

DCUSA DCP 256 Consultation responses – collated comments

Company	Confidential/ Anonymous	1. Do you understand the intent of the DCP 256?	Working Group Comments
<p>Response Summary:</p> <p>All respondents understood the intent of DCP 256.</p>			
Electricity North West	Non- confidential	Yes.	
Northern Powergrid	Non- confidential	Yes	
RWE npower	Non- confidential	<p>Yes, we understand the intent of the DCP 256.</p> <p>We agree that implementing the change will improve transparency of DCUSA costs, allowing us to plan and budget for DCUSA invoices. We also agree that it will improve effectiveness of the arrangements for following up on non-payment of DCUSA invoices.</p> <p>Furthermore, this change will help to align DCUSA invoices to other industry code invoices, creating more consistency between them.</p>	
ScottishPower Energy Retail Limited	Non- confidential	Yes	
Southern Electric Power Distribution	Non- confidential	Yes.	

plc and Scottish Hydro Electric Power Distribution plc			
SP Distribution plc & SP Manweb plc	Non-confidential	Yes.	
SSE Energy Supply	Non-confidential	Yes	
Western Power Distribution	Non-confidential	Yes	

Company	Confidential/ Anonymous	2. Are you supportive of the principles of the DCP 256?	Working Group Comments
<p>Response Summary:</p> <p>Six of the respondents confirmed that they were supportive of the principles of DCP 256. One respondent agreed with Principles 1 and 2 and provided comments with regard to the remaining principles. The final respondent partly agreed with the principles, providing further information as part of Question 7 and 10.</p>			
Electricity North West	Non-confidential	We are supportive of the base principles.	
Northern Powergrid	Non-confidential	Yes	

RWE npower	Non-confidential	We are supportive of the principles of the DCP 256.	
ScottishPower Energy Retail Limited	Non-confidential	<p>We agree that Principles 1 and 2 will greatly assist Scottish Power with operating cost forecasting and obtaining appropriate approvals.</p> <p>We broadly agree with the intent of Principle 3 and 4 however we have concerns that the time periods are too harsh and there should be a longer period before suspension of Suppliers' registration rights.</p> <p>With regards to Principle 5, We believe that at this stage the Non Paying Party should advise the date when payment can be made furthermore the decision to make payment whether CHAPS or BACs should be the Suppliers.</p>	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Partly, as we have reservations relating to the suspension of registration services (see responses to Q7 and Q10).	
SP Distribution plc & SP Manweb plc	Non-confidential	Yes.	

SSE Energy Supply	Non-confidential	Yes	
Western Power Distribution	Non-confidential	Yes	

Company	Confidential/ Anonymous	3. Do you have a preference to receive paper or electronic (a PDF version that is eMailed) invoices or both a paper and an electronic invoice?	Working Group Comments
<p>Response Summary:</p> <p>Five respondents confirmed that they preferred to receive electronic invoices, with the remaining three respondents confirming that they preferred both electronic and paper invoices.</p>			
Electricity North West	Non-confidential	Our preference is to receive invoices electronically as this makes for a more efficient process. We would prefer to notify DCUSA Ltd of the parties within our company who need to receive such electronic invoices thereby minimising process time.	
Northern Powergrid	Non-confidential	We would prefer electronic – but when emailed to the named Party contract manager there should be the option to courtesy copy a deputy's mailbox in case the contract manager is on holiday or on sick leave.	
RWE npower	Non-confidential	We would like only an electronic invoice to be sent to us. It is very important that we do not receive both an electronic and paper invoice. The use of two methods of invoicing can potentially lead to confusion and requires	

		additional work by parties to ensure that invoices are not paid twice.	
ScottishPower Energy Retail Limited	Non-confidential	Our preference is for both a paper and electronic copy to be issued. The Paper Invoice sent to our administration team and an electronic copy with backing data to a specified business contact.	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	We prefer both paper and electronic invoices at present.	
SP Distribution plc & SP Manweb plc	Non-confidential	Both. We do not accept electronic copies of invoices only, however electronic copies are useful as they can be received earlier than paper copies and assist in speeding up the approval process for when the paper copy is received.	
SSE Energy Supply	Non-confidential	Electronic Invoice	
Western Power Distribution	Non-confidential	electronic	

Company	Confidential/ Anonymous	4. Is there any additional information that you would like to receive in your invoice that would aid you in paying promptly?	Working Group Comments
<p>Response Summary:</p> <p>Six respondents confirmed that the invoices did not need to include any additional information in order to aid them paying the invoice promptly. Two respondents requested that backing data would be useful to be provided, which is available to be provided by the Secretariat subject to a format being agreed.</p>			
Electricity North West	Non-confidential	We believe the invoices contain the relevant information we need to follow our payment processes.	
Northern Powergrid	Non-confidential	No	
RWE npower	Non-confidential	<p>We have a request in regards to the invoice backing data; it would be useful if it was sent within an Excel format.</p> <p>It is important that the payment date is always clear on the invoice, in addition to specifying how many days we have to pay.</p>	
ScottishPower Energy Retail Limited	Non-confidential	Backing data where applicable	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power	Non-confidential	Not that we can think of.	

Distribution plc			
SP Distribution plc & SP Manweb plc	Non-confidential	No.	
SSE Energy Supply	Non-confidential	No	
Western Power Distribution	Non-confidential	No	

Company	Confidential/ Anonymous	5. Do you have a preference regarding when invoices are issued?	Working Group Comments
<p>Response Summary:</p> <p>Six respondents do not have a preference regarding when invoices are issued, with one respondent agreeing with the invoicing schedule proposed in the consultation and the final respondent suggesting that invoices should be avoided within 5 working days of a bank holiday.</p>			
Electricity North West	Non-confidential	In general, if the timetable has been circulated and the invoice specifies when payment is due we do not envisage any problems with when invoices are issued as long as the invoices are sent to the contacts we have provided.	
Northern Powergrid	Non-confidential	Yes – we suggest that invoicing should be avoided within 5 working days of a bank holiday.	

RWE npower	Non-confidential	Principle 2 specifies that invoices will be issued at the end of the third week after the start of the quarter, and we are happy with this.	
ScottishPower Energy Retail Limited	Non-confidential	We have no preference to when invoices are issued, however it would be useful for DCUSA to publish an expected Invoice timetable.	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	No.	
SP Distribution plc & SP Manweb plc	Non-confidential	No.	
SSE Energy Supply	Non-confidential	No preference of timing within a month	
Western Power Distribution	Non-confidential	No	

Company	Confidential/ Anonymous	6. Do you have any comments on the straw man principles (including the proposed timescales)?	Working Group Comments
<p>Response Summary:</p> <p>Three respondents did not have any comments on the straw man principles, four respondents provided comments on the principles and one respondent provided comments within their response to Question 7.</p>			
Electricity North West	Non-confidential	<p>The straw man principles do seem quite comprehensive however we have the following observations:</p> <ul style="list-style-type: none"> • Principle 1 d): should we also add the date payment is due • Principle 1 – perhaps we should also mention that the intention is to cover off three years rather than just one. • Principle 2 d) we cannot understand why under clause 23.4 there is 4 Working Days yet for this payment default it is 5 Working Days. We suggest they are aligned. • Principle 3 a) we should add within such a correspondence the reason for the request to suspend registrations and the clause within DCUSA that provides such a right. Is there a need for a response from the distributors that this request has been undertaken? • Principle 3 – there needs to be a communication to the suppliers at the 	

		<p>time of the suspension indicating that DCUSA Ltd will shortly be requesting additional payment due to such an incident occurring. Since this is unplanned advanced warning would be welcome and advisable to avoid queries at the time.</p> <p>Principle 4: why does principle 4 say 10 working days yet the process map says 5 working days and the legal text also say 5 working days. Also note our comment on the timescales associated with events of default. We have reservations over this principle as indicated elsewhere.</p>	
Northern Powergrid	Non-confidential	<p>We agree with the intent and fully support DCUSA in seeking to ensure that invoices are paid on time, however we have concerns about the 5 working days as proposed in Clause 8.11.A3 because of the effects of Bank Holidays especially around Christmas, New year and Easter and the risk that some parties may be at risk of missing the 5 day deadline simply due to coincidental staff absence. 5 days seems a short period of time given the proposed consequences of missing the deadline due to what may be a simple administration failing. We suggest a longer time period is applied in respect of responding to the proposed Panel reminder e.g. 10 working days and also to avoid invoicing within 5 working days of a bank holiday.</p>	

RWE npower	Non-confidential	<p>We have a number of comments on the straw man principles outlined in the consultation document.</p> <p>Principle 2c,d: This principle states that payment should be made within 30 days. Is this 30 calendar days – if so can this be added in.</p> <p>Principle 2d: Due to the strong sanction of registration rights being suspended, it is crucial that the Late Payment Notice is received and noted by the party. We agree that the party contract manager should be notified via telephone and via email. However, having only one alternative contact – and notifying them only via email is too risky due to annual leave / sickness etc.</p> <p>We propose that DCUSA take 'all reasonable steps' to ensure that the party is notified, and that DCUSA receive confirmation of receipt from the party involved. Steps may involve including a group email address, adding a third alternative contact and attaching a read receipt to any emails.</p> <p>Principle 4b: The suspension of registration rights, which later progresses to the termination of accession to the DCUSA is a step not to be taken lightly. It is a breach of Supply License condition 11.2; this needs to be included in the text here.</p>	
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ScottishPower Energy Retail Limited	Non-confidential	Please refer to Q2	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	<p>We are not clear if that DCUSA has the authority to instruct (or perhaps even request) distributors to suspend (or re-instate) a Party's registration rights or that distributors would be obliged to implement such instructions/requests. This requires further explanation to clarify the precise clauses and provisions that would be exercised by DCUSA and the distributors.</p> <p>Suspension of registration rights is potentially a very serious sanction to exercise and distributors must be certain of their position before they take this action. It is possible that distributors may require indemnities if they are to be required to take action on behalf of DCUSA against another Party, or do so at the request of DCUSA.</p>	
SP Distribution plc & SP Manweb plc	Non-confidential	None.	
SSE Energy Supply	Non-confidential	No comments, all seems appropriate	
Western Power Distribution	Non-confidential	No	

Company	Confidential/ Anonymous	7. Do you have any comments on the proposed sanction to suspend registration rights (Principle 4)?	Working Group Comments
<p>Response Summary:</p> <p>Four respondents did not have any comments on the proposed sanction to suspend registration rights, two respondents provided comments and two respondents provided comments within Question 9 and Question 7 respectively.</p>			
Electricity North West	Non-confidential	<p>Is this question relating to Principle 3 – suspension of registration or principle 4 termination of accession?</p> <p>On the former we are supportive, on the latter less so. See response to the legal text section and to Q8 and Q9 for more details</p>	
Northern Powergrid	Non-confidential	No	
RWE npower	Non-confidential	<p>Due to TRAS liabilities and the risk from DCUSA re-invoicing the outstanding amount across other suppliers, this is an appropriate sanction to use.</p> <p>Although an appropriate sanction to support the intent of the DCP 256, it is never the less a strong one. As outlined in our response to Question 7, the DCUSA must take 'all reasonable steps' to alert a party to a Late Payment Notice.</p>	
ScottishPower Energy Retail Limited	Non-confidential	We broadly agree with the intent of Principle 3 and 4 however we have concerns that the time periods are too harsh and there should be a	

		longer period before suspension of Suppliers' registration rights.	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Please see response to Q7.	
SP Distribution plc & SP Manweb plc	Non-confidential	None.	
SSE Energy Supply	Non-confidential	No comment	
Western Power Distribution	Non-confidential	No	

Company	Confidential/ Anonymous	8. Do you have any comments on the proposed legal text?	Working Group Comments
<p>Response Summary:</p> <p>Four respondents did not have any comments on the proposed legal text, three respondents provided comments on the proposed legal text and one respondent did not have any further comments other than those made in their response to Question 7 and Question 9.</p>			
Electricity North West	Non-confidential	<p>The legal text needs to cover off registration service suspensions on similar lines to those already within DCUSA.</p> <p>We do not support final termination since this impacts DUOS income (although such rights seem to live on despite termination. Such instances are usually for services undertaken up to the termination and not for a continuation of the service and as such if the company was not in distress we may need to introduce bi-lateral Use of System agreements between distributor and supplier.</p> <p>Also both suppliers and distributors have a licence obligation to be a party to and comply with DCUSA. We believe that this trumps the Panel regarding who has rights to determine accession and termination.</p> <p>If a party is in serious trouble the suspension of registrations on the supplier side is sufficient and also likely to be enacted by distributors for none payment of their invoices so it may well have already taken place.</p>	

		<p>If they move into administration/liquidation consideration by the industry is buy out/supplier of last resort. Other codes would also be aware as would Ofgem. This should be the course of action to manage out suppliers rather than DCUSA Ltd having to consider such an approach. This is already covered in DCUSA.</p> <p>On distributor termination the industry has no distributor of last resort provisions and once again this may result in bi-lateral agreements being needed. We do understand that the MRA are looking at distributor to distributor MPAN transfer processes to cover off trade sales/incorrectly generated MPANS but if it is just none payment and the distributor is solvent then intervention from Ofgem with a threat of Licence revocation is more suitable than DCUSA Ltd terminating accession to the agreement and the ramifications that that may have.</p> <p>Whilst it is recognised that the legal text places a right on the DCUSA Ltd we suspect that to exercise such a right may well be after other actions have taken place within the industry.</p> <p>Regarding 8.14 and the charging of administration – as it stands this already exists and the admin costs are more to do with managing the current late payment process. However there will be a significant impact on such a process should the late payment result in additional charges to suppliers for non TRAS payments and refunds. It may be helpful to provide further clarity in the legal text of such a situation.</p>	
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		<p>New defined terms are introduced. These need to be defined.</p> <p>Clause 8.11A.3 – reference to clause 54.1.1 is understandable but that clause allows 20 WDS to resolve the material breach. Notwithstanding the fact that there is no right to suspend registrations, the process infers that suspensions will take place 5 WDs after the Late payment Notice has been issued and at the same time as the event of default being notified by this clause. Is this the intention? If so let's make it clear.</p>	
Northern Powergrid	Non-confidential	No – other than in our responses to questions 7 and 9.	
RWE npower	Non-confidential	The legal text that was circulated with the consultation paper does not seem to tie up with the proposals outlined.	
ScottishPower Energy Retail Limited	Non-confidential	No	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	<p>In relation to suspension of registration rights, we believe this possible consequence should be explicitly set out in Section 1B if it is intended to be a sanction for non payment of DCUSA invoices.</p> <p>For matters such as DUoS payment or security cover default, the distributor's entitlement to suspend is clearly set out and beyond dispute,</p>	

		whereas it is quite unclear (if not missing) in relation to non payment of DCUSA invoices.	
SP Distribution plc & SP Manweb plc	Non-confidential	None.	
SSE Energy Supply	Non-confidential	No comment	
Western Power Distribution	Non-confidential	No	

Company	Confidential/ Anonymous	9. Which DCUSA General Objectives does the CP better facilitate? Please provide supporting comments	
<p>Response Summary:</p> <p>All eight respondents agreed that the proposal better facilitate DCUSA General Objective Four.</p>			
Electricity North West	Non-confidential	We believe that General Objective 4 – The promotion of efficiency in the implementation and administration of this Agreement will be better facilitated by this change proposal, as it will improve how late payments are managed, hopefully avoid the need for additional administration where non payment is received especially those related to non TRAS payments and provide clarity to parties on the underlying processes.	

Northern Powergrid	Non-confidential	The proposal would seem to better support objective 4	
RWE npower	Non-confidential	This change proposal better facilitates General Objective number 4, 'the promotion of efficiency in the implementation and administration of this Agreement'. In our opinion it supports this as it will improve transparency in payments, helping parties to budget for the year and pay on time. This is needed to avoid re-invoicing across other suppliers, a cost that we want to avoid due to TRAS liabilities being introduced.	
ScottishPower Energy Retail Limited	Non-confidential	DCUSA General Objective Four-More transparency of expected DCUSA TRAS invoices and a clear process for the management of Late Payers.	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	It seems clear that General Objective 4 is better facilitated as it is clearly related to improving the administration of the DCUSA.	
SP Distribution plc & SP Manweb plc	Non-confidential	We agree with the working group assessment that DCUSA General Objective 4 is better facilitated by this change for the reasons stated in the Consultation Document.	
SSE Energy Supply	Non-confidential	DCUSA objective 4 The promotion of efficiency in the implementation and administration of this Agreement	

Western Power Distribution	Non-confidential	As proposal	
Company	Confidential/ Anonymous	10. Are you aware of any wider industry developments that may impact upon or be impacted by this CP?	Working Group Comments
<p>Response Summary:</p> <p>Seven respondent confirmed that they were not aware of any wider industry developments and one respondent suggested that the late payments process in other industry codes should be considered.</p>			
Electricity North West	Non-confidential	We probably need to consider how other codes act for late payments and indeed how they recover their payments. We indicate in our response to Q14 that some code administrators recover payments via variable/fixed direct debit payments. This may be worthy of consideration.	
Northern Powergrid	Non-confidential	No	
RWE npower	Non-confidential	We are not aware of any wider industry developments that may impact upon or be impacted by the DCP 256.	
ScottishPower Energy Retail Limited	Non-confidential	No	
Southern Electric Power	Non-confidential	No.	

Distribution plc and Scottish Hydro Electric Power Distribution plc			
SP Distribution plc & SP Manweb plc	Non-confidential	None at this time.	
SSE Energy Supply	Non-confidential	No	
Western Power Distribution	Non-confidential	No	

Company	Confidential/ Anonymous	11. Do you have a preference on the date that DCP 256 is implemented into the DCUSA?	Working Group Comments
<p>Response Summary:</p> <p>Three respondents suggested that DCP 256 should be implemented in the next release following Authority consent and the remaining four respondents did not have a preference on the date that DCP 256 is implemented into the DCUSA.</p>			
Electricity North West	Non-confidential	It would seem reasonable for implementation to take place in the next DCUSA release following Authority consent, although should an alternative payment method be preferred such as variable direct debits then the timetable may need to allow for its introduction.	

Northern Powergrid	Non-confidential	No	
RWE npower	Non-confidential	As outlined in the consultation document, we agree that the DCP 256 should be implemented in the next DCUSA release following Authority Consent. Following the decision, there should be no delay to the implementation date as TRAS liabilities will be introduced early this year.	
ScottishPower Energy Retail Limited	Non-confidential		
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	It should take effect at the next convenient DCUSA update issue.	
SP Distribution plc & SP Manweb plc	Non-confidential	No.	
SSE Energy Supply	Non-confidential	No	
Western Power Distribution	Non-confidential	No	

Company	Confidential/ Anonymous	12. Are there any alternative solutions or matters that should be considered by the Working Group?	Working Group Comments
<p>Response Summary:</p> <p>Five respondents did not have any alternative solutions or matters, with two respondents providing suggestions regarding the original solution and the final respondent suggesting an alternative solution for consideration.</p>			
Electricity North West	Non-confidential	<p>It may be preferable for all parties to set up variable direct debits to reduce the risks of payments not being made on time. This is in place under Elexon and now available under the DCC. As long as parties know the budget, the values for that quarter and the necessary invoices provided, so that the value can be checked, this process is seen as the most efficient and where parties fail to pay there is either a technical reason or the company may indeed be in difficulty.</p>	
Northern Powergrid	Non-confidential	<p>We would ask whether this change proposal is linked to the late payment process that is on the website and dated 22/3/10 and whether it is also linked to the grounds on which DCP223 was withdrawn in 2015?</p> <p>As a general comment we note that clause 8.10.2 refers to prescribed time period for d invoice, however taking a look at a recent invoice to appear that a date is given for payment rather than a prescribed time period. It may be considered app to reword 8.10.2 to align what act goes on the invoices.</p>	

RWE npower	Non-confidential	We suggest that a Guidance Document is created, which explains the steps of the Straw Man / Legal text in a clear, easy to understand format. The suspension of registration rights and termination of accession to the DCUSA are strong sanctions, and all parties need to be aware of the steps taken in the process. This Guidance Document could be an attachment which is circulated in the annual budget, and may be particularly helpful to smaller suppliers.	
ScottishPower Energy Retail Limited	Non-confidential	Not at this time	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Not that we can think of.	
SP Distribution plc & SP Manweb plc	Non-confidential	No.	

SSE Energy Supply	Non-confidential	No	
Western Power Distribution	Non-confidential	No	

Company	Confidential/ Anonymous	13. Can DCUSA Ltd provide any additional information to assist your organisation with Purchase Order facilitation?	Working Group Comments
<p>Response Summary:</p> <p>Five respondents did not require DCUSA Ltd to provide any additional information to assist their organisation with Purchase Order facilitation. Three respondents provided suggestion with regarding to Purchase Order facilitation, which included additional information being provided on the budget throughout the year, the completion of a pro-forma and the use of Direct Debits.</p>			
Electricity North West	Non-confidential	Once the annual budget information has been agreed and circulated our approach is to raise one purchase order for that amount and then 'goods receipt' part of the purchase order as and when invoices are received and approved for payment during the year. We believe that by having the purchase order already in place the process is faster than raising on receipt of invoice as long as all the respective parties have been notified and are in receipt of the invoice. Naturally each party will need to comply with their internal controls in this area but overall the additional information being provided on the budget throughout the year and the added value of it covering three years is a proactive step.	

Northern Powergrid	Non-confidential	Completion of a proforma by DCUSA before the invoice date to enable the Purchase Order to be created in good time.	
RWE npower	Non-confidential	<p>At the moment, npower does not pay DCUSA invoices using Purchase Order facilitation, but it is a payment method which we may consider using in future. As much information would therefore be helpful and we would like to share our views on this question if we transition to this payment method.</p> <p>Direct Debit payment is another payment method which we may consider using in future, so information to assist with this would be helpful also.</p>	
ScottishPower Energy Retail Limited	Non-confidential	Not at this time.	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Not that we can think of.	
SP Distribution plc & SP Manweb plc	Non-confidential	No	

SSE Energy Supply	Non-confidential	Do not use POs so do not require assistance from DCUSA.	
Western Power Distribution	Non-confidential	No	

Company	Confidential/ Anonymous	14. Is there anything that would prevent DNOs from suspending registration rights as envisaged within the legal text?	Working Group Comments
<p>Response Summary:</p> <p>Four respondents did not believe that there would be anything preventing DNOs from suspending registration rights as envisaged in the legal text. Three respondents highlighted potential issues that would prevent DNOs from suspending registration rights as envisaged in the legal text. Four respondents did not provide any comments and one respondent referred to their response provided in Question 7.</p>			
Electricity North West	Non-confidential	There is nothing in the legal text obliging the Distributor to undertake such an action in relation to DCUSA Ltd payment defaults. They only apply between Distributor to Supplier and Distributor to Distributor instances so Distributor's would not do so. The working group should therefore include such a provision under clause 8.	
Northern Powergrid	Non-confidential	We may find it difficult in justifying the suspension of registrations for Party if they were excluded from the DCUSA only, as the supplier party may still be party to the MRA and BSC and may also be fully compliant with DCUSA provisions in respect of Use of System credit cover obligations at that point. However,	

		if exclusion from DCUSA led to additional consequences in other codes or sanctions by Ofgem in respect of the Party's licence that would obviously prompt further steps in respect of suspending registrations. We suggest a further legal review of this aspect by DCUSA.	
RWE npower	Non-confidential	We have some concern around how the suspension will actually happen. Provisions in the MRA may not allow for this. A change to the MRA may have to occur. This is something which needs to be further investigated.	
ScottishPower Energy Retail Limited	Non-confidential	Not at this time	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Please see response to Q7.	
SP Distribution plc & SP Manweb plc	Non-confidential	No	
SSE Energy Supply	Non-confidential	No comment	

Western Power Distribution	Non-confidential	Not that we are aware of	
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