




DCUSA Change Report		At what stage is this document in the process?
<h2>DCP 325:</h2> <h3>Reviewing the requirements of Sections 35A ('Provision of Cost Information'), 35B ('Production of the Annual Review Pack'), Schedule 15 ('Cost Information Table') and Schedule 20 ('Production of the Annual Review Pack')</h3> <p>Date Raised: 11/07/2018 Proposer Name: Kara Burke Company Name: Northern Powergrid 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 is to combine, review, and if appropriate amend the requirements of Section 35A, Section 35B, Schedule 15 and Schedule 20 to improve transparency and efficiency in the data published by DNOs. .</p>		
	<p>This document is issued in accordance with Clause 11.20 of the DCUSA, and details DCP 325'.</p> <p>Parties are invited to consider the proposed amendment (Attachment 2) and submit their votes using the Voting form (Attachment 1) to dcusa@electralink.co.uk by xx February 2025.</p> <p>The voting process for the proposed variation and the timetable of the progression of the Change Proposal (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>DNOs. IDNOs, Suppliers, CVA Registrants</p>	
	 <p>Impacted Clauses:</p> <p>Clauses 35A and 35B and Schedules 15 and 20</p>	



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? Any questions?

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Timetable

The timetable for the progression of the CP is as follows:

Change Proposal timetable

Activity	Date
Initial Assessment Report	18 July 2018
Consultation 1 Issued to Industry Participants	08 October 2018
Request for Information Issued to Industry Participants	23 September 2024
Consultation 2 Issued to Industry Participants	08 November 2024
Change Report Approved by Panel	19 FebruaryAugust 2025
Change Report issued for Voting	20 AugustFebruary 2025
Party Voting Closes	13 September March 2025
Change Declaration Issued to Parties	14 SeptemberMarch 2025

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1 Executive Summary

What?

- 1.1 Clause 35A (supported by Schedule 15) requires each DNO Party to publish cost information on a quarterly basis. This consists of:
 - a forecast of its revenue allowances for the current regulatory year and the following four regulatory years ('table 1');
 - an indication of the likely range within which given allowances could vary ('table 2'); and
 - illustrative Common Distribution Charging Methodology (CDCM) tariffs.
- 1.2 Clause 35B (supported by Schedule 20) requires each DNO Party to publish an 'annual review pack' (ARP) at the time of setting charges in December each year. This consists of:
 - historical CDCM input information for the previous three years;
 - forecast CDCM input information for the next five years;
 - illustrative tariffs for the next five years based on the forecast inputs provided;
 - functionality to enable a user to amend any of the forecast inputs and recalculate illustrative tariffs; and

- details of the values calculated for each year where CDCM inputs have been calculated based on a three-year average, most notably the load characteristics and peaking probabilities.

1.3 This change seeks to:

1. combine the main requirements of Clause 35A and 35B alongside the two accompanying schedules;
2. review the requirements to determine whether the information provided is useful to stakeholders, whether it is presented in a useful format, and whether some duplication could be removed; and
3. if appropriate following this consultation, amend the requirements to enable DNOs to provide stakeholders with better quality information whilst reducing duplication.

Why?

1.4 There is significant crossover between the requirements of Clause 35A and Clause 35B, without sufficient alignment to enable use of a common template. This results in some cases of the same or similar information being published in a different format in the two publications, which is inefficient to produce and risks being misleading for users.

1.5 Feedback from some industry parties suggested that they may not use the functionality to amend forecast CDCM inputs and recalculate tariffs in the ARP. This may be due to the requirement on distributors to give 15 months' notice of a change to Use of System charges. The ARP was developed at a time when distributors were only required to give three months' notice of a change to Use of System charges. The sensitivity of tariffs to changes in CDCM inputs is primarily of interest for charges which have not yet been published which are now much further into the future than when the ARP was originally put in place. The functionality to recalculate tariffs adds significant complexity into the ARP, and as a result reduces the transparency and usability of the information provided.

1.6 It should be straightforward for DNOs to provide more useful information in a more succinct manner – thus improving both the efficiency of provision and usefulness of the output.

1.7 Clause 35A also requires DNOs to convene a meeting to present the most recently submitted information. This meeting could be more efficiently arranged and conducted if responsibility for it lay with the Secretariat rather than DNOs, in line with the arrangements introduced for the Distribution Charging Methodologies Development Group (DCMDG), which replaced the Distribution Charging Methodologies Forum (DCMF).

How?

1.8 The requirements of Clause 35A and Clause 35B ~~should behave been reviewed, amended and combined, reviewed and, if appropriate, amended,~~ alongside combining the details given in Schedule 15 and Schedule 20 into a single publication. A 'first draft' of a proposed template for submission was provided as an attachment (Attachment 4 proposed template) to the Change Proposal (CP) form. Following Working Group discussions and industry consultation this template has been developed into the Cost Information Review Pack (CIRP), as provided in Attachment X, which is proposed to replace the ARP and the Cost Information Template.

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1.81.9 The proposed template CIRP sought to align standardises the years for which data is provided to the years currently required under Schedule 15, i.e. Regulatory Year t-1 to Regulatory Year t+4; and to link the years required more closely to the Price Control Periods, so would require publication of data from the start of the Price Control Period which was in place two years prior to the current year up to the latter of four forecast years or the end of the current Price Control Period. The proposer provided this template as a starting point for discussions and in doing so did not intend to restrict the ability of the Working Group to review and, if appropriate, amend the requirements of the combined sections in full. The Proposer set out their view that a Working Group should ensure, by consultation with industry, that removal of any information or functionality which the solution seeks to remove is not detrimental to stakeholders.

1.91.10 The publication timetable should also be considered — a simple amalgamation of the publication requirements of Clause 35A and Clause 35B would result in five publications of the same template each year (quarterly in February, May, August and November as per Clause 35A, and annually with the publication of final charges by December 31st as per Clause 35B); however this could be given further consideration to ensure the timing of publications is appropriate was considered and it is proposed that the CIRP should be populated and published by the DNOs three times a year, in May, September and the month of publication of final tariffs. This timetable will allow for the CIRP to be updated with more meaningful updates for each publication, compared to the current timetable which often only provides minimal updates.

1.10 It is also the view of the Proposer that a Working Group should consider whether the provision of a model template (as is currently the case in Schedule 20) would be appropriate once the two sections have been combined.

1.11 Finally, the Proposer suggested that the a current requirement on DNOs in Clause 35A to convene a meeting (known as the 'DCP 066A Teleconference') could be has been amended to require that the Secretariat convenes such a meeting, at which all DNOs will be required to present their latest forecast information, and to which all supplier and IDNO Parties will be invited. The legal text has also been updated to require that the meeting is held on a specific day which has been set as the first Thursday at least 15 working days following publication of the CIRP. This is to allow all parties advanced notice of when each of the meetings will be which may aid attendance.

1.12 Following the restart, this CP will no longer consider did not consider changes to the contents of tables 1, 2 or 3 of clause 35A as these were covered by DCP 421 'Update the Tables in Schedule 15 of DCUSA'¹.

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2 Governance

Justification for Part 2 Matter

2.1 This change has no impact on Use of System charges calculated, and only on the supplementary information published. Whilst the change may result in less information being directly published (e.g. if the functionality to recalculate charges based on forecast input data were removed), the same level of information would be published to enable users to calculate this information, simply

¹ [Update the Tables in Schedule 15 of DCUSA](#)

using the data in the published CDCM model. Hence the change is not expected to have an impact on competition and does not impact any of the other areas listed in clause 9.4, so is considered to be a Part 2 matter.

This Change Proposal should:

- Be treated as a Part 2 Matter;
- Be treated as a Standard Change; and

Requested Next Steps

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

3 Why Change?

Background

- 3.1 There is significant crossover between the requirements of Clause 35A and Clause 35B, without sufficient alignment to enable use of a common template. This results in some cases of the same or similar information being published in a different format in the two publications, which is inefficient to produce and risks being misleading for users.
- 3.2 For example, both Clause 35A and Clause 35B effectively require a completed 'table 1' to be published (explicitly for Clause 35A, and because it is a CDCM input and so required for Clause 35B). The implications of the requirement to give 15 months' notice of a change to Use of System charges (introduced by DCP 178 – 'Notification Period for Change to Use of System Charges'²⁴) has created an inconsistency in the years provided (Clause 35A requires four forecast years from the current regulatory year, whilst Clause 35B requires CDCM input information for the next five years at the time of publication – these were aligned prior to DCP 178, but now result in Clause 35B requiring an extra year forecast to Clause 35A).
- 3.3 Both Clause 35A and Clause 35B require a view of illustrative charges for the forecast years, but this is currently provided in a different format in the two templates. It would be more efficient, both for the DNOs when populating the information and users when receiving it, if both datasets were in a consistent format.
- 3.4 The ARP currently requires DNOs to populate a forecast of all CDCM inputs for the next five years. In the most recent published versions, the vast majority of these inputs have been held at the latest published values. Cost inputs have generally been uplifted by inflation in the forecast inputs, with the only inputs actually updated being the number of days in the year and the number of hours in each time band. The forecast inputs add complexity to the ARP, but as long as they are simply held at the published levels, they add little value.
- 3.5 Feedback from some industry parties during the process of developing the new DCUSA models suggests that parties may not use the functionality to amend forecast CDCM inputs and recalculate tariffs in the ARP. Again, this may be due to the requirement on distributors to give 15 months' notice of a change to Use of System charges. The ARP was developed at a time when distributors were only required to give three months' notice of a change to Use of System charges.

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Commented [KB2R1]: It seems to be standard to include the link now, so suggest we do include it here.

² Notification period for change to use of system charges - DCUSA

The sensitivity of tariffs to changes in CDCM inputs is primarily of interest for charges which have not yet been published which are now much further into the future than when the ARP was put in place. This functionality adds significant complexity into the ARP, and as a result reduces the transparency and usability of the information provided. In any case, a user wishing to test the sensitivity of a given input can do so using the published CDCM model. Consideration should be given to removing the requirement to provide the functionality to recalculate tariffs for the forecast period, and perhaps to require the publication of an illustrative updated CDCM model for the first forecast year in its place.

- 3.6 Clause 35A also requires DNOs to convene a meeting (known as the 'DCP 066A Teleconference') to present the most recently submitted information. This meeting could be more efficiently arranged and conducted if responsibility for it lay with the Secretariat rather than DNOs, in line with the arrangements introduced for the DCMDG.

4 Working Group Assessment

Working Group Assessment

- 4.1 The DCUSA Panel established a Working Group to assess DCP 325 when the Change Proposal was first raised in 2018. This Working Group ~~consists~~ consisted of DNO, IDNO and Supplier representatives. 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 Working Group issued a consultation in October 2018 to gather views on this Change Proposal, however following this the Change Proposal was put on hold due to Ofgem's Targeted Charging Review (TCR) and subsequent Change Proposals relating to the TCR which took up a lot of industry resources.

- 4.3 The Working Group restarted in 2024, with a new call for participants ensuring the group consisted of DNO, IDNO and Supplier representatives.

- 4.24.4 Due to the time elapsed since the original consultation responses were received the Working Group felt that the responses may be outdated. Additionally, a new Change Proposal, DCP 421 'Update the Tables in Schedule 15 of DCUSA - DCUSA' was raised, and has now been approved, to make changes to table 1 and 2 of clause 35A and to keep table 3 unchanged. This also introduced the Cost Information Template, and to create a template for use by DNOs when updating and publishing the se tables. The Working Group agreed that the contents of ~~the~~ tables 1, 2 and 3 is now out of scope of this Change Proposal as all changes to this were covered by DCP 421.

- 4.34.5 The Working Group decided that the most appropriate action to progress this change would be to re-consult on each of the aspects of this CP i.e. ARP publications, combining the requirements of Schedule 15 and Schedule 20, publication timetables and the meeting required to be convened by DNO parties under Clause 35A (often referred to as the 'DCP66A' teleconference which takes place quarterly). This was to ensure that the responses are each Company's most recent view and that the Working Group is not using out of date responses to develop a solution.

Request for Information

4.44.6 Before considering a solution, the Working Group issued a Request for Information, to find out if the ARP is used, if the content of the ARP is useful and if parties would find it beneficial to combine the requirements of the ARP and Cost Information Tables.

4.54.7 It was agreed that the responses to the RFI would be treated as anonymous as the Working Group believed this could encourage more respondents to come forward. However, the Working Group did agree that the party categories for each respondent would be captured though, as it may be helpful to understand if there were certain party categories who found certain elements of schedules 15, 16 and clauses 35 A and 35B useful.

4.64.8 The RFI was issued to parties on 24 September 2024. There were eight responses received to the RFI. Of these eight responses, four were from DNO parties, two were from IDNO parties and two were from supplier-Supplier parties.

4.74.9 The Working Group's Conclusions-conclusions can be found in Attachment x, and the questions asked and a summary of the Working Groups conclusions are below.

1. Do you use the ARP? If so, for what purpose?

The four DNO responders stated that they produce the ARP. Three stated that they do not use the output and one stated that they use the output for a report which they publish on their website.

4. The two IDNO and two Supplier responders stated that they do use the information in the ARP.

2. Are there any elements of the ARP that you find useful or not useful? For elements that are not useful, is there a reason to retain them?

One IDNO responder stated that they mirror the DNO outputs and therefore the forecasts from the ARP are useful to better understand the tariffs.

The two Supplier responders stated that they find the information in the ARP useful and specifically stated that they use:

- The amount of residual revenue

2.- The volumes and numbers of meters associated with customer types

3. Would it be beneficial to combine the ARP and the Cost Information Tables? Please provide your rationale.

3. The IDNO and Supplier responders stated that they felt that combining the requirements of the ARP and the Cost Information Tables would be beneficial as long as the information contained in both is still available.

4. Do you have any other comments?

One Supplier responder stated that "The ARP was introduced (under DCP086) to enable Suppliers to improve the accuracy of their forecasts and assessments and therefore reduce the risk of exposure to unexpected changes and provide a greater insight into the potential range of future charges, both within the current and future price controls. It was believed that this would facilitate competition between Suppliers as it will enable them to compete more effectively due to the additional data provision.

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We believe that the current ARP provision fulfils the aims of DCP086 and has succeeded in enabling the benefits described and its provision should be continued."

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4.4.10 The Working Group concluded that there was evidence that the information in the ARP is used by Suppliers and IDNOs and that access to the same level of information should be maintained, although this did not necessarily need to be in the ARP if an alternative solution would provide the same level of information.

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Working Group Solution

4.8 The Working Group considered the following elements of Schedule 15 and Schedule 20:

- Alignment and Combination of Schedule 15 and Schedule 20
- Publication timetable
- Meetings ('DCP 066A Teleconference')

Alignment and Combination of Schedule 15 and Schedule 20

4.9 There is significant overlap between the requirements under Clause 35A and 35B, as both require a forecast of allowed revenue and both require illustrative CDCM tariffs, although there is a discrepancy around which years are required to be provided.

4.10 At present Clause 35A requires a forecast for the current regulatory year and the following four regulatory years, whilst Clause 35B requires historical CDCM input information for the previous three years and forecast CDCM input information for the next five years.

4.11 With regards to the crossover in requirements under 35A and 35B, the Working Group ~~has~~ proposed two solutions:

Option A – Combined Template for ARP and Cost Information Tables

4.12 The Working Group produced a proposed template, referred to as the Cost Information Review Pack (CIRP), to combine the Cost Information ~~template~~ Template, as ~~developed~~ implemented following DCP 421, and the ARP. This template adds the sheets from the Cost Information ~~Template~~ into the ARP, with the exception of:

- 'Table 1 – CDCM Inputs table' which is not required as the same information is in the replaced by the Allowed Revenue section in the 'ARP General Inputs' sheet of the ARP, which will be in turn linked to the 'Table 1 – Detailed Input' sheet for forecast years; and
- 'Table 3 – Illustrative Prices', which is not required as it would have the same information as the existing 'replaced by the 'Tariff Summary' output sheet in the ARP -output sheet.

4.13 The Working Group believe this template would add functionality and increase the transparency of the Cost Information forecast, especially with regards to the calculation of the tariffs in Table 3. It would allow Suppliers to calculate sensitivities around any inputs to the CDCM and to see several years at once. It would also make it easier for DNOs to populate the ARP for allowed revenues as it would be a direct link to the PCFM.

Option B – Remove the requirement to publish the ARP and instead publish the

Cost Information ~~Tables-Template~~ and a populated CDCM model

- 4.14 An alternative solution proposed within the Working Group ~~was~~ to remove the requirement to publish the ARP and to instead replace it with the Cost Information ~~Tables-Template~~ and a populated CDCM. It was identified that the majority of the CDCM inputs for future years in the ARP are set to the same value as the latest published year and as such the latest CDCM will also contain these same values.
- 4.15 If this solution was adopted, then any supplementary information from the ARP which is not available in the CDCM or Cost Information ~~Tables-Template~~ at present could be added into the Cost Information Template to ensure users still have access to all required information.
- 4.16 The Working Group ~~is seeking sought~~ views ~~in the consultation~~ on whether parties prefer ~~red~~ Option A or Option B and whether any supplementary information is required for either option.

5 Consultation

- 5.1 The Working Group undertook one consultation during the development of the change proposal.

Consultation

- 5.2 The consultation was issued to parties on 08 November 2024. There were eight responses received to the consultation. The Working Group's conclusions can be found in **Attachment x** **DCP 325 Consolidated Consultation 2 Responses**, with a summary of each shown below.

Question 1: Do you understand the intent of the Change Proposal?

- 5.3 All respondents understood the intent of the change proposal.

Question 2: Are you supportive of the principles of this Change Proposal?

- 5.4 All respondents supported the intent of the change proposal.

Question3a – Do you prefer Option A or Option B for the combination of requirements of Schedule 15 (the Cost Information Template) and Schedule 20 (ARP)? Please provide your rationale.

Question 3b - For option A - If the tables are to be combined, does the provided template achieve this? Is there an alternative way of combining the two templates? Are any other changes to the template required? Please provide your rationale.

Question 3c – For option B – Which additional items from the ARP would need to be added to the Cost Information Template to ensure all required information is still available in the Cost Information Table and populated CDCM.

Question 3d - Is there an alternative solution that the Working Group hasn't considered? Please provide details if yes.

- 5.5 Five responders preferred option A, two preferred solution B and one responder offered no preference.

Question 3a

~~-5.6~~ Those who supported solution A gave reasons such as:

- ~~They use~~ the prices automatically created in the ARP in the clearview pricing model on their website, ~~which and that~~ has received positive feedback.

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- Combining the ARP and Cost Information requirements would remove duplication of information and would make it easier for users of the Cost Information tables and ARP to access and use.
- The ARP is very similar to the CDCM just with inputs for multiple years rather than one and a VBA macro to capture the outputs of multiple years.

5-65.7 These responders who supported solution B stated:-

- Solution B streamlines the overall process by removing duplication of effort and gives the wider interested stakeholder parties an up-to-date view of costs and pricing information.
- The ARP model seems more complex and outdated for the user.
- The CDCM is already a requirement/output of preparing published prices and affords the user the added advantage of performing sensitivity checks on the CDCM model inputs.
- One responder believed that there is extremely limited (if any) benefit in including the additional tables from the ARP into the Cost Information ~~Sheet-Template~~ (Option A) as the vast majority of the data items do not currently change year on year in the ARP and the values which do, are already included as part of the Cost Information ~~SheetTemplate~~.
- In addition, Option B would propose publishing a populated CDCM model which parties can utilise to update the Allowed Revenue and other financial inputs to illustrate future years' charges.

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Question 3b

5-75.8 Six responders believed that the template for solution A is fit for purpose.

5-85.9 One responder did not state if it was fit for purpose but did say that they saw no real benefit in the inclusion of these additional tables and feel that it makes what is already a significant data set as the Cost Information Tables even larger for no clear benefit.

5-95.10 The final responder offered a number of suggested amendments to the template.

Question 3c

5-105.11 If solution B was taken forwards the additional items the responder mentioned they would like to see ~~were included in the Cost Information Template are:~~

- The Tariff output sheet from the ARP to be added as an additional item.
 - All items that change year on year. ~~These include Volumes and MPANs by customer type, number of days in the year, typical annual hours by time band and potentially transmission exit charge values and other expenditure. This could assist Suppliers who are looking at years further out than already available. will need to be added to the Cost Information Template.~~
 - To retain the macro function to allow tariff forecasts for multiple years; however, this would be the equivalent of Option A.
- ~~The number of days and the amount of hours in each time band could be included to assist Suppliers who are looking at years further out than already available.~~

Question 3d

5-115.12 Seven responders offered no alternative solution.

5.13 One responder noted that the process could remain unchanged, however, ~~within~~ the Working Group ~~that reviewed the response they~~ stated that leaving things unchanged was not a preferred solution as it is effectively the same as rejecting the CP.

5.125.14 The working group response to this can be found in paragraph 6.7.6.10 below.

Question 4 Should the years in the combined requirements be aligned to those currently in Schedule 15? Please provide your rationale.

5.15 All the responders believed that the years in the combined requirements should be aligned to those in ~~schedule~~ Schedule 15.

5.16 One responder highlighted that if Solution A is taken forwards then care should be taken to ensure that the inputs in the ARP Inputs sheets for years where tariffs are already published should remain as published, so that the tariffs calculated in the ARP for published years are not revised.

5.135.17 The Working Group response to Q3a, b and c can be found in paragraph 6.2 below.

Question 5 Is the conclusion from DCP 421 for the calculation of forecast revenues in future price control periods still valid? (i.e. future years should be calculated on the same basis as the latest known price control period, with a caveat stating that it is subject to change once the licence conditions are known.

5.18 Seven of the respondents believed this conclusion was still valid and one responder offered no comment.

5.145.19 The Working Group response to this can be found in paragraph 6.3 below.

Question 6 Would a change to the current publication timetable be beneficial? If so would publications in April, September and the month of publication of final tariffs be appropriate? Is there another publication timetable that would be more appropriate? Please provide rationale.

5.155.20 All eight responders believed that there was value in reducing the number of publications from four to three.

5.21 There were some conflicting views on which three months should be used ~~with:~~

5.16- six responders believing the publication timetable should use April, September and the month of publication of final tariffs. One of these suggested it would "be of benefit for DNOs to discuss the availability of internal data... to ensure timetabling efficiency is maximised."

5.17- One responder suggested February, August and October.

- The final responder stated that they agreed to the timetable of April, September and the month of publication of final tariffs in principle however, they did suggest using August rather than September as it would be beneficial to them, but they did also go on to say they understood the rationale of it being September as this was in line with information from the PCFM.

5.185.22 The Working Group response to this can be found in paragraph 6.12-6.16 below.

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Question 7 Would it be beneficial to prescribe in the legal text that the allowed revenue information from the latest submission of the PCFM must be used?

~~5.19~~5.23 Four responders said it would be beneficial to prescribe in the legal text that the allowed revenue information from the latest submission of the PCFM must be used.

~~5.20~~5.24 Two responders stated that the legal text should make clear that the most up to date information be used.

5.25 One responder said no, due to the timing of publication and their internal governance requirements.

5.26 The Working Group response to this can be found in paragraph 6.4 below.

~~5.21~~

Question 8 Do you find the meetings convened under clause 35A (known as the 'DCP 066A teleconference') useful?

~~5.27 Three DNO responders stated the question was not more particularly relevant to them as they weren't a supplier parties, as the DNOs are primarily there to explain the changes.~~

5.225.28 Four responders said that they find the teleconference useful as ~~they~~ it gives insight and understanding into the DNO cost information and any changes which are expected and that they use the the information ~~can be used~~ to view future annual price movements.

5.235.29 Some of the responders who stated the meetings are useful did go on to say that the supplier involvement for these meetings has been diminishing over time which has led to a reduction in value as the meeting is mainly for the benefit of suppliers.

~~5.241.1 Three responders stated the question was not particularly relevant to them as they weren't a supplier party.~~

5.30 The final responder stated that they didn't find the last meeting particularly useful as they found that the format/detail of information was inconsistent, and the pace was too quick to absorb the information being shared.

5.255.31 The Working Group response to this can be found in paragraph 6.5 below.

Question 9 Are there any improvements that should be made, such as submitting questions in advance or use of an online tool such as slido?

~~5.26~~5.32 One responder stated that Information should always be provided up front to allow questions to be made before the meeting rather than as it is happening via Slido etc and the information should be in a consistent format if possible.

5.275.33 Additionally, they said that it might be beneficial for some to have a pre-meeting introduction briefing/training to enable all attendees to fully understand what is being presented and what it relates to within the wider picture.

5.285.34 Another responder added that submitting questions in advance via email or an online tool has the potential to add value, as questions may need to be investigated internally by the DNOs to provide more detailed answers, and parties who may not be able to attend could still ask questions and receive answers from the minutes.

5.295.35 A DNO responder stated that very few questions are asked. They noted that there ha'd only been one question asked in the last two teleconferences. They advised that if submitting questions in advance is done, this would need to be monitored to see if this is used.

5.36 Other-The remaining DNOs responded by stating that this question was better answered by suppliers.

5.305.37 The Working Group response to this can be found in paragraph 6.5 below.

Question 10 Who should be responsible for hosting them – the ENA, the DCUSA secretariat or someone else?

5.345.38 Four responders said that the DCUSA secretariat would be better suited to hosting the post publication calls.

5.325.39 Two had no preference, with one of these responders saying that whilst they had no preference, they believed the ENA conducted the calls efficiently, however, they did understand the reasoning in proposing to transfer responsibility to DCUSA.

5.40 One responder said they would'd prefer the teleconference to remain with the ENA, and-t

5.335.41 The final responder offered no comment to this question.

5.42 One responder noted that if the DCUSA were to take on this call, additional changes to the legal text will be needed to allow this to happen, the meeting is currently referenced in clause 35A.7.

5.345.43 The Working Group response to this can be found in paragraph 6.19-6.22 below.

5.35 The above responder also went on to suggest that one approach could be for this meeting to take place in the hour before the DCMDG every month as a lot (but not all) of the same attendees will be part of both meetings, even if this meant the date of the DCMDG needed to change to accommodate this.

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Question 11 Should the meetings be held on a fixed day? Please provide your rationale.

5.365.44 Four responders believed the meeting dates should be fixed for the below reasons:

- It allows for the meeting to be set further in advance which allows participants to plan their schedule around the meeting, this may result in an improvement in meeting attendance.
- It could be aligned to meetings such as the DCUSA panel meetings or the DCMDG. One responder also went on to suggest that one approach could be for this meeting to take place in the hour before the DCMDG every month as a lot (but not all) of the same attendees will be part of both meetings, even if this meant the date of the DCMDG needed to change to accommodate this.

- It makes diary planning easier for both DNOs and Suppliers.

5.37 Three respondents said that as long as sufficient and timely notice of the meetings is given, they don't necessarily need to be held on a fixed day. H

5.385.45 Two of the above three responders however did say within the Working Group two of these three clarified that they actually did no't really have any real preference between to a fixed or non-fixed date and had no objection to the date being fixed.

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5.46 The final responder offered no comment to this question.

5.395.47 The Working Group response to this can be found in paragraph 6.23-6.26 below.

Question 12 Which of the DCUSA General Objectives do you believe would be better facilitated by the intent of the DCP? Please provide your rationale

5.405.48 Four responders believed that general objectives three and four were better facilitated by this change.

5.49 Three responders believed charging objective two was better facilitated by this change.

5.415.50 -and eOne responder stated that charging objective 6 was better facilitated by this change.

5.51 It was noted in the responses that the above applied to both solution A and solution B.

5.42

Commented [KB5]: Not sure what our conclusions are for this. Do we sometimes put this in as a table so that it's easier for people to process?

Question 13 Are you aware of any wider industry developments that may impact upon or be impacted by this CP?

5.435.52 Seven respondents said they were not aware of any wider industry developments that could impact or be impacted by this change.

5.445.53 One responder noted that DCP437 could have an impact, however the Working Group noted that the legal text for DCP 325 had been updated to reflect the changes that DCP 437 was seeking to make. Specifically changing the December publication date to 'The month of the publication of final tariffs'.

Question 14 The proposed implementation date for DCP 325 is the first scheduled DCUSA release following approval. Do you agree with the proposed implementation date?

5.455.54 Seven responders stated they agreed with the proposed implementation date.

5.465.55 One responder said their preference is three months after approval but did not elaborate on why.

Question 15 Does the legal text suitably and clearly delivery the proposed solution? If not, please provide

5.475.56 Seven responders believed that the legal text was fit for purpose, however, one responder stated that if the responsibility of the teleconference was moved to the DCUSA, the legal text would require to be updated. This was noted by the Working Group.

5.485.57 It was also noted that for Clause 35A and B (Option A), the header should read "Provision of Cost Information Review Pack" (instead of "Provision of Cost Information"). This has been corrected in the legal text.

5.495.58 The other responder offered no comment to this question.

Question 16 Do you have any comments on the draft legal text?

5.59 One responder said that paragraph 2.1 of the legal text suggests that DNOs provide an updated model with tariff forecasts of rates for years where rates are already set. They believed this

should be changed so that the published tariffs are provided and not forecasts of the charges where the charges are already published.

5.505.60 This was noted by the working group.

Question 17 - Do you have any additional comments?

5.61 ~~There were no comments raised to this question that hadn't been mentioned previously in the consultation save one~~ One responder that said that if they were *"able they would like to receive the ARP information in its current format more frequently it will be beneficial to enable us to update forecasts more frequently."*

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5.62 There were no other additional comments.

5.545.63 This was noted by the Working Group.

6 Working Group Conclusions & Final Solution

6.1 After reviewing the Consultation responses, the Working Group made the following conclusions.

6.2 For Q4 the Working Group concluded that the years included in the final solution template should be aligned to the current requirement in Schedule 15 i.e. years (t-1) to (t+3), where t is the current regulatory year.

6.3 For Q5 the Working Group concluded that the conclusion from DCP 421 for the calculation of forecast revenues in future price control periods remains valid (i.e. future years should be calculated on the same basis as the latest known price control period, with a caveat stating that it is subject to change once the licence conditions are known).

6.4 For Q7 the Working Group concluded that it would not be beneficial to prescribe in the legal text that the allowed revenue information from the latest submission of the PCFM must be used, but that DNOs should use the latest information available to them. This will allow DNOs to use more up to date forecasts of inputs such as inflation than in the latest PCFM submission, which is fixed at the previous year's inflation forecast until the next Autumn OBR forecast is available.

6.5 For Q8 and Q9, with reference to the meetings convened under clause 35A, the Working Group concluded that Parties do find these useful but that it could be useful for there to be an introduction or induction to these calls so that Parties understand what is being presented. They also concluded that it may be useful for Parties to be able to submit questions in advance, but that if this is implemented then it should be monitored to see if the provision is used. Both of these things can be considered and developed outside of this CP as they do not need to be included in the legal text.

6.16.6 The Working Group agreed that the following areas required further consideration:

- ~~Which solution to progress~~ Which Option (A or B) should be progressed to the final solution (Q3)?
- ~~What should the frequency for publication timetable be?~~
- Who should facilitate the ~~post publication teleconference~~ post publication meetings?



- Should ~~these meetings~~ ~~is call~~ be held on ~~happen on~~ a fixed date ~~or not~~?

Which Option (A or B) should be progressed to the final solution (Q3)
Which solution to progress?

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Commented [AG6]: Placeholder until an approach is agreed

6.7 The Working Group discussed the merits of both solutions. ~~Following review of the consultation responses, as summarised in 5.5-5.13 above, the Working Group were concerned that only four of the responses were from Supplier/IDNO parties who are the recipients of the Cost Information and ARP. It was agreed to send the consultation out again to S~~supplier and IDNO parties, ~~as these categories utilise the APR and the Cost Information packs, that~~as it would be helpful if more views from these party categories could be gained.

6.8 The Working Group agreed to reissue the consultation to ~~S~~supplier and IDNO parties only for an additional period of one week in January 2025. ~~However, following this no It was noted that no new views were received, when extending the consultation period.~~

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6.9 The Working Group considered the responses to the consultation and the earlier request for information and concluded that there was more support for Option A than Option B, however that valid points had been raised in favour of Option B.

6.2 As a result, the Working Group agreed to take forward Option A with some additional changes to mitigate the concerns of those respondents who preferred Option B. These included making it clearer to Users that the tariffs and typical bills generated by the model are indicative only, and making the model more user friendly. ~~As there wasn't a wide set of supplier views on shared to the consultation, and as this was a part 2 matter and was self-governance, the Working Group decided that it would be best to take both solutions to voting.~~

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6.10

~~The additional changes to the CIRP are detailed in 6.28 below. It was believed that this would give all parties within the industry the best opportunity to have their say on which of the two solutions were most fit for purpose.~~

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~~It was agreed that in terms of the voting process, parties would be able to approve both solutions and then state which of the two they preferred.~~

6.11 It was agreed that both solutions were better than the current status quo and allowing parties to approve both and state a preference would mitigate the risk of both solutions not reaching the 65% approval threshold for part 2 matter and the change being rejected.

What should the frequency for publication be
publication timetable be (Q6)?

6.12 Based on the consultation responses, ~~as summarised in 5.20-5.21, above,~~ the Working Group agreed that there should be ~~three~~3 publications a year.

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6.13 The working group discussed which months the publications should be in and agreed that this should coincide with the months which have the most available updated data ~~as this aligned with when the most valuable information would be available.~~

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~~What dates should the publication obligation be?~~

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6.14 It was agreed that the publications should be the last working days of May, September and the final day of the month of final publication of tariffs in each year.

6.15 May was chosen due to this allowing time for more meaningful information being made available to DNOs (such as the final inflation and some final revenue figures for the previous regulatory year OBR inflation figures) which would make the publication more valuable.

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6.16 September was chosen due to the PCFM submission in August which could then be used in this update, making the information more meaningful. It was advised that there is a PCFM submission mid August, and so using September made sense as this would allow for the PCFM submission to be included on the September publication.

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6.17 The month of final publication of tariffs was chosen as it aligns with the current publication of the ARP and provides an update of all inputs.

6.18 The Working Group updated the legal text to state that the publications needed to be made by the final Day of May, September and the month of final publication of tariffs in each year. This is reflected in the updated legal text in Attachment 2.

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— What should the frequency for publication be?

— What dates should the publication obligation be?

— Which solution to progress?

Who should facilitate the post publication teleconference meetings (Q10)?

6.36.19 It was noted that within the consultation responses, summarised in 5.38-5.41 above, four respondents stated that the teleconference should be hosted by the DCUSA secretariat, 1 stated it should remain with the ENA, two had no preference and another offered no comment.

6.20 The Working Group agreed-discussed that the DCUSA secretariat has a structured process when it comes to arranging meetings, with a draft agenda's being issued 10 working days before a meeting and a final agenda being issued 5 working days before a meeting, and such agendas would include all the documents/presentations so anyone joining would have plenty of up front visibility.

6.46.21 It was also noted that the DCUSA secretariat has access to the list of contacts for the Suppliers and IDNOs so may be better placed to issue the meeting invites than the ENA.

6.56.22 The Working Group agreed that the call should be hosted by the DCUSA secretariat, and agreed. This is reflected in the updated legal text in Attachment 2 to make the relevant changes to the legal text once it had also agreed on when these calls should be hosted.

Should this call happen these meetings be held on a fixed date (Q11) or not?

6.23 The working group considered the consultation responses, as summarised in 5.44-5.46 above, and discussed whether the meeting should be held on a fixed date.

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6.66.24 The responses highlighted that having the call on a fixed date would mean that all parties would have much more advance notice of when the calls would be, which could aid attendance. The Working Group agreed that having the call on a specified day would be beneficial for all.

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parties. It was decided that whilst leaving the legal text as is, i.e. the call should take place 20 working days post-publication would allow for people to manage instances where they couldn't make a fixed date. However, it would still be better to have the call hosted on a fixed date as people would then be able to manage their diaries in advance and that this is consistent with current structure of having a set date meeting is consistent with other regular DCUSA meetings, such as the Standing Issues Group (SIG), Open Panel Session and Distribution Charging Methodology Decision Making Group (DCMDG).

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6.25 The date that the Working Group considered what the date should be, including consideration of when existing industry meetings are scheduled, and agreed that the meeting should convene on landed on was, the first Thursday, at least 15 working days following publication of the CIRP. For example, in September 2025 the submission date would be 30 September. 15 days after this is Wednesday 15th October so the meeting would on the first Thursday following this, i.e. Thursday 16th October.

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6.26 This is reflected in the updated legal text in Attachment 2 that the meeting should be convened. It was requested that this area of the legal text be raised to the DCUSA legal advisors to ensure the language used in the legal text was appropriate.

Final Solution

6.27 The Working Group has developed Option A following the consultation, with some additional changes to mitigate the concerns of the consultation respondents who preferred Option B.

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6.28 The details of the final solution are as follows:

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- The ARP and the Cost Information template will be combined into one Cost Information Reporting Pack (CIRP), as provided in Attachment X.

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- The CIRP will be populated and published three times a year, in May, September and alongside the publication of final tariffs.

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- The CIRP will contain historical CDCM input information and forecast of the CDCM inputs for Regulatory Year t-1 to t+4, with forecasts of tariffs for years t+2 to t+4.

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- The post-publication meeting will be hosted by the DCUSA secretariat and will take place on the first Thursday at least 15 working days following publication of the CIRP.

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- Changes to the CIRP made following the consultation are as follows:

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Change	Sheets	Reason
Delete sheets	'Table 1 – CDCM Input' sheet	The functionality of this sheet was to convert the information in 'Table 1 – Detailed' to the right format to enter into the CDCM. This intermediate step is not needed as the 'CIRP General Inputs' sheet, can be linked directly to the 'Table 1 – Detailed' sheet.

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	<u>'ARP DNO Commentary'</u>	<p><u>Commentary box added to the 'Table 1 – Delta from Previous' sheet.</u></p> <p><u>The Delta from Previous sheet already contained commentary so it makes the workbook more streamlined to have any additional commentary on this sheet as well, rather than on a separate sheet.</u></p>
	<u>'ARP Load characteristics'</u> <u>'ARP Peaking probabilities'</u>	<p><u>These sheets provided the detail of the three years of data used to calculate the three-year average for these inputs. The average is an input into the CDCM rather than the individual years' data, meaning that the data in these sheets is superfluous and likely of limited interest to Users.</u></p>
<u>Add functionality to hide/unhide sheets</u>	<u>Multiple CDCM Calculation sheets</u> <u>Multiple CDCM Input sheets</u> <u>'ARP CDCM timebands'</u> <u>'Named ranges'</u>	<p><u>The majority of the sheets in the workbook are duplicates of the CDCM model and are used to calculate the tariffs. Most Users will not need to view these sheets. The functionality to hide/unhide these using a button on the User Control sheet does not change the functionality of the workbook but does make it more user friendly by making the only those sheets that most Users are likely to use visible by default.</u></p> <p><u>Note the CDCM Input sheets that can be hidden are linked to the 'CIRP' input sheets and pull through an individual year's data for the calculations. The CIRP Input sheets will remain unhidden.</u></p>
<u>Years aligned to t-1 to t+4</u>	<u>Table 1, Table 2, and Tariff Summary and Typical Bills sheets</u>	<u>Aligned to years agreed following consultation.</u>
<u>Add disclaimer to view tariffs/typical bill outputs</u>	<u>'Tariff Summary' and 'Typical Bills'</u>	<p><u>Following discussion in the Working Group it was agreed that a disclaimer should be added to the output sheets in order to make sure that users understand that the tariffs calculated for forecast years are indicative only and subject to change once final allowed revenues are known and if any DCUSA changes are implemented.</u></p>

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What should the frequency for publication be?

~~6.81.1 Based on the consultation responses the Working Group agreed that there should be 3 publications a year as this aligned with when the most valuable information would be available.~~

What dates should the publication obligation be?

~~6.91.1 It was agreed that the publications should be the last working days of May, September and the final day of the month of final publication of tariffs in each year.~~

~~6.101.1 May was chosen due to this allowing time for more meaningful information being made available to DNOs (such as the OBR inflation figures) which would make the publication more valuable.~~

~~6.111.1 It was advised that there is a PCFM submission mid-August, and so using September made sense as this would allow for the PCFM submission to be included on the September publication.~~

~~6.121.1 The Working Group updated the legal text to state that the publications needed to be made by the final Day of May, September and the month of final publication of tariffs in each year.~~

Which solution to progress?

Commented [AG7]: Placeholder until an approach is agreed

~~6.131.1 The Working Group discussed the merits of both solutions. It was agreed to send the consultation out again to supplier and IDNO parties, as these categories utilise the APR and the Cost Information packs, that it would be helpful if more views from these party categories could be gained.~~

~~6.141.1 The Working Group agreed to reissue the consultation to supplier and IDNO parties only for an additional period of one week. It was noted that no new views were received when extending the consultation period.~~

~~6.151.1 As there wasn't a wide set of supplier views on shared to the consultation, and as this was a part 2 matter and was self governance, the Working Group decided that it would be best to take both solutions to voting.~~

~~6.161.1 It was believed that this would give all parties within the industry the best opportunity to have their say on which of the two solutions were most fit for purpose.~~

~~6.171.1 It was agreed that in terms of the voting process, parties would be able to approve both solutions and then state which of the two they preferred.~~

~~6.181.1 It was agreed that both solutions were better than the current status quo and allowing parties to approve both and state a preference would mitigate the risk of both solutions not reaching the 65% approval threshold for part 2 matter and the change being rejected.~~

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.
- 7.2 The Proposer 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 checked="" type="checkbox"/>	4. The promotion of efficiency in the implementation and administration of the DCUSA	Positive
<input type="checkbox"/>	5. Compliance with the Regulation on Cross-Border Exchange in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators	None

- 7.3 When this CP was raised, the Proposer highlighted which of the DCUSA Charging Objectives they believed would be better facilitated by the implementation of the change. However, following on from discussion at the Working Group, it was determined that the CP should be set against the DCUSA General Objectives as there would be no material impacts on the calculations within the charging methodologies.
- 7.4 The Working Group considered that this CP will better facilitate DCUSA General Objectives 3 and 4 as it improves efficiency by removing duplication of requirements under Clause 35A (Schedule 15) and Clause 35B (Schedule 20).
- 7.5 The Working Group is seeking industry views on which of the DCUSA General Objectives would be better facilitated by the intent of this CP.

Commented [KB8]: I'm not sure if we discussed this in the Working Group.

8 Impacts & Other Considerations

Impacts on other Industry Codes

- 8.1 No impacts.

BSC..... ☐ REC..... ☐ Distribution Code.. ☐
CUSC..... ☐ SEC..... ☐ Grid Code..... ☐

None.....



Significant Code Review Impacts?

8.2 This Change Proposal does not impact any SCRs or significant industry code projects currently in progress.

Consideration of Wider Industry Impacts

8.3 This change is expected to impact the DCUSA Code Administrator in the following ways:

- Amending processes/procedures related to the cost information tables and their publication;
- Amending processes/procedures related to the annual review pack and its publication;
- Possible updates to the DCUSA website to include a new section for new documentation; and
- The provision of a meeting, or multiple meetings, for the purpose of each DNO presenting their respective 'Provision of Tariff Forecasts'/'Schedule 15 Tables' to Suppliers and IDNOs.

Consumer Impacts

8.4 This CP does not impact consumers.

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 DCP 325 is the first scheduled release following approval; however, this is still under review by the Working Group whilst the solution is developed. Respondents are invited to consider whether they agree with the proposed implementation date.

10 Legal Text

Legal Text

10.1 The legal text for this CP is provided as Attachment 1.2 for option A and Attachment 2 for option B.

Text Commentary

10.2 Option A. The solution is seeking to combine combining the templates for the ARP and the Cost Information Tables by removing clauses 35A and 35B and creating a new clause (the Working Group have agreed to consult with Gowlings post consultation to confirm if both clauses 35A and 35B need to be deleted and replaced with a new clause or if only one of the two clauses need to be deleted and the other repurposed 35X which combines the required elements of both clauses together).

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10.3 ~~Schedules 15 and 20 to be deleted and replaced with a new schedule (as with paragraph 8.2, the Working Group will seek legal advice from Gowlings as to whether schedules 15 and 20 are to be deleted and replaced with a new clause, or if one of schedules 15 or 20 can be repurposed and the other deleted)X which combines the required elements of the Schedules together.~~

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10.4 ~~Option B is seeking to remove the requirement to publish the ARP and instead publish the Cost Information Tables and a populated CDCM model~~

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10.5 ~~Update Clause 35A to include the new frequency of when the information is obligated to be published.~~

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10.6 ~~New paragraph 35A.4A to include the obligation for the Company to populate a CDCM model, as described in Schedule 16 and used to calculate the tariffs in table 3, and send the populated model to the Secretariat.~~

10.7 ~~Delete Clause 35B entirely.~~

10.8 ~~It is believed that no changes are required to schedule 15 but this option deletes schedule 20.~~

Commented [AG9]: Update once the solution is known

Commented [AG10R9]: Solution B will potentially need hours, days etc including.

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11 Code Specific Matters

Reference Documents

11.1 N/A.

12 Recommendations

Panel's Recommendation

12.1 The Panel approved this Change Report on ~~19 February August~~ 2025. 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 DCP 325.

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12.2 The Panel have recommended that this report is issued for Voting for a period of 3 weeks and DCUSA Parties should consider whether they wish to submit views regarding this Change Proposal.

~~12.3 Parties can vote to accept both solutions stating, which is their preferred solution, vote to accept Solution A and reject solution B; vote to accept Solution B and reject solution A; or vote to reject both solution A and solution B~~

13 Attachments

- Attachment 1: DCP 325 Voting Response Form
- Attachment 2: DCP 325 Draft Legal Text
- Attachment 3: DCP 325 Change Proposal Form
- Attachment 4: DCP 325 Collated Consultation 1 Responses
- Attachment 5: DCP 325 Collated Consultation 2 Responses



- [Attachment X: Cost Information Reporting Pack](#)
- [Attachment X: Log of changes to the reporting pack](#)

Commented [KB11]: Not sure if this is needed, but it feels like it makes it easier for people to understand what's changed if we include something like this.