










DCUSA Change Declaration		At what stage is this document in the process?
<h1>DCP 441</h1> <h2>Proposal to increase the number of allowed Change Report alternative variations from two to three</h2> <p><b>Date Raised:</b> 23/04/2024</p> <p><b>Proposer Name:</b> Simon Vicary</p> <p><b>Company Name:</b> EDF ENERGY CUSTOMERS LIMITED</p> <p><b>Party Category:</b> Supplier</p> <p><b>Governance:</b> Part 1 Matter</p>		01 – Change Proposal
		02 – Consultation
		03 – Change Report
		04 – Change Declaration
<p><b>Purpose of the Change Proposal (“CP”)</b></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>DCUSA Parties have voted on this CP with the outcome being a recommendation to the Authority as to whether or not the CP should be accepted. As this is considered to be a Part 1 Matter, the recommendation will be issued to the Authority for its final decision.</p> <p>The DCUSA Parties consolidated votes are provided as attachment 2.</p>	
	<p>DCUSA Parties have voted to:</p> <ul style="list-style-type: none"> <li>• accept the proposed variation (solution); and</li> <li>• accept the implementation date.</li> </ul>	
	<p><b>Impacted Parties</b></p> <p>All Parties</p>	
	<p><b>Impacted Clauses</b></p> <p><a href="#">Section 1C ‘Change Control’ – Clause 11.23</a></p>	

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Timeline		<b>Contact</b> Code Administrator   <a href="mailto:dcusa@electralink.co.uk">dcusa@electralink.co.uk</a>   020 7432 3011  <b>Proposer</b> Simon Vicary   <a href="mailto:simon.vicary@edfenergy.com">simon.vicary@edfenergy.com</a>   07875 110 961
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	18 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

- 2.1 This CP is classified as a Part 1 matter and will go to the Authority for determination, with the outcome of the voting acting as a recommendation.
- 2.2 DCUSA Parties have voted on this CP and the outcome of the vote acts as a recommendation to the Authority as to whether this CP should be accepted or not. Parties recommend that this CP be accepted and that the change be made.

## 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.*

*.....*

*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.*

## 4 Solution

- 4.1 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.
- 4.2 The Panel agreed for this CP to progress to the Change Report stage, where the Code Administrator displayed an 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 looked 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, findings of this analysis are published within the [Change Report](#). This was circulated for voting; the natural next step is to progress for Authority Decision.

## 5 Relevant 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 Working Group considers that the following 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 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 (4). 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

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

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.

### Consumer Impacts

6.2 The Proposer does not believe that this CP impacts upon consumers.

## Environmental Impacts

- 6.3 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 6 November 2024, could be implemented as part of the 7 November 2024 DCUSA release.

## 8 Legal Text

- 8.1 The legal text for this CP is provided as attachment 1.
- 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 variations on top of the original variation proposed.
- 8.3 The Proposer has considered the legal text and is satisfied that it meets the intent of the solution.

## 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.dcusa.co.uk/event/standing-issues-group-sig-meeting-154/>

## 10 Voting

- 10.1 The Change Report was issued to DCUSA Parties for Voting on 20 June 2024 for a period of 15 working days.
- 10.2 This is a Part 1 Matter and, as such, will go to the Authority for determination, with the outcome of the voting acting as a recommendation.

### Proposed Variation (Solution)

- 10.3 For the majority of the Party Categories that were eligible to vote, the sum of the Weighted Votes of the Groups in each Party Category which voted to accept the change solution was more than 50%.
- 10.4 DCUSA Parties have therefore voted to accept the proposed variation (solution) of this CP.

## Implementation Date

10.5 For the majority of the Party Categories that were eligible to vote, the sum of the Weighted Votes of the Groups in each Party Category which voted to accept the implementation date was more than 50%.

10.6 DCUSA Parties have therefore voted to accept the implementation date of this CP.

The table below sets out the outcome of the votes that were received in respect of the Change Report.

	WEIGHTED VOTING						
	DNO	IDNO	Supplier	CVA Registrant	Gas Supplier	Safe Isolation Provider	Offshore Transmission System Operator (OTSO)
<b>CHANGE SOLUTION</b>	Accept	Accept	Accept	No votes received	No votes received	No votes received	No votes received
<b>IMPLEMENTATION DATE</b>	Accept	Accept	Accept	No votes received	No votes received	No votes received	No votes received

## 11 Outcome

11.1 DCUSA Parties have voted on this CP. In accordance with Clause 13.5, these Parties are deemed to recommend to the Authority to accept the Change Proposal and accept the proposed implementation date.

## 12 Attachments

- Attachment 1 - DCP 441 Legal Text
- Attachment 2 - DCP 441 Consolidated Party Votes
- Attachment 3 - DCP 441 Change Proposal Form