




DCUSA Consultation		At what stage is this document in the process?
<h1>DCP 436</h1> <h2>Date change for the provision of Rota Load Block Alpha Identifiers and potential provision of additional data</h2> <p><b>Date Raised:</b> 12 February 2024</p> <p><b>Proposer Name:</b> Paul Nicholson</p> <p><b>Company Name:</b> Northern Powergrid</p> <p><b>Party Category:</b> DNO</p>		01 – Change Proposal
		02 – Consultation
		03 – Change Report
		04 – Change Declaration
<p><b>Purpose of Change Proposal:</b></p> <p>The proposal is to change the dates related to the provision of Rota Load Block Alpha Identifiers to later dates and optimise the way the data is provided (e.g., providing subsets based on changes to block letters, new connections, etc.). Later dates would ensure that the most up to date Rota Load Block Alpha Identifiers are provided to Customers via Suppliers during the winter when the use of Rota Load Disconnections are most likely to be needed. Without changing the dates, DNOs and IDNOs would need to issue Rota Load Block Alpha Identifiers to Suppliers twice per year to achieve this accuracy during winter, which is disruptive to all Parties involved. The provision of the additional subset of data may also support Suppliers in updating their systems in a more efficient manner.</p>		
<div>  <p>This document is a Consultation issued to DCUSA Parties and any other interested Parties in accordance with Clause 11.14 of the DCUSA seeking industry views on DCP 436.</p> <p>The Working Group recommends that this Change Proposal should proceed to Consultation.</p> <p>Parties are invited to consider the questions set in section 10 and submit comments using the form attached as Attachment 2 to <a href="mailto:dcusa@electralink.co.uk">dcusa@electralink.co.uk</a> by 12 April 2024.</p> <p>The Working Group will consider the consultation responses and determine the appropriate next steps for the progression of the Change Proposal.</p> </div>		

	<b>Impacted Parties:</b> Suppliers/DNOs/IDNOs
	<b>Impacted Clauses:</b> Schedule 8 – Paragraphs 13.1; 13.2; 13.3

## Contents

1	Summary	4
2	Governance	4
3	Why Change?	4
4	Code Specific Matters	5
5	Working Group Assessment	5
6	Relevant Objectives	7
7	Impacts & Other Considerations	7
8	Implementation	8
9	Legal Text	8
10	Consultation Questions	8
11	Attachments	9



Any questions?

Contact:

**Code Administrator**



DCUSA@electralink.co.uk



0207 432 3011

Proposer:

**Paul Nicholson**



paul.nicholson@northernpowergrid.com



0191 3877 357  
07921 111 767

Other:

**Sam Townend**



sam.townend@enwl.co.uk



07741 806 893

## Timetable

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

### Change Proposal timetable

Activity	Date
Initial Assessment Report	21 February 2024
Consultation Issued to Industry Participants	March 2024
Change Report Approved by Panel	15 May 2024
Change Report issued for Voting	17 May 2024
Party Voting Closes	10 June 2024
Change Declaration Issued to Parties	13 June 2024

## 1 Summary

### What?

- 1.1 The proposal is to change the dates related to the provision of Rota Load Block Alpha Identifiers to later dates. The dates requiring changes are referenced in Schedule 8 – Paragraph 13.1, 13.2, 13.3. The later dates will be approximately 3-months later than the currently specified dates.

### Why?

- 1.2 Later dates would ensure that the most up to date Rota Load Block Alpha Identifiers are provided to Customers via Suppliers during the winter when the use of Rota Load Disconnections are most likely to be needed. Without changing the dates, (I)DNOs would need to issue Rota Load Block Alpha Identifiers to Suppliers twice per year to achieve this accuracy during winter, which is disruptive to (I)DNOs and Suppliers. The later date also aligns with the (I)DNO requirement to review and provide updates to the Protected Sites List to the Department for Energy Security and Net Zero by 1st October every two years. The Protected Sites List can require alterations to be made to the Rota Load Alpha Identifiers, again driving changes to be made up to October.

### How?

- 1.3 It is proposed to change the date in Schedule 8 – Paragraph 13.1 from 30 June to 30 September, and Schedule 8 – Paragraph 13.2 from 31 July to 31 October and the second working day of August to the second working day of November. The final DCUSA CP may also propose to change the dates reference in 13.3 if deemed necessary and agreed with other Impacted Parties. A Working Group is proposed for Impacted Parties to agree the exact date changes.

## 2 Governance

### Justification for Part 1 Or Part 2 Matter

- 2.1 This CP has been classed as a Part 2 Matter therefore, Authority consent is not required.

### Next Steps

- 2.2 This consultation is issued for a period of 15 working days. The Working Group will review the responses after this period.

## 3 Why Change?

- 3.1 Later dates would ensure that the most up to date Rota Load Block Alpha Identifiers are provided to Customers via Suppliers during the winter when the use of Rota Load Disconnections are most likely to be needed. Without changing the dates, (I)DNOs would need to issue Rota Load Block

Alpha Identifiers to Suppliers twice per year to achieve this accuracy during winter, which is disruptive to (I)DNOs and Suppliers.

- 3.2 The later date also aligns with the (I)DNO requirement to review and provide updates to the Protected Sites List to the Department for Energy Security and Net Zero by 1st October every two years. The Protected Sites List can require alterations to be made to the Rota Load Alpha Identifiers, again driving changes to be made up to October.

## 4 Code Specific Matters

### Reference Documents

- 4.1 This section is not applicable to this CP.

## 5 Working Group Assessment

### Working Group Assessment

- 5.1 The DCUSA Panel established a Working Group to assess this CP. Meetings were held in open session and the minutes and papers of each meeting are available on the DCUSA website – [www.dcusa.co.uk](http://www.dcusa.co.uk).
- 5.2 The Proposer walked the Working Group through the change and explained that to meet the dates currently required by the DCUSA the data was extracted around April each year, meaning it is 6 to 7 months old by the time the block letter reaches the customer. The Proposer noted that the data had needed to be cut again due to changes to some of the block letters, meaning the activity was performed more than once, requiring effort by all Parties involved (DNOs, IDNOs, the Nominated Central Source and Suppliers). The Proposer explained that by pushing the dates back, it is hoped that this would keep this activity limited to once per year.

**Question 1 – Do you understand the intent of the CP?**

**Question 2 – Are you supportive of the principle of the CP?**

- 5.3 The Working Group discussed why the block letters change.
- 5.4 It was explained that they may change as a result of, for example, a rearrangement of the network to suit a new connection, a customer being moved from one primary substation to another as a result of changes of demand and the need to balance the demand on each block, or the addition or removal of a protected site.
- 5.5 The Proposer explained that there had been a lot of activity in relation to block letters as a result of ongoing work on protected sites, and that by submitting the data to the Nominated Central

Source later in the year, DNOs and IDNOs would be submitting more up to date information than previously.

**Question 3 – Do you agree that the dates for the DNO/IDNO Parties to submit the Alpha Identifiers to the Nominated Central Source, and therefore for the collated data to be uploaded to the DCUSA website, should be moved to later in the year? Please provide your rationale.**

- 5.6 The Working Group discussed concerns raised by the Supplier representative that the dates, as currently drafted in the legal text, were too close to winter and would mean some customers may not get their updated block letter on a bill in time for winter.
- 5.7 The Working Group discussed whether the Supplier could comply with its obligation to send the updated block letter to the customer in other ways, such as pointing them to a website. Whilst the Working Group acknowledged there may be other avenues, it was agreed that any changes to Supplier obligations in respect of complying with this requirement should form part of another Change Proposal.

**Question 4 – Do you agree with the proposed dates as set out in the current draft legal text? (See Attachment 1 to this consultation.) If not, please provide suggestions for your proposed dates and your rationale for these.**

- 5.8 The Working Group discussed the impact to Suppliers. The Supplier representative explained that it was a large piece of work to reconcile and update their systems with the block letters, requiring a lot of resource to complete it. The Working Group discussed whether the Nominated Central Source could provide a subset of data, alongside the existing full dataset, that showed only where there were new or changed post codes, and whether this would assist Suppliers in updating their systems in a more efficient manner.
- 5.9 The Working Group noted that this should be considered and, having successfully applied to Panel to amend the intent of the CP to include the potential provision of a subset of data, is now consulting on this.

**Question 5 – To Suppliers: If a subset of data was provided that showed changes to the block letter for those post codes that had changed or for new post codes that had been created, in the previous 12-month period, would this reduce the time needed to update your systems?**

- 5.10 The Working Group discussed what the impact to customers would be as a result of moving the date to later in the year. It was discussed that there are positive implications, such as ensuring the data is more up to date by the time the customer receives it, however it was also discussed that customers may receive the updated block letter too close to winter, or into winter.

**Question 6 – Do you believe there are any impacts to customers as a result of moving the dates to be later in the year, and do you believe these to be positive or negative? Please provide our rationale.**

## 6 Relevant Objectives

### Assessment Against the DCUSA Objectives

- 6.1 For a DCUSA Change Proposal to be approved it must be demonstrated that it better facilitates the DCUSA Objectives. There are five General Objectives and six Charging Objectives.
- 6.2 The Proposer considers that the following DCUSA General Objectives are better facilitated by this CP:

	DCUSA General Objectives	Identified impact
<input type="checkbox"/>	1. The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks	None
<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	None
<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 type="checkbox"/>	4. The promotion of efficiency in the implementation and administration of the DCUSA	None
<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.	None

- 6.3 The Proposer believes that by providing the data at a later date, this means the Rota Load Block Alpha Identifiers provided to consumers will be more up-to-date when they receive their bills (or when the identifiers are communicated to them).

**Question 7 – Do you consider that the proposal better facilitates the DCUSA General Objectives? Please give supporting reasons.**

## 7 Impacts & Other Considerations

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

- 7.1 This CP is not believed to impact any significant industry change projects or SCRs.

## Consumer Impacts

7.2 The Working Group has identified some potential consumer impacts and is consulting on the impact to consumers.

## Environmental Impacts

7.3 In accordance with DCUSA Clause 11.14.6, the Working Group assessed whether there would be a material impact on greenhouse gas emissions if this CP was implemented. The Working Group did not identify any material impact on greenhouse gas emissions from the implementation of this CP.

**Question 8 – Are you aware of any wider industry developments that may impact upon or be impacted by this CP?**

## 8 Implementation

8.1 The Proposed Implementation date needs to be for the June 2024 DCUSA standard implementation update or earlier. By meeting this date, an additional Derogation to Schedule 8 – Paragraph 13.2 in 2024 would not be required.

**Question 9 – Are you supportive of the proposal to implement this CP prior to the June 2024 DCUSA standard release?**

## 9 Legal Text

9.1 The legal text for this CP is provided as Attachment 1.

**Question 10 – Do you have any comments on the draft legal text?**

## 10 Consultation Questions

10.1 The Working Group is seeking industry views on the following consultation questions:

No.	Questions
1	Do you understand the intent of the CP?
2	Are you supportive of the principle of the CP?
3	Do you agree that the dates for the DNO/IDNO Parties to submit the Alpha Identifiers to the Nominated Central Source, and therefore for the collated data to be uploaded to the DCUSA website, should be moved to later in the year? Please provide your rationale.



4	Do you agree with the proposed dates as set out in the current draft legal text? (See Attachment 1 to this consultation.) If not, please provide suggestions for your proposed dates and your rationale for these.
5	To Suppliers: If a subset of data was provided that showed changes to the block letter for those post codes that had changed or for new post codes that had been created, in the previous 12-month period, would this reduce the time needed to update your systems?
6	Do you believe there are any impacts to customers as a result of moving the dates to be later in the year, and do you believe these to be positive or negative? Please provide our rationale.
7	Do you consider that the proposal better facilitates the DCUSA General Objectives? Please give supporting reasons.
8	Are you aware of any wider industry developments that may impact upon or be impacted by this CP?
9	Are you supportive of the proposal to implement this CP prior to the June 2024 DCUSA standard release?
10	Do you have any comments on the draft legal text?

10.2 Responses should be submitted using Attachment 2 to [dcusa@electralink.co.uk](mailto:dcusa@electralink.co.uk) no later than 12 April 2024.

10.3 Responses, or any part thereof, can be provided in confidence. Parties are asked to clearly indicate any parts of a response that are to be treated confidentially.

## 11 Attachments

- Attachment 1 – DCP 436 Legal Text
- Attachment 2 – DCP 436 Consultation Response Form
- Attachment 3 – DCP 436 Updated Change Proposal Form