




DCUSA Change Report		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>Date Raised: 12 February 2024</p> <p>Proposer Name: Paul Nicholson</p> <p>Company Name: Northern Powergrid</p> <p>Party Category: DNO</p>		01 – Change Proposal
		02 – Consultation
		03 – Change Report
		04 – Change Declaration
<p>Purpose of Change Proposal:</p> <p>The intent of this Change Proposal (“CP”) 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>		
	<p>This document is issued in accordance with Clause 11.20 of the DCUSA. Parties are invited to consider the proposed change and submit their votes using the voting form (attachment 2) to dcusa@electralink.co.uk by 30 May 2024.</p>	
	<p>The voting process for the proposed variation and the timetable of the progression of the 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</p> <p>Suppliers, DNOs and IDNOs</p>	
	<p>Impacted Clauses</p> <p>Schedule 8 – Paragraphs 13.1; 13.2; 13.3</p>	

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Any questions?

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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	15 May 2024
Party Voting Closes	30 May 2024
Change Declaration Issued to Parties	31 May 2024

1 Executive 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.

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 Working Group Assessment

- 4.1 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.
- 4.2 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.
- 4.3 The Working Group issued a consultation to gather information and feedback from market participants.

5 Consultation Responses Review

- 5.1 The consultation was issued on 20 March 2024. Fourteen responses were 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.
- 5.3 The Secretariat hosted a mid-consultation Q&A for this CP, supported by Sam Townend of ENWL in lieu of the Proposer. There were eight attendees of this session. The output of the Q&A can be found in attachment 4.

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

- 5.4 The Working Group noted that all consultation respondents understood the intent of the CP.

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

- 5.5 The majority of consultation respondents supported the principle of the CP.
- 5.6 The Working Group noted the concerns raised around the accuracy of the data and the potential knock-on effects of reducing the timescales.
- 5.7 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.
- 5.8 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. The Working Group requested that

the Secretariat support the efforts of the ENA in arranging such a session, by providing contract manager contact details.

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.

- 5.9 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.
- 5.10 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, for example to DESNZ.
- 5.11 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.

Question 4 – Do you agree with the proposed dates as set out in the current draft legal text? If not, please provide suggestions for your proposed dates and your rationale for these.

- 5.12 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.
- 5.13 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.

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.

- 5.14 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 to upload this information onto their systems.
- 5.15 The Working Group therefore agreed that as providing the subset of data does not have a material impact on reducing the timescales, it would remain out of scope of this CP.

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 your rationale.

- 5.16 The Working Group noted the responses and the potential impacts on customers, which it has considered as part of the previous questions.
- 5.17 The Working Group discussed the feasibility of updating the Powercut105 website to provide additional clarification around discrepancies in the data shown on their bills and the data held on the website, such as banners and additional FAQs, and agreed to assess this with the ENA.

- 5.18 The Working Group also noted that, as had been identified in some responses, not all customers would have the ability to access the Powercut105 website and would therefore remain reliant on their bills (or other forms of communication).

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

- 5.19 The Working Group noted the broad agreement that the CP better facilitates the DCUSA General Objectives, noting objective 3 specifically, but also noted the concerns raised by Suppliers about the need to balance this against the impact to customers.
- 5.20 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 considered whether this analysis was required and/or feasible. The Working Group discussed that whilst it would be possible to analyse historical data to determine the percentage of post codes or sites that had changed block letters, this analysis would not be useful in assessing the scale of the impact as the last few years had seen significant changes which would skew the results of the analysis.

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

- 5.21 The Working Group noted the work being undertaken by DESNZ, the ESO and network operators, as per its responses to previous questions.

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

- 5.22 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 – Do you have any comments on the draft legal text?

- 5.23 The Working Group noted there were no specific comments on the legal text and, additionally, noted the increased engagement by Suppliers.

6 Working Group Conclusions & Final Solution

- 6.1 The Working Group reviewed the responses and noted that:
- the majority of consultation respondents supported the intent and the principles of the CP;
 - the majority of consultation respondents agreed that the proposed solution better facilitated the DCUSA Charging Objectives; and
 - the majority of consultation respondents supported the proposed implementation timescales.

- 6.2 The Working Group considered what the appropriate dates in the legal text should be, taking into account:
- the need to move the date to later in the year to improve the efficiency of the DNO data extraction and provide more up-to-date data;
 - the need to ensure Suppliers have sufficient time to update their systems prior to any code freezes; and
 - the need for customers, particularly those without access to the Powercut105 website, to receive their Rota Load Block Alpha Identifier.
- 6.3 The Working Group agreed the following dates (which are reflected in the legal text in attachment 1):
- in paragraph 13.1, the date that the Company will provide data to the Nominated Central Source will be by 31 August;
 - in paragraph 13.2, the date that the Nominated Central Source will provide the data to the Secretariat will be by 30 September;
 - in paragraph 13.2, the date that the Secretariat will publish the data on its website will be by the second working day of October;
 - in paragraph 13.3, the 12-month period during which Suppliers notify customers of their Rota Load Block Alpha Identifier will commence on 1 November; and
 - in paragraph 13.3, the last sentence has been updated to refer to the October and November dates amended above.

7 Relevant Objectives

Assessment Against the DCUSA Objectives

- 7.1 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. This Change Proposal has been assessed against the DCUSA General Objectives.
- 7.2 The majority of the Working Group 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

7.3 The majority of the Working Group agreed that, assuming the data accuracy of the submissions had improved, and that Suppliers would only need to perform the updates to their systems once per year, that this CP better facilitated objective 3, by improving the efficiency of the Rota Load Block Alpha Identifier process, and that by providing the data at a later date, this means the data provided to customers will be more up-to-date when they receive their bills (or when the identifiers are communicated to them.)

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 The Working Group does not believe that this CP impacts upon any current SCR or other significant industry change projects.

Does this Change Proposal impact Other Codes?

8.2 The Working Group does not consider that there are any impacts to any other Industry Codes as a result of the implementation of this CP.

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

Consumer Impacts

8.3 The Working Group identified some potential consumer impacts, in the form of a delay in receiving their updated Rota Load Block Alpha Identifiers and consulted on these impacts with industry. The Working Group recognised that pushing the dates to be later in the year would increase the risk that more customers would not receive their updated Rota Load Block Alpha Identifiers in time for winter. The Working Group worked to agree the dates, as per the updated legal text, by balancing customer needs against the need to move the dates.

Consideration of Wider Industry Impacts?

8.4 The Working Group has not identified any wider industry impacts arising from this CP.

Environmental Impacts

- 8.5 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.

9 Implementation

- 9.1 The proposed implementation date for this CP is the June 2024 standard release.

10 Legal Text

- 10.1 The legal text for this CP 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 Not applicable.

Reference Documents

- 11.2 Not applicable.

12 Recommendations

Panel's Recommendation

- 12.1 The Panel approved this Change Report on 15 May 2024. 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 this CP.
- 12.2 The Panel has 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 436 Legal Text
- Attachment 2 – DCP 436 Voting Form
- Attachment 3 – Non-confidential Consultation Responses & Working Group Comments
- Attachment 4 – DCP 436 Mid-consultation Q&A Output
- Attachment 5 – DCP 436 Change Proposal Form