




DCUSA Consultation		At what stage is this document in the process?
<h2>DCP 428:</h2> <h2>Zero REP-002/A Data</h2> <p><i>Date raised: 25 August 2023</i></p> <p><i>Proposer Name: Peter Waymont</i></p> <p><i>Company Name: Eastern Power Networks</i></p> <p><i>Company Category: DNO</i></p>		01 – Change Proposal
		02 – Consultation
		03 – Change Report
		04 – Change Declaration
<p><b>Purpose of Change Proposal (CP):</b></p> <p>To specify how parties should deal with zero or blank data in the supercustomer/aggregated billing messages when sending daily statements or raising invoices.</p>		
	<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 428 ‘Zero REP-002/A Data’</p> <p>Parties are invited to consider the questions set in section 10 and submit comments using the form attached as Attachment 1 to <a href="mailto:dcusa@electralink.co.uk">dcusa@electralink.co.uk</a> by <b>08 December 2023</b>.</p> <p>The Working Group will consider the consultation responses and determine the appropriate next steps for the progression of the Change Proposal (CP).</p>	
	<p><b>Impacted Parties:</b></p> <p>Suppliers / DNOs / IDNOs</p>	
	<p><b>Impacted Clauses:</b></p> <p>Potential impacts on Clauses 21, 23, 44, 46 and Schedule 19.</p>	

## Contents

1	Summary	3
2	Governance	3
3	Why Change?	4
4	DCP 428 Working Group Assessment	4
5	Assessment Against the DCUSA Objectives	5
6	Impacts & Other Considerations	6
7	Implementation	6
8	Legal Text	6
9	Code Specific Matters	8
10	Consultation Questions	9
11	Attachments	9



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	20 September 2023
Consultation Issued to Industry Participants	17 November 2023
Change Report Approved by Panel	20 March 2024
Change Report issued for Voting	21 March 2024
Party Voting Closes	11 April 2024
Change Declaration Issued to the Authority	15 April 2024
Implementation	01 April 2024

## 1 Summary

### What?

- 1.1 Since DCP 428 has been raised, it has been noted that REP002B/A messages will also include site specific billed consumption data, bar a handful of EDCM customers that are on Line Loss Factors that are site specific. These site specific customers are excluded from the current D0030, therefore DNOs would need to ensure that they do not double invoice.
- 1.2 As a result, clarification is required to be added to DCUSA to specify how Parties should deal with zero or blank data in the supercustomer/aggregated billing messages, including for site specific billed data when sending daily statements or raising invoices.

### Why?

- 1.3 The MHHS programme have stated that the REP002B/A messages (which are the equivalents of the current D0030 and D0314 flows) will contain zero values.

They have stated:

*“for settlement dates for which suppliers don’t have any registered and energised Whole Current MHHS MPANs, the supplier will be included on the LDSOs version of the REP-002 and any such suppliers will be issued an (empty) REP-002 where the supplier is a qualified participant with the correct role type”.*

*it would contain the following records:*

- S0 – Transactional Info
- R027 Distributor Id
- R013 – GSP Group
- R007 Settlement Run Execution
- R002 – Settlement Run Info
- R009 – Supplier MPID (REP-002) or R006 – Embedded LDSO Id (REP-002A)

*but none of the following:*

- R010 Tariff Characteristics
- R011 – Consumption data by Settlement Period
- R0105 – Daily volumes on Actuals or Estimates”

### How?

- 1.1 By amending the DCUSA to clarify the resulting processes as they affect daily statements and invoices.

## 2 Governance

### Justification for Part 1 Matter

- 2.1 This change proposal should be treated as a Part 1 Matter as it is likely to have a significant impact on the interests of electricity consumers and it is directly related to the safety or security of consumers.

## Requested Next Steps

1.2 This Change Proposal should:

- Be treated as a Part 2 Matter;
- Be treated as a Standard Change; and
- Proceed to the Working Group phase.

## 3 Why Change?

### Background of DCP 428

3.1 To clarify how Distributors (DNOs/ IDNOs) should progress zero values in the REP-002B/A message. To clarify the actions Suppliers/IDNOs should take following receipt of zero value daily statements/invoices.

Question 1: Do you understand the intent of DCP 428?

Question 2: Are you supportive of the principles of DCP 428?

## 4 DCP 428 Working Group Assessment

### DCP 428 Working Group Analysis

- 4.1 The DCUSA Panel established a Working Group to assess this CP. This Working Group consists of Supplier, DNO, IDNO representatives. A meeting was held in open session and the minutes and papers are available on the DCUSA website – [www.dcusa.co.uk](http://www.dcusa.co.uk).
- 4.2 As stated above, clarification is required to be added to DCUSA to specify how Parties should deal with zero or blank data in the supercustomer/aggregated billing messages, including for site specific when sending daily statements or raising invoices.
- 4.3 It is proposed to amend the DCUSA to make it clear that zero value statements and invoices will be issued. It will also require the User to notify the Company that zero sum invoices should be cleared down. Where the User does not do this, the Company will incur costs in pursuing the User for clarity on next steps and so admin fees may be payable. It was noted Distributors being able to pursue the admin fee is an entitlement but is not mandatory.

### Supercustomer/aggregated DUoS Reports

- 4.4 In order to address the above issue, it is proposed that in relation to Supercustomer DUoS reports, the legal text (Section 8) will state that Distributors will issue Daily Statements, Initial Accounts and Reconciliation Accounts to Suppliers even if these total zero.

- 4.5 It will then add a requirement on the Supplier to clear down all zero sums quoting the Initial Account or Reconciliation Account number to be cleared. The legal text will also state that the DNO shall be entitled to receive a reasonable administration charge for any zero sum invoice which it has not received notice to clear down. It was noted that this will be an entitlement but not mandatory.

**Question 3: Do you agree with the Working Group's proposed solution? Please provide your rationale either way.**

**Question 4: Do you have any other solution proposal? Please provide your rationale.**

## 5 Assessment Against the DCUSA Objectives

- 5.1 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. DCP 428 will be measured against the DCUSA General Objectives, which are set out in the table below:

	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 type="checkbox"/>	3. The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences	None
<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.	None

- 5.2 By adding clarity to DCUSA as to how to deal with supercustomer/aggregated billing data that is entirely blank or zero or where invoices for these result in a zero value, will ensure Distributors and Suppliers agree to the most efficient way of dealing with these scenarios.

**Question 5: Do you consider that the proposal better facilitates the DCUSA General Objectives?**

**If so, please detail which of the General Objectives you believe are better facilitated and provide supporting reasons.**

**If not, please provide supporting reasons.**

## 6 Impacts & Other Considerations

### Significant Code Review (SCR) or other significant industry change projects

6.1 This CP has been raised due to the MHHS programme introducing a new REP-002/A messages, which will include zero values.

### Cross Code Impacts

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

### Consideration of Wider Industry Impacts

6.2 This was discussed in the SIG initially and a consultation issued. Consultation documents are available on the DCUSA website and the responses can be found as Attachment 2. This change has been raised in light of those responses.

**Question 6: Are you aware of any wider industry developments that may impact upon or be impacted by this CP?**

### Confidentiality

6.3 This Change Proposal document is non-confidential.

## 7 Implementation

7.1 The proposed implementation date of this CP is 01 April 2025.

**Question 7: Do you agree with the Working Groups proposed implementation date? Please provide your rationale.**

## 8 Legal Text

### Legal Text

8.1 The following clauses have been suggested to be either added or modified:

**Amended Clauses 20, 23, 44 and 46 as follows;**

#### Initial Account

20.2. Following its receipt of each Supercustomer DUoS Report in accordance with the timetable for Settlement after each Settlement Run relating to each Settlement Day, the

Company shall deliver Daily Statements, **including where these total zero**, to the User as soon as is reasonably practicable.

20.3. The Company shall submit to the User as soon as is reasonably practicable after the end of each charging period an account or accounts (the **Initial Account**) specifying the Use of System Charges payable by or to the User in respect of each Initial Settlement Run in respect of which a Daily Statement has been produced and which has not previously been included in an Initial Account, **including where these total zero**. Such Initial Accounts shall be based on the Daily Statements provided pursuant to Clause 20.2.

### **Reconciliation Account**

20.4. Where a subsequent Daily Statement for any Settlement Day indicates that, as a result of a subsequent Reconciliation Run or Post-Final Settlement Run, the Use of System Charges in respect of that Settlement Day are different from those included in an Initial Account, **including where either of these total zero**, the Company shall calculate such difference and the interest thereon and shall submit an account **including where that account total zeros** (the **Reconciliation Account**) in respect of such difference to the User as soon as is reasonably practicable after the end of each charging period. Such interest shall be calculated in accordance with the provisions of Schedule 3.

20.5. Within 14 days of the date of an Initial Account or Reconciliation Account submitted in accordance with Clause 20.3 or 20.4, the Payor shall (subject to Clause 19.6) pay to the Payee all sums due in respect of such Initial Account or Reconciliation Account in pounds sterling by electronic transfer of funds to such bank account (located in the United Kingdom) as is specified in the Initial Account or Reconciliation Account (or, where the Company is the Payor, such bank account as is notified to the Company by the User from time to time), quoting the Initial Account or Reconciliation Account number against which payment is made and/or such other details as the Payee may reasonably require.

20.5a **Within 14 days of the date of an Initial Account or Reconciliation Account submitted in accordance with Clause 20.3 or 20.4 that totals £0, the User shall (subject to Clause 19.6) notify the Company to clear down all zero sums quoting the Initial Account or Reconciliation Account number to be cleared and/or such other details as the Company may reasonably require.**

23.3 The Payee shall be entitled, without prejudice to any other right or remedy, to receive interest on any payment not duly made pursuant to the terms of Clause 20.5, Clause 21.3, or Clause 22.3, calculated from day to day at a rate per annum equal to the Default Interest Rate from the day after the date on which payment was due up to and including the date of payment, together with any reasonable administration charge notified by the Payee to the Payor from time to time. **The Company shall be entitled to receive a reasonable administration charge, as notified by the Company to the User from time to time, for any zero sum invoice which it has not received notice to clear down in accordance with Clause 20.5a.**

- 44.4 Within 14 days of the date of an account submitted in accordance with Clause 44.2 or Clause 44.3, the User shall pay to the Company all sums due in respect of such account in pounds sterling by electronic transfer of cleared funds to such bank account (located in the United Kingdom) as is specified in the account, **or if the account totals £0 the User shall notify the Company to clear down all zero sums**, quoting the account number against which payment is made **or clearance of zero value is directed** and/or such other details as the Company may reasonably require.
- 46.3 The Company shall be entitled, without prejudice to any other right or remedy, to receive interest on any payment not duly made pursuant to the terms of Clause 44.4, or Clause 45.3 calculated from day to day at a rate per annum equal to the Default Interest Rate from the day after the date on which payment was due up to and including the date of payment, together with an administration charge as notified by the Company to the User from time to time. **The Company shall be entitled to receive a reasonable administration charge, as notified by the Company to the User from time to time, for any zero sum invoice which it has not received notice to clear down in accordance with Clause 44.4.**

## Amend Schedule 19 as follows;

- 2.1 In order to calculate the Use of System Charges attributable to the EDNO's aggregated settled demand Connectees, the DNO Party will use the data provided to it by the SVAA **including where these total zero for the EDNO [pursuant to section S and BSCP508 of the BSC].**
- 2.2 Where a subsequent Settlement Run indicates that, as a result of such Settlement Run, the Use of System Charges are different from those previously billed, the DNO Party shall calculate such difference and the interest thereon, and shall submit an invoice, **including where such difference totals zero**, for such difference and interest as soon as is reasonably practicable after such Settlement Run. Such interest shall be calculated in accordance with the provisions of Schedule 3 (as if the invoice under Paragraph 2.1 was an Initial Account, and as if the invoice under this Paragraph 2.2 was a Reconciliation Account under Clause 20.4).
- 8.2 The highlighted and bracketed phrase is proposed to be removed in the MHHS drafting work.

**Question 8: Do you have any comments on the proposed legal text? Please provide your rationale.**

## 9 Code Specific Matters

### Reference Documents

- 9.1 Not applicable.



## 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 DCP 428?
2	Are you supportive of the principles of DCP 428?
3	Do you agree with the Working Group's proposed solution? Please provide your rationale either way.
4	Do you have any other solution proposal? Please provide your rationale.
5	Do you consider that the proposal better facilitates the DCUSA General Objectives? If so, please detail which of the General Objectives you believe are better facilitated and provide supporting reasons. If not, please provide supporting reasons.
6	Are you aware of any wider industry developments that may impact upon or be impacted by this CP?
7	Do you agree with the Working Groups proposed implementation date? Please provide your rationale.
8	Do you have any comments on the proposed legal text?
9	Do you have any other comments on DCP 428?

10.2 Responses should be submitted using Attachment 1 to [dcusa@electralink.co.uk](mailto:dcusa@electralink.co.uk) no later than **08 December 2023**.

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 419 Consultation Response Form
- Attachment 2: DIF 67 Consultation and Responses
- Attachment 3: DCP 419 Draft Legal Text
- Attachment 4: DCP 419 Change Proposal Form