

DCP 415 - Replacement of D0242/D0315 for MHHS

COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

Company	Confidential/ Anonymous	1. Do you understand the intent of DCP 415?	Working Group Comments
British Gas	Non-confidential	Yes.	
UK Power Networks	Non-confidential	Yes.	
Energy Assets Networks Ltd	Non-confidential	Yes.	
Electricity North West	Non-confidential	Yes.	
SP Energy Networks	Non-confidential	Yes.	
National Grid Electricity Distribution	Non-confidential	Yes.	
Working Group Conclusions: The Working Group noted that all respondents understood the intent of the CP.			

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Company	Confidential/ Anonymous	2. Are you supportive of the principles of DCP 415?	Working Group Comments
British Gas	Non-confidential	Yes.	
UK Power Networks	Non-confidential	Yes.	
Energy Assets Networks Ltd	Non-confidential	Yes.	
Electricity North West	Non-confidential	<p>Yes, in principle as the inbound flow (D0030) that triggers the outbound D0242 is moving to a DIP flow for migrated sites therefore it seems sensible for the D242 to also move to a DIP flow in this scenario.</p> <p>Also, a number of data items that appear on the current D242 (e.g profile class) will no longer be relevant for sites that have migrated due to MWHHS so it may be difficult to retain the flow.</p> <p>We do note that the feasibility does need investigation prior to progressing.</p>	<p>It was explained that this response is looking from a point of view of time and cost, and that if it was cheaper to keep existing flows, this should be considered.</p> <p>The Working Group discussed the challenge of having two D0030 and REP2 coming in. It was discussed whether there would be two D242s for the same settlement date or these would be put into a single D242. It was noted that this could be challenging if there is a lag between the two input flows being received.</p>

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			<p>It was discussed that this CP may be forced down the route of using the DTN if the DIP flow is not feasible.</p> <p>The Working Group agreed to move forward with the development of a DIP flow, in view of the lack of impact identified that would require the DTN to be considered.</p>
SP Energy Networks	Non-confidential	Yes.	
National Grid Electricity Distribution	Non-confidential	Yes.	
<p>Working Group Conclusions: The Working Group noted the broad support from respondents, and the comments from ENWL regarding the feasibility assessment of using the DTN or DIP. It was agreed the CP would be progressed with the intent of using the DIP.</p>			

Company	Confidential/Anonymous	3. Do you have any comments on the structure of the flow, such as items you would like to include or items you believe should be removed? Please provide your rationale.	Working Group Comments
British Gas	Non-confidential	Preferably DUoS Traiff ID rates to be included within flow structure and broken down into volumes components, i.e. Red, amber green (as mentioned in 3.2 of the DCP). This should help with volume reconciliation and simply rate validations from charging/rate schedules.	It was discussed whether, post-MWHHS, you could still end up with data passing to a default tariff and whether there could be a situation

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			<p>where the DUoS tariff ID and the rates don't align. It was discussed that you would have to use the rates that applied, as opposed to the DUoS tariff rates.</p> <p>The Working Group discussed that there was merit to the proposal, but noted the lack of responses or concerns from other Suppliers. The Working Group agreed that Suppliers should be contacted again about this to gather feedback on support or any concerns.</p>
UK Power Networks	Non-confidential	There is currently no D0030 received for DR (Dispute Reconciliation) runs. Is that relevant under MHHS?	This was noted by the Working Group as something to monitor.
Energy Assets Networks Ltd	Non-confidential	Should the GSP Group be owned by the LDSO to improve consistency throughout the flow? Have the 'Total Daily Number of MSIDs' and 'Total Daily Uncorrected Volume' being intentionally left blank in the 'Owner' field?	<p>The Working Group noted that the owner fields are also blank in REP-002. The Working Group agreed the GSP is owned by the DNO.</p> <p>It was discussed that the totals fields have come out of the settlements process, which could be a reason these may not owned by LDSO.</p> <p>The Working Group agreed to check with the programme whether these</p>

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			will be picked up by it, to identify and agree the owners.
Electricity North West	Non-confidential	None, St Clements as the provider of the Durabill billing system should be better placed to comment on this.	St Clements provide a DUoS billing system, DURABILL, and stated that they don't have concerns over the current straw man. It was noted that if the rates were added, as discussed previously, this would also be achievable.
SP Energy Networks	Non-confidential	Happy with current content	
National Grid Electricity Distribution	Non-confidential	No.	
Working Group Conclusions:			

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Company	Confidential/ Anonymous	4. Are there any consequences of the flow being a DIP flow as opposed to a DTN flow? Please provide your rationale.	Working Group Comments
British Gas	Non-confidential	No.	
UK Power Networks	Non-confidential	<p>If we did this via a DTN flow it would either need to be a new flow (same amount of work) or a change to the existing flows (but as two versions are likely to have to co-exist during migration it is the same amount of work) and if the DTN does get removed subsequently we will have to do this change all over again, in any case, to move to the DIP (creating double the work).</p> <p>Billing / validation systems etc. will need to accomodate two different methods of transmission for data flow inputs, it seems sensible to match the transmission method for the data flow outputs to its input source. There is then a natural migration.</p>	<p>It was discussed that it there is going to be cost and complexity whichever way you it is done, but there could be more work to do if there's the eventual migration to the DIP from the DTN.</p> <p>It was questioned whether the Working Group had fully investigated the other option and understood the amount of work involved. The respondent stated there was a need to consider time pressures and costs related to the whole programme, so it's about whether it was right to do the work now or later.</p> <p>The Working Group agreed, as per question 2, to continue moving ahead towards a DIP flow.</p>
Energy Assets Networks Ltd	Non-confidential	The industry billing systems will need to be able to process the JSON format but this is already a requirement of the MHHS design.	It was noted that this is correct to a point, however based on the MHHW design, there is no requirement to send out a JSON message.

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Electricity North West	Non-confidential	<p>This will potentially add cost and complexity to what is already a challenging programme of delivery and timescale for DNO's. St Clements, as the provider of Durabill, will be best placed to assess whether it would be possible to modify the existing DTN flows rather than introduce brand new DIP flows. The solution should be chosen on the basis of which option is going to have the least impact and therefore least risk to the programme as a whole, therefore, feasibility of amending the existing flow should be investigated.</p> <p>SCS also made the following comment; DURABILL will be developing functionality to load messages received as a DIP flow as part of the MHHS programme. DURABILL could be capable of producing a DIP flow, however connection to the DIP or an intermediary DNO adapter is subject to current MHHS Discussions.</p>	<p>It was noted that from a DURABILL development point of view, producing the DTN or DIP flow is not seen as dramatically different in terms of cost.</p> <p>It was discussed that the costs will largely be immediately after DURABILL development (e.g., developing adapters and a connection to the DIP).</p> <p>It was noted that every LDSO will need some method of connecting to the DIP for MPRS and that these discussions are still in early stages.</p> <p>It was noted that, if the adapter is required in any case, it will already be needed for both incoming and outgoing flows.</p>
SP Energy Networks	Non-confidential	As long contact for DIP, we don't see any consequences in changing from DTN to DIP flows	
National Grid Electricity Distribution	Non-confidential	DURABILL will be developing functionality to load messages received as a DIP flow as part of the MHHS programme. DURABILL could be capable of producing a DIP flow, however connection to the DIP or an intermediary DNO adapter is subject to current MHHS discussions.	See above.
Working Group Conclusions:			

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Company	Confidential/ Anonymous	5. Are there any consequences of using a single flow for both LDSOs and Suppliers? Please provide your rationale.	Working Group Comments
British Gas	Non-confidential	No.	
UK Power Networks	Non-confidential	Yes it is a synergy by reducing the number of flows - the structure of the 2 existing flows is the same.	
Energy Assets Networks Ltd	Non-confidential	We do not foresee any consequences at this stage.	
Electricity North West	Non-confidential	No consequences have been identified. SCS have stated that the development of a single flow would naturally bring lower cost and development time compared to two separate flows.	
SP Energy Networks	Non-confidential	If the flow is not provide via DIP, then two billing runs will be affected instead one. We have had previous experience of D0030/D0314 not been provided inline with billing calendar dates and this has caused a delay to NHHSC invoices being issued.	It was discussed that, there would be two versions of the flow: one for Suppliers and one for LDSOs. REP002 and REP002A make the differentiation. REP-002 comes in and a D242 is sent to suppliers. REP-002A comes in and a D242 is sent to IDNOs. A delay to one would not impact the other.
National Grid Electricity Distribution	Non-confidential	St Clements do not foresee any negative consequences of using a single flow for both. The development of a single flow would naturally bring lower cost and development time compared to two separate flows.	
Working Group Conclusions:			

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Company	Confidential/ Anonymous	6. Do you have any comments on the proposed draft legal text? Please provide your rationale.	Working Group Comments
British Gas	Non-confidential	No.	
UK Power Networks	Non-confidential	No.	
Energy Assets Networks Ltd	Non-confidential	No.	
Electricity North West	Non-confidential	We have no comments on the proposed legal text.	
SP Energy Networks	Non-confidential	I am happy with the current updates to the draft legal text	
National Grid Electricity Distribution	Non-confidential	Section 6 – The Market Domain Data will be replaced with Industry Standing Data as part of the MHHS programme	This was noted by the Working Group.
Working Group Conclusions:			

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Company	Confidential/ Anonymous	7. Are there any other consequential changes to the DCUSA legal text as a result of the introduction of the REP-242 replacement flow that the Working Group should be considering? Please provide your rationale.	Working Group Comments
British Gas	Non-confidential	No.	
UK Power Networks	Non-confidential	None identified	
Energy Assets Networks Ltd	Non-confidential	No comment.	
Electricity North West	Non-confidential	None that we are aware of.	
SP Energy Networks	Non-confidential	No.	
National Grid Electricity Distribution	Non-confidential	No.	
Working Group Conclusions:			

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Company	Confidential/ Anonymous	8. Do you consider that the proposal better facilitates the DCUSA Charging Objectives? Please give supporting reasons.	Working Group Comments
British Gas	Non-confidential	Yes.	
UK Power Networks	Non-confidential	Yes – see our proposal	
Energy Assets Networks Ltd	Non-confidential	<p>We believe this question should reference ‘General Objectives’. We agree with the WG’s view that General Objectives 1 and 4 are better facilitated.</p> <p>General Objective 3 may also be better facilitated in that the DNO and IDNO parties will be able to support the MHHS Programme as part of their licence obligations to comply with certain industry codes.</p>	<p>This was noted by the Working Group and will be corrected.</p> <p>This was agreed by the Working Group.</p>
Electricity North West	Non-confidential	We believe this change would better facilitate charging objective 1 and 4.	
SP Energy Networks	Non-confidential	Yes, hopefully this will reduce the billing schedule for IDNOs.	
National Grid Electricity Distribution	Non-confidential	We agree that the proposal facilitates DCUSA General Objectives 1 & 4	
Working Group Conclusions:			

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Company	Confidential/ Anonymous	9. Are you aware of any impact on other industry codes of this Proposal?	Working Group Comments
British Gas	Non-confidential	No.	
UK Power Networks	Non-confidential	Only to the extent that the new flow should be appropriately developed and catalogued.	
Energy Assets Networks Ltd	Non-confidential	We agree that the BSC and REC are potentially impacted.	
Electricity North West	Non-confidential	We are not aware of any impact on other industry codes.	
SP Energy Networks	Non-confidential	No.	
National Grid Electricity Distribution	Non-confidential	No.	
Working Group Conclusions:			

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Company	Confidential/ Anonymous	10. Are you aware of any wider industry developments that may impact upon or be impacted by this CP?	Working Group Comments
British Gas	Non-confidential	No, proposal raised due to impacts of changes for MHHS programme.	
UK Power Networks	Non-confidential	Only the work on wider consequential code changes that may consider changing some of the same clauses - the two pieces of work should be cogniscent of each other.	
Energy Assets Networks Ltd	Non-confidential	The MHHS Programme.	
Electricity North West	Non-confidential	No.	
SP Energy Networks	Non-confidential	It will ensure the DNO move away from the DTN gateway and use the DIP for all flows.	
National Grid Electricity Distribution	Non-confidential	This flow is outside of the MHHS end-to-end design and therefore we understand that it will outside of the scope of SIT. We therefore believe that a go-live date in line with the start of MHHS migration is appropriate	
Working Group Conclusions:			