

DCP 451

'SUSPENDING REGISTRATIONS'

COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

Company	Confidential/ Anonymous	1. Do you understand the intent of DCP 451?	Working Group Comments
ENWL	Non-Confidential	Yes.	Yes
NGED	Non-Confidential	I understand the intent of DCP451.	Yes
NPg	Non-Confidential	Yes.	Yes
REC	Non-Confidential	N/A.	N/A
SEPD/SHEPD	Non-Confidential	Yes.	Yes
SPEN	Non-Confidential	Yes, we fully understand the intent of DCP 451.	Yes
SSE	Non-Confidential	Yes, we do.	Yes
UKPN	Non-Confidential	Yes.	Yes
Working Group Conclusions: 7 of the 8 responders stated they understood the principles of the CP, the other replied with N/A			

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Company	Confidential/ Anonymous	2. Are you supportive of the principles of DCP 451?	Working Group Comments
ENWL	Non- Confidential	Yes, as this DCP will add clarity to the suspension of registrations for the DCUSA and the REC.	Yes
NGED	Non- Confidential	In support.	Yes
NPg	Non- Confidential	Yes.	Yes
REC	Non- Confidential	N/A.	N/A
SEPD/SHEPD	Non- Confidential	Yes.	Yes
SPEN	Non- Confidential	Yes, we are supportive of this change.	Yes
SSE	Non- Confidential	Yes. We note that REC will be monitoring responses to see whether I0248 should be progressed, we believe changes will be required to REC in	Yes

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		addition to those noted within this change report. Further detail can be found under Q10.	
UKPN	Non-Confidential	Yes.	Yes
Working Group Conclusions: 7 of the 8 responders stated they supported the principles of the CP, the other replied with N/A			

Company	Confidential/ Anonymous	3. For Distributors only – Have you had experience of the issue explained and what was that experience like?	Working Group Comments
ENWL	Non-Confidential	While we haven't had any direct experience of the issue it is useful for the legal text to be reviewed and indeed REC Issue I0248 to be progressed to ensure alignment.	No but useful to clarify the process.
NGED	Non-Confidential	We have had first-hand experience, and the process was not clear and confusing as we could not ascertain a definitive answer. Advice given was often conflicting.	Yes, unclear and confusing process. Advice received was also conflicting.
NPg	Non-Confidential	Yes – when suspending registrations as is the new process it takes too long. There are too many parties involved and gives the Supplier who is not meeting their obligations more time to increase customers and potential debt which is ultimately passed onto the customer.	Yes, new process takes too long. Too many parties involved which allows the supplier time to register more customers.

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REC	Non-Confidential	N/A.	N/A
SEPD/SHEPD	Non-Confidential	Yes. The previous arrangements under the MRA worked well, closing down data flows which prevented large volumes of rejections. The current arrangements mean, despite notifying CSS, our MPRS is receiving & rejecting flows. These subsequently have to be dealt with manually (checking each rejection), which is time-consuming and labour intensive.	Yes, new process is time consuming as it requires manual intervention.
SPEN	Non-Confidential	<p>We have experienced the issue explained and found it to be frustrating as the process text is not clear.</p> <p>We have been advised that the request must come from DCUSA for the removal of Regulatory Alliance, however our understanding of the process is that the correct route to confirm is from the DNO to the CSS, as per schedule 24 section 4.10.7 and 4.10.8 of the REC.</p> <p>It appears that there is some confusion on the process for applying a market sanction, (which would come from DCUSA/BSC and would be received by the REC PAB to be assigned) and the process for creating/removing a Regulatory Alliance which would come from the DNO.</p> <p>In Schedule 24 of the REC it is clear in section 4.5, part (k) subsection ii that the DNO (ERDA) masters the Regulatory Alliance.</p>	Yes, process is unclear. Received advice stating the request to suspend registration should come from the DCUSA but the process seems to suggest that the correct route is the DNO to CSS.
SSE	Non-Confidential	N/A.	N/A

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UKPN	Non-Confidential	<p>As the proposer we found the action to initiate the ending of a regulatory alliance to be very simple and efficient. The difficulties we experienced were with the REC code manager's misunderstandings and communications. This should be easy to resolve.</p> <p>At the time when registrations are needed to be suspended it is vital that the process is able to be enacted in a quick and efficient manner, and ending the regulatory alliance enabled us to do this. The problem was that we then spent 3 days being unclear whether we had followed the correct process.</p>	Yes,
<p>Working Group Conclusions: Five respondents have experienced the issue, two replied N/A and the other said they hadn't experienced the issue.</p> <p>The responders who stated they had experienced the issue noted the new process is unclear and too long. This can lead to suppliers still being allowed to take on new customers creating potential customer debt.</p> <p>Advice received was also unclear as the direction was that the request to end the regulatory alliance should come from the DCUSA however the industry codes suggest it should be from the DNO to the CSS.</p>			

Company	Confidential/Anonymous	4. For Distributors only – Do you have any concerns with the process for reinstating registrations? What are those concerns?	Working Group Comments
ENWL	Non-Confidential	We believe the process is appropriate and ensures timely reinstatement of registrations.	No

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NGED	Non-Confidential	No concerns. We have successfully reinstated.	No
NPg	Non-Confidential	No, but it is worth noting it seems quicker than suspending.	No
REC	Non-Confidential	N/A.	N/A
SEPD/SHEPD	Non-Confidential	No concerns.	No
SPEN	Non-Confidential	We have not identified any concerns around the process for re-instating registrations, however for clarity, the agreed process for ending and re-instating registrations should be clearly defined in terms of notifications and processing.	No
SSE	Non-Confidential	N/A.	N/A
UKPN	Non-Confidential	No, we have not had any issues with reinstating registrations.	No
Working Group Conclusions: There were no concerns raised with the process for unsuspending registrations.			

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Company	Confidential/ Anonymous	<p>5. Do you consider that the proposal better facilitates the DCUSA General Objectives?</p> <p>If so, please detail which of the General Objectives you believe are better facilitated and provide supporting reasons.</p> <p>If not, please provide supporting reasons.</p>	Working Group Comments
ENWL	Non-Confidential	We believe General Objectives 3 and 4 will be better facilitated by this change as it will improve the efficiency of the processes around the suspension of registrations enabling DNOs to also efficiently discharge their obligations under the DCUSA.	3&4
NGED	Non-Confidential	Agree that Objective 3 will give us more control over our licence obligations and with Objective 4 in making the process more efficient to follow.	3&4
NPg	Non-Confidential	Yes, 3 and 4, we as DNO's need the ability to impose sanctions as per our licence.	3&4
REC	Non-Confidential	N/A.	N/A
SEPD/SHEPD	Non-Confidential	Yes it does as outlined in the change document.	3&4
SPEN	Non-Confidential	Yes, we agree that objectives 3 and 4 are better facilitated, as the implementation of this change would limit our exposure, and an update to	3&4

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		the process will ensure a greater understanding of the process and implement as was the initial intention.	
SSE	Non-Confidential	We do not have any concerns with the objectives noted within the change report and have no further comments to make.	3&4
UKPN	Non-Confidential	We believe that DCUSA General Objective 3 is better facilitated as this change will ensure that the Distributor is able to limit their exposure to a Supplier failing. It will also better facilitate DCUSA General Objective 4 as it clarifies the arrangements and ensures efficient administration where it is necessary to suspend registrations.	3&4
<p>Working Group Conclusions: Seven responders all said objectives 3&4 were better facilitated by this CP.</p> <p>The reasons given were because it will improve the efficiency of the process, give DNOs more control over their licence conditions, make the process clearer and it will limit DNOs exposure to a supplier failing.</p>			

Company	Confidential/Anonymous	6. Are you aware of any wider industry developments that may impact upon or be impacted by this CP?	Working Group Comments
ENWL	Non-Confidential	No.	No
NGED	Non-Confidential	REC changes will be required- these are advancing as a separate issue.	The REC change

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NPg	Non-Confidential	No.	No
REC	Non-Confidential	N/A.	N/A
SEPD/SHEPD	Non-Confidential	Potentially, the Codes Review.	Future code reviews
SPEN	Non-Confidential	We are not aware of any wider developments that may affect this CP.	No
SSE	Non-Confidential	Not at this time.	No
UKPN	Non-Confidential	No, other than the REC change which is referred to in this consultation.	No
Working Group Conclusions: Five responders said this CP had no wider industry impacts, one stated that a REC change would be required which has already been raised, another stated the code review and the last responder stated N/A.			

Company	Confidential/ Anonymous	7. How are you impacted by the outcome of this CP?	Working Group Comments
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ENWL	Non-Confidential	We do not believe we will be adversely impacted should this DCP be implemented.	No impact
NGED	Non-Confidential	It will make the process more definitive and clearer for us in the future. This will also limit further requests for insight being issued to DCUSA.	Positively
NPg	Non-Confidential	Positively.	Positively
REC	Non-Confidential	N/A.	N/A
SEPD/SHEPD	Non-Confidential	It should reduce the resources that we have to apply to dealing with temporary suspensions (ie dealing with flows received from CSS and rejected by our MPRS) and prevent and customer complaints. Currently, customers can start the process to leave the User for which MPRS has been suspended, but their registration with another Supplier cannot be completed – leaving the customer in limbo.	Positively
SPEN	Non-Confidential	We require a clear process for the application of Regulatory Alliance (creation and deletion) to ensure that we are compliant with the industry rules, and to limit our exposure in a scenario of default of a Supplier (and in terms of cost to the end customer).	Positively
SSE	Non-Confidential	We do not foresee any significant impacts, if this change is accepted, as we noted within Q2, subsequent changes are required to the REC and are referred to within Q10.	Positively

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UKPN	Non-Confidential	As a Distributor we are looking for the arrangements to be clear to all concerned so that when we are next required to suspend registrations, there is no confusion by any code administrator.	Positively
<p>Working Group Conclusions: There were no negative impacts noted by all responders.</p> <p>A number of responders noted they would be positively impacted by this CP as it would make the process clearer and improve efficiency.</p>			

Company	Confidential/Anonymous	8. Do you agree with the Working Group's proposed implementation date? If not, please provide your rational.	Working Group Comments
ENWL	Non-Confidential	Yes, the timescale for implementation seems reasonable.	Yes
NGED	Non-Confidential	Yes.	Yes
NPg	Non-Confidential	Yes.	Yes
REC	Non-Confidential	N/A.	N/A
SEPD/SHEPD	Non-Confidential	Yes.	Yes

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SPEN	Non-Confidential	We agree with the implementation of this date, we are keen for this to be implemented as soon as possible.	Yes
SSE	Non-Confidential	Yes.	Yes
UKPN	Non-Confidential	Yes, we agree with the proposed implementation.	Yes
Working Group Conclusions: Of the seven responders who answered this question, all of them said they agreed with the implementation date.			

Company	Confidential/Anonymous	9. Do you have any comments on the draft legal text?	Working Group Comments
ENWL	Non-Confidential	We believe the legal text as drafted will deliver the intent of this DCP.	No
NGED	Non-Confidential	No.	No
NPg	Non-Confidential	No.	No
REC	Non-Confidential	We believe there need to be references to REC Schedule 24 Switch Data Management. We're adding references to the DCUSA payment default	A reference to the REC schedule 24 data management would be usefultk

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		<p>procedures into this Schedule, and think it would be good to have a reference from DCUSA to REC. I think this probably looks like:</p> <p>54.2.1 Clause 54.1.1 or 54.1.6, any Party to whom the obligations in question were owed shall be entitled to suspend its performance of the services described in Section 2 to the Breaching Party by: (a) giving notice in writing to the Breaching Party and copying that notice to the Authority and the Panel (care of the Secretariat); and (b) reporting under the Retail Energy Code the amendment to the Regulatory Alliance ending the Regulatory Alliance under the Retail Energy Code (as per REC Schedule 24 Switching Data Management) with the Breaching Party and copying the notice given under (a) to the REC Performance Assurance Board;</p> <p>54.2.2 Clause 54.1.8, the Panel shall be entitled to instruct the REC Code Manager to procure suspension of CSS registration services for the Breaching Party by imposing a Market Sanction under the Retail Energy Code (as per REC Schedule 24 Switching Data Management) and shall notify each DNO/IDNO Party and the Authority that the Panel has taken such action;</p>	<p>and consistent in what the REC are doing with their legal text as they make a reference to therelevant DCUSA schedules and clauses.</p>
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SEPD/SHEPD	Non-Confidential	No comments.	No
SPEN	Non-Confidential	No comments.	No
SSE	Non-Confidential	Suggested amendment to the following clause - Schedule 1, Clause 3.5 – In addition to any other remedies available to it, the Company shall be entitled to take the following actions as a result of following a Cover Default (provided that, where the provision of CSS registration services or the right to make future connections under Section 2B (as applicable) has been suspended at any time after Day 0 + 5, then the Company must, as soon as the Cover Default has been remedied, notify the User, and copying that notice to the Authority and the Panel (care of the Secretariat), and reinstate the right to CSS registration services (by updating the Regulatory Alliance under the REC) by and notifying the REC Performance Assurance Board, or reinstating the right to make future connections under Section 2B (as applicable)):	
UKPN	Non-Confidential	No.	No
<p>Working Group Conclusions: Six responders noted they had no comments on the legal text.</p> <p>The REC suggested adding into the DCUSA legal text a reference to the relevant REC schedules and clauses for this process (Schedule 24 Switch Data Management). This is consistent with the approach the REC are taking as their legal text does reference the relevant DCUSA Schedules and clauses.</p>			

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Company	Confidential/ Anonymous	10. Do you have any other comments on DCP 451?	Working Group Comments
ENWL	Non-Confidential	To ensure consistency between Parties, should this DCP be approved for implementation there will need to be an agreed Mailbox to use when notifying the REC Performance Assurance Board of suspensions/reinstatements.	
NGED	Non-Confidential	No further comments.	
NPg	Non-Confidential	No.	
REC	Non-Confidential	N/A.	
SEPD/SHEPD	Non-Confidential	No comments.	
SPEN	Non-Confidential	No further comments.	
SSE	Non-Confidential	As we have referenced in other questions, we believe the REC change should be progressed which concentrates on the processes in which suppliers should manage these restrictions, where there has been a Change	

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		of Supply event. The default which caused this change to be raised has identified a lack of process within the REC in how suppliers manage customers who have had a COS event take place, but industry systems show a mismatch in data. It is not clear from current REC drafting what the losing supplier should do in instances where there is a mismatch in consumer data, but the supplier needs to report on such loss. Reference to the ‘exclamation mark’ within EES is detailed within its user guide, however there are no references to the processes in which the supplier must follow within the Registration Services schedule, which we believe should be clarified. Therefore, we would appreciate REC progressing I0248 to consider this issue.	
UKPN	Non-Confidential	No.	
Working Group Conclusions: There were no new issues raised within this question that hadn’t been raised before or that were in scope of this change.			