

## Question 1

Company	Confidential/ Anonymous	1. Do you understand the intent of this CP?	Working Group Comments
Total Energies	Non-confidential	Yes	Noted
NGED	Non-confidential	Yes	Noted
SSE Networks	Non-confidential	Yes	Noted
EDF Energy	Non-confidential	Yes	Noted
E.ON	Non-confidential	Yes	Noted
IDCSL	Non-confidential	Yes	Noted
SSE Business Energy	Non-confidential	Yes	Noted
SPEN	Non-confidential	Yes, the CP intends to provide Customers with more accurate Rota Load Block Alpha Identifiers during the higher risk period of the winter months, whilst maintaining one update of the dataset per year.	Noted
UKPN	Non-confidential	Yes, the CP intends to provide Customers with more accurate Rota Load Block Alpha Identifiers during the higher risk period of the winter months, whilst maintaining one update of the dataset per year.	Noted

ENWL	Non-confidential	Yes, the CP seeks to provide more accurate Rota Load Block Alpha Identifiers for Customers during the higher risk period of the winter months.	Noted
BUUK	Non-confidential	Yes, the CP intends to provide Customers with more accurate Rota Load Block Alpha Identifiers during the higher risk period of the winter months, whilst maintaining one update of the dataset per year.	Noted
British Gas	Non-confidential	Yes we understand the intent of the CP	Noted
<b>Working Group Conclusions</b>		The Working Group noted that all respondents understood the intent of the CP.	

## Question 2

Company	Confidential/ Anonymous	2. Are you supportive of the principles of this CP?	Working Group Comments
Total Energies	Non-confidential	Yes	Noted
NGED	Non-confidential	Yes	Noted
SSE Networks	Non-confidential	Yes	Noted
EDF Energy	Non-confidential	Yes, on the basis that it will improve the quality of the published data and avoid the need for more than one file, as we have had in the last two years. Additional files, that are necessary due to errors, create extra work and cost for us as a Supplier.	Noted

E.ON	Non-confidential	Yes, in principle we are supportive of moving the dates for when DCUSA provides the Rota Load Block Alpha identifiers to make it more accurate and to avoid having multiple data uploads per year.	Noted
IDCSL	Non-confidential	Yes	Noted
SSE Business Energy	Non-confidential	Whilst we do not support this CP, we do believe changes should be made to the overall Rota Load Disconnection Alpha Identifier (RLDAI) process and that the most up to date and accurate information should be provided by DNOs/IDNOs to Suppliers. We note that this CP will not progress changes to the data quality issues which we, and other Suppliers, have seen in previous years but there is a risk that should these not be explored, Suppliers will likely continue to experience issues in the production of this data and DNO's/IDNO's will likely continue to request changes to the dates that these are provided (by them to Suppliers).	<p>Proposer: data being more accurate one of the drivers of this CP</p> <p>A separate mod is likely to be raised to address data quality.</p> <p>If pushing the dates back, any issues with data quality causes more challenges for Suppliers to communicate this. May need to consider what assurances there will be re the data quality and the provision of a single file.</p> <p>Could walk through the existing checks, based on lessons learned, to understand what quality controls are in place at a company level and a nominated central source level. Due to timescales, may be appropriate for this to be done outside of this CP. Additionally, Suppliers could be engaged to share learnings on their own checks.</p>

		Current initiatives, such as that led by DESNZ, reviewing the RLDAI process and Protected Sites tiers should be taken into consideration prior to any changes being made under the DCUSA as we strongly believe that once these initiatives have been progressed and completed, the date for providing this (updated) information (reflecting the DESNZ inspired changes) to Suppliers could remain as it currently stands.	The work ongoing now is about the protected sites list, as opposed to the rota load blocks and data provisions. The later the data is submitted, the more accurate this will be for Suppliers, given the nature of the changes being made. Any changes to the protected sites list has the potential to impact the block letters.
SPEN	Non-confidential	Yes, this CP will provide Customers with more accurate Rota Load Block Alpha Identifiers during the higher risk period of the winter months.	Noted
UKPN	Non-confidential	Yes, UK Power Networks support the principle of providing Customers with more accurate Rota Load Block Alpha Identifiers during the higher risk period of the winter months.	Noted
ENWL	Non-confidential	Yes, ENWL support the principle of providing more accurate and timely information to Customers.	Noted
BUUK	Non-confidential	Yes, both individually and as a member of the Energy Networks Association (ENA), we support the principle of providing Customers with more accurate Rota Load Block Alpha Identifiers during the higher risk period of the winter months.	Noted
British Gas	Non-confidential	Yes we are supportive of the principles of this CP.	Noted
<b>Working Group Conclusions</b>		The Working Group noted the concerns raised around the accuracy of the data and the potential knock-on effects of reducing the timescales.	

	<p>The Working Group discussed that a separate Change Proposal may need to be raised to address concerns around the quality and accuracy of the data, with one Party stating it may do so, however it was also discussed that the standards of the quality of the data was already subject to requirements, which means data quality issues could become a compliance issue.</p> <p>The Working Group discussed changes to the process since the last submissions, and the lessons learned by various Parties, and agreed that a collaborative information-sharing effort could be beneficial but would be outside the scope of this CP to deliver.</p>
--	---

### Question 3

Company	Confidential/ Anonymous	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.	Working Group Comments
Total Energies	Non-confidential	We are concerned about the balance on when the best date is. If suppliers receive the data in December it is likely that many customers will not get the updated information on their bills before the highest risk period for planned outages finishes. We also see the need for DNO/iDNO parties to produce up to date and correct data.	Noted
NGED	Non-confidential	Yes	Noted
SSE Networks	Non-confidential	Yes. Moving the dates to later in the year will ensure that more up to date information is available to customers.	Noted
EDF Energy	Non-confidential	Yes, on the basis that as a Supplier it can be accommodated within our existing process for system updates but note that some quarterly	Noted

		billed customers would potentially not receive their revised block letter until the Spring, after the risk period has passed.	
E.ON	Non-confidential	<p>Partially agree.</p> <p>We do see the benefit of moving the dates to later in the year to improve the accuracy of the data that will be provided to customers. If the data has changed for the customer, updating it in the winter months will limit the ability for the customer to have the right identifier on their energy bill.</p> <p>October through to February are the months where rota load disconnections are more likely and to move the data provision date to October and November could impact the accuracy of the information the customer has available to them in the event that rota load disconnections need to be implemented and they haven't received a bill with the updated information Due to their billing cycle.</p> <p>Some suppliers bill Customers on a quarterly basis, by moving the Supplier obligation date to 1st December there is potential that a quarterly billed customer will not see the identifier on their bill, March, April or May.</p> <p>As a supplier, there needs to be stability of our systems for our customers over the Christmas period by avoiding any additional code changes and updates between mid December and the end of the first week in January. Moving the date for the data to be available to suppliers to the 1st December gives suppliers a short timeframe to upload this information to the customers bills and no contingency if there are any problems.</p>	Noted
IDCSL	Non-confidential	We have no issue with the dates proposed, as an IDNO, to submit the rota block IDs but question whether this provides the Supplier	Noted

		<p>enough time to provide the info to consumers in time for the winter period.</p>	
SSE Business Energy	Non-confidential	<p>We would urge the working group to explore the impacts that the IDNO community will have on this process, as ultimately this change has been raised to accommodate them. We cannot justify the proposed changes when we strongly believe that IDNO's will have very little impact on the overall process as the DNO's will initially assess network capacity. Having said that, where IDNO's have made changes and the DNO is required to re-assess network capacity, it feels that both the DNO's and IDNO's need to establish a more robust mechanism of rebalancing the network.</p> <p>We would also urge the DNO/IDNO's to assess the time taken for the data processing to occur. In this regard, the timeline provided assumes 1 month, is this needed?</p> <p>Whilst we do agree that the current timeline could see out of date information being published by DNOs / IDNOs to Suppliers, we believe that this timeline ahead of publication to Suppliers could be compressed. For example –</p> <p>1<sup>st</sup> August – DNO takes snapshot Mid August – Data processing and then DNO's send to IDNO's  1<sup>st</sup> September – IDNO takes snapshot Mid September – Data Processing  1<sup>st</sup> October – IDNO/DNO Send to NCS and Protected Sites list provided to DESNZ Mid October – NCS Data Processing  31<sup>st</sup> October – Publication by the Secretariat and update to Power105</p>	<p>The Working Group noted that this change is not being driven as a result of the IDNOs. The IDNOs and DNOs need to work together to ensure they are aligned and agree protected sites within their networks.</p> <p>The Working Group discussed that the larger IDNO networks can now be approaching size of a small DNO, and so its impact on the networks will not necessarily be minimal.</p> <p>This was noted by the Working Group, which was acknowledged as a compromise between having the most accurate (latest) data against the need to provide this to customers in a timely fashion.</p>

		<p>1<sup>st</sup> November – Suppliers obligation starts</p> <p>In the example provided above, this assumes that Data processing of the RLDAI can be achieved within 2 weeks and whilst there could still potentially be out of date information being provided to Suppliers, this achieves the aim of providing more accurate data but also reduces the potential impact to end customers.</p>	The Working Group agreed to contact the ENA to discuss the potential for the timeline to be clear on how long it takes for each activity (and any opportunities to optimise this, which may be feasible if the process is clean.)
SPEN	Non-confidential	Yes, the dates to submit Alpha Identifiers should be moved to later in the year. Based currently preparing the information earlier in the year means this it could be out of date by 6 months and when it is more likely to be required by Customers over the winter period. By moving the dates later in the year ahead of winter, then Customers will have access to more accurate Alpha Identifiers.	Noted
UKPN	Non-confidential	Yes, UK Power Networks agrees that the dates to submit Alpha Identifiers should be moved to later in the year. Based on the current dates, the network information is potentially more than half a year out of date during the higher risk period of the winter months when Customers would be most likely to need to refer to them. By moving the dates later in the year ahead of winter, then Customers will have access to more accurate Alpha Identifiers.	Noted
ENWL	Non-confidential	Yes, as per Attachment 1 of the mid-consultation Q&A session, the network information is potentially more than half a year out of date by the time the Customer is likely to need it during the winter months. By moving the dates later – and closer to winter – Customers have access to more accurate Rota Load Block Alpha Identifier information.	Noted
BUUK	Non-	Yes, both individually and as an ENA member, we agree that the	Noted

	confidential	dates to submit Alpha Identifiers should be moved to later in the year. Based on the current dates, the network information is potentially more than half a year out of date during the higher risk period of the winter months when Customer would be most likely to need to refer to them. By moving the dates later in the year ahead of winter, then Customers will have access to more accurate Alpha Identifiers.	
British Gas	Non-confidential	Our main concern with the provision of this data is to have certainty as to when the data is going to be provided and that a complete and accurate data set is provided. If by approving this CP this can be better achieved then we are supportive.	Noted
<b>Working Group Conclusions</b>		<p>The Working Group noted the concerns around the timescales for providing data to customers and discussed that this would need to be agreed (as a potential compromise) to take the solution forward.</p> <p>The Working Group discussed the concerns around the impacts of a repeat of the previous submissions, specifically the need for multiple corrected files to be issued. One member explained that the issue was not one of a data quality issue but rather an issue with the processing of the data, and that lessons had been learned from this. They also noted the issue had been compounded by other requirements for file submissions, namely to DESNZ.</p> <p>The Working Group discussed the potential for squeezing some elements of the timeline and it was agreed to engage with the ENA to assess the feasibility of this.</p>	

## Question 4

Company	Confidential/ Anonymous	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.	Working Group Comments
Total Energies	Non-confidential	We do not have an exact date, I think it has to be balanced against the two needs outlined in Q3	Noted
NGED	Non-confidential	Yes	Noted
SSE Networks	Non-confidential	<p>The proposed dates would give the best outcome for DNOs, as the proposed initial submission date is closely aligned to the date by which the Protected Site List needs to be provided to DESNZ on a two-yearly basis.</p> <p>However, I am aware of concerns from Supplier parties that the proposed dates will not give the best outcome for customers, due to the time it takes for them to process the data and for the information to be finally available to their customers.</p> <p>I am open to the suggestion that the dates should not be moved as far as proposed, for the reason above, but would note that producing the data earlier than the dates proposed does increase the chances of further change as the PSL is finalised, which introduces errors to the data provided to customers.</p> <p>The situation that needs to be eliminated by this CP is the need to provide data twice in a year.</p>	<p>Noted</p> <p>The Working Group noted that this is not a DCUSA requirement but arises as a result of other external requirements (and exceptional circumstances, such as the</p>

			requirement for an additional submission closer to the 2022 Winter period, which could be alleviated by having more recent data submitted, and the data processing issues). The DCUSA requirement is for a single submission per year.
EDF Energy	Non-confidential	Yes. They would not cause a problem with our existing process for system updates.	Noted
E.ON	Non-confidential	As above	Noted
IDCSL	Non-confidential	We have no issue with the dates proposed, as an IDNO, to submit the rota block IDs but question whether this provides the Supplier enough time to provide the info to consumers in time for the winter period.	Noted
SSE Business Energy	Non-confidential	No, we do not agree that the publication should be made in December, as there is a significant risk that end customers will not be aware of their new RLDAI ahead of the winter months. Any amendments to the timeliness of providing end customers with their RLDAI could result in those customers being unaware of when they are due to go off supply, should these rota disconnection arrangements be instigated. As an energy supplier, our obligation is to ensure our customers are aware of the RLDAI and do so on each energy bill sent. Whilst we do agree there are other avenues that customers can look at their RLDAI, should there be data quality issues, it is not always likely that the RLDAI will be available on the Power105 website and not all customers have access to the internet.  As provided in Question 2, a compressed timescale could reduce the	Noted

		impacts to our customers. We appreciate there is a need to ensure continuity of supply over the winter months however any changes that may be required should be reviewed on a case by case basis to reduce any RLDAI changes being made when it is likely that they will need to be used.	
SPEN	Non-confidential	Yes, the dates set out are the optimum from a Network Operator process and would enable up to date publishing of Alpha Identifiers to the Powercut105 website ahead of the higher risk period of the winter months.	Noted
UKPN	Non-confidential	Yes, UK Power Networks agree. The dates set out are the optimum from a Network Operator process and would enable up to date publishing of Alpha Identifiers to the Powercut105 website, as well as timely communication of Alpha Identifiers to wider stakeholders to support emergency planning activity, ahead of the higher risk period of the winter months.	Noted
ENWL	Non-confidential	Yes, ENWL agree. The dates set out are the optimum from a Network Operator process. However, ENWL appreciate that the dates need to accommodate Supplier data processing & notification time ahead of winter.	Noted
BUUK	Non-confidential	Yes, BUUK agree. The dates set out are the optimum from a Network Operator process and would enable up to date publishing of Alpha Identifiers to the Powercut105 website ahead of the higher risk period of the winter months.	Noted
British Gas	Non-confidential	Yes we are supportive of the agreed dates	Noted
<b>Working Group Conclusions</b>		The Working Group noted the reiterated concerns around multiple file submissions and discussed that, under the DCUSA, the requirement was for a single submission to be provided.	

	<p>The Working Group noted the comments regarding the dates and the concerns raised by some Supplier Parties about the timescales for providing the identifiers to their customers. As per the Working Group conclusion to question 3, the Working Group discussed that the dates would need to be agreed (as a potential compromise) to take the solution forward.</p>
--	---

Question 5

Company	Confidential/ Anonymous	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?	Working Group Comments
Total Energies	Non-confidential	<p>We work on the basis of updating the whole data set in one go, it will be probably more complex to update certain fields. We do realise other suppliers may operate their updates in different ways and prefer a subset as well.</p>	Noted
EDF Energy	Non-confidential	<p>No, a subset of data would not reduce the time needed to update our systems and is likely to take longer.</p> <p>We would prefer that a full set of data is always provided as there have been several instances, most recently in 2023, where we have identified that the data was missing a significant number of updates, resulting in an amended file needing to be issued.</p> <p>However, in addition to a file of the full set of data, it could be helpful for a subset of data to be provided that showed changes to the block letter for those post codes that had changed or for new post codes that had been created.</p>	<p>Noted</p> <p>The Working Group noted that the full dataset would continue to be issued, along with a separate file showing the changes and the new post codes.</p>
E.ON	Non-	Potentially it could reduce the time to load the data onto the	Noted

	confidential	customers' bills as there would be less data items. The time it takes to prepare the technical changes and arrange for this to be loaded with our technical team would still be the same regardless of the volume of data items being provided.	
SSE Business Energy	Non-confidential	Yes, in principle this should be the case. However, it would still be beneficial to receive the entire data set. Furthermore, the changes that may arise from the other initiatives may result (at least initially) in a higher level of possible block letter changes, as the level of protection and tiers of protection (and thus number of sites protected) are altered, which, in turn could potentially have a knock-on effect on block letter allocation.	Noted  The Working Group noted that the full dataset would continue to be issued, along with a separate file showing the changes and the new post codes.
British Gas	Non-confidential	We would prefer to have the data provided with both a full data set and a subset of changes. We use a number of service providers to fulfil our obligations for various customer portfolios therefore both options would be preferable.	Noted  The Working Group noted that the full dataset would continue to be issued, along with a separate file showing the changes and the new post codes.
<b>Working Group Conclusions</b>		The Working Group noted that some Suppliers would continue to use the full dataset. The Working Group noted therefore that whilst the subset of data may be useful to some Suppliers, it would not specifically help to reduce the overall timescales.	

## Question 6

Company	Confidential/ Anonymous	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 your rationale.	Working Group Comments
Total Energies	Non-confidential	We believe they will be negative as billing timetables mean customers will get the information too late considering winter is the highest risk period for rota codes to be needed.	Noted
NGED	Non-confidential	We believe there will be a positive impact on customers as it improves the accuracy of information provided.	Noted
SSE Networks	Non-confidential	Moving the dates to later in the year should be positive for customers, as the data will be more accurate.	Noted
EDF Energy	Non-confidential	<p>Yes, some quarterly billed customers would potentially not receive their revised block letter until the Spring, after the risk period has passed.</p> <p>However, we note that customers could visit the 105 website (<a href="https://www.powercut105.com/">https://www.powercut105.com/</a>) and find their block letter by entering their postcode.</p>	<p>Noted</p> <p>The Working Group noted that this issue already exists under the existing arrangements, with some customers not having their block letter for the entire winter, and recognised that moving the dates further back would result in more customers not receiving their block letter for the start of the winter period.</p> <p>The Working Group discussed that the obligation in how to communicate this to customers is one aspect of how timely the</p>

			customer receives their block letter, but that this is out of scope of this CP and would need to be raised separately.
E.ON	Non-confidential	<p>Yes</p> <p>For customers who receive bills from their supplier on a quarterly basis between October and March would not see the amended code. There is the opportunity for the customer to look up the number on the registered website to minimise this impact but it is putting more onus on the customer to know where to look. It will be confusing for customers if the bill from the supplier gives a different identifier than that stored on the registered website.</p> <p>It will cause additional pressure on suppliers as customers may choose to call suppliers to clarify which is the correct identifier.</p>	<p>Noted</p> <p>The Working Group discussed that it could be clearer on the 105 website that the identifier provided on the website is the most up to date. It was also discussed that an FAQ entry could be added to explain why there may be a discrepancy between the identifier on the bill and on the website.</p> <p>SF to check the feasibility of making the above amendments.</p>
IDCSL	Non-confidential	As mentioned above, we believe there is a strong chance that the consumer would be negatively impacted if the Supplier is unable to communicate the rota block ID in time for the winter period.	Noted
SSE Business Energy	Non-confidential	Should the identifier be provided to suppliers in December, there is a risk that customers will not receive their updated RLDAI through their billing cycle within the winter period. For example, a quarterly billed customer could be billed in November, and if an RLDAI change is made in December, the customer is not advised of their updated RLDAI until February, noting that during this timeframe it is more than likely the RLD process may (on a balance of probabilities) have been initiated.	<p>Noted</p> <p>The Working Group noted that the proposed amendments to the 105 website, per SF's action above, would help alleviate this issue.</p>

		<p>We would appreciate clarity on the process where the RLDAI has been changed from the snapshot being taken, to being published if the RLD process is initiated, which RLDAI would be used?</p> <p>Ultimately, our main concern is that of our customers and we need to ensure that should this process be initiated, we can provide our customers with accurate information. There will always be practical issues with any changes to the RLDAI and advising our customers of that information, therefore we need to find the most suitable approach to alleviate the DNO/IDNO concerns and ensure customers receive the correct RLDAI in time for winter (i.e. ahead of, not during, the winter period, starting with the October clock change)</p>	<p>The information is supplied once per year and is based on the network at that time. The Working Group discussed whether there is a potential for the 105 website to be updated more than once annually. Whilst it was felt this may be feasible, it would be outside the scope of this CP as this may need to encompass other processes. It was also noted, as a point of concern, that having the 105 website updated more than once per year would result in it being out of alignment with the data being used for customers bills (i.e., the Supplier would be sending out of date data that contradicts the 105 website).</p> <p>The Working Group discussed that the DCUSA allows up to 12 months for Suppliers to provide the code but noted that the process could be improved to make this better for customers, but would be outside the scope of the change.</p> <p>The Working Group discussed that Suppliers would likely prefer to get the updated information issued to customers as soon as practicable, taking into consideration the need to manage customer demand and</p>
--	--	---	--

			<p>not issue additional 'out of cycle' bills and not being within a code freeze, rather than wait the full 12 months the DCUSA may appear to allow.</p> <p>The Working Group discussed whether it would be possible to analyse historical data to determine the percentage of post codes/sites that changed block letters. It was noted this could be possible, but the last few years have seen significant changes which could skew the results of the analysis. The Working Group will consider whether this analysis is required and/or feasible.</p>
SPEN	Non-confidential	Moving the dates later in the year does have a positive impacts because it provides Customers with more accurate Rota Load Block Alpha Identifiers during the higher risk period of the winter months, whilst maintaining one update of the dataset per year. This is especially applicable for those customers who would check their postcodes via the Powercut105.com website because this is updated straight after the publication of the revised Alpha Identifiers and is not reliant on the issuing of revised bills to Customers.	Noted
UKPN	Non-confidential	The UK Power Networks believes that moving the dates later in the year does have a positive impact because it provides Customers with more accurate Rota Load Block Alpha Identifiers during the higher risk period of the winter months, whilst maintaining one update of the dataset per year. This is especially applicable for those customers	Noted

		<p>who would check their postcodes via the Powercut105.com website because this is updated straight after the publication of the revised Alpha Identifiers and is not reliant on the issuing of revised bills to Customers.</p> <p>UK Power Networks does recognise the need for Supplier input to ensure that overall the agreed date is positive and does not significantly result in a negative impact to any customers who would solely be reliant of their bills to obtain their Alpha Identifiers. This can be discussed via the working group and we are willing to explore the possibility of providing an additional separate list of new or changed Alpha Identifiers only, which we understand should increase the speed and help prioritise Suppliers re-issuing of bills to Customers.</p>	
ENWL	Non-confidential	<p>Yes, there are two impacts:</p> <ul style="list-style-type: none"> <li>⇒ customers will have more accurate Rota Load Block Alpha Identifiers due to the change proposal which is positive.</li> <li>⇒ However in contrast, it is possible that some Customers will not receive their updated bills with Rota Load Block Alpha Identifiers before winter (dependent on Suppliers' billing cycles or other communication to consumers of Identifiers). This of course would not be ideal and so ENWL would like to see greater Supplier engagement to optimise the submission dates under this Change Proposal and thereby minimise this possible negative impact.</li> <li>⇒</li> </ul> <p>This potential negative is mitigated by the fact that the Nominated Central Source updates the Powercut105.com website with the latest Rota Load Block Alpha Identifiers immediately following publication. This data on this website is available to consumers.</p>	Noted

		<p>Looking ahead, ENW understand that DESNZ are attending a Working Group with the Electricity System Operator amongst others, one result of which is anticipated to be a Demand Control Rotation protocol which will govern operation and communication of demand rotation to Customers, potentially reducing the reliance on customers to check their Supplier bills.</p> <p>Therefore, in summary, in the short-term Customers will be afforded the more accurate data either immediately following publication, via the powercut105 website, or alternatively via updated information on bills from Suppliers.</p>	<p>The Working Group noted the ongoing work by DESNZ with the ESO, but considered that customers would still need to be advised of their identifiers. It was noted that the communication piece being taken forward by DESNZ would cover communications in the event of the protocol being instigated.</p>
BUUK	Non-confidential	<p>BUUK via the Energy Networks Association believes that moving the dates later in the year does have a positive impact because it provides Customers with more accurate Rota Load Block Alpha Identifiers during the higher risk period of the winter months, whilst maintaining one update of the dataset per year. This is especially applicable for those customers who would check their postcodes via the Powercut105.com website because this is updated straight after the publication of the revised Alpha Identifiers and is not reliant on the issuing of revised bills to Customers.</p> <p>The use of powercut105.com and the formal communications methods of Block Letters during an emergency power cut is currently being reviewed and developed by a joint System Operator, Network Operators and Department for Energy Security and Net Zero working group via the Energy Networks Association. This should further reduce the use of bills as the source of Alpha Identifiers for Customers before this coming winter and beyond.</p> <p>We recognise, both individually and as an ENA member, the need for Supplier input to ensure that overall the agreed date is positive and does not significant result in a negative impact to any customers who</p>	<p>Noted</p> <p>As noted above, customers would still need to be advised of their identifiers. It was noted that the communication piece being taken forward by DESNZ would cover communications in the event of the protocol being instigated.</p>

		would solely be reliant of their bills to obtain their Alpha Identifiers. This can be discussed via the working group and we are willing to explore the possibility of providing an additional separate list of new or change Alpha Identifiers only, which we believe should increase the speed and help prioritise Suppliers re-issuing of bills to Customers.	
British Gas	Non-confidential	For new postcodes that have customers that are billed on a quarterly basis there could be a negative impact as there will be a delay in them being informed of their rota block code. For example customers billed on Oct will now not be informed of their code until January.	Noted
<b>Working Group Conclusions</b>		<p>The Working Group noted the responses and the potential impacts on customers, which it has considered as part of the previous questions.</p> <p>The Working Group discussed the feasibility of updating the 105 website to provide additional clarification around discrepancies in the data between their bills and the data held on the website, such as banners and additional FAQs, and agreed to assess this with the ENA.</p> <p>The Working Group noted that, as had been identified in some responses, not all customers would have the ability to access the 105 website and would therefore remain reliant on their bills (or other form of communication).</p>	

## Question 7

Company	Confidential/ Anonymous	7. Do you consider that the proposal better facilitates the DCUSA General Objectives? Please give supporting reasons.	Working Group Comments
Total Energies	Non-confidential	N/A	
NGED	Non-confidential	Yes, General Objective 3 is positively impacted and we agree with the reasons given in the CP.	Noted
SSE Networks	Non-confidential	Yes	Noted
EDF Energy	Non-confidential	No, we believe it is neutral against the DCUSA General Objectives.	Noted
E.ON	Non-confidential	<p>We consider it better facilitate the following objectives:</p> <ul style="list-style-type: none"> <li>• The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences; and</li> <li>• The promotion of efficiency in the implementation and administration of the DCUSA,</li> </ul> <p>on the basis that the data is accurate and there is a single upload.</p> <p>However, the impacts to customers and suppliers needs to be taken into consideration.</p>	Noted
IDCSL	Non-confidential	We agree that, as an IDNO, the proposal better facilitates General Objective 3.	Noted
SSE Business Energy	Non-confidential	Yes, we believe this CP better facilitates the General Objectives, but we still do not believe this change should be progressed.	Noted

		As we have alluded to in other questions, our main concern is that of our customers. Energy Suppliers are ultimately held accountable, by Ofgem, for issues that impact the end consumer and any changes that could potentially cause detriment to them need to be considered.	
SPEN	Non-confidential	<p>Yes, the proposal does better facilitate the DCUSA General Objectives.</p> <p>In the absence of this Change Proposal, an additional inefficient publication of Alpha Identifiers would be required, one in August to meet the current DCUSA requirements as they currently are and a further update around the start of November to enable the powercut105 website to be updated with the most up to date Alpha Identifiers during the higher risk period of the winter months. The proposal, therefore, facilitates a more efficient discharge of (I)DNO Parties' obligations.</p>	Noted
UKPN	Non-confidential	<p>Yes, the proposal does better facilitate the DCUSA General Objectives.</p> <p>In the absence of this Change Proposal, an additional inefficient publication of Alpha Identifiers would be required, one in August to meet the current DCUSA requirements as they currently are and a further update around the start of November to enable the powercut105 website, and wider emergency planning stakeholders, to be updated with the most up to date Alpha Identifiers during the higher risk period of the winter months. The proposal, therefore, facilitates a more efficient discharge of (I)DNO Parties' obligations.</p>	Noted
ENWL	Non-confidential	<p>Yes, the CP does better facilitate the DCUSA General Objectives.</p> <p>In the absence of this Change Proposal, an additional publication of</p>	Noted

		Rota Load Block Alpha Identifiers would be required, one in August (to meet the current DCUSA requirements) and a further update just before winter. This would be inefficient. Therefore, the Change Proposal does facilitate a more efficient discharge of DNO and IDNO Parties' obligations.	
BUUK	Non-confidential	<p>Yes, the proposal does better facilitate the DCUSA General Objectives.</p> <p>In the absence of this Change Proposal, an additional inefficient publication of Alpha Identifiers would be required, one in August to meet the current DCUSA requirements as they currently are and a further update around the start of November to enable the powercut105 website to be updated with the most up to date Alpha Identifiers during the higher risk period of the winter months. The proposal, therefore, facilitates a more efficient discharge of (I)DNO Parties' obligations.</p>	Noted
British Gas	Non-confidential	<p>Where we already hold the rota block disconnection code for a customer this change will have no impact.</p> <p>For new post codes or changes to existing codes this CP will ensure the most up to date data is provided to Suppliers. However by delaying the provision of the data to just before the start of winter there is a risk that, for Suppliers who use the customer's bill to notify customers of their rota block code that the data will be too late should an incident occur in early winter. Having said that we recognise that the Suppliers bill is not the only way that the customer can enquire what their rota block code is.</p>	<p>Noted</p> <p>As per a Working Group response to question 6, the Working Group discussed whether it would be possible to analyse historical data to determine the percentage of post codes/sites that changed block letters. It was noted this could be possible, but the last few years have seen significant changes which could skew the results of the analysis.</p>
<b>Working Group Conclusions</b>		The Working Group noted the broad agreement that the CP better facilitates the DCUSA General Objectives,	

	<p>noting objective 3 specifically, but also noted the concerns raised by Suppliers about the need to balance this against the impact to customers.</p> <p>The Working Group noted that the potential analysis identified in its response to question 6 was relevant to the British Gas response, in determining the scale of the impact. The Working Group will consider whether this analysis is required and/or feasible.</p>
--	--

## Question 8

Company	Confidential/ Anonymous	8. Are you aware of any wider industry developments that may impact upon or be impacted by this CP?	Working Group Comments
Total Energies	Non-confidential	No	Noted
NGED	Non-confidential	No	Noted
SSE Networks	Non-confidential	I am aware of a DESNZ working group reviewing electricity prioritisation. The conclusions of this review may lead to changes in the composition of the PSL, which will affect block letter allocation.	Noted (and as discussed above re the DESNZ, ESO and (I)DNO Working Group)
EDF Energy	Non-confidential	No	Noted
E.ON	Non-confidential	No	Noted
IDCSL	Non-confidential	No	Noted
SSE Business Energy	Non-confidential	Yes, as noted in our answer to Question 2 above, we are aware of other initiatives, led by DESNZ, that are reviewing the RLD process,	Noted (and as discussed above re the DESNZ, ESO and (I)DNO

		and the Protected Sites proposed tiers.	Working Group)
SPEN	Non-confidential	None directly.	Noted
UKPN	Non-confidential	None directly.  Alpha Identifiers are also made available to wider stakeholders nationally, including across other industries, health organisations, local resilience organisations, and government, to support emergency planning activity. It is essential that a single data set is made available at the optimum time for use by all stakeholders who receive and use the Alpha Identifier data for the benefit of society.	Noted
ENWL	Non-confidential	None	Noted
BUUK	Non-confidential	None directly. However indirectly, a working group, led by the System Operator and participated by Network Operators and DESNZ via the Energy Networks Association, is seeking to produce a formally agreed protocol that will specify the national communication process during an emergency power cut. This will likely involve the use of many alternative methods to communicate Alpha Identifiers to Customers in addition to (and in preference to) the use of Customer bills.	Noted (and as discussed above re the DESNZ, ESO and (I)DNO Working Group)
British Gas	Non-confidential	No	Noted
<b>Working Group Conclusions</b>		The Working Group noted the work being undertaken by DESNZ, the ESO and network operators, as per its responses to previous questions.	

## Question 9

Company	Confidential/ Anonymous	9. Are you supportive of the proposal to implement this CP prior to the June 2024 DCUSA standard release?	Working Group Comments
Total Energies	Non-confidential	As long as the best date that balances DNO/Supplier/Customer needs is met.	Noted
NGED	Non-confidential	Yes	Noted
SSE Networks	Non-confidential	I am supportive of the change (whether this is in line with the current CP or with amended dates) being implemented prior to the June DCUSA release.	Noted
EDF Energy	Non-confidential	<p>Yes, but we expect that an improvement in the quality of the published data will prevent the need for more than one file due to errors, as we have had in the last two years.</p> <p>We also expect that this extra time will mean that the data is updated to use the letter V for Protected Site identification, as set out in the most recent ESEC document <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/995049/esec-guidance.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/995049/esec-guidance.pdf</a>, rather than the old F and O identifiers.</p>	<p>Noted</p> <p>The Working Group discussed that under the lessons learned work completed, it would result in any F and O identifiers being corrected to the V identifier (if this is not captured by the DNO, this would be captured by the check process that has been implemented).</p> <p>The Working Group discussed that it may be valuable for these data discrepancies to be referred back to the network operator to check the validity of the data, but this is outside of the scope of this CP.</p>

E.ON	Non-confidential	Yes, as there are no supplier requirements needed to be implemented before the proposed 1st December date.	Noted
IDCSL	Non-confidential	Yes, to avoid the need for a further derogation if the CP is approved.	Noted  The Working Group noted that a derogation would be required to Schedule 8 Paragraph 13.2 , if the CP was rejected or was not published before 30 June 2024.
SSE Business Energy	Non-confidential	No, as we have alluded to in other questions, we believe this change should be deferred until such time as the other initiatives have been completed. We believe this change will have a detrimental impact on our customers and our ability to advise them in a timely manner for any changes to the RLDAI.	Noted
SPEN	Non-confidential	Yes	Noted
UKPN	Non-confidential	Yes	Noted
ENWL	Non-confidential	Yes	Noted
BUUK	Non-confidential	Yes	Noted
British Gas	Non-confidential	We are supportive of the proposed implementation date.	Noted
<b>Working Group Conclusions</b>		The Working Group noted the broad support for the proposed implementation dates, noting the concerns around the accuracy of the data, updating the protected sites to use the valid 'V' letter, and SSE Business Energy's concerns around the impacts to its customers.	

## Question 10

Company	Confidential/ Anonymous	10. Do you have any comments on the draft legal text?	Working Group Comments
Total Energies	Non-confidential	No.	Noted
NGED	Non-confidential	No	Noted
SSE Networks	Non-confidential	No	Noted
EDF Energy	Non-confidential	No	Noted
E.ON	Non-confidential	No	Noted
IDCSL	Non-confidential	No	Noted
SSE Business Energy	Non-confidential	Not currently.	Noted
SPEN	Non-confidential	No	Noted
UKPN	Non-confidential	None	Noted
ENWL	Non-confidential	ENWL believe that Suppliers' need to advise DCP 436 Working Group of their lead times for updating systems and notifying consumers of Block Identifiers. This is key to enable the Working Group to identify	Noted The Working Group noted the

		<p><b>the optimal submission date that ensures the most number of customers know the (most accurate) Identifier for their property in time for the most likely outage period (winter).</b></p> <p>The working group, with more Suppliers in attendance, should be asked to discuss and agree optimum dates to combine the most up-to-date information with the billing cycles.</p>	<p>context of this response was based on less Supplier engagement with the CP, but noted that this has increased considerably and that the need to balance the date with customer impacts was being considered with full Supplier engagement.</p>
BUUK	Non-confidential	No	Noted
British Gas	Non-confidential	No	Noted
<b>Working Group Conclusions</b>		The Working Group noted there were no specific comments on the legal text and, additionally, noted the increased engagement by Suppliers.	