

Question 1

Company	Confidential/ Anonymous	1. Do you understand the intent of the Change Proposal?	Working Group Comments
BU-UK	Non-confidential	Yes, we understand the aim of this change proposal to update the tables from Schedule 15 of DCUSA to reflect all the relevant updates of the new price control, RIIO-ED2.	Noted
UKPD	Non-confidential	yes	Noted
UKPN	Non-confidential	Yes	Noted
ENWL	Non-confidential	Yes	Noted
NPg	Non-confidential	Yes	Noted
SSE	Non-confidential	Yes	Noted
BG	Non-confidential	Yes	Noted
Working Group Conclusions: All parties understood the intent of the change proposal.			

Question 2

Company	Confidential/ Anonymous	2. Are you supportive of the principles that support this Change Proposal?	Working Group Comments
BU-UK	Non-confidential	Yes, we are supportive of this change proposal's principles for updating the tables from Schedule 15 of DCUSA to be in line with the modifications of the current price control, RIIO-ED2	Noted
UKPD	Non-confidential	Yes	Noted
UKPN	Non-confidential	Yes	Noted
ENWL	Non-confidential	Yes	Noted
NPg	Non-confidential	Yes	Noted
SSE	Non-confidential	Yes	Noted
BG	Non-confidential	Yes	Noted
Working Group Conclusions: All Parties supported the principles of the change proposal.			

Question 3

Company	Confidential/ Anonymous	3. Should the years in Table 1 remain the same as in the current Table 1, with allowed revenue for any years in a future price control period assumed to be calculated on the same basis as the latest known price control period? Please provide rationale.	Working Group Comments
BU-UK	Non-confidential	Yes, we agree that all the future years should continue to be included in Table 1 from Schedule 15 of DCUSA, forecasting the allowed revenue related costs information for different internal analysis purposes. We believe that there is value in DNOs sharing these estimations in Table 1 on the presumption that the current licence conditions will continue to apply in the next price control, even if they are not completely accurate as the forecasts provide insights into what the DNOs are anticipating for the near future.	Yes
UKPD	Non-confidential	Do not know	
UKPN	Non-confidential	Yes, as the Allowed Revenue for years beyond the Price Control will be unknown, and for Suppliers it is better that there is consistency between DNOs in the approach.	Yes
ENWL	Non-confidential	Yes, this should be the approach. The DNO presentation provides the opportunity to explain the limitations in any basis for estimating future years figures.	Yes
NPg	Non-confidential	Yes. Although the allowed revenue calculations will not be known for future price control periods until close to that period starting, an estimate of the allowed revenues will be required much earlier. For example 2023/24 is the first year of RIIO-ED2 and charges for	Yes. It was noted that the prices were published in December 2021.

		<p>2023/24 were published with 15 months' notice in December 2022, but the licence conditions were not published until February 2023.</p> <p>The most sensible approach to forecasting allowed revenues where the formulas are not yet known seems to be to continue to use the existing formulas, perhaps with a caveat to say these years are subject to change once the licence conditions are finalised.</p>	Noted that the caveat to inform that prices could change was agreed within the WG and WG agrees this should sit within the template
SSE	Non-confidential	No objection to retaining the existing format. In the absence of any authority direction, we can assume the current licence condition will apply.	Yes
BG	Non-confidential	Yes, out to T+4 is sufficient and until such time as the figures for the next price control begin to take shape the best view of the next price control will be the current one. The DNOs should be transparent with their assumptions and flag any known items to provide a best view of the years that fall into the next price control	Yes
<p>Working Group Conclusions: 6 of the respondents believed years in Table 1 should remain the same as in the current Table 1 with the final responder not offering a view.</p> <p>It was noted in response to the suggestion of a caveat stating these years were subject to change, the Working Group agreed to include the caveat in the template.</p>			

Question 4

Company	Confidential/ Anonymous	4. Is the level of granularity in 'Table 1 – CDCM Input Version' sufficient for the CDCM 'General Inputs' or is anything further required for input into the CDCM? Please provide rationale.	Working Group Comments
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BU-UK	Non-confidential	Yes, we believe that there is enough granularity in the proposed 'Table 1 – CDCM Input Version', and that it contains all the relevant information for filling in the 'General Inputs' of the CDCM spreadsheet.	Yes
UKPD	Non-confidential	Do not know	
UKPN	Non-confidential	We believe that they are sufficient.	Yes
ENWL	Non-confidential	The level of granularity is sufficient.	Yes
NPg	Non-confidential	<p>The items currently in the 'General Inputs' table that aren't in 'Table 1 – CDCM Input Version' are:</p> <ul style="list-style-type: none"> - Excluded Services – NPg do not currently use this block - Revenue raised out CDCM – Voluntary under-recovery – NPg do not currently use this block. The licence has changed from saying that a DNO must use "reasonable endeavours to ensure that...Regulated Distribution Network Revenue does not exceed its Allowed Distribution Network Revenue" to that it must use "best endeavours to ensure that Recovered Revenue equals Allowed Revenue", which suggests that voluntary under-recovery would not be allowable without a derogation from Ofgem against this requirement. <p>Although these blocks are not currently in use it may make sense to keep a few rows in to allow for anything that comes up that isn't currently known, such as the rebates in 2013/14 which the voluntary under-recovery row was last used for.</p>	The Working Group agreed to include two extra line inside revenue raised out CDCM to capture any unforeseen changes.

SSE	Non-confidential	It is sufficient (please also see Q6 response).	Yes
BG	Non-confidential	'Table 1 – CDCM input version' is sufficient for the CDCM 'General Inputs' as it contains a level of granularity sufficient for the differential treatment of costs (e.g. SOLR) within the CDCM model.	Yes
<p>Working Group Conclusions: Five of the seven respondents believe the level of granularity was sufficient, one offered no view and another stated whilst the level of granularity was sufficient, the blocks for excluded services and revenue raised out CDCM weren't used. They also stated that although these blocks are not currently in use it may make sense to keep a few rows in to allow for anything that comes up that isn't currently known.</p> <p>The Working Group agreed to include two extra line inside revenue raised out CDCM to capture any unforeseen changes</p>			

Question 5

Company	Confidential/Anonymous	5. For Suppliers Only- Is the level of granularity in 'Table 1 – ED2 Detailed' required for the quarterly Cost Information submissions, or is the level within 'Table 1 – CDCM Input Version' sufficient for? Please provide rationale.	Working Group Comments
BU-UK	Non-confidential	N/A	Noted
UKPD	Non-confidential	N/A	Noted
UKPN	Non-confidential	N/A	Noted
ENWL	Non-confidential	N/A	Noted

NPg	Non-confidential	N/A	Noted
SSE	Non-confidential	N/A	Noted
BG	Non-confidential	The level of detail in the ED2 Detailed table is preferable to the CDCM input version, the extra level of granularity provided in the incentives section and the splits of allowed base revenues between the different funding pots may prove useful for suppliers in understanding the drivers of revenue movements	Stated the level of detail in the ED2 table was preferable.
Working Group Conclusions: It was noted only one supplier provided a response to the question, but they believed that the detail in the ED2 detailed table was preferable to the CDCM input version.			

Question 6

Company	Confidential/Anonymous	6. Are there any data items that have not been included within 'Table 1 - ED2 Detailed' or 'Table 1 - CDCM input version' that you believe should be included, or any other changes to the format that you believe would improve this table? If so please provide rationale.	Working Group Comments
BU-UK	Non-confidential	We consider the level of detail proposed for Table 1 to be sufficient and that it offers all the required information.	None
UKPD	Non-confidential	No	None
UKPN	Non-confidential	None that we are aware of.	None

ENWL	Non-confidential	None	None
NPg	Non-confidential	We believe all items needed for input into the CDCM are included. We cannot comment on whether other items or detail is required by Suppliers	None for distributors.
SSE	Non-confidential	Table 1 – CDCM Input worksheet: It might be beneficial to provide the breakdown of Output Delivery Incentive (ODI) and Other Revenue Allowance (ORA) as was done for Pass-Through (PT). Or leave the breakdown for all three in 'Table 1 – ED2 Detailed' worksheet. On the format, a colour legend will be helpful, for example, to distinguish which cells are calculated or pulled from other worksheets within the workbook (we could include a cover page for this).	States that Table 1 – CDCM Input worksheet: It might be beneficial to provide the breakdown of Output Delivery Incentive (ODI) and Other Revenue Allowance (ORA) as was done for Pass-Through (PT). Or leave the breakdown for all three in 'Table 1 – ED2 Detailed' worksheet. Also Stated that a colour legend would be helpful.
BG	Non-confidential	The split of revenue between CDCM and EDCM isn't included in the 'ED2 Detailed' tab if the intention is to only provide only the 'ED2 Detailed' or the 'CDCM Input Version' then rows 48, 49 and 53 of the 'CDCM Input Version' should be included in the 'ED2 Detailed output'	It was highlighted that the change would require both the ED2 Detailed sheet and the CDCM input version.
<p>Working Group Conclusions: Five respondents stated no additional information was required. One stated that CDCM Input worksheet: It might be beneficial to provide the breakdown of Output Delivery Incentive (ODI) and Other Revenue Allowance (ORA) as was done for Pass-Through (PT). Or leave the breakdown for all three in 'Table 1 – ED2 Detailed' worksheet and that a colour legend would be helpful. It was stated by the responder that this was a nice to have requirement however, some of the passthrough items are used separately in the CDCM so they need to be within the CDCM sheet. It was noted that everything within the CDCM was included within the sheet.</p> <p>In regard to the colour legend, the responder highlighted with the Working Group that this was not an essential item and that there were happy with the level of details.</p>			

In response to the supplier response, it was noted in the Working Group that the approach is to request both the ED2 detailed tab and CDCM Input Version tab level of details so this resolved the query.

Question 7

Company	Confidential/ Anonymous	7. Does the 'Delta from previous' table provide additional value to the submission? Are there any data items that have not been included within the 'Delta from previous' table that you believe should be included, or any other changes to the format that you believe would improve this table? If so please provide rationale.	Working Group Comments
BU-UK	Non-confidential	We consider this question to be more pertinent for the suppliers, as they see the value in having the 'delta from previous' included in the table. As an IDNO, we are not currently making use of this information, however, we are still supportive of the proposed solution to adjust the tables in order to make them as accessible for all the users as possible, and thus, support the addition of the 'Delta from previous' section. Nevertheless, we do not believe to be any data items missing from this proposed modification.	Noted
UKPD	Non-confidential	Yes it will add value, understand what may explain significant price changes. No comment on data item potentially not included.	Noted
UKPN	Non-confidential	We believe that the current approach is appropriate.	Noted
ENWL	Non-confidential	This table is comprehensive and it includes nearly 100 rows of data, and so we do not believe it is necessary to add further data items.	Noted

NPg	Non-confidential	We believe this provides additional value as it allows for an easy comparison to the previous submission. We already use a similar table in our internal workbooks which is not published, which allows us to check variances are as expected and helps to prepare the commentaries and presentation.	Noted
SSE	Non-confidential	The comparison worksheet may be helpful to suppliers; however, the stakeholder teleconference might need to take a slightly different format as these deltas are discussed during the presentation (for example, the slides may not be needed as the same information is contained in the worksheet).	Notes that the template may be a better way of presenting the data back to suppliers rather than the current approach of producing slides.
BG	Non-confidential	Yes, the delta from previous table provides additional value in understanding the variance between current and previous revenue forecasts. As the split of revenue between CDCM and EDCM isn't included in the 'ED2 Detailed' tab and the 'Delta from previous' tab shows movements based on that tab the movement in the split between CDCM and EDCM is omitted	States as the split of revenue between CDCM and EDCM isn't included in the 'ED2 Detailed' tab and the 'Delta from previous' tab shows movements based on that tab the movement in the split between CDCM and EDCM is omitted.
<p>Working Group Conclusions: It was noted by the only supplier in the Working Group that whilst the slides may not be required, and just the worksheet, the stakeholder call still added value as it gives suppliers opportunity to ask questions.</p> <p>It was concluded that until the value is formalised the only change is of a function of the allowed revenue so including this within the ED2 Delta Detailed tab wouldn't add value at this point.</p> <p>All respondents believed that the Delta from pervious table provided additional value.</p>			

Question 8

Company	Confidential/ Anonymous	8. For suppliers only - Do you use the information provided in Table2? If so what do you use the information for and does it add significant value?	Working Group Comments
BU-UK	Non-confidential	N/A	Noted
UKPD	Non-confidential	N/A	Noted
UKPN	Non-confidential	No response given.	Noted
ENWL	Non-confidential	N/A	Noted
NPg	Non-confidential	N/A	Noted
SSE	Non-confidential	N/A	Noted
BG	Non-confidential	The current format of the DCP66 table 2 doesn't provide much insight, however the updated table 2, if populated by the DNOs could be much more useful in providing foresight of potential revenue movements.	Noted
Working Group Conclusions: It was concluded that only one supplier had responded to this question who stated that the initial section was valuable and they could see value in the other sections however it was better to continue with the proposed approach as it provides the most amount of data.			

Question 9

Company	Confidential/ Anonymous	9. Is the proposed Table 2 an improvement on the existing Table and do you believe this could provide more meaningful information to Suppliers? Please provide your rationale.	Working Group Comments
BU-UK	Non-confidential	We believe that this question should be addressed to the suppliers as it proves to be more relevant to their systems. Nevertheless, we support the inclusion of the additional information in Table 2 from the Schedule 15 of DCUSA on the presumption that it streamlines the processes for suppliers.	Noted
UKPD	Non-confidential	N/A	Noted
UKPN	Non-confidential	We believe that the existing style of sensitivity analysis, that gives a range of impacts on key components offers more insight and the ability to react to circumstances. The proposed Table may be prescriptive and not flexible enough to reflect issues of importance in the future without a DCP	Believes the existing style is more preferable and the proposed table may be too prescriptive and not allow for any flexibility.
ENWL	Non-confidential	We believe it is an improvement over the existing table, it is more aligned with ED2 and provides sensitivities in a more useful format which can be tailored to different scenarios.	Noted
NPg	Non-confidential	N/A – as a Distributor we believe it is more appropriate for Suppliers to comment on what they require in Table 2	Noted
SSE	Non-confidential	The proposed 'Table 2' is an improvement on the existing table.	Noted
BG	Non-confidential	The main potential benefit for Table 2 is to give a view of items which could impact the DNO allowed revenues but aren't finalised enough to form part of the best view. Giving suppliers an advanced warning	Noted

		of potential shifts in revenue before they are finalised potentially allows suppliers to manage that risk more efficiently, possibly leading to lower costs to consumers.	
<p>Working Group Conclusions: It was highlighted that after discussing this within the working group the responders stated that they were comfortable with ether current and proposed processes.</p> <p>A caveat within the sheet may be useful to highlight what bottom sections are for.</p> <p>It was concluded after discussion that all parties who responded either didn't offer a view to this question or believed that the proposed Table 2 an improvement on the existing Table</p>			

Question 10

Company	Confidential/ Anonymous	10. Are there any data items that have not been included within Table 2 tab that you believe should be included, or any other changes to the format that you believe would improve this table? If so please provide rationale.	Working Group Comments
BU-UK	Non-confidential	No, we do not believe that there are any data items missing from Table 2 tab. However, we appreciate that this question may be more relevant for suppliers and their existing processes.	Noted
UKPD	Non-confidential	No response given	Noted
UKPN	Non-confidential	None that we are aware of.	Noted
ENWL	Non-confidential	None	Noted
NPg	Non-confidential	N/A – as a Distributor we believe it is more appropriate for Suppliers to comment on what they require in Table 2	Noted

SSE	Non-confidential	It might be worth including a commentary column (possible changes to the calculated revenue section) or append general commentary at the bottom of this sheet. Inflation table: Unless the intention is to show potential swings or extremes on the level of impact (more clarity on what we are trying to capture), there is no need for the inflation table in Table 2. Also, as previously stated, defining colour legends (e.g., which data is hardcoded or referenced from other worksheets, calculation cells, etc.) would be beneficial.	States a commentary column may be helpful as well as the previously mentioned colour coded legend. Also commented that unless the intention for the inflation table in Table 2 is to only show potential large swings and impacts of different inflation values, it is not needed.
BG	Non-confidential	Not that we have identified	Noted
Working Group Conclusions It was concluded that the intention for the inflation template was to only show potential swings or extremes that different levels of inflation could have. The responder who highlighted this concern stated as this had now been explained, they were comfortable with this section.			

Question 11

Company	Confidential/Anonymous	11. What source of forecast inflation should be used, and should that source be consistently applied by all DNOs?	Working Group Comments
BU-UK	Non-confidential	We believe that moving forward, it would be best practice to continue to use OBR as the main source of information of the forecasted inflation, subject to availability, however, we consider that the ONS is another reliable source as a backup option, as this platform is rather dynamic, providing different cuts of the data, such as monthly, quarterly or yearly options. Please see below the link in question: Inflation and price indices – Office for National Statistics (ons.gov.uk)	OBR as the main source however ONS could be another reliable source as it is more dynamic than OBR.

UKPD	Non-confidential	It should be consistent with what the DNO will use to adjust their allowance once the year is over, and yes, ideally it should be consistent across DNOs	No source offered but the data should be consistent across distributors.
UKPN	Non-confidential	This should be a decision for DNOs as different businesses might have specific reasons for taking a specific approach, this also potentially provides the Suppliers with a range of views that they could use.	Believes the decision of the inflation source should sit with the DNOs.
ENWL	Non-confidential	We would favour using the most recent OBR forecast of CPI as the forecast of inflation. Ideally, we believe this should be consistent across DNOs because suppliers will typically operate across DNOs areas. Using alternative forecasts would risk creating artificial step changes between the alternative source and the OBR forecast used for price setting which result only from methodological differences in the forecast production.	OBR forecast of CPI as the main source and it should be consistently applied.
NPg	Non-confidential	<p>The source of inflation for setting charges in December of each year is specified in the licence conditions, meaning that all DNOs will align at that point.</p> <p>As these submissions are a forecast of expected allowances we do not believe it should be necessary for all DNOs to align their forecast inflation assumptions, as long as they are clear what assumptions they have used, to which end there could be a requirement to state the source used and any assumptions, rather than a requirement to all use the same value.</p> <p>The proposed template has a row for DNOs to enter their indexation assumption which is then used in a formula to index the allowed revenues to the correct price base. This functionality could be used by Suppliers to change the indexation if they wanted all DNOs on the same basis.</p>	<p>States that the source for setting charges in December of each year is in licence conditions so all DNOs will align at that point.</p> <p>States that not as this is for forecasting, they believe it should not be necessary for all DNOs to align their forecast inflation assumption.</p>

		However, as a DNO we are not a user of this data, so suppliers are better placed to indicate if they would prefer all DNOs to use a consistent source for their forecast	
SSE	Non-confidential	The OBR forecast should be used per the license conditions and must be consistently applied. It would help if all DNOs worked on the same basis	OBR as this is the annual source within licence and states it should be aligned.
BG	Non-confidential	The DNOs should use a sensible and up to date view of inflation, they are expected to provide a best view of allowed revenues and that is not well represented by an outdated view of inflation especially with the volatility in inflation over recent years. Whether the DNOs choose to use a consistent source or their own internal view is less important than them using a reasonable inflation forecast.	Noted
<p>Working Group Conclusions: It was concluded that as the OBR figure is formalised only once a year, this may not be the most appropriate source to use throughout the year as the value could be very different several months in the future.</p> <p>A vote was taken within the Working Group and those in favour of using the OBR figure for forecasting was zero of seven Working Group members and those in favour of allowing DNOs to set the figure was five. It was also concluded that this is the current approach and that being too prescriptive could cause issues in the future if the value become not fit for purpose or if the frequency the value was updated changed. It was also highlighted that the inflation source could be raised on the teleconference call if suppliers wanted a different source to be used.</p>			

Company	Confidential/Anonymous	12 Who should be responsible for codifying where the inflation source comes from i.e. the DCUSA, Ofgem etc? Please provide rationale	Working Group Comments
BU-UK	Non-confidential	We believe that the main body responsible for codifying the inflation sources should be DCUSA as this party's Governance regulates the licence conditions that the distributors are currently following.	DCUSA

UKPD	Non-confidential	No preference	
UKPN	Non-confidential	We do not believe that the inflation source should be determined by any party other than the DNO, but if it was determined that a single source was used by all we believe that staying with the latest OBR forecast or the long term target from Ofgem's Price Control Financial Model would be appropriate. With this as a consistent base suppliers could calculate sensitivities based on their own view of inflation	DNO
ENWL	Non-confidential	If it is necessary to formally codify this, we would consider DCUSA as the most appropriate party. Schedule 15 is a DCUSA responsibility. However, it is our view that it may be most efficient to manage this informally amongst DNOs.	DNO
NPg	Non-confidential	We do not believe this should be codified, for the reasons above and also because if there is a change to the source of the inflation forecasts, ie if the one being used stopped being published, or if there was a change to the publication frequency of the inflation forecasts then if this was codified it would necessitate a change to the legal text to reflect the change which would require eg a DCP to be raised (if it was codified in the DCUSA).	DNO
SSE	Non-confidential	The calculation is based on the licence condition; hence, responsibility should lie with Ofgem	After the discussion within the Working Group this party member believed DNOs should apply the inflation figure through out the year.
BG	Non-confidential	It is more important that a reasonable forecast of inflation is used than a consistency of forecast across the DNOs, therefore it is unnecessary to codify the inflation source but instead to ensure that DNOs provide their best view of inflation	DNO

Working Group Conclusions: Five respondents agreed that codifying the forecast inflation source wasn't the needed as per current process. One respondent stated it should be Codified within the DCUSA and another offered no view

Company	Confidential/ Anonymous	13 Do you have a preference of how the tables are reflected within the DCUSA legal text? Should they be captured within the body of the text or provided in a separate workbook, referenced within the legal text.	Working Group Comments
BU-UK	Non-confidential	We believe that the most useful approach moving forward would be to create an universal separate Excel workbook template which would be standardised and thus the discrepancies in format would be alleviated across different DNOs.	In a separate workbook
UKPD	Non-confidential	The separate workbook makes it easier, as long as there is a clear link as to where to find it.	In a separate workbook
UKPN	Non-confidential	A separate workbook would seem to be more appropriate and would allow changes in future to be made rather than buried within the legal text.	In a separate workbook
ENWL	Non-confidential	We would favour a separate workbook; this would make future updates more straight forward as it is easier to set out the required format in a spreadsheet (not least because the tables include formulaic content). The appropriate version would be referenced in the legal text but not set out in full.	In a separate workbook
NPg	Non-confidential	We believe that the template workbook for the tables should be held centrally by the DCUSA and published on their website. This could then be referenced within the legal text and all DNOs required to use	In a separate workbook

		this template. This could be referenced similarly to the CDCM models in paragraph 3 of Schedule 16.	
SSE	Non-confidential	Our preference is to provide this in a separate workbook and reference within the legal text.	In a separate workbook
BG	Non-confidential	The separate workbook approach, referenced within the legal text is preferred as it should lead to consistent outputs removing the potential for differences in formatting by the DNOs	In a separate workbook
Working Group Conclusions: All respondents agreed that the tables should be referenced within the a separate workbook with a reference in the legal as this would allow for flexibility to update the template without having to go through the formal change process.			

Company	Confidential/Anonymous	14 Do you consider the solution better facilitates the DCUSA objectives? Please give supporting reasons.	Working Group Comments
BU-UK	Non-confidential	<ol style="list-style-type: none"> 1. We believe that this change proposal focuses on the tables from Schedule 15 of DCUSA which are charges related information only and thus, it should aim to better facilitate the Charging Objectives. Since the tables in question provide several classifications of charges, we do not believe that this change proposal better facilitates any of the General Objectives. 2. Furthermore, we consider that this change proposal better facilitates the Charging Objective 2 as this additional information required in the new format would allow suppliers to make more informative decisions which would, in turn, improve competition. 	Charging objectives 2 and 4

		Given that this change proposal has been raised as a result of the updates in the new price control, RIIO-ED2, and it aims to reflect those modifications and developments in the relevant tables from Schedule 15 of DCUSA, we believe that DCP 421 better facilitates the Charging Objective 4.	
UKPD	Non-confidential	No response given	
UKPN	Non-confidential	We support the working groups view that by updating the tables within DCUSA Schedule 15 to correctly represent RIIO-ED2 allowed revenue, it is believed that DCUSA General Objective 2 and 3 and DCUSA Charging Objectives 1, 2 and 4 will be better facilitated.	General objectives 2 and 3 and charging objectives 1, 2 and 4
ENWL	Non-confidential	<p>Yes, this better satisfies DCUSA Objectives overall.</p> <p>It is our assessment that the change is positive in respect of the following objectives, for the reasons provided:</p> <p>General Objective 3: as the revised format reflects changes to DNO parties licences.</p> <p>Charging Objective 1: as the revised format reflects changes to DNO parties licences.</p> <p>Charging Objective 4: as the revised format reflects changes to DNO parties licences</p>	General objective 3 Charging objectives 1 and 4
NPg	Non-confidential	We agree with the assessment of the proposer that by updating the tables within DCUSA Schedule 15 to correctly represent RIIO-ED2 allowed revenue calculations then DCUSA General Objective 2 and 3 and DCUSA Charging Objectives 1, 2 and 4 will be better facilitated.	General objectives 2 and 3 Charging objectives 1,2 and 4
SSE	Non-confidential	Yes, it does. The cost tables in their current format are no longer fit for purpose; the proposed tables correctly represent ED2 allowed revenue.	Agree with proposers view.

BG	Non-confidential	We believe that this change better facilitates DCUSA General Objectives 2 & 3 and DCUSA Charging Objectives 1,2 & 4. As per the change proposal form the current tables in schedule 15 of the price control do not align to the ED2 price control and the proposed tables do. This aligns to objectives of efficiency, compliance and properly taking account of developments. Providing more granular and up to date forecasts potentially means industry parties face less unpredictability in the charges they face, potentially allowing them to price more competitively.	General objectives 2 and 3 Charging objective 1, 2 and 4
<p>Working Group Conclusions: For the charging objectives Six respondents believed the change better facilitates objective 4 and four respondents believed objectives 1 and 2 were better facilitated.</p> <p>For the General objectives five respondents believed objective 3 was better facilitated and four believed objective 2 was better facilitated. One responder offered no view.</p>			

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
BU-UK	Non-confidential	No, we do not consider there to be any other industry developments that may impact this CP.	None
UKPD	Non-confidential	No	None
UKPN	Non-confidential	DCP325 is also looking at Schedule 15 and so ensuring that any changes are aligned would likely be beneficial	DCP 325
ENWL	Non-confidential	None that specifically impact upon this CP, although there is another change proposal under working group development in this area, <i>DCP 325 Reviewing the requirements of Sections 35A ('Provision of Cost Information'), 35B ('Production of the Annual Review Pack'), Schedule</i>	DCP 325

		<i>15 ('Cost Information Table') and Schedule 20 ('Production of the Annual Review Pack')</i> which may be impacted by this change	
NPg	Non-confidential	Nothing, beyond the acknowledged interaction with DCP325.	DCP 325
SSE	Non-confidential	None	None
BG	Non-confidential	Not that we have identified	None
Working Group Conclusions: Three responders highlighted that DCP 325 was also reviewing some elements of schedule 15 (cost information tables) however the Working Group concluded that the two change proposals were written specifically in a way to separate which parts of schedule 15 needed changing so there shouldn't be any interactions.			

Company	Confidential/Anonymous	16 What date do you believe this change proposal should be implemented? Please provide rationale.	Working Group Comments
BU-UK	Non-confidential	Subject to approval of DCP 325, which is proposing the implementation of the tables being published three times per year instead of four, with the first publication of the year taking place at the beginning of April, we support the implementation date of this change proposal to be the 1 st Jan 2024 which will allow time for the DNOs to assess the modifications and implement accordingly in their future publications	1 st Jan 2024
UKPD	Non-confidential	No response given.	

UKPN	Non-confidential	We agree with the Working groups view that this change is implemented 1 January 2024	1 st Jan 2024
ENWL	Non-confidential	For the next quarterly return. The current tables do not reflect the licence	Noted
NPg	Non-confidential	We agree with the working group proposal of January 2024. It is too late to implement this in time for 2025/26 charge setting, which will be published by 31 December 2023, but which requires any changes to the models to be approved by September 2023. January 2024 will allow the new templates to be in use for the February 2024 quarterly submission.	1 st Jan 2024
SSE	Non-confidential	January 2024 (in time for the next quarterly submission in February)	1 st Jan 2024
BG	Non-confidential	This proposal should be implemented after the next round of charge setting to allow for changes to the ARP/CDCM models to be made to accommodate the amended inputs	Stated they be comfortable with 1 st Jan 2024 but not before
Working Group Conclusions: Five responders stated that the implementation date should not be before 01 January 2024. One responder stated for the next quarterly return and one responder offered no view.			

Company	Confidential/ Anonymous	17 Do you have any other comments?	Working Group Comments
BU-UK	Non-confidential	Overall, we are supportive of this change proposal, and we see its usefulness, however, we believe that there should be more consideration towards the DCP 325 and the further iterations as	It was noted within the Working Group that whilst there is a requirement to be aware of DCP 325, they were both deliberately

		there may be more overlap than originally expected during the discussions stage of this change proposal.	raised as separate proposals with separate requirements so there shouldn't any material impact between the two changes.
UKPD	Non-confidential	No	None
UKPN	Non-confidential	Not at this time.	None
ENWL	Non-confidential	No	None
NPg	Non-confidential	We note that this change will also be reflected in the CDCM and ARP 'General Inputs' tables. In the CDCM the 'SoLR & bad debt adders' sheet uses values from the 'General Inputs' sheet for the calculations of the fixed adders. It should be noted that in RIIO-ED2 the 'COVID-19 Bad Debt Adjustment' passthrough term no longer exists and the 'Eligible Bad Debt Adjustment' passthrough term is now the 'Valid Bad Debt Adjustment' and only includes the IDNO bad debt, as there has been a change to how we recover bad debt in the ED2 licence. We don't believe this requires a change to the DCUSA as 103 references "Eligible Bad Debt" but does not reference the COVID-19 bad debt separately. The CDCM would require a change to remove the COVID-19 bad debt rows from the calculation in the 'SoLR & Bad Debt adders' sheet but would not require anything further beyond the name of the passthrough item changing, which will need to be flagged to CEPA/TNEI when the CDCM models are updated to reflect the revised Table 1.	Noted
SSE	Non-confidential	No comment	None

BG	Non-confidential	No comment	None
Working Group Conclusions:			