

DCP 414 'Transitional Protection for NHH CT Customers affected by regulatory change.

COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

Company	Confidential/ Anonymous	1. Do you understand the intent of DCP 414?	Working Group Comments
National Grid Electricity Distribution	Non-confidential	Yes.	Noted
UK Power Networks	Non-confidential	Yes	Noted
NPg	Non-confidential	Yes	Noted
SP Energy Networks	Non-confidential	Yes SPEN understand the intent of DCP 414	Noted
Npower Commercial Gas Ltd (NATP) & Eon Next Ltd (EOND).	Non-confidential	Yes	Noted
ScottishPower Energy Retail Ltd.	Confidential	Yes; but while we understand the intent of DCP 414, we note that requirements are themselves dependent on an Authority decision to implement BSC MP432, something we think would be premature.	The Working Group understands the impacts of the proposed dates of P432.
Electricity North West	Non-confidential	Yes, we understand the intent.	Noted

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Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Yes	Noted
Business Energy Direct	Non-confidential	Yes	Noted
Working Group Conclusions: All respondents to the consultation understood the intent of DCP 414.			

Company	Confidential/ Anonymous	2. Do you support the principles of DCP414?	Working Group Comments
National Grid Electricity Distribution	Non-confidential	Yes	Noted
UK Power Networks	Non-confidential	Yes	Noted
NGp	Non-confidential	Yes, however we believe that 1.1.3 (ensure a fair and consistent approach is adopted wherever a change of residual charging band occurs as a	Noted

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		consequence of regulation change) is already covered by paragraph 6 of Schedule 32 of the DCUSA.	
SP Energy Networks	Non-confidential	Yes SPEN supports the principles of DCP 414	Noted
Npower Commercial Gas Ltd (NATP) & Eon Next Ltd (EOND).	Non-confidential	Yes	Noted
ScottishPower Energy Retail Ltd.	Confidential	No. We have clearly documented our objections to BSC MP432, and cannot support DCP 414 for the same reasons.	Noted
Electricity North West	Non-confidential	No, it is more cost reflective to charge the same to all customers in the same category. This change will create an unlevel playing field for customers of the same type ie those customers who have historically traded as HH and there does not appear to be a rationale for treating customers differently.	This is a set of customers who don't have a MIC identified and it's putting in protections for those customers who haven't had a MIC identified. A similar approach to protecting customers was adopted for the BSC P272 within the DCUSA.
Southern Electric Power Distribution plc and Scottish Hydro Electric	Non-confidential	Yes	Noted

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Power Distribution plc			
Business Energy Direct	Non-confidential	No, however the context here is that DCP414 has only been proposed as a result of the P432 proposal, a change proposal which is a problem for all in scope customers and the suppliers.	
<p>Working Group Conclusions: Six of the Respondents supported the principles of DCP 414, three of them did not.</p> <p>One response stated, “This change will create an unlevel playing field for customers of the same type i.e., those customers who have historically traded as HH and there does not appear to be a rationale for treating customers differently”. The Working Group’s response was that this is a set of customers who don’t have a MIC agreed with the distributor and this change is putting in protections for those customers. A similar approach to protecting customers was adopted for P272 within DCUSA.</p> <p>Another respondent stated they had clearly documented their objections to BSC P432 and cannot support DCP 414 for the same reasons. The third respondent also cited their concern over P432. The Working Group noted the objections.</p>			

Company	Confidential/ Anonymous	3. Are there any lessons from P272 or other industry changes that would benefit this CP, specifically any communication improvements.	Working Group Comments
National Grid Electricity Distribution	Non-confidential	The lesson from P272 is that there can be long standing issues for some customers and so as long a transition period as possible might be required. This would also allow for re-bills over a longer period.	The Working Group noted the request for as long a transition period as possible as it gives the Working Group the time to develop the most effective solution and gives them the best

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			opportunity to get the right data to base its decisions on.
UK Power Networks	Non-confidential	<p>As a DNO, for P272 we contacted all impacted customers to inform them of the change and the MIC that would be charged. In the vast majority of cases this was a letter sent to the site address, which we had an extremely low level of response to, the feedback we did have included 'Who are UK Power Networks?' and 'Why are you writing to me?'. This suggests that any effective communication for this and future changes should be Supplier led, as they will have more appropriate points of contact than the DNO, including Customer names, as well as more appropriate addresses than just the site address. The Customer will also know who their Supplier is and so would be more likely to engage and make the changes necessary.</p> <p>The Supplier is also in control of the migration and so should be obliged to contact customers with a good lead time, to explain what is happening, what the impact is, how their charges will change and how they can take action concerning their capacity values. This will be of particular importance for domestic customers.</p>	The Working Group noted the issue raised that the communications for this change would be more appropriate if it was supplier led as suppliers are more likely to have the correct contacts rather than just the site addresses.
NPg	Non-confidential	Distributors do not hold contact details for these customers, and in many cases the MPRS address is not a valid postal address. Letters to MPRS addresses (with cleansing) for P272 customers were largely returned undelivered. In addition, DNOs do not hold the customer names, and the site address of the MPAN may not be most appropriate address for correspondence to be sent to. Suppliers should engage with DNOs to provide contact details (preferably email addresses) for these customers so that we are able to proactively contact them. There was limited cooperation on this during P272 implementation.	The Working Group noted the data issues with contact information and returned letters so a supplier led approach would be best.

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<p>SP Energy Networks</p>	<p>Non-confidential</p>	<p>As part of P272 SPEN sent letters to all impacted customers, a large proportion of these were returned. We believe that Suppliers are better placed than DNOs to communicate any changes to customers in relation to the outcome of DCP 414.</p>	<p>The Working Group noted the data issues with contact information and returned letters so a supplier led approach would be best.</p>
<p>Npower Commercial Gas Ltd (NATP) & Eon Next Ltd (EOND).</p>	<p>Non-confidential</p>	<p>In terms of the CP's intention the proposed solution to charge excess capacity at agreed rates in the absence of a MIC broadly brings the consumer impact of the resultant network charging changes once moved to HH in line with those that were in place under P272.</p> <p>We feel there is room for communication improvements specifically between suppliers & DNO's in terms of enabling better communications and openness of customers communications suppliers and DNOs respectively issue to customers. In terms of the scope of Mpans impacted by a DUoS tariff change it will be evident once CP1558 completes which NHH customers are going to need to site specific DUoS tariffs because the connection type will be linked per Mpan, making it clear to DNO's and suppliers who is going to be impacted.</p> <p>This will then enable suppliers and DNO's to communicate on the basis of impacted sites enabling any further recommended refinements to ensure that DNO's and suppliers can both agree and align customer communications prior to and during the CoMC process, as well as after to be better facilitate the accurate setting of a capacity level.</p>	<p>Noted the room for improvement with communications between both suppliers and distributors.</p> <p>Also, CP 1558 will help to identify the sites that will be impacted by this change by identifying the connection types within MPAS.</p>
<p>Scottish Power Energy Retail Ltd.</p>	<p>Confidential</p>	<p>There is insufficient clarity around the arrangements for establishing customers' demand capacities. In particular, if these were understated, it could leave customers facing capacity charges. The lesson from P272 was that customers were simply not properly engaged and, as a result, many were erroneously assigned a high default capacity. This has never been properly resolved.</p>	<p>Noted that a distributor led approach would be best but there needs to be an understanding on how capacity would be chosen.</p>

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		It is clear from this experience that it should not be for the supplier to communicate with customers to agree capacities, rather it must be for the DNO to undertake such an exercise.	
Electricity North West	Non-confidential	As P272 was implemented in 2017 there shouldn't be a need for DCP 414. It would be more appropriate for there to be a transitional period prior to the implementation of this change proposal. We do not believe it is appropriate for the DNOs to be contacting suppliers' customers.	The scope of this is looking at all CT customers which need to migrate which includes profile class customers 1-4 and also the residual profile class 5-8 customers. Its not appropriate to contact supplier customers but there are some discussions that distributors will need to have with customers in regards to connection agreements.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	- No objection to sharing relevant information as requested by suppliers (although there is a need to highlight GDPR concerns); or from customers where it ensures MIC is in place at the earliest opportunity. - In favour of DNOs' being able to set a default value where no site-specific data is available.	Happy for improved dialogue between distributors and suppliers and in favour of setting a default value where no sites specific data is available.
Business Energy Direct	Non-confidential	The financial detriment suffered by customers that had supplies in scope for P272 is significant, with the incorrect and inappropriate assignment of a MIC, without any input from customers, being one contributing factor. The industry must agree on a communication solution and which parties (supplier, DNO or both) will engage with the customer. Communications	Incorrectly reporting of MIC without input from customers was a concern associated with P272. Communication piece needed to educate customers.

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		<p>must incorporate a customer education piece, with such an exercise being both simple and relatable.</p> <p>The supplies in scope are mostly relatively low demand supplies, something which has been commented on throughout P432 workgroup discussions. The majority do not require the capacity that the supply is capable of providing. The setting of any MIC should be practical, without blind assumptions being made. Data will be available from almost all of the CT meters and should P432 gain approval, one of the first actions should be a direction to the appointed MOPs / DCs is to ensure that the suppliers have MD data purged through each month. Some supplier's billing systems already incorporate NHH demand, it is detailed on the invoices each month (Smartest Energy is one example), and we expect that MD data is already being recorded by almost all existing CT meter's that are still in certification.</p> <p>This MD information must be identified prior to an MIC being assigned to a customers MPAN. Consequently this means that a lag will exist prior to the MIC being established and the only fair way to charge for capacity prior to an MIC being assigned, is based on confirmed MD for the relevant charging periods (usually monthly).</p> <p>The communication to customers needs to educate them on what MD is and what the difference between potential demand and operational demand is. The reason why there are as many 50,000 meter points in scope for P432 is a result of customers, landlords, M&E consultants and DNOs not recognising the difference between potential and operational demand, again the known demand and load factor of the supplies in scope being very low typically.</p> <p>More needs to be done to understand the customer operations, with the type of businesses possibly being catagorised by DNOs to establish what an</p>	<p>Agreed it would be useful prior to migration if one of the first actions should be a direction to the appointed MOPs / DCs is to ensure that the suppliers have MD data purged through each month.</p> <p>Agreed it would be useful if there could be more information about what a site is used for as this may support a more logical approach to be applied and an MIC assigned where MD data is not available. Suggested that maybe a website to capture/drill into specific sites usage would be a good solution.</p>
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		upper MD of an operation is likely to be. Only then can logic be applied and an MIC assigned where MD data is not available.	
<p>Working Group Conclusions: Several lessons and benefits to help develop this change proposal were identified namely:</p> <ul style="list-style-type: none">• having as long as possible for the transition period so parties have plenty of opportunity to get accurate data and to allow enough time to develop the best solution;• the communications should be supplier led as the experience from P272 was the communications from distributors were largely ignored by customers or didn't get to the correct recipient as distributors customer contact information wasn't as robust as suppliers;• CP 1558 will help to identify the sites that will be impacted by this change by identifying the connection types within MPAS. It was stated that better communication between suppliers and distributors to obtain the correct data will also be helpful;• an education piece for customers would support the change as this would help customers understand why the changes were happening and what the change meant; and• understanding what a site is used for would be useful when assigning a MIC where MD data is not available. <p>The Working Group concluded that the communication should be supplier lead and the legal text was updated to reflect this and mandate for specific customer contact data items to be shared between parties to improve customer communication.</p>			

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Company	Confidential/ Anonymous	4. If a customer changes from Non-Hour-Hour(NHH) to Half-Hour (HH) what is your process for setting up capacity values and residual charges?	Working Group Comments
National Grid Electricity Distribution	Non-confidential	Use the data provided by the Customer to determine their MIC. We advise Customers to seek independent advice where they are unsure of capacity requirements. Customers are made aware of excess capacity charges and 12month fixed MIC in advance of entering any connection agreement.	When a customers seeking a new connection customers need to be made aware of the additional charges.
UK Power Networks	Non-confidential	Where a Customer has a known agreed capacity this will be used for billing and setting the residual charge band, which for the majority of customers impacted by this change will be Band 1. Where records of the capacity are not available, we assign a default capacity based on the measurement class. We use 71kVA for MC=E and 101kVA for MC=C. These numbers are based on the lower values of kVA likely for each MC (on the assumption that MC=E customer have CTs - which are normally required at capacities of 69kVA and above) and to use default values that are not normally an agreed value and so can be easily identified as such. The residual charge band then follows the defaulted capacity.	Highlights the process is to default capacity if no site information is available. 71 Kva for MC E and 101 for MC C
NPg	Non-confidential	<p>We see three main movements in NHH to HH:</p> <ul style="list-style-type: none"> • P272 PC 5-8 initial HH migrations (the deadline was 1 April 2017, but we still have ~3k unmigrated MPANs). These have capacity values established and are treated under the rules implemented by DCP 179 and DCP 248. We established a MIC based on a number of data sources for each site, including historical connection agreements, maximum demand data, recent consumption data and any 	<p>MIC based on a number of data sources as noted in their response.</p> <p>The second default value is 72 kVA</p> <p>And the third value is based on information agreed with the customer or a default of 72 kVA</p>

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		<p>information provided by suppliers at the time. The residual band is allocated on the basis of the capacity.</p> <ul style="list-style-type: none"> Largely erroneous movement of MC G to MC C/E, and vice versa. Whole current metered sites have no MIC and are not meant to receive a capacity charge, however when erroneously registered by the supplier to MC C/E one is incurred. As these sites have no MIC, the banding is based on a default capacity value up to 100A/~72kW (whole current), which places the default in the lowest residual band. <p>NHH sites with CT metering migrated to MC C/E. If a connection agreement is in place the capacity and banding is applied on that basis. In the absence of a connection agreement the banding is based on a default capacity value up to 100A/~72kW (whole current), which places the default in the lowest residual band.</p>	
SP Energy Networks	Non-confidential	<p>For P272 SPEN used a default capacity if nothing else was available, so we would probably do the same for customers moving from NHH to HH. From memory suppliers provided capacities for some sites as part of P272, is this an option? Residual bands will fall out of the agreed capacity.</p>	<p>Use the default if no information is available but default value not noted within the response.</p> <p>Raise the question if suppliers provide capacity of part of P272. Will be dependent on the data flows containing capacity values.</p>
Npower Commercial Gas Ltd (NATP) &	Non-confidential	<p>Our process for informing capacity to customers whilst NHH have historically had a dependency on a Maximum Demand recording register so is very much limited to P272 requirements whereby a PC 05-08 meter becomes advanced so must be settled HH under existing obligations, or if a</p>	<p>Supplier perspective- dependency on a Maximum Demand recording register and increase in loads linked in with the</p>

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<p>Eon Next Ltd (EOND).</p>		<p>customer moves to HH because they require an increased load (e.g WC to CT) it is then informed to us as it is set on the basis of a revised connection agreement between customer and DNO's. There are some instances whereby we can access HH metered data also to assist the customer in capacity setting, however this is limited to meters that already have HH reactive and active power recording capacities configured whilst NHH settled that can be collected from the meter.</p> <p>In terms of residual charge setting, we have no involvement as they form part of the make-up of the fixed costs within the DUoS tariff so is very much driven on the basis of the applicable NHH and expected HH DUoS tariff assigned to an Mpan.</p>	<p>connection agreement with the distributor.</p>
<p>Scottish Power Energy Retail Ltd.</p>	<p>Confidential</p>	<p>This only happens where the customer is connecting material additional load, such that HH metering/settlement is warranted. Again it is between the customer and the network operator to establish an agreed capacity.</p>	<p>It's the customer and network operator who agree the connection capacity.</p>
<p>Electricity North West</p>	<p>Non-confidential</p>	<p>If a MIC is provided by the Supplier via a D0302 flow, we would not make any changes to the current MIC. If driven by a customer application for an add-load, we would setup a new MIC in the systems for DUoS charging (assuming MD HH rather than NMD HH, NMD HH is still billed via SCDOoS)</p> <p>If no new MIC agreed as part of the change and it was previously MD NHH rather than NMD NHH, we would have the last agreed MIC from when we used to site specifically bill the PC5-8 group; if NMD NHH this would be either a default value (1kVA was back-populated where null at the time we</p>	<p>The Working Group reviewed the D0302 flow and believe that this does contain the MIC. This is not a mandatory field within the flow.</p> <p>Also has a process that involves the customers when agreeing a MIC.</p> <p>The Working Group queried whether value mentioned at the end of the second to last para would cover CT sites. Also noted that some of these</p>

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		<p>made this a mandatory field to populate at the time of MPAN generation) or the actual value if provided. The expectation is that the MIC would be a max of 20kVA if single phase, 40kVA if split single or 60kVA if 3 Phase.</p> <p>The LLF allocated to an MPAN is determined by the MIC value (see below, the first LLF is with MAP charges, the second LLF without).</p>	<p>customers may not have been charged MIC for years so this would need to be considered.</p>
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COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

		<table border="1"> <tr> <td>Voltage</td> <td>New Line Loss Factor Class</td> </tr> <tr> <td>HV</td> <td>103 63 for Non-final demand</td> </tr> <tr> <td></td> <td>843 803 where MIC <= 422kVA</td> </tr> <tr> <td></td> <td>113 73 where MIC > 423 kVA and <1000kVA</td> </tr> <tr> <td></td> <td>123 83 where MIC > 1001 kVA and <1800kVA</td> </tr> <tr> <td></td> <td>133 93 where MIC > 1801kVA</td> </tr> <tr> <td>LV Substation with MIC</td> <td>102 62 for Non-final demand</td> </tr> <tr> <td></td> <td>842 802 where MIC <= 80kVA</td> </tr> <tr> <td></td> <td>112 72 where MIC > 81 kVA and <150kVA</td> </tr> <tr> <td></td> <td>122 82 where MIC > 151 kVA and <231kVA</td> </tr> <tr> <td></td> <td>132 92 where MIC > 232kVA</td> </tr> <tr> <td>LV Network with MIC</td> <td>104 64 for Non-final demand</td> </tr> <tr> <td></td> <td>841 801 where MIC <= 80kVA</td> </tr> <tr> <td></td> <td>114 74 where MIC > 81 kVA and <150kVA</td> </tr> <tr> <td></td> <td>124 84 where MIC > 151 kVA and <231kVA</td> </tr> <tr> <td></td> <td>134 94 where MIC > 232kVA</td> </tr> <tr> <td>LV Network no MIC</td> <td>364 for Non-final demand</td> </tr> <tr> <td></td> <td>631 for single rate (PC3) or 661 for 2 rate (PC 4.)</td> </tr> <tr> <td>Domestic</td> <td>511 for domestic unrestricted or 531 for domestic 2 rate</td> </tr> </table>	Voltage	New Line Loss Factor Class	HV	103 63 for Non-final demand		843 803 where MIC <= 422kVA		113 73 where MIC > 423 kVA and <1000kVA		123 83 where MIC > 1001 kVA and <1800kVA		133 93 where MIC > 1801kVA	LV Substation with MIC	102 62 for Non-final demand		842 802 where MIC <= 80kVA		112 72 where MIC > 81 kVA and <150kVA		122 82 where MIC > 151 kVA and <231kVA		132 92 where MIC > 232kVA	LV Network with MIC	104 64 for Non-final demand		841 801 where MIC <= 80kVA		114 74 where MIC > 81 kVA and <150kVA		124 84 where MIC > 151 kVA and <231kVA		134 94 where MIC > 232kVA	LV Network no MIC	364 for Non-final demand		631 for single rate (PC3) or 661 for 2 rate (PC 4.)	Domestic	511 for domestic unrestricted or 531 for domestic 2 rate	
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Southern Electric Power Distribution plc and Scottish	Non-confidential	If a customer switches from NHH-HH, we expect a physical increase in load, thus requiring an assessment undertaken by the engineering team. The	The process is to have discussions with the customer and an agreed MIC will be agreed with said customer. Process																																						

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Hydro Electric Power Distribution plc		<p>team will determine the capacity requirements, and a MIC must be agreed upon between both parties and included in a connection agreement.</p> <p>Banding for residual charges: We would allocate the appropriate residual band based on the agreed MIC. However, we note that an amendment to DCUSA schedule 32 will be required due to this change.</p>	<p>also allocates the appropriate residual band based on the agreed MIC.</p> <p>The Working Group believe that a change to schedule 32 may be needed.</p>
Business Energy Direct	Non-confidential	N/A	N/A
<p>Working Group Conclusions: The respondents use a variety of methods ranging from:</p> <ul style="list-style-type: none"> • Use data provided by the customer; • Where a customer has a known agreed capacity this will be used for billing and setting the residual charge band; • The use of default values. • suppliers provided capacities for some sites as part of P272. Residual bands will fall out of the agreed capacity'. <p>One respondent noted that they still have circa 3,000 Profile Class 5-8 HH MPANs that they have been unable to migrate as part of P272. Whilst other respondents didn't provide volumes it was noted by many others that they also had some unmigrated MPANs as part of P272.</p>			

Company	Confidential/ Anonymous	5. How many NHH CT customers do you have that require migration and are suppliers are expecting to consider a mass migration approach?	Working Group Comments
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National Grid Electricity Distribution	Non-confidential	Approximately 15000 across all 4 NGED areas	Noted that there's 15,000 across the estate
UK Power Networks	Non-confidential	We have approx. 15k MPANs across our three regions, which we would not expect to be enough to require a mass migration.	Noted that there's 15,000 across the estate
NPg	Non-confidential	We have just under 6k NHH CT customers in our distribution area (~2k Northeast, ~4k Yorkshire). A mass migration approach would not be an issue in terms of volumes for our MPRS system.	6,000 in total
SP Energy Networks	Non-confidential	Volumes unknown at this stage.	Unknown
Npower Commercial Gas Ltd (NATP) & Eon Next Ltd (EOND).	Non-confidential	We have approx. 7,500 NHH CT Mpans across domestic, SME & I&C supply portfolios. Whilst at this point, we have not finalised plans on migration approach our working assumption is that we are likely toCoMC NHH-HH in line with customer contract renewals as opposed to a mass migration approach.	7,5000 (Supplier)
ScottishPower Energy Retail Ltd.	Confidential	Total of 2,613, comprised of: <ul style="list-style-type: none"> • 1,122 Advanced; • 897 Advanced Capable; and • 594 Non AMR. 	2,613 (Supplier)

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Electricity North West	Non-confidential	There are currently 1,743 traded energised MD NHH MPANs with CT meters. In addition, we do have 543 traded de-energised MD NHH MPANs with CT meters. We have not received any information from suppliers in respect of migration plans.	1,743 in total as well as an additional 543 in a de energised state. Working Group notes these should be counted within the MPAN count.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	We have an approximate estimate of 13,255 for both areas, but we need to re-iterate that these are estimated and subject to review. A mass migration approach is likely.	13,255 in total
Business Energy Direct	Non-confidential	N/A	
<p>Working Group Conclusions: 51,000 + SPEN + IDNOs could equate to 60,000+ in total. P432 suggested around 50,000 impacted sites which is derived from data in 2018.</p> <p>For the suppliers who responded, one stated that they would align with contract renewals rather than a mass migration and the other didn't provide a response.</p>			

Company	Confidential/ Anonymous	6. Is your process for moving customers from NHH to HH manual or automated?	Working Group Comments
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National Grid Electricity Distribution	Non-confidential	It is a manual process because it requires TCR bands to be applied	Manual
UK Power Networks	Non-confidential	It is entirely automatic.	Automatic
Npg	Non-confidential	Manual, due to the need to identify outstanding P272 migrations.	manual
SP Energy Networks	Non-confidential	Automated.	Automatic
Npower Commercial Gas Ltd (NATP) & Eon Next Ltd (EOND).	Non-confidential	Our processes are currently manual however we are likely to automate the process given the number of Mpans we expect to move from NHH-HH.	Manual for now but may become automatic in the future
Scottish Power Energy Retail Ltd.	Confidential	The CoMC process is rarely used and, consequently, very manual.	Manual
Electricity North West	Non-confidential	Automated, driven by Supplier registration data received upon the initial registration being made, a subsequent change of Supplier or just an updated D0205 being received into MPRS. This sends a DB31 internally into our system which triggers the LLF (re)calculation process, which does involve some manual intervention.	Automatic for the majority but may require some manual intervention.

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		If there was a transitional period a supplier should trigger a new D0205 when that period finishes, if not we would need to use a resource intensive manual process.	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Moving customers from NHH-HH will require an LLFC change, a manual process, and the (mass) migration will involve IT, so it is essentially a bit of both.	Manual in the main but some parts can be automatic
Business Energy Direct	Non-confidential	N/A	N/A
<p>Working Group Conclusions: Half of the respondents who answered said the process was automated, the other half manual.</p> <p>Both supplier respondents indicated a manual process, one of the suppliers hope to automate the P432 migration.</p>			

Company	Confidential/ Anonymous	7. What are the impacts to excess charging during the transition period?	Working Group Comments
National Grid Electricity Distribution	Non-confidential	None	No impacts.

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<p>UK Power Networks</p>	<p>Non-confidential</p>	<p>We would have to change our systems so that the default capacity is set to zero for this sub-set of customers – we have yet to determine how we can separately identify them from data available to the billing system in order to make such a change. This will take at least 6 months and may be complex due to needing to provide the system with other standing data to assist in identifying these customers. Providing such data may impact other systems.</p> <p>If a zero capacity is set then all demand will be charged at the excess capacity charge, the rate for which will need to be set to the “normal” capacity rate, until such time that a capacity value is agreed or is determined after 12 months. We would need to create new tariffs and new LLFCs in order to do this.</p>	<p>Changes to billing systems required and some data cleanse activity needed which both can take up to 6 months.</p> <p>New tariffs may also be required.</p>
<p>NPg</p>	<p>Non-confidential</p>	<p>We have identified two approaches to excess capacity charging:</p> <p>1. Amending Excess Capacity Charging Rates</p> <p>It is unclear how removing excess capacity charging (or setting the rate equal to that of the capacity rate) can be achieved without introducing new tariffs to the CDCM, as tariffs cannot be introduced into billing systems if they have not come out of the charging models.</p> <p>Introducing new tariffs would not require any changes to the DNO billing process, but would require the introduction of new tariffs to be used on a temporary basis. This would mean that MPANs would be required to be migrated twice: once onto the temporary tariff; and then onto the final tariff once a capacity is agreed. MPANs should remain on the temporary tariffs for a maximum of 12 months.</p>	<p>Amending excess capacity charging rates which includes changes to billing systems, changes to the CDCM, introducing new tariffs etc. Changes to the CDCM can take at least 15 months and without a derogation the implementation date of 2023 feels unachievable as the earliest date without a derogation would be April 2025.</p>

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		<p>The exceeded capacity charge for each HH core customer group is calculated using the same formula allocated to the capacity charge, but with the customer proportion set to zero (per Schedule 16, par 81). The tariffs are calculated on a core customer group basis and split at the revenue matching stage into banded tariffs.</p> <p>It is our view that if they were to be introduced then the new tariffs with exceeded capacity charge equal to the capacity charge would need to be added to the CDCM after the point at which the revenue matching has been applied, as the introduction of these tariffs should not impact on the calculation of the rest of the tariffs in the CDCM.</p> <p>This would require enough lead in time to update the CDCM models, LC14 statements, MDD submission, mid-year losses submission and a derogation from Ofgem. It is our view that if the implementation date was June 2023 then it would not be achievable using this approach.</p> <p>2. Default Capacity</p> <p>Alternatively, if all DNOs ensure a suitable default capacity is applied where no MIC is available then this should ensure that the majority of MPANs do not incur excess capacity charges. Any MPANs incurring excess capacity charges would need to be identified and contacted to increase their MIC and could then be rebilled back to the date of change of measurement class. The default MIC could be applied for a grace period, similar to the process used for DCP248.</p> <p>This would not require any changes to billing systems or published tariffs.</p>	<p>Default capacity No system or tariff changes.</p>
<p>SP Energy Networks</p>	<p>Non-confidential</p>	<p>The billing system currently does not allow for this, system changes would be required</p>	<p>Changes to the billing system required.</p>

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<p>Npower Commercial Gas Ltd (NATP) & Eon Next Ltd (EOND).</p>	<p>Non-confidential</p>	<p>the main impact would be in the customer bills on the basis that the excess capacity rate is higher than the agreed rate, however the clear difference here is that there is a lack of consistently available information provisioned for whilst NHH settled in PC 01-04 prevents the use of metered data from unforming this upfront.</p> <p>There may be some additional process & system related impacts dependent on the DNO solution to bill capacity, assuming the agreed capacity rate is billed instead of the excess rate then these are likely to be minimal.</p>	<p>From a supplier perspective this will depend on the distributors process. They state that they may not be impacted but distributors could be.</p>
<p>Scottish Power Energy Retail Ltd.</p>	<p>Confidential</p>	<p>We are unclear as to what these impacts might be.</p>	<p>Unknown as the solution isn't understood at this stage.</p>
<p>Electricity North West</p>	<p>Non-confidential</p>	<p>There is an effective from date included in the D0205 received from the Supplier so if NHH prior to the change, no DUoS charges are applied for capacity usage up to the effective from date for MD HH charging, at which stage the new MIC is effective from in respect to charging. As such, no transition period, unless we are misunderstanding what is meant by this.</p> <p>Upon receipt of HH consumption via the D0036, each month the standard calculation is effected to determine the actual capacity used vs the agreed MIC. If less than or equal to the MIC, no excess capacity charged; if actual is higher than the agreed MIC, we charge the MIC at the standard rate and the excess amount at the higher published rate.</p> <p>We have agreed capacities in place with all our customers. However, where customers are not charged on a basis of capacity they are unlikely to be</p>	<p>New tariffs, new MDD and new LLFCs would indicate an implementation date of April 2025 as previously noted by the Working Group.</p>

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		<p>actively engaged in managing their level of capacity, and in some cases will not have a good understanding of what their capacity is.</p> <p>All current capacity tariffs include an excess capacity charge. In order to enable a suspension of excess capacity charging during a transition period, there would need to be new tariffs introduced via changes to DCUSA and additional LLFCs in Market Domain Data.</p> <p>The existence of tariffs with no excess capacity charging would create an economic incentive for customers to remain on a lower agreed capacity until the very end of the transition period.</p>	
<p>Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc</p>	<p>Non-confidential</p>	<p>Existing tariff settings cannot be adjusted, and there is no functionality within Durabill (billing system) to exclude excess capacity rates within the charging model. Any consideration for the affected customers will require a change in the CDCM tariff structure.</p>	<p>Again, noted a change to the CDCM tariff structure which again raises the implementation date being April 2025. Also notes billing system changes too.</p>
<p>Business Energy Direct</p>	<p>Non-confidential</p>	<p>The customers in scope will be paying for capacity that they shouldn't be because it isn't required and their TCR banding may be incorrectly assigned as a result of not identifying the true MD.</p>	<p>There's a reconciliation process within P272 so consideration would be needed to make sure this is picked up within DCP 414s legal text.</p>
<p>Working Group Conclusions: Many respondents mentioned that if the process was to charge the customer at the non excess capacity rates on the total demand once they have migrated to HH settled, in the absence of a valid MIC, new tariffs, new Market Domain Data and new Line Loss Factor Classes</p>			

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would indicate an implementation date of April 2025, and this would require changed to the CDCM, unless a derogation was granted as CDCM changes typically take no less than 15 months and large changes to billing systems and a data cleanse activity would be required which can take up to six months to test and implement.

One respondent raised that a similar process could be introduced similar to the P272 process by having a default MIC and a reconciliation process. The Working Group noted the potential impact to implementation dates and concluded that having a similar process to that of P272 (having a default MIC and reconciliation process) would be the best process to follow as it was the least complex and could be delivered within the tight timescales required for this CP.

Company	Confidential/ Anonymous	8. Are you aware of any wider industry developments that may impact upon or be impacted by this CP?	Working Group Comments
National Grid Electricity Distribution	Non-confidential	No	None
UK Power Networks	Non-confidential	Only the changes being brought forward as a result of MHHS, which is where this change originated from. A key aspect in this change could be reverse migration.	Noted
NPg	Non-confidential	No	None
SP Energy Networks	Non-confidential	SPEN are not aware of any wider industry developments that may impact upon or be impacted by this CP.	None

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Npower Commercial Gas Ltd (NATP) & Eon Next Ltd (EOND).	Non-confidential	We are not aware of any other industry developments that have not already been highlighted within this CP based on its current solution proposed.	None that the proposal hasn't raised.
Scottish Power Energy Retail Ltd.	Confidential	The CP clearly impacts, and is impacted upon, by the Market-wide Half Hourly Settlement plans. However, in the wider context, the industry is already undergoing significant upheaval, and the benefits from implementing any change therefore need to be carefully weighed against the disruptive effects.	Noted
Electricity North West	Non-confidential	In view of Suppliers being under pressure with current market conditions are they aware of the high impact this DCP will have, particularly if having to contact their customers? There may be impacts on the DUoS SCR together with the BSC [P432] and delivery of the MHHS SCR.	Noted the first paragraph and that the DUoS SCR is with the Authority.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	The pertinent one is MWHHS.	Noted
Business Energy Direct	Non-confidential	Yes – In the event that P432 and DCP414 gains approval, Business Energy Direct will be promoting an industrywide campaign to take meter points in scope, back out of scope. There will be two methods for doing so.	Noted and may have a bearing on the timeline.

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		<p>The first will be to have DNOs remove the CT chambers and replace the existing fuses with lower rated ones, thereby enabling Whole Current metering to be installed, saving the customers tens of thousands of pounds (higher supplier charges) that they would otherwise be exposed to if CT meters were retained.</p> <p>The second part to this is to block all remote communications to the meters. This can be done by small device that blocks the remote comms so that data cannot be extracted from the meters. Only communicating AMRs are in scope for P432 and by preventing communication (which can also be done by piling up boxes / products around the meter).</p> <p>Business Energy Direct have contact information for around 1000 third party consultants, (most having customers that would be impacted) and we intend to share details of the positive action to be take, to prevent their clients from spending thousands of pounds a year more on electricity, exclusively as a result of an incorrect meter classification, a legacy caused by connection applicants not understanding electricity demand, and Elexon and OFGEM not understanding what DNOs required prior to approving P272.</p>	
<p>Working Group Conclusions: The majority pointed to the MHHS Programme with another mentioning the proposed DUoS SCR which is currently with the Authority.</p> <p>Another respondent pointed to a reverse migration phase within the MHHS Programme where a site may move to HH and then move back to NHH.</p> <p>One respondent advised that they would encourage their customers to action that would take metering points out of scope, back out of scope such as to seek the removal of distributor assets such as CT chambers where the customer's capacity requirements did not require them.</p>			

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Company	Confidential/ Anonymous	9. What date do you believe this change proposal should be implemented? Please provide rationale.	
National Grid Electricity Distribution	Non-confidential	It needs to be consistent with the P432 process.	Noted, in line with P432
UK Power Networks	Non-confidential	It should align to the implementation date of P432, with sufficient lead time to allow parties to make required system changes which we believe requires the date to be six months following the Authority decision and for parties to be ready for the increase in discussions with customers. Although this also depends upon the solution chosen (see response to Q10).	Noted, in line with P432 with the implementation date of 6 months after Authority decision to allow for system changes and for customer communication to take place.
NPg	Non-confidential	We agree with the proposer that the implementation should align with P432's proposed implementation date. As noted in our response to Q7 above, this may not be possible depending on the solution proposed by the working group regarding excess capacity charges.	In line with P432 and again notes may not be possible with current billing systems.
SP Energy Networks	Non-confidential	SPEN believes that the implementation date should align with the implementation date of P432, as long as there is sufficient time to make any necessary system changes, depending on the solution decided for DCP 414.	In line with P432 as long as the correct time for system changes that will be required.
Npower Commercial Gas Ltd (NATP) &	Non-confidential	This proposal should be implemented either ahead or concurrent with the implementation of P432, this is on the basis that the change of DUoS tariff would be triggered at the point an NHH advanced CT meters moves to HH settlement.	In line with P432 or before to allow P432.

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Eon Next Ltd (EOND).			
Scottish Power Energy Retail Ltd.	Confidential	Given the uncertainty surrounding the MHHS plans at the moment, we do not think now is the right time to implement DCP 414.	Noted that they state not at this time. This is in line with their response to P432
Electricity North West	Non-confidential	<p>The proposed implementation date for DCP 414 is Jun-23 which may present a risk if system changes are required to implement this change, as we believe a minimum lead time of 6 months should be provided for system changes following Authority approval.</p> <p>We should also highlight as a DNO we will be heavily involved in the delivery of the Stage Zero changes for MHHS, which also have a delivery deadline of the end of Jun-23.</p>	Noted a lead time of 6 months for billing system changes will be required
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Realistically, April 2025 – any time frame prior is highly ambitious.	Prefers April 2025 which the Working Group have mentioned within the conclusions earlier.
Business Energy Direct	Non-confidential	Should DCP414 be approved then it should be implemented alongside MHHS migrations.	This should align with the MHHS migration plan rather than before.
Working Group Conclusions: Most of the responses (seven) said that if the change is approved the implementation date should be in line with P432.			

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Another respondent raised that as billing systems required changing, the testing period for these changes can take up to 6 months so there was a risk that the initial stated implementation date for DCP 414 (June 2023) would create a risk as there wouldn’t be enough time to rigorously test the changes that would be needed.

Another respondent stated that April 2025 would be an appropriate implementation date due to the reasons set out in the response to question 7.

Company	Confidential/ Anonymous	10. What legal text changes do you believe are required to facilitate this change?	Working Group Comments
National Grid Electricity Distribution	Non-confidential	No comment provided	No comment
UK Power Networks	Non-confidential	<p>This depends on the solution chosen.</p> <p>If the solution looks to charge a zero capacity rate, with an excess capacity rate that is the same as the existing capacity charge, or to charge an “MD charge” for this group of customers, until they have agreed a capacity, then a number of changes will be necessary to Schedule 16 to introduce a new tariff. This could require updated charging models and may require fifteen months notice (depending on views of changed tariffs v new tariffs). So if this change was approved for June 2023 the new tariff might not be available until the charging year for 2025/26, unless Ofgem were willing to grant all DNOs any required derogations.</p> <p>At the very least, changes as identified the Working Group concerning the back-dating of connection agreements for one year following migration will be required. This impacts Part 4 of Schedule 16 e.g. as follows –</p>	The Working Group used this drafted as the baseline for the legal text that will be used for consultation.

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		<p>Part 4 – Transitional Protection for Customers affected by BSC Modification P272P432 or MHHS</p> <p>179. This Part 4 sets out the transitional protection for Customers who may be affected by BSC Modification P272P432, being demand Customers in Profile Class (PC) 5-8 with CT metering which are required to become half-hourly settled or who are impacted by moving to Half Hourly Settlement under MHHS(where capable metering has been installed).</p> <p>181</p> <p>(a) a Customer takes a supply of electricity at a Premises where the electricity conveyed to the Premises is recorded through an advanced CT meter; and</p> <p>(b) the Metering Point for such Premises has, on or before 31 March 2017, been migrated to Measurement Class C or E or to the advanced market segment as defined in MHHS, as a result of BSC Modification P272,</p> <p>then, for a period of twelve months immediately following the date of the [first] migration to Measurement Class C or E or to the advanced market segment as defined in MHHS, a lower new Maximum Import Capacity (MIC) may be agreed between the Customer and the DNO/IDNO Party. In such circumstances, the revised MIC will be applied retrospectively from the date of the migration to Measurement Class C or E.</p> <p>Add new Clause 184 as follows (and renumber existing 184) New 184 – following the period of twelve months immediately following the date of the [first] migration to Measurement Class C or E or to</p>	
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		<p>the advanced market segment as defined in MHHS, the Company shall reasonably determine a non-zero MIC or MEC, having regard to the Maximum Demands in that period and shall notify the Customer.</p> <p>Amend Existing 184 (renumbered)by adding</p> <p>BSC Modification P432 means the modification to the BSC referred to as modification 'P432, Half Hourly Settlement for CT Advanced Metering Systems', which was approved by the Authority on [date]</p> <p>& delete existing definition of BSC Modification P272.</p> <p>The NTC in Section 3 of Schedule B will also need to be changed e.g. as follows to add new Clause 12.15,</p> <p>12.15 Clauses 12.12 to 12.13 shall not apply where Part 4 of Schedule 16 of the DCUSA is applicable.</p> <p>Our preferred solution would be to adopt the approach that we used for customers under P272. This would be to allocate a capacity charge based on 71kVA or 101kVA depending on Measurement Class and allow Customers a full 12 months to arrange a suitable capacity. At that point the capacity would be backdated to take effect from when the migration of that customer was implemented. But this backdating would only be permitted where this was done within the twelve months.</p> <p>This could be delivered with no system change (for us) and no changes to the charge calculation elements of the CDCM, no new tariffs or models being introduced, no re-assessment to impose a MIC after 12 months, no tariff change after 12 months, no impact of reverse migration.</p>	
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		Ultimately the success of any of these measures requires effective communications from Suppliers to Customers prior to their migration and we believe Clauses to mandate this should be added to Section 2A of DCUSA.	
NPg	Non-confidential	We do not currently have a view of the required changes to the legal text, as it is dependent on the solution developed by the working group.	Noted
SP Energy Networks	Non-confidential	The legal text changes will depend on the chosen solution.	Noted
Npower Commercial Gas Ltd (NATP) & Eon Next Ltd (EOND).	Non-confidential	No additional comments over and above the sections highlighted in the proposal at this stage, however we hope to be able to comment further as the solution becomes better defined.	Noted
Scottish Power Energy Retail Ltd.	Confidential	No comment	Noted
Electricity North West	Non-confidential	The sections/schedules noted in the consultation document appear to be a useful starting point for the drafting of legal text changes.	Agrees with the proposed areas.
Southern Electric Power Distribution plc	Non-confidential	The terms of Schedule 32: <i>Residual Band Charging (Exceptional circumstances)</i> , clause six should not apply to NHH-CT customers moved	Noted that changes to schedule 32 may also be required.

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and Scottish Hydro Electric Power Distribution plc		into HH settlement (particularly for a mass migration approach); or an additional text in schedule 32 that is specific to this CP.	
Business Energy Direct	Non-confidential	N/A	N/A
<p>Working Group Conclusions: Most respondents stated that as the solution was unknown at this time they couldn't comment.</p> <p>One respondent provided text changes to both Part 4 of Schedule 16 and to the National Terms of Connection contained within Schedule 2B.</p> <p>One respondent noted that in addition to the changes highlighted in the change proposal, Schedule 32 may also require changes citing Paragraph 6 covering exceptional circumstances.</p> <p>The Working Group noted these responses and considered them when drafting the legal text</p>			

Company	Confidential/ Anonymous	11. Do you have any further comments on this change proposal?	Working Group Comments
National Grid Electricity Distribution	Non-confidential	No comment provided	No additional comments
UK Power Networks	Non-confidential	No	No additional comments

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<p>NPg</p>	<p>Non-confidential</p>	<p>We do not agree that a MIC level should be set solely based on peak kVA recorded as there are some cases where the maximum demand required may not be within the capability of the connection to the premises. Similarly to P272, the agreement of a billing capacity is largely a paperwork exercise, so we cannot for safety reasons agree capacities that are higher than expected for the classification (over 100kVA).</p> <p>Historically customers allocated to NHH settlement were under 100kW, however, some customers with over 100kW were classified by suppliers as NHH, and so there were customers who migrated under P272 that had much larger usage. In most cases we could only safely agree a MIC value of up to 100kVA (in the absence of a connection agreement). If the customer required a higher capacity they were referred to connections for a load increase.</p>	<p>Noted the points raised and will revisit once the Working Group get to reviewing the default values.</p>
<p>SP Energy Networks</p>	<p>Non-confidential</p>	<p>Within the consultation document, it specifies DNOs are to identify all NHH CT metered MPANs. As with P272 this is not that straightforward for SPEN, from memory I believe Suppliers provided us with their view of the NHH CT / WC metered MPANs. We would request this again from Suppliers for the NHH CT metered MPANs to be migrated.</p> <p>SPEN's preference would be to treat the customers the same as in P272, allocate a default capacity with the option to backdate for 12 months. This would be the easiest option from a system perspective too.</p>	<p>Will review within comms plan and CP 1558 will help to identify customer types which may mean a lot of this information will be known when DCP 414 goes live.</p>
<p>Npower Commercial Gas Ltd (NATP) &</p>	<p>Non-confidential</p>	<p>As we have highlighted in this CP, the current NHH CT customer base is allocated to residual costs within the aggregated DUoS charging tariffs on the basis of the Measurement class assigned at the point residual cost</p>	<p>Noted will be discussed with the design development in line with other comments.</p>

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<p>Eon Next Ltd (EOND).</p>		<p>allocation were worked out, using historical data which as in turn underpinned the cost recovery of residual for this price control and potentially into the next price control.</p> <p>Taking into this account and considering some early working group suggestions, we think it is appropriate for the working to consider if these customers should remain on aggregated DUoS tariffs until MHHS transition completes, rather than move to site specific charging. In principle if this was enabled, it would alleviate the immediate distortion caused within the residual costs recovered because such customers would remain on existing allocated DUoS tariffs. This would require for further work and would also need to encompass other changes to industry arrangements, such as ring fencing all NHH CT's by Mpan and preventing the LLFC changing upon CoMC and further changes to ensure that those LLFCs form part of valid top line combinations.</p> <p>We are conscious that this would extend the scope of this CP and would not prevent distortion going into the next Transmission price control period, however on the basis the vires of this CP is to provide transitional protection we feel this could be within the intended of scope of this CP.</p> <p>in addition It may also act to provide industry time to develop and implement a solution that addresses the distortion likely to be seen in the LV no MIC & LVCT residual costs allocated so that it is addressed in to for commencement of the next price control in 2026, noting that MHHS full transition is currently planned to be completed either 3 or 6 months after the next Transmission price control takes effect.</p>	
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Scottish Power Energy Retail Ltd.	Confidential	N/A	No comment.
Electricity North West	Non-confidential	<p>Is this Change Proposal only relating to NHH MD CT Metered customers for migration?</p> <p>We understand concerns have been raised at the P432 working group with regard to 'reverse migration' which may need looking into.</p>	<p>All NHH CT metered customers in scope.</p> <p>And reverse migration will be discussed/considered as part of the design solution,</p>
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Not currently.	Noted
Business Energy Direct	Non-confidential	<p>Excess capacity charges (exceeding the assigned MIC) should not be applied by the DNOs for the first 12 months of HH settlement of a P432 migrated MPAN. Any customers with a seasonal MD will already be paying for capacity that isn't going to be required during certain periods, and we believe that manner in which capacity charges should be applied, requires an industry review. It would be more appropriate to have a tolerance based on an MIC (or an Agreed Supply Capacity), before excess capacity is charged, for all customers with supplies of up to 200amps.</p>	<p>The Working Group agree with the first comment around excess capacity charges but acknowledge it will be a difficult position to get to.</p> <p>Moving to a tolerance-based model for a MIC is considered to be out of scope for this DCP and will require a further change proposal.</p>

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Working Group Conclusions: There were a number of different comments raised to this question ranging from:

- CP 1558 supporting the change as it helps identify the customer types;
- MHHS reverse migration;
- customers should remain on aggregated DUoS tariffs until MHHS transition completes, rather than move to site specific charging;
- excess capacity charges (exceeding the assigned MIC) shouldn't be applied by the distributors for the first 12 months of HH settlement of a P432 migrated; and
- to treat the customers the same as in P272, allocate a default capacity with the option to backdate for 12 months. This would be the easiest option from a system perspective.
- One respondent did not agree that a MIC level should be set solely based on peak kVA recorded as there are some cases where the maximum demand required may not be within the capability of the connection to the premises.

The Working Group noted these comments and considered them when developing the legal text.