

DCUSA Change Report		At what stage is this document in the process?
<h2>DCP 441</h2> <h3>Proposal to increase the number of allowed Change Report alternative variations from two to three</h3> <p>Date Raised: 23/04/2024 Proposer Name: Simon Vicary Company Name: EDF ENERGY CUSTOMERS LIMITED Party Category: Supplier Governance: Part 1 Matter</p>		01 – Change Proposal
		02 – Consultation
		03 – Change Report
		04 – Change Declaration
<p>Purpose of Change Proposal:</p> <p>This Change Proposal seeks to change the number of alternative variations that can be added by the Panel to a Change Report from two to three.</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 11 July 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>All Parties</p>
		<p>Impacted Clauses</p> <p>Section 1C 'Change Control' – Clause 11.23</p>

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Any questions?

Contact

Code Administrator



DCUSA@electralink.co.uk



020 7432 3011

Proposer

Simon Vicary



simon.vicary@edfenergy.com



07921 111 767

Change Proposal Timetable

Activity	Date
Initial Assessment Report	15 May 2024
Change Report Approved by Panel	19 June 2024
Change Report issued for Voting	20 June 2024
Party Voting Closes	11 July 2024
Change Declaration Issued to Parties/Authority	16 July 2024
Authority Decision	TBC

1 Executive Summary

What?

- 1.1 Clause 11.23 of Section 1C 'Change Control' currently limits the number of alternative variations (in addition to the variation originally proposed), that the Panel can include within the Change Report for a given Change Proposal, to a maximum of two.

Why?

- 1.2 This restriction in the number alternative variations recently caused an issue for DCP 406 'Access SCR: Changes to CCCM' where two variables had two alternatives that required a complex approach so that all four options could be presented to the Authority, which they had requested. However, if three alternatives had been allowed then this would have been straight forward.

How?

- 1.3 It is proposed to change Clause 11.23 in Section 1C 'Change Control' such that the Panel will be able to add, in addition to the original proposed variation, up to three alternative variations. As it currently stands, the Panel only has the ability to add up to two alternative variations in addition to the original proposed variation.

2 Governance

Justification for Part 1 Or Part 2 Matter

- 2.1 It is the Proposers view that this Change Proposal be considered as a Part 1 Matter as meets the criteria set out in Clause 9.4.5 as "*it concerns the governance or the change control arrangements applying to this Agreement*".

Requested Next Steps

- 2.2 The Panel recommends that this CP should be issued to Parties for Voting.

3 Why Change?

- 3.1 On 09 February 2023, Ofgem made a decision on DCP406 'Access SCR: Changes to CCCM' and in their decision letter, noted the following:

In the course of the Working Group ('WG'), it became apparent that the development of DCP406 would require additional potential solutions. As DCUSA governance only allows for two alternative options to be presented in a single Change Proposal (CP), DCP406A was additionally raised by the Proposer, not as an alternative option to those included in DCP406 but as a separate, stand-alone CP and approved excommittee on 20 October 2022.

In effect, DCP406A seeks to complement DCP406 in addressing what the WG has stated they see as two situations arising from the implementation of DCP406 that would result in potentially inequitable treatment of connection customers. By raising this proposal separately, the WG and DCUSA Panel have appropriately presented additional options for consideration. We have published our decision to approve DCP406A alongside this decision.

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Send back and preliminary assessment of DCP406 and DCP406A

On 3 November 2022 a single Change Declaration ('CD') for DCP406 and DCP406A was submitted to Ofgem. Notwithstanding that DCP406 and DCP406A are two distinct CPs, the WG elected to group them together in a single Change Report ('CR') and single CD.

On 15 December 2022, we issued our decision to send back the two CPs on the basis that we were unable to properly form an opinion on the two proposals based on a single CR. In particular, we considered that the WG did not provide an independent assessment of DCP406 and DCP406A as no distinction between the modifications was made during the party voting process and their assessment against the DCUSA Charging Objectives.

We therefore asked the DCUSA Panel and the associated WG(s) to address our concerns through either (i) amalgamating the changes proposed by DCP406 into DCP406A within a single modification CP; or (ii) through a full and formal separation of DCP406 and DCP406A, implying the provision of two separate CRs with individual assessments against DCUSA Charging Objectives and consolidated party votes. Alongside our send back decision, we outlined our preliminary assessment of the options under DCP406 and DCP406A and indicated our initial view that based on the information available at that time, we would be minded to approve DCP406 Alternative Proposal (formerly referred to as Solution 2) and DCP406A.

- 3.2 It is proposed that the current allowance of two alternatives is increased to three. The very limited scope of this change is not expected to cause any significant issues and would avoid a repeat of this same situation that occurred during the development of DCP 406.

4 Code Administrator's Assessment

- 4.1 The Panel conducted their initial assessment of DCP 441 during their meeting on 15 May 2024. The Panel agreed that the Change Proposal should be progressed directly to the Report Phase and for it to be treated as a Part 1 Matter. The reason for DCP 441 being progressed directly to the Report Phase is because of the very narrow scope of the change and because the legal text amendments are simple in nature.
- 4.2 In reaching the above decision, the Panel requested for the DCUSA Code Administrator to carry out some analysis with respect to the number of previous Change Proposals which have progressed with one or two alternative solutions (in addition to the solution originally proposed). The analysis should look to identify any instances where there had been discussions on the possible inclusion of more than two alternative solutions but that had not been taken forward due to the current restriction.
- 4.3 The output of this analysis is set out below. It should be noted that the analysis only covers CPs that were known to have had alternatives and were identifiable, rather than every CP where a potential alternative was discussed.

Analysis of previous Change Proposals that included Alternative variations in Change Report

DCP No. / Link	Change Proposal Titles	no. of alternatives in final report	no. of alternatives discussed	Comments
DCP 001 DCP 001A	Proposed move to annual amendment of DUoS Charges	1	4	Solutions proposed in the CP was not accepted during initial discussions. 3 alternative solutions were drafted on the same meeting.
DCP 005 DCP 005A	Change to the notification period for Non-Standard Connection Terms	1	2	Initial solution was withdrawn and replaced by Alternative A.
DCP 012 DCP 012 A	Introduction of contractual arrangements for the provision of use of system between one distributor and another distributor	1	2	DCP 012 was raised with an alternative variation incorporated within it and has been discussed by a project working group and consulted on by the Panel prior to being raised. Following discussions during the actual Working Group, a member disagreed with the proposed solution and wished to put forward one of their own. Therefore the proposal put forward two options.
DCP 018 DCP 018A	Clarification of provision of metering data	1	3	During their refinement of DCP 018, the Working Group agreed to remove and element of the original proposal that the proposer wanted to keep. Therefore, the proposer requested that an alternative variation be put forward to cover off their original intent. Both variations were consulted on. During their review of consultation responses a third variation was proposed by a respondent but the Working Group agreed to suggested approach and incorporated the suggestions within the original variation that was taken forward.
DCP 019 DCP 019A	Moving Meters with Service Alterations	1	3	DCP 019A was raised early on in the process due to one Working Group member wanting to put forward an alternative variation. Both variations were consulted on. During their review of consultation responses a third variation was proposed by a respondent but was not taken forward by the Working Group as it was deemed to be out of scope.
DCP 030 DCP 030A	Provision of cost information	1	4	During their review of consultation responses, the Working Group noted that three respondents suggest alternative variations. One was discarded, and as a result of what had been proposed by the other two respondents, a Party raised an DCP 030A. Therefore the original and an alternative were the only options to proceed.
DCP 046A DCP 046B	Common Distribution Charging Methodology Governance	1	3	046 was split early on in the process due to feedback from Ofgem. During their review of consultation responses a third variation was proposed by a respondent but was not taken forward by the Working Group.
DCP 066 DCP 066 A	Enhanced Provision of Cost Information	1	2	As a result of the consultation and RFI responses, a second variation was developed by the DCP 066 Working Group and was sponsored by one of the Working Group members.
DCP 071 DCP 071 A	Allocation of Cost to HV Connected IDNOs with LV End Users	1	2	The Working Group noted that during the development of the CDCM two different options for calculating the HV Split had been considered and so decided to put forward two options (i.e., an original and an alternative variation).
DCP 080 DCP 080A	Theft in Conveyance	1	2	The DCP 080 Working Group was unable to reach agreement that the definition of "Theft in Conveyance" proposed in the CP was correct. The Working Group subsequently developed an alternative, DCP 080A, to reflect the views of those who did not support DCP 080.
DCP 091 DCP 091A	Publication of Tariffs and Annual Charge Estimates	1	2	As a result of the consultation responses, a second variation was developed by the DCP 091 Working Group and was sponsored by one of the Working Group members.

DCP No. / Link	Change Proposal Titles	no. of alternatives in final report	no. of alternatives discussed	Comments
DCP 158 DCP 158A	DNO DUoS Re EDNOs	1	2	The Working Group consulted on a number of solutions as set out below but managed to pick a single option for solution one and so presented two proposed options in their Change Report. Consultation Options were as follows: <ul style="list-style-type: none"> • Solution One (Option 1, Option 2, Option 3 and Option 4) • Solution Two
DCP 162 DCP 162A	Non Secure Connections in the Common Connection Charging Methodology	1	2	The Working Group was split on the solution proposed and as result some Working Group members chose to raise an alternate Change Proposal (DCP 162A). The majority of the Working Group supported the original DCP 162 Change Proposal.
DCP 166 DCP 166 DCP 166A	Additional text for the DNO Common Connection Charging Methodology to provide clarity where a customer requests a supply voltage in excess of the minimum scheme for the capacity requested.	1	2	As a result of the consultation responses, an alternative variation was put forward by two Working Group members, who disagreed with the Working Group majority's preferred solution and exercised the right to raise an alternate proposal (DCP166A)
DCP 167 DCP 167A	Additional example(s) for the Common Connection Charging Methodology to illustrate remote reinforcement and network reconfiguration	1	2	As a result of the consultation responses, an alternative variation was put forward by a Working Group member, who disagreed with the Working Group majority's preferred solution and exercised the right to raise an alternate proposal (DCP167A)
DCP 190 DCP 190A	Credit for equipment recovery associated with temporary connections	1	2	Prior to the first consultation for DCP 190, one Working Group member disagreed with the Working Group's preferred solution and exercised the right to raise an alternate proposal (DCP190A).
DCP 195 DCP 195A	Service Level Agreement for Resolving Network Operational Issues	1	2	As a result of the consultation responses, an alternative variation was put forward by a Working Group member, who believed there was a better way forward as compared to the Working Group majority's preferred solution and exercised the right to raise an alternate proposal (DCP195A).
DCP 205 DCP 205A	Recovery Of Costs Due To Load And Generation Increases From Existing Customers In RIIO-ED1	1	4	The Working Group developed four solutions for Parties' consideration as part of their first consultation. Following the feedback from the first consultation, the Working Group agreed to proceed with two Options: Option C and Option D. Option C was the Working Group's preferred Option and was submitted for consideration as the solution to the originating DCP 205. Option D was submitted for consideration as an alternative of DCP 205A which was introduced by the Working Group.
DCP 211 DCP 211A	Enhance transparency of DCUSA Change Management	1	2	As a result of the consultation responses, an alternative variation was put forward by the Working Group as they were split as to the most appropriate solution and agreed that an alternative (DCP 211A) should be raised so that Parties have the opportunity to vote on two options.
DCP 254 DCP 254 A	TRAS De Minimis Threshold	1	2	As a result of the consultation responses, the majority of the Working Group agreed to updated the original solution, however, the proposer of the CP wished to retain their original solution and so the Working Group agreed that an Alternative CP (DCP 254A) should be raised so that parties have the opportunity to vote on the two options

DCP No. / Link	Change Proposal Titles	no. of alternatives in final report	no. of alternatives discussed	Comments
DCP 281 DCP 281A	Changes to Schedule 19 – Portfolio Billing	1	2	Following the DCP 281 consultation, an alternative variation was put forward by a Working Group member, who believed there was a better way forward as compared to the Working Group majority’s preferred solution and exercised the right to raise an alternate proposal (DCP 281A).
DCP 288 DCP 288A DCP 288B	DCP-288/A Introduction of the Electricity Theft Detection Incentive Scheme DCP-288B Equitable Theft Detection Incentive Scheme	2	3	During their review of the consultation responses the Theft Issues Group noted that one of the respondents wished to raise an alternative CP proposing to introduce, in their view, a fairer approach to the Electricity Theft Detection Incentive Scheme for independent Suppliers. The alternative CP, DCP 288A was raised on 14 April 2017. The second alternate, DCP 288B was raised on 25 July 2017. Through DCP 288B the proposer seeks to create what it considers would be an equitable scheme which suitably incentivises detection of Electricity theft without distorting competition and hampering effective functioning of the market.
DCP 289	Creation of Distribution Charging Methodology Development Group	2	2	The DCP 289 Working Group developed both the original proposal as well as an alternative variation proposed by a Working Group member prior to the consultation. Upon reviewing the responses to that consultation and considering the varying responses in support of both DCP 289 and DCP 289A, the Working Group agreed that a second alternative should be drafted as a compromise to ensure that the concerns of both the supporters and opponents of both DCP 289 and DCP 289A were alleviated
DCP 406 DCP 406A	Access SCR: Changes to CCCM	2 x 2	4	In the course of the Working Group, it became apparent that the development of DCP406 would require additional potential solutions. As DCUSA governance only allows for two alternative options to be presented in a single CP, DCP406A was additionally raised by the Proposer, not as an alternative option to those included in DCP406 but as a separate, stand-alone CP. In effect, DCP406A seeks to complement DCP406 in addressing what the Working Group stated as two situations arising from the implementation of DCP406 that would result in potentially inequitable treatment of connection customers

5 Relevant Objectives

Assessment Against the DCUSA Objectives

5.1 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.

5.2 The Proposer believes 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 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

5.3 It is believed that by to changing the number of alternative variations that can be added by the Panel to a Change Report from two to three, this Change Proposal will better facilitate DCUSA General Objective Four. It is the Proposer’s view that this will avoid a similar situation as occurred for DCP 406/406A where Ofgem had to send back the Change Report due to the method that was used to overcome the current restriction of only two alternative variations that can be added by the Panel.

6 Impacts & Other Considerations

Impacts on any Significant Code Review (SCR) or other significant industry change projects

6.1 The Proposer does not believe that this CP impacts upon any current SCR or other significant industry change projects. It is noted that as part of Energy Code Reform, Ofgem will be reviewing and potentially consulting on an improved change/modification process for industry codes, however, the Proposer believes that making this change now is the best course of action as code consolidation could still be some years away.

Impacts Other Codes

6.2 The Proposer does not consider that there are any impacts to any other 'Industry Codes' as a result of the implementation of this CP.

Grid Code..... SEC... CUSC... None...

Distribution Code... REC... BSC.....

Consumer Impacts

6.3 The Proposer does not believe that this change will impact consumers.

Environmental Impacts

6.4 In accordance with DCUSA Clause 11.20.5A, the Proposer assessed whether there would be a material impact on greenhouse gas emissions if this CP were implemented. The Proposer did not identify any material impact on greenhouse gas emissions from the implementation of this CP.

7 Implementation

7.1 The Proposed Implementation date should be set to the next standard release following Authority approval, which, if approved by the Authority before 06 November 2024, could be implemented as part of the 07 November 2024 DCUSA release.

8 Legal Text

8.1 The legal text for DCP 441 was provided by the Proposer and has been reviewed by the DCUSA legal advisors and is provided below for ease of reference but can also be found within Attachment 1 to the Change Report.

Amend Clause 11.23 in Section 1C as follows:

11.23 The Panel may, prior to submitting a Change Report to the Voting Procedure, and having had regard to the consultation responses received, direct the Secretariat to amend the Change Report in one or more of the following ways:

11.23.1 to alter the Party Categories who will be eligible to vote on the proposal;

11.23.2 to alter the proposed date for the implementation of the proposal (provided that the Panel may not amend an implementation date specified by the Authority in accordance with Clause 11.9A.2);

11.23.3 to add (in addition to the variation proposed) up to ~~two~~three of the alternative variations referred to in Clause 11.20.6(C); and

11.23.4 to clarify or correct typographical errors in the Change Report or make other amendments which do not alter the substance of the Change Report,

but where one of the alternative variations referred to in Clause 11.20.6(C) is a variation that was submitted by the Proposer, the Panel must use its power under Clause 11.23.3 to direct the Secretariat to add that variation to the Change Report, whether or not it also directs that a second or third alternative variation shall be added.

Text Commentary

8.2 The solution is to amend Clause 11.23 such that it allows the Panel to add into a Change Report for a given Change Proposal up to three additional to variations on top of the original variation proposed.

9 Code Specific Matters

Reference Documents

9.1 This issue has been discussed by the Standing Issues Group during their meeting in March 2024: <https://www.dcuda.co.uk/event/standing-issues-group-sig-meeting-154/>

10 Recommendations

Panel's Recommendation

10.1 The Panel approved this Change Report on 19 June 2024. The Panel considered that the Proposer has carried out the level of analysis required to enable Parties to understand the impact of the proposed amendment and to vote on DCP 441.

10.2 The Panel have recommended this report be issued for voting and DCUSA Parties should consider whether they wish to submit views regarding this Change Proposal. The voting form acts as Attachment 2 to this Change Report or can be completed via the online voting form which will be available on the following page of the DCUSA website: [DCP 441 'Proposal to increase the number of allowed Change Report alternative variations from two to three'](#)

11 Attachments

- Attachment 1 – DCP 441 Legal Text
- Attachment 2 – DCP 441 Voting Form