively impact suppliers as they would struggle to recover these new costs.	This was noted by the Working Group.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	This CP will cover all distribution voltages and customer categories. We have a particular concern for vulnerable customers who may de-energise (ie go “Off Grid”) for economic reasons. Under this change they would still be liable for DUoS charges (post MHHS implementation Capacity). Removing the cost free de-energisation option may leave vulnerable customers with costs for a supply they are not using.	This was noted by the Working Group.

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Northern Powergrid	Non-confidential	No comment	
Electricity North West	Non-confidential	This could result in Suppliers potentially sending energy bills to empty premises with limited chance of receiving payment.	This was noted by the Working Group.
SSE Energy Solutions	Non-confidential	<p>We note that there is currently a provision under clause 139. of Schedule 16 of the DCUSA (i.e. the CDCM) which applies to site-specific metered demand customers, stating that “there will be no charges applied to correctly de-energised HH MPANs/sites as determined by the de-energisation status in MPAS”.</p> <p>We are keen to understand what this original policy intent was for this provision, so that the Working Group can ensure that there are no unintended consequences, should this provision be revoked. (We note that there appears to be no equivalent provision for EDCM customers in the DCUSA.)</p> <p>As we have mentioned in our other responses, we believe that due to various practical challenges of collecting charges from de-energised customers, there could be an increased cost to DUoS payers at large, as non-payment of charges by de-energised customers will need to be recovered by other means.</p> <p>There is also a potential for financial impact on suppliers in an already volatile market with the added complexity of the cost of living crisis. These have to be considered.</p>	<p>This was noted by the Working Group.</p> <p>The Working Group noted this has been in place for a significant period of time, possibly as far back as deregulation, and it may be difficult to find the policy intent. The Working Group agreed to include information about how long this situation has existed for in future documentation.</p>

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Working Group Conclusions:

Company	Confidential/ Anonymous	9. Might this Proposal lead to a change in behaviour in order to avoid charges for de-energised sites? Please provide scenarios and your rationale.	Working Group Comments
The Electricity Network Company Limited	Non-confidential	Yes, we believe this change will bring changes in new customers’ behaviours by disincentivising them from wanting to register until the latest possible moment. While currently the supplier registers all customers at once and then they get energised as their individual contracted period approaches, by exposing new customers to DUoS charges will drive them to leave registering to the last minute.	This was noted by the Working Group.
ScottishPower Energy Retail Ltd	Non-confidential	We may also see an increase in the use of ‘umbrella’ companies to mask who the actual responsible party is for de-energised supply points making recovery of the costs difficult to achieve.	The Working Group noted this concern. The Working Group also considered the scenario where a site de-energised for debt could be re-energised under an umbrella company.
British Gas	Non-confidential	This change may lead to an increase in requests for a physical disconnection of the service. We recommend a review of the disconnection process as part of this change.	The Working Group noted this concern. It was discussed in terms of both the resourcing impacts of the increase in requests and the costs of

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			<p>the disconnection/reconnection process.</p> <p>The Working Group discussed that while a review of the disconnection process may be beneficial, it would not be in the scope of this change proposal. It was discussed it may better sit with REC.</p> <p>The Working Group discussed the difficulties that may be faced by customers who wish to disconnect, to avoid charges, but the disconnection is refused by the DNO. It was discussed that it would be useful to understand the rejection reasons and that this could form the basis of a future consultation question.</p>
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<p>Npower Commerical Gas Limited (NATP) &amp; Eon Next Limited (EOND)</p>	<p>Non- confidential</p>	<p>New connections are likely to be impacted because a supplier has to trade an Mpan in line with its registration effective from date (EFD), into a de-energised state firstly and then energised once metering and energisation confirmation is received, therefore the period after a connection is completed but before an MPAN is traded where a de-energised site is not charged DUoS under this proposal would result in a customer receiving fixed and capacity charges for any period of time after a supplier has registered but has not energised the site.</p> <p>As such customers would need to ensure they time meter installation and energisation requests tightly to a supplier EFD in order to not attract de-energised DUoS charges, which may be feasible for simpler WC connections however it is possible that delays with the completion of DNO connection works this can also arise which would be compounded if the supplier is also registered the Mpan as DUoS becomes chargeable despite delays caused beyond the customers control.</p>	<p>The Working Group noted the difficulties and complexity in certain circumstances (e.g., CT cabinets).</p> <p>This was noted by the Working Group, and relates to segmentation.</p>
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		<p>There are different factors that will impact the timing of Mpan registration, metering and energisation for different voltage levels, such as the installation of transformer cabinets and other types of High Voltage equipment in order for the supplier to arrange the installation of metering equipment, and energisation of some LV CT &amp; all HV connections is solely the DNO’s responsibility. As such added complexities can arise which create additional customer burdens if de-energised DUoS charging is included in such new connections processes. This needs to be made clear to customers right from the outset and through the customer connection journey, it should also be considered that development of a DUoS reconciliation process is in place to enable de-energised DUoS charges where charged through no fault of either the customer or supplier, such as DNO delays to energise or complete connection work.</p>	
UK Power Networks	Non-confidential	<p>We believe that this change could lead to currently long term de-energised properties being disconnected to remove the DUoS being charged, but this would be a positive scenario where the property really has no likely long term usage, and any associated capacity could be reallocated to others who require it.</p>	This was noted by the Working Group.
Power Data Associates Ltd	Non-confidential	<p>May lead to sites remaining energised, and having zero or minimal consumption. Not a problem. Will have a positive outcome that metered data under MHHS will be expected through a smart or advanced meter – on a daily basis. Should reduce any theft opportunity</p>	This was noted by the Working Group.

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OVO Energy	Non-confidential	<p>It is possible. De-energised sites that are de-energised for a valid reason may be disconnected by individuals attempting to avoid costs.</p> <p>Also, potentially increasing the likelihood of suppliers not offering de-energisations and moving straight to disconnections.</p>	<p>This was noted by the Working Group.</p> <p>The Working Group discussed that the supplier can't lead on disconnecting and that the process would normally be to de-energise the supply and remove the meter first. Further clarification may be useful.</p>
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	<p>If 4 states of connection are assumed: a) In build – connection imminent (not affected by this CP); b) connected; c) de-energised; d) disconnected. De-energisation is currently the most economically efficient way for a customer to temporarily avoid DUoS charges and retain their access to the network. Removing this option (ie by charging DUoS on the de-energised connection) customers may be inclined to seek disconnection; incurring additional costs to get the disconnection and subsequently applying to re-connect, as a new connection, on a future date.</p>	<p>This was noted by the Working Group.</p>
Northern Powergrid	Non-confidential	<p>No comment</p>	
Electricity North West	Non-confidential	<p>There's a concern DNOs could see an increase in requests for Logical Disconnections.</p>	<p>This was noted by the Working Group.</p>
	Non-confidential		

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SSE Energy Solutions		<p>As is the intention of this proposal, we would expect that the operators of those deenergised sites which are on route to de-commissioning would respond to becoming liable for fixed and capacity charges by agreeing to return their unused capacity sooner than is currently the case.</p> <p>However, we also expect that other operators, e.g. those which are de-energising temporarily to re-plant or re-purpose their site, would wish to retain their capacity, and we would expect them to assess the economics of paying network charges during the de-energised period versus the risk of giving up their capacity and having to apply for re-connection later.</p> <p>We believe there will be an increase in disconnections to avoid paying charges, however as noted in our previous questions, this could impact future customers regarding capacity requests.</p> <p>The energy industry is already in an unfavourable view of customers, by adding additional charges to a customers bill, could see an increase in customer complaints.</p>	<p>This was noted by the Working Group.</p> <p>The Working Group also discussed the costs of dealing with customer complaints, e.g., handling the complaint, deadlocking the complaint, going to the ombudsman, as a consideration moving forwards.</p>
Working Group Conclusions:			

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Company	Confidential/ Anonymous	10. Might this Proposal lead to any other changes in behaviour? Please provide scenarios and your rationale.	Working Group Comments
The Electricity Network Company Limited	Non-confidential	<p>As well as customers leaving the registration to the latest possible moment in order to avoid DUoS charges, we anticipate implementing this change under the current proposed circumstances will encourage customers to disconnect more from our networks and connect back when required. Nevertheless, their charge will be socialised amongst the rest of the customers connected to the network.</p> <p>Furthermore, disconnecting and connecting back at a later date will may potentially extend the waiting period of time for new connectees as customers reconnecting will be prioritised. For these reasons, we believe that this change proposal will not bring to the industry the intended outcomes.</p> <p>It is also worth noting that this reconnection to the network will not be at the customer’s cost following the implementation of Ofgem’s Access SCR.</p>	<p>The Working Group discussed the prioritisation of the customers reconnecting versus new connections. It was discussed that there are multiple factors that influence when a connection goes ahead and should not be influenced solely/mainly by whether a connection previously existed.</p> <p>The Working Group discussed that a customer reconnecting would join the queue, and so may face risks where they may not get connected when they need to. It was not felt that it is solely a financial decision.</p> <p>The Working Group agreed that this should be included in any impact assessment undertaken.</p> <p>The Working Group discussed that the extension assets would still be charged to the reconnecting customer (under</p>

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			DCP 406) but the reinforcement asset charges would be socialised. This does not therefore directly impact the overall costs as it's a timing issue, based on what capacity is needed at the given time.
ScottishPower Energy Retail Ltd	Non-confidential	No.	
Npower Commerical Gas Limited (NATP) & Eon Next Limited (EOND)	Non-confidential	<p>We believe this CP would achieve its intention of promoting better management of customer’s booked network capacity, in turn that will offer benefits as it withholds contracted capacity from being used by other customers, so also acts to prevent inefficient network reinforcement decisions being determined as DNO’s will have an improved view on where capacity is and is not free.</p> <p>We can also see that DUoS capacity &amp; fixed rates are likely to reduce in published statement of charges because the value of the costs recovery remains the same i.e. within the DNOs allowed revenues limits so costs would be recovered from a wider population of customers by encompassing de-energised into DUoS charging which should lower the rates of each applicable DUoS charging item.</p> <p>However we believe that suppliers view on risks associated to increased costs via de-energised DUoS bills is generally likely to be more adverse than currently, issues such as bad debt, cash recovery &amp; increased cost for credit cover provisions are likely to change as a consequence of this CP within its</p>	This was noted by the Working Group.

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		retail costs is likely to erode any benefit perceived from lower fixed and capacity charges.	
UK Power Networks	Non-confidential	There may be an increase in requests for logical disconnections from those who don't understand the purpose of those but we would expect this to reduce once issues with this have been explained.	This was noted by the Working Group.
Power Data Associates Ltd	Non-confidential	See 9	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	A possible change would be that the customer seeks to reduce their fixed charge by asserting DCUSA Schedule 32, Cluse 6 (ie >50% reduction in MIC and change of use)?	This was noted by the Working Group.
Northern Powergrid	Non-confidential	No comment	
Electricity North West	Non-confidential	May be a reduction in the number of requests for de-energisation, alternatively could requests for permanent disconnection increase although agreement would need to be reached that there is no further use of the connection.	This was noted by the Working Group.
SSE Energy Solutions	Non-confidential	We believe this change could potentially lead to an increase in theft, and whilst the investigation processes are in place, this will not deter customers	This was noted by the Working Group.

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		from avoiding charges. There is also the added element of customer wishing to go ‘off grid’ to avoid these charges.	
Working Group Conclusions:			

Company	Confidential/ Anonymous	11. Why do you de-energise sites? Please provide reasons and volumes for de-energisations (average for past 12 months).	Working Group Comments
The Electricity Network Company Limited	Non-confidential	Us, distributors do not de-energise the sites – the customers do.	The Working Group noted that de-energisations are customer or supplier driven, unless it is due to a H&S issue.
ScottishPower Energy Retail Ltd	Non-confidential	We de-energise sites at Customer’s request, as part of non payment and due to theft. We are unable to provide volumes at present.	This was noted by the Working Group.
Npower Commerical Gas Limited (NATP) & Eon Next Limited (EOND)	Non-confidential	We de-energise sites upon customer requests, such as site renovations and & non-payment as a last resort debt mitigation action.	This was noted by the Working Group.
Power Data Associates Ltd	Non-confidential	N/A	This was noted by the Working Group.

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		But this proposal needs to be clear than unmetered supplies, which currently do not have any standing charges are not impacted. MHHS is moving away from de-energising temporary supplies anyway, moving to keeping them energisated with a "zero" inventory.	
OVO Energy	Non-confidential	Customer requests due to vacant properties. Historical reasons where sites are de-energised and disconnections have not been possible due to DNO not approving requests.	<p>This was noted by the Working Group.</p> <p>The Working Group discussed that this may be useful as a future consultation question to DNOs on why these are rejected. (e.g., technical rejection (dates), reason for request or future use identified) and the associated volumes.</p> <p>It was noted that it may be difficult to quantify the reasons due to limitations on information on the data flows. It was noted that there is a 'rejection reason code' in the flow, J1722. (MM00151)</p>

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Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	De-energisation of sites is usually Supplier led where either the customer has requested it or the Supplier is requesting as part of a warrant job due to unpaid bills. During the past 12 months we completed 22 de-energisations, with a further 33 de-energisation requests cancelled for various reasons. We have had to reject around 180 de-energisation requests as they either didn't have effective from dates or had dates in the past, and/or they didn't have site contact information.	The Working Group noted this was low volumes compared to the customer base, but not the whole picture as not captured the MOP numbers.
Electricity North West	Non-confidential	As a DNO we would potentially de-energise for Theft in Conveyance and Safety.	This was noted by the Working Group. It was discussed that it's likely where an illegal connection has been identified by a MOP/MEM.
SSE Energy Solutions	Non-confidential	<p>We do not currently have volumes for the reason of de-energisation, however, the following are the reasons for this:</p> <ul style="list-style-type: none"> <li>• Theft</li> <li>• Non payment</li> <li>• Customer request</li> <li>• Avoidance of standing charge</li> <li>• Seasonal supplies</li> </ul>	This was noted by the Working Group.
Working Group Conclusions:			

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Company	Confidential/ Anonymous	12. To Suppliers, is there always a customer on whom de-energised charges can be levied? Please explain your rationale.	Working Group Comments
ScottishPower Energy Retail Ltd	Non-confidential	<p>No, it can be challenging at times. We can find out who owns the land but it does not always guarantee liability.</p> <p>With respect to historically de-energised MPANs and metering equipment removed it can be difficult to identify the customer to levy the charge against, as after we cease billing, billing records are correctly deleted after a certain amount of time.</p> <p>In many cases Customers who request a de-energisation, do so to stop charges, meaning it is unlikely they will pay.</p> <p>If they need a disconnection, this can involve high costs, which means the Supplier will carry the cost exposure for both these scenarios.</p>	<p>This was noted by the Working Group.</p> <p>The Working Group noted this concern and would like further clarification on this risk.</p>
British Gas	Non-confidential	Whilst there will always be a legal owner of the property there may not be a “customer” taking a “supply” at the property to whom we can levy DUoS charges.	This was noted by the Working Group.
Npower Commerical Gas Limited (NATP) & Eon Next Limited (EOND)	Non-confidential	No - please see response to Q4.	
OVO Energy	Non-confidential	As above, sites can be vacant with no forwarding address available	This was noted by the Working Group.

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SSE Energy Solutions	Non-confidential	<p>Not all de-energised sites are associated to a customer who can be billed. There are instances where a site is empty and we do not have a customer’s details to set up an account. There would be no way to chase for payment where no customer is available.</p> <p>We believe known customers with agreed capacity should be given a choice to pay for reserved capacity.</p>	This was noted by the Working Group.
Working Group Conclusions:			

Company	Confidential/ Anonymous	13. Post TCR implementation, do you believe that transmission charges include de-energised sites? If so, how are these charged.	Working Group Comments
The Electricity Network Company Limited	Non-confidential	No, we do not believe that DUoS charges for de-energised sites are included within the transmission charges. Data is provided to the ESO from our billing system to charge residual elements and our billing system will only ever see energised sites on the D0030 data flow.	
ScottishPower Energy Retail Ltd	Non-confidential	We have not had resources to investigate this in depth	
British Gas	Non-confidential	Transmission charges do not include de-energised sites post TCR implementation. As per Approved P402 the Final Modification Report for	This was noted by the Working Group.

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		<p>the Alternative solution approved by Ofgem included the following definition to be included in ANNEX X-1: GENERAL GLOSSARY:</p> <p>"Billing Data": means:</p> <p>(i) the count of Final Demand Sites on each Settlement Day reported by Charging Band, GSP Group and Registrant of each Lead Metering System (excluding de-energised Lead Metering Systems); and</p> <p>(ii) the total Import on each Settlement Day to SVA Metering Systems associated with Measurement Classes “B” and “D”.</p> <p>We therefore conclude that transmission charges do not include de-energised sites.</p>	
<p>Npower Commerical Gas Limited (NATP) &amp; Eon Next Limited (EOND)</p>	<p>Non- confidential</p>	<p>We understand the working group has asked this question to NGESO, as both the custodian of the CUSC and the responsible party for the recovery of transmission charges they are best placed to provide workgroup steer in this regard.</p> <p>However if the provisions for de-energised sites with no future use as suggested in Q4 is taken forward as part of this CP then we think that residual charge for transmission charges would also reflect the rebanding or reclassification of a non-final demand site because the allocation of customer residual charging bands is provisioned for by the DCUSA, however we think that CUSC changes would also be required because the definition</p>	<p>This was noted by the Working Group.</p>

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		of a Non-Final Demand site implemented by CMP334 details exactly the same legal text as defined under section 32 of the DCUSA.	
UK Power Networks	Non-confidential	We do not know. However, as a DNO we provide data to NG ESO following the approval of P402. For HH MPANS this includes counts of both energised and de-energised sites. NHH counts are based on supercustomer data, which excludes de-energised sites.	Further clarification was provided that de-energised MPANs are not included.
OVO Energy	Non-confidential	We are unsure of the treatment of de-energised sites for TNUoS.	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	TNUoS charging relies on Suppliers providing demand forecasts – if a site is de-energised, one would expect that the Supplier will not provide a forecast, therefore TNUoS charges will not be applied? Have I misunderstood this question?	This was noted by the Working Group.
Northern Powergrid	Non-confidential	NGESO will invoice distribution-connected sites based on information provided by a DNO/IDNO Party in accordance with BSC change P402 ‘Enabling reform of residual network charging as directed by the Targeted Charging Review’. The data provided will include a count of Final Demand Sites per Supplier, and therefore residual TNUoS charges will only be applied where the DNO/IDNO Party has included a de-energised site in the monthly data provided to NGESO. A de-energised site should not be included in that data as this will be flagged as de-energised regardless of	This was noted by the Working Group.

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		whether the site had been allocated an LLFC assigning the MPAN to a residual charging band.	
SSE Energy Solutions	Non-confidential	We are keen to understand what the provisions are at transmission level, for comparison.	
Working Group Conclusions: The Working Group noted the responses confirming that transmission charges do not include de-energised sites.			

Company	Confidential/ Anonymous	14. Are you aware of any impact on other industry codes of this Proposal?	Working Group Comments
The Electricity Network Company Limited	Non-confidential	No, we do not believe this modification would have impacts on any other industry codes.	
ScottishPower Energy Retail Ltd	Non-confidential	No, however we believe this change has increased the need for a number of changes within other codes. The obligations on DNOs and IDNOs to update the Supplier with the agreed site capacity needs to be reviewed and in our	This was noted by the Working Group.  It was discussed that not all site capacity is managed at MPAN level.

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		opinion needs to be sent by flow and not email, given the volumes involved (£ and number of MPANs).	Some are aggregated over multiple MPANs.
Npower Commerical Gas Limited (NATP) & Eon Next Limited (EOND)	Non- confidential	<p>We believe there are various impacts and considerations against the REC, this includes the timeliness of registrations being cancelled following a change to Mpans status on the basis that there is a need for a period of time to elapse between a de-energisation and disconnection, however as DUoS costs will be levied on de-energised Mpans there is potential to introduce DNO performance management to ensure that when a disconnection is completed the Mpans status is set to inactive in a timely fashion in order to reduce billing errors outside of the customers and suppliers control.</p> <p>We also consider that some form of DUoS disputes process would need to be developed, akin to the BSC’s Trading Disputes process. Whilst we are unsure which code this should be facilitated in we feel this is necessary because the disconnection date can only be set within the Final Reconciliation (RF) window, which itself is reducing from 14 month to 4 months as part of MHHS transition so any instances of de-energised Mpans remaining active in registration beyond that period that have been physically disconnected will be charged de-energised DUoS charges that can be rectified beyond RF by the BSC dispute provisions because no material error within settlement processes in such cases.</p> <p>as per our response to Q13 the CUSC may also be impacted to reflect any changes to the non-final demand definition that may be taken forward.</p>	<p>This was noted by the Working Group.</p> <p>The Working Group noted the potential difficulties that would be experience if there were delays to disconnection status updates. DCUSA contains a DUoS disputes process that could be expanded.</p> <p>It was noted that disconnection status performance is not audited, whereas energisation status is.</p>

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UK Power Networks	Non-confidential	A change to the data provided as part of MHHS would be required to ensure that data for de-energised NHH/Smart MPANs was provided to allow the sites to be charged.	This was noted by the Working Group.
Power Data Associates Ltd	Non-confidential	No	
OVO Energy	Non-confidential	We are not aware of any impact on other industry codes.	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Shouldn't be any, as the change is purely centred on whether de-energised sites should incur DUoS Charges or not.	
Northern Powergrid	Non-confidential	No	
Electricity North West	Non-confidential	None identified.	
SSE Energy Solutions	Non-confidential	We are unaware of any additional impacts until a solution is developed.	
Working Group Conclusions:			

## DCP 411

### ‘Charging De-energised Sites’

#### COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS



Company	Confidential/ Anonymous	15. Are you aware of any wider industry developments that may impact upon or be impacted by this CP?	Working Group Comments
The Electricity Network Company Limited	Non-confidential	No.	
ScottishPower Energy Retail Ltd	Non-confidential	No.	
Npower Commercial Gas Limited (NATP) & Eon Next Limited (EOND)	Non-confidential	We are not aware of any other developments that might impact by this CP.	
UK Power Networks	Non-confidential	Only the work under MHHS, which as noted in response to Q14, will need to consider the provision of this data.	This was noted by the Working Group.
Power Data Associates Ltd	Non-confidential	No	

## DCP 411

### ‘Charging De-energised Sites’

#### COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

OVO Energy	Non-confidential	<p>We believe this will have implications for the Default Tariff Cap allowances will need to be updated to reduce the DUoS and increase the bad debt caused by this change (not just reduce the DUoS).</p> <p>We consider this proposal does not feel in line with the Ofgem change to put more charges on the fixed charge and less on the variable, as that was meant to be done by capacity and these sites have zero capacity.</p>	This was noted by the Working Group and as above, regarding bad debt and costs for customers already paying DUoS charges.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	MHHS (for NHH sites). Access SCR?	This was noted by the Working Group.
Northern Powergrid	Non-confidential	The WG should consider the Ofgem open letter published on 8/11/22 <a href="#">Open Letter regarding Prioritisation of Electricity Network Charging Reforms   Ofgem</a> and whether this change meets the criteria set out for CPs to be considered in the short term.	The Working Group did not see any specific reasons to not progress the Change Proposal.
Electricity North West	Non-confidential	None identified.	
SSE Energy Solutions	Non-confidential	The proposer has already referred to the work on the MHHS reforms.	

**DCP 411**

**'Charging De-energised Sites'**

**COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS**

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Working Group Conclusions: