




DCUSA Change Report		At what stage is this document in the process?
<h2>DCP 415</h2> <h3>Replacement of D0242/D0315 for MHHS</h3> <p>Date Raised: 10/11/22 Proposer Name: Peter Waymont Company Name: Eastern Power Networks Party Category: DNO</p>		<p>This draft Change Report was not issued for voting as the change was handed over to the MHHS Programme to lead on.</p> <p>This draft Change Report has been published on the DCUSA website for information only.</p>
<p>Purpose of Change Proposal:</p> <p>DCP 415 seeks to create a new DCUSA owned DIP data message for supercustomer billing statements using MHHS data.</p>		
	<p>This document is issued in accordance with Clause 11.20 of the DCUSA. Parties are invited to consider the proposed amendment (Attachment 1) and submit their votes using the Voting form (Attachment 2) to dcusa@electralink.co.uk by 10 March 2023.</p> <p>The voting process for the proposed variation and the timetable of the progression of the Change Proposal (CP) through the DCUSA Change Control Process is set out in this document.</p> <p>If you have any questions about this paper or the DCUSA Change Process, please contact the DCUSA by email to dcusa@electralink.co.uk or telephone 020 7432 3011.</p>	
	<p>Impacted Parties: Suppliers/DNOs/IDNOs</p>	
	<p>Impacted Clauses:</p> <p>Section 1A – Clause 1. DEFINITIONS AND INTERPRETATION; Section 2A – Clause 19. CHARGES; SCHEDULE 16 - COMMON DISTRIBUTION CHARGING METHODOLOGY; SCHEDULE 21 - PORTFOLIO BILLING FOR NESTED NETWORKS</p>	

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Any questions?

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Timetable

The timetable for the progression of the CP is as follows:

Change Proposal timetable

Activity	Date
Initial Assessment Report	16 November 2022
Consultation Issued to Industry Participants	December 2022
Change Report Approved by Panel	15 February 2023
Change Report issued for Voting	17 February 2023
Party Voting Closes	10 March 2023
Change Declaration Issued to Parties	14 March 2023
Implementation	First release after Party Voting

1 Executive Summary

What?

- 1.1 A new flow needs to be introduced for supercustomer statements in the post Market-Wide Half-Hourly Settlement (MHHS) environment.

Why?

- 1.2 MHHS introduces new data flows using the Data Integration Platform (DIP) and JavaScript Object Notation (JSON) format, including for the supercustomer data from settlement. There will be removal of certain data items used in the current process, making population of the D0242 'Supercustomer DUoS Daily Statement'/D0315 'Embedded Network Supercustomer DUoS Daily Statement' impossible in their current format.

How?

- 1.3 By introducing a new DIP flow in JSON format, to be sent in place of the D0242/D0315 for informing counterparties of Distribution Use of System (DUoS) billing outcomes based on settlement data from MHHS.

2 Governance

Justification for Part 1 Or Part 2 Matter

- 2.1 It is considered that this is a Part 2 matter as it does not meet the criteria for Part 1.

Requested Next Steps

- 2.2 The Panel is to consider if the Working Group have carried out the level of analysis required to enable Parties to understand the impact of the proposed amendment and to vote on DCP 415.
- 2.3 The DCUSA Panel recommends that this CP be issued to Parties for voting.

3 Why Change?

Background of DCP 415

- 3.1 The change is required in order to continue to operate the supercustomer DUoS process in the MHHS environment.
- 3.2 A new flow, MHHS-REP-002 will be introduced to sit alongside, and eventually replace, the D0030 and D0314 flows that are currently sent to distributors and suppliers. The new flow structure is available at <https://mhhsprogramme.co.uk/design/supporting-documents> (under "ECS Reports - External").
- 3.3 The structure of the existing DTN flows (D0030, D0314, D0242 and D0315) are available at <https://www.electralink.co.uk/dtc-catalogue/>.

4 DCP 415 Working Group Assessment

- 4.1 The DCUSA Panel established a Working Group to assess DCP 415. Meetings were held in open session and the minutes and papers of each meeting are available on the DCUSA website – www.dcusa.co.uk.
- 4.2 The Proposer walked the Working Group through the change and explained that a new flow needs to be introduced for supercustomer statements in the post Market-Wide Half-Hourly Settlement (MHHS) environment and that, due to the removal of certain data items used in the current process, it will be impossible to populate the existing D0242 'Supercustomer DUoS Daily Statement'/D0315 'Embedded Network Supercustomer DUoS Daily Statement' flows in their current format.
- 4.3 The Working Group issued a consultation to gather feedback from Parties on the approach to the implementation of the D0242/D0315 replacement flow, currently referred to as the REP-0242 for the purpose of this change proposal.
- 4.4 The Proposer provided a strawman, provided with the consultation, showing the structure of the proposed REP-0242 flow. The Proposer suggested a single flow be used for both suppliers and LDSOs, by putting the supplier or LDSO ID into field DI-087 on the strawman.

5 DCP 415 Consultation

- 5.1 The DCP 415 consultation was issued on 23 December 2022. There were a total of six responses received.
- 5.2 Set out below are the questions that the Working Group sought views on, and a summary of the responses received. The full set of responses and the Working Group's comments are provided in Attachment 3.

Question 1 - Do you understand the intent of DCP 415?

- 5.3 All consultation respondents understood the intent of the CP.

Question 2 - Are you supportive of the principles of DCP 415?

- 5.4 All consultation respondents supported the principle of the CP.
- 5.5 One consultation respondent added that it supported the change proposal in principle, due to the D0030 flow moving to a DIP flow and a number of data items no longer being available. The respondent also noted that the feasibility needs investigation prior to progressing the change proposal further.

Question 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.

- 5.6 One respondent suggested the DUoS Tariff ID rates be included within the flow structure and broken into volumes components, such as Red, Amber and Green. It stated this should help with volume reconciliation and simplify rate validations.
- 5.7 One respondent noted there is currently no D0030 receive for Dispute Reconciliation runs and asked is this was relevant under MHHS.
- 5.8 The Working Group noted the outgoing flow should be sent whenever there is an incoming REP002.
- 5.9 One respondent questioned whether the GSP Group should be owned by the LDSO to improve consistency throughout the flow. It also asked whether the 'Total Daily Number of MSIDs' and 'Total Daily Uncorrected Volume' fields had been left intentionally blank.
- 5.10 The Working Group confirmed the GSP is owned by the DNOs. The Working Group agreed to contact the MHHS programme to check that the owners will be agreed in due course.
- 5.11 One respondent was happy with the current content.
- 5.12 Two respondents had no comment, with one noting that St Clements would be better placed to comment on this.
- 5.13 St Clements confirmed that, for DURABILL, it did not have concerns over the current straw man.

Question 4 - Are there any consequences of the flow being a DIP flow as opposed to a DTN flow? Please provide your rationale.

- 5.14 One respondent noted that continuing to use the DTN would require the same amount of work as a new flow would be needed. It also noted that if the DTN is subsequently removed, a DIP flow would then need to be created, meaning that double the amount of work would have been undertaken. It also noted that it would be sensible for data flow outputs to match the transmission method of the inputs.
- 5.15 The Working Group noted there is existing action with the Chair to confirm with the programme that picking this flow up in the DIP is acceptable. It was noted that this is a potential risk to the proposal.
- 5.16 One respondent noted that industry billing systems would need to be able to process the JSON format, but that this was already a requirement of the MHHS design.
- 5.17 One respondent stated that this will add cost and complexity to what it considered to be an already challenging programme of delivery and timescales for DNOs. It suggested St Clements would be best placed to assess whether it would be possible to modify the existing DTN flows rather than introduce new DIP flows. It stated that the solution should be chosen on the basis of which option is going to have the least impact and therefore present the least risk to the programme as a whole, and that the feasibility of amending the existing flow should be investigated.
- 5.18 St Clements confirmed that, from a DURABILL point of view, the costs of developing the flow in either the DTN or DIP were going to be similar. It noted that the costs after DURABILL, e.g., the adapters

and connection to the DIP, is where the cost is unknown. The Working Group noted that this was not a consequence of introducing the proposed flow to the DIP as these adapters/connections will be needed regardless.

- 5.19 Two respondents stated that DURABILL will be developing functionality to load messages received as a DIP flow as part of the MHHS programme. They stated that 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.
- 5.20 The Working Group noted this as a dependency.
- 5.21 Two respondents did not identify any issues changing from a DTN flow to a DIP flow.

Question 5 - Are there any consequences of using a single flow for both LDSOs and Suppliers? Please provide your rationale.

- 5.22 One respondent stated it is a synergy by reducing the number of flows as the structure of both is the same.
- 5.23 Two respondents noted that the creation of a single flow would bring lower costs and development time.
- 5.24 Four respondents did not identify any consequences.
- 5.25 One respondent stated that if the flow is not provided by the DIP, two billing runs would be affected. It noted a previous experience whereby the D0030 and D0314 had not been provided inline with calendar billing dates, leading to a delay in NHHSC invoices being issued.

Question 6 - Do you have any comments on the proposed draft legal text? Please provide your rationale?

- 5.26 Five respondents had no comments on the legal text.
- 5.27 One respondent stated that the Market Domain Data in Section 6 would be replaced with Industry Standing Data as part of the MHHS programme.
- 5.28 The Working Group agreed with this and drafted an amendment to Schedule 19 Section 6 of the DCUSA legal text. The Working Group noted that Industry Standing Data would need to be defined and that this should be picked up by a cross-code piece of work on consequential changes. A placeholder definition was drafted for the proposed legal text, but noted that this may be superseded by, or need to be aligned with, the aforementioned work on consequential changes.

Question 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.

- 5.29 No respondents identified any other consequential changes.

Question 8 - Do you consider that the proposal better facilitates the DCUSA General Objectives? Please give supporting reasons

- 5.30 Four respondents agreed that the change proposal better facilitates the DCUSA General Objectives.

- 5.31 Two respondents agreed DCUSA General Objectives 1 and 4 would be better facilitated.
- 5.32 One respondent stated that DCUSA 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.
- 5.33 The Working Group agreed that DCUSA General Objective 3 would also be better facilitated by this change proposal.

Question 9 - Are you aware of any impact on other industry codes of this Proposal?

- 5.34 Four respondents did not identify impacts on any other industry codes.
- 5.35 One respondent agreed that REC and BSC are potentially impacted.
- 5.36 One respondent stated impacts only to the extent that the new flow should be appropriately developed and catalogued.

Question 10 - Are you aware of any wider industry developments that may impact upon or be impacted by this CP?

- 5.37 Two respondents did not identify any wider industry developments.
- 5.38 Two respondents stated the MHHS Programme as a wider industry development, with one noting that this change proposal is raised due to the impacts of the MHHS Programme.
- 5.39 One respondent stated there could be impacts to the wider consequential code changes that may consider changing some clauses and that these pieces of work should be cognisant of each other.
- 5.40 One respondent stated it will ensure the DNO move away from the DTN gateway and use the DIP for all flows.
- 5.41 One respondent stated that the flow is outside of the MHHS end-to-end design and therefore, it understands, that it will be outside of the scope of SIT. It therefore believes that a go-live date in line with the start of MHHS migration is appropriate.

6 Working Group Conclusions & Final Solution

- 6.1 The Working Group reviewed the responses and noted that the consultation respondents supported the intent and the principles of the CP.
- 6.2 The Working Group identified the following areas from the consultation responses for further consideration:
- Including the DUoS charge rates and volumes, broken down by red, amber, green.
 - Liaison with MHHS programme regarding this as an additional DIP flow.
- 6.3 The Working Group followed-up with Suppliers to gain further feedback on Question 3 and the proposal by one respondent of including the DUoS charge rates and volumes, broken down by red, amber, green. Three responses were received:

- One respondent stated it need to see the MPAN, volume per coloured tariff, fixed rate charge if applicable, capacity if applicable, the rate and the run type for the bill. It asked whether the REP-242 flow structure could be similar to the D2021, which provides a full breakdown of costs, as it believes customers want to see the breakdown of what they are paying or receiving from the network. It also stated it will be important for customers to see the breakdown of charges within the distribution network as more power is traded within the distribution network through communities.
- One respondent stated that it did believe including the tariffs in the D0242 replacement would significantly change anything for it, as its systems load and hold the associated DUoS Tariff ID rates information from other sources and it doesn't currently envisage this will need to change as part of MHHS design changes unless the replacement D0242 contains it. It noted that this could be a lot of additional data to store/process as the tariff files would essentially be being resent with every single replacement D0242 flow. It concluded that it did not see this as a need as the benefit to it would be limited, but that it was not significantly opposed to the suggestion either, as it could see the supplier benefit (to a limited extent) suggested by the respondent.
- One respondent noted that the proposed flow structure does not include a breakdown of volume charges by time band, which, it stated, would be useful for reporting, forecasting and validation purposes.

6.4 Although there was not much response, the Working Group could see the benefit to all Parties in breaking out the volumes for each DUoS Tariff ID into the unit charge components, e.g. red, amber, green.

6.5 The Working Group contacted the MHHS programme to determine the practicalities of adding an additional DIP flow. The MHHS programme representative stated this was currently being considered as part of a Consequential Changes Impact Assessment.

6.6 The Working Group recognises the dependency on the MHHS programme including this as a DIP flow, and agreed that the proposed approach of creating a DIP flow would be taken forward.

7 Relevant Objectives

Assessment Against the DCUSA Objectives

7.1 For a DCUSA CP to be approved it must be demonstrated that it better facilitates the DCUSA Objectives. There are five General Objectives and six Charging Objectives. The full list of objectives is documented in the CP form provided as Attachment 4.

7.2 The Working Group considers that the following DCUSA General Objectives are better facilitated by DCP 415:

	DCUSA General Objectives	Identified impact
<input checked="" type="checkbox"/>	1. The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks	Positive
<input type="checkbox"/>	2. The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent therewith) the promotion of such competition in the sale, distribution and purchase of electricity	Neutral
<input checked="" type="checkbox"/>	3. The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences	Positive
<input checked="" type="checkbox"/>	4. The promotion of efficiency in the implementation and administration of the DCUSA	Positive
<input type="checkbox"/>	5. Compliance with the EU Internal Market Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	Neutral

7.3 Objective 1 - The ability to charge DUoS in a governed process enables the Distributors to recover their revenue and hence maintain the network.

7.4 Objective 3 - This proposal supports the MHHS Programme by proactively developing the flow for implementation inline with the go-live date for MHHS.

7.5 Objective 4 - Moving the processes into the post MHHS environment enhances the efficiency of processes administrated under the DCUSA.

7.6 The Working Group's view is that there is a neutral impact on the rest of the objectives.

8 Impacts & Other Considerations

Does this Change Proposal impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

8.1 This change is related to, and a result of, the MHHS Programme.

Does this Change Proposal impact Other Codes?

BSC.....	<input checked="" type="checkbox"/>	MRA.....	<input type="checkbox"/>
CUSC.....	<input type="checkbox"/>	SEC.....	<input type="checkbox"/>
Grid Code.....	<input type="checkbox"/>	REC.....	<input checked="" type="checkbox"/>
Distribution Code..	<input type="checkbox"/>	None.....	<input type="checkbox"/>

Consideration of Wider Industry Impacts?

- 8.2 The MHHS discussions have recognised the need for this flow but have not dived deeper at this time as it is “owned” by DCUSA.

9 Implementation

- 9.1 The proposed implementation date for DCP 415 is first release following Party voting. The Working Group identified no reason why this should not be implemented before MHHS go-live, particularly as there needs to be time allowed for system development in advance of MHHS go-live.

10 Legal Text

- 10.1 The legal text for DCP 415 has been reviewed by the DCUSA legal advisors and is provided as Attachment 1.
- 10.2 The Working Group has considered the legal text and is satisfied that it meets the intent of the solution.

11 Code Specific Matters

Modelling Specification Documents

- 11.1 N/A

Reference Documents

- 11.2 N/A

12 Recommendations

Panel's Recommendation

- 12.1 The Panel approved this Change Report on 15 February 2023. The Panel considered that the Working Group has carried out the level of analysis required to enable Parties to understand the impact of the proposed amendment and to vote on DCP 415.
- 12.2 The Panel have recommended that this report is issued for Voting and DCUSA Parties should consider whether they wish to submit views regarding this CP.

13 Attachments

- Attachment 1 - DCP 415 Legal Text
- Attachment 2 - DCP 415 Voting Form
- Attachment 3 - Consultation Responses & Working Group Comments

- Attachment 4 - DCP 415 Change Proposal
- Attachment 5 - REP-242 Flow Structure