

DCP 325 – NON-CONFIDENTIAL

‘Reviewing the requirements of Sections 35A, 35B, Schedule 15 and Schedule 20’

COLLATED CONSULTATION 2 RESPONSES WITH WORKING GROUP COMMENTS

Company	Confidential/ Anonymous	1. Do you understand the intent of the CP?	Working Group Comments
Party 1	Anonymous	Yes.	Noted
Centrica	Non- Confidential	Yes.	Noted
ENC	Non- Confidential	Yes.	Noted
NGED	Non- Confidential	Yes.	Noted
NPg	Non- Confidential	Yes.	Noted
SPEN	Non- Confidential	Yes.	Noted
SSEN	Non- Confidential	Yes.	Noted
UKPN	Non- Confidential	Yes.	Noted
Working Group Conclusions:			

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: All 8 respondents understood this change

Company	Confidential/ Anonymous	2. Are you supportive of the principle of the CP?	Working Group Comments
Party 1	Anonymous	Yes.	Noted
Centrica	Non-Confidential	Yes.	Noted
ENC	Non-Confidential	Yes.	Noted
NGED	Non-Confidential	Yes.	Noted
NPg	Non-Confidential	Yes.	Noted
SPEN	Non-Confidential	Yes.	Noted
SSEN	Non-Confidential	Yes, in principle (as we do not want duplication).	Noted

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UKPN	Non-Confidential	Yes.	Noted
Working Group Conclusions: All 8 respondents supported the principles of this change.			

Company	Confidential/ Anonymous	3. a) 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.	Working Group Comments
Party 1	Anonymous	We prefer option A because we use the ARP format for forecasting currently.	A
Bryt Energy (Reissued)	Confidential	We have a strong preference for option A – we use the ARP for future year DUoS forecasts, therefore losing these would have an impact on our forecasting processes.	NEW
Centrica	Non-Confidential	Our preference is for Option A. 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. It is our belief that Option B would end with an output very similar to Option A which already has a draft model.	A
ENC	Non-Confidential	We do not have a preference regarding option A or B, as both options have the positive outcome of combining information from the ARP and Cost information tables while retaining all the essential information.	No preference

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ENC (Reissued)	Non-Confidential	After having further considered our position regarding option A or B, we remain of the view that we have no preference. For us both options have the same outcome, and it makes an inconsequential difference to us as to which option is taken forward.	NEW
NGED	Non-Confidential	Option A as we use the prices automatically created in the ARP in our clearview pricing model on our website which has received positive feedback.	A
NPg	Non-Confidential	Option A. We believe 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 information, particularly in respect of the calculation of indicative tariffs which are somewhat opaque in the current Cost Information tables.	A
SPEN	Non-Confidential	Our preferred option is Option B (Remove the requirement to publish the ARP and instead publish the Cost Information Tables and a populated CDCM model). Option 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.	B
SSEN	Non-Confidential	We will be happy with Option A if there is an understanding that the CDCM data will remain static, as we would not be able to update more than once a year.	A

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		We have no objection to Option B; however, we wonder if removing the macro functionality for multiple years that was in the ARP is a disadvantage.	
UKPN	Non-Confidential	We support Option B. We believe that there is extremely limited (if any) benefit in including the additional tables from the ARP into the Cost Information Sheet (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 Sheet. 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.	B
<p>Working Group Conclusions: 5 Five responders preferred option A, two preferred solution B and one responder offered no preference.</p> <p>Those who supported solution A gave reasons such as:</p> <ul style="list-style-type: none"> - They use the prices automatically created in the ARP in the clearview pricing model on their website, which has received positive feedback. - 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. 			

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Company	Confidential/ Anonymous	3. b) 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?	Working Group Comments
Party 1	Anonymous	Yes we believe the provided template achieves this.	
Centrica	Non-Confidential	We believe the proposed template achieves the aims.	
ENC	Non-Confidential	<p>We currently use Schedule 15 publications for a view of the future price movements, the proposed option A achieves this. The important consideration for us is that there is a consistent format for making a year-on-year comparison and with sufficient detail to strip out individual components to see the impact of these.</p> <p>The provided template does achieve the objective of combining the tables.</p>	
NGED	Non-Confidential	Yes.	
NPg	Non-Confidential	We believe the proposed template is suitable.	
SPEN	Non-Confidential	Option B is our preferred option but if Option A is chosen for progression instead, then the template appears to achieve the desired level of data/information amalgamation.	

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SSEN	Non-Confidential	<p>Cover page: The ARP highlights the charging setting year as year ‘t’ (referencing the latest published tariffs). We can either retain it as is or amend it to reference the 'current' financial year (t) to match the Cost Information table.</p> <p>It is unclear if Table 1-CDCM Inputs from the Cost Information table should be excluded from the combined version. The consultation report alludes to this, which makes sense as it is a replica of the Target Revenue section in the existing ARP_General Input sheet, but the table is still present in the Proposed Template (right after ‘ARP_Inputs by network level’). If the plan is to include it, then there should be a formula in the ARP_General Input sheet that references the Allowed Revenue section in the imported Table 1-CDCM Inputs to minimise errors.</p>	
UKPN	Non-Confidential	<p>As stated above we see 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, when most of the information which is proposed to be included does not change year on year.</p>	
<p>Working Group Conclusions: Those responders who supported solution B stated:</p> <ul style="list-style-type: none"> - 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. 			

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- One responder believed that there is extremely limited (if any) benefit in including the additional tables from the ARP into the Cost Information 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 Template.
- 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.

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

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.

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

Company	Confidential/ Anonymous	3. c) 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.	Working Group Comments
Party 1	Anonymous	We would want the Tariff output sheet from the ARP to be added as an additional item.	
Centrica	Non-Confidential	All items that change year on year will need to be added to the Cost Information Template. These include Volumes and mpans by customer type, number of days in the year, typical annual hours by special distribution time	

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		band, typical annual hours by distribution time band, and potentially transmission exit charge values and other expenditure.	
ENC	Non-Confidential	For our use purposes the relevant APR information is already available in the Cost Information Tables and CDCM.	
NGED	Non-Confidential	N/A.	
NPg	Non-Confidential	Suppliers are better placed to answer this question, as users of the ARP and Cost Information Table.	
SPEN	Non-Confidential	By bringing together the Cost Information submissions and CDCM models there should be more than adequate information available for the users to understand costs and cost drivers as well as well as being able to enter any future year’s revenue to understand the expected impact upon charges.	
SSEN	Non-Confidential	We could retain the macro function to allow tariff forecasts for multiple years; however, this would be the equivalent of Option A.	
UKPN	Non-Confidential	We believe that this is a question more for Suppliers, however it could be that 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.	
Working Group Conclusions: If solution B was taken forwards the additional items the responders mentioned they would like to see included in the Cost Information Template are:			

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- 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.
- To retain the macro function to allow tariff forecasts for multiple years; however, this would be the equivalent of Option A.

Company	Confidential/ Anonymous	3. d) Is there an alternative solution that the Working Group hasn't considered? Please provide details if yes.	Working Group Comments
Party 1	Anonymous	No comment.	Noted
Centrica	Non-Confidential	No.	Noted
ENC	Non-Confidential	None that we are aware of.	Noted
NGED	Non-Confidential	No.	Noted
NPg	Non-Confidential	None identified at this time.	Noted

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SPEN	Non-Confidential	We currently have no other alternative options for consideration.	Noted
SSEN	Non-Confidential	We could consider leaving things the way they are – i.e. let the ARP continue to be a separate submission (once a year) as well as the Cost Information tables, and users can update the ARP as necessary using data from the latest cost information tables as they wish (but with a revised publication timetable for the latter).	No change to current process
UKPN	Non-Confidential	Not that we are currently aware of.	Noted
<p>Working Group Conclusions:</p> <p>Seven responders offered no alternative solution.</p> <p>One responder noted that the process could remain unchanged, however the Working Group stated that leaving things unchanged was not a preferred solution as it is effectively the same as rejecting the CP.</p>			

Company	Confidential/ Anonymous	4. Should the years in the combined requirements be aligned to those currently in Schedule 15? Please provide your rationale.	Working Group Comments
Party 1	Anonymous	They could be combined but we would require/prefer current regulatory year + the following five regulatory years not four if this is possible.	

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Centrica	Non-Confidential	Although we see no issue aligning the dates, care will need to be taken to ensure the model doesn't inadvertently provide updated rates where rates have already been set. For example, rates are set for 26/27 charging year, updated inputs are added into the combined model during the following year, the model will create revised rates for 26/27 which do not align to the published values. This risk doesn't exist with the current ARP as the inputs are only updated at price setting at the same time as the years covered by the ARP are moved along.	
ENC	Non-Confidential	It would be beneficial to align the years to those in Schedule 15 as it would improve simplicity and usability of the information.	
NGED	Non-Confidential	Yes as they need to be kept consistent.	
NPg	Non-Confidential	Yes we believe the two should be aligned in order to create a clear and consistent reporting standard and that the years in Schedule 15 are appropriate.	
SPEN	Non-Confidential	We agree with the DCP 421 Working Group conclusion to align and standardise the years for which data is provided, and to link the years required more closely to the Price Control Periods. This should enable DNOs to provide and maintain the information in a more efficient and useful way.	
SSEN	Non-Confidential	Yes, to align with the proposer's suggestion to link the required years more closely to the price control periods (t-1 up to t+4 per schedule 15).	

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UKPN	Non-Confidential	Yes, it does not make sense currently to have different years used across the two publications, and if they are to be combined or merged then one approach needs to be used.	
<p>Working Group Conclusions:</p> <p>All the responders believed that the years in the combined requirements should be aligned to those in Schedule 15.</p> <p>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.</p>			

Company	Confidential/ Anonymous	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.	Working Group Comments
Party 1	Anonymous	No comment.	Noted
Centrica	Non-Confidential	We believe this is still a valid assumption, until the next price control parameters are known the closest proxy will be the previous price control calculation.	Yes

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ENC	Non-Confidential	We believe this would still be valid.	Yes
NGED	Non-Confidential	Yes.	Yes
NPg	Non-Confidential	Yes we believe this is still valid. Later years need to be included and this method maintains consistency across the DNOs.	Yes
SPEN	Non-Confidential	Yes.	Yes
SSEN	Non-Confidential	Yes.	Yes
UKPN	Non-Confidential	Yes it is impossible to determine what future years forecast revenues are going to be into the next price control and we believe that this is a reasonable approach.	Yes
Working Group Conclusions: Seven of the respondents believed this conclusion was still valid and one responder offered no comment			

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Company	Confidential/ Anonymous	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.	Working Group Comments
Party 1	Anonymous	In principle we do not object to the reduction of publications from 4 to 3. It would benefit us more if August rather than September was one of the publication dates but only if this still provided meaning information and therefore we understand the rationale of it being September in line with information from the PCFM.	
Centrica	Non-Confidential	Theoretically updates in April, September and for charge setting should improve efficiency. April updates could include revised OBR inflation and updated sales for the prior year, September to include a view of submissions to Ofgem and then models that align to the published PCFMs and rates. Currently it appears that in practice the DNOs refresh their internal view of costs to different timescales, and we believe there would be benefit in aligning internal updates to provide the most up to date view of costs possible as part of each published update. It would be of benefit for the DNOs to discuss the availability of internal data e.g. final sales data, inflation forecasts, draft and final PCFM inputs, volume forecasts... to ensure timetabling efficiency is maximised.	
ENC	Non-Confidential	Yes, as these dates are logical and allow for the information to be more useful, we do not see any negative impacts of this proposed timetable.	

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NGED	Non-Confidential	We agree that publications in April, September and the month of publication of final tariffs would be most appropriate as these would include the DRY run 1 PCFM forecasts issued to OFGEM.	
NPg	Non-Confidential	Yes, a change to the current publication timetable would be beneficial. Changing the publication dates to April, September and the month of publication of final tariffs would allow for more informative updates to be made to each publication as it aligns to times when DNOs will have information to update, where the current timetable means the submissions often have minimal updates.	
SPEN	Non-Confidential	If Option B is progressed, we believe that publications in September, and the month of publication of final tariffs is the optimal approach.	
SSEN	Non-Confidential	<p>Yes, a change would be beneficial for both options. We propose:</p> <p>February - to align with the PCFM published on our website in December / publication of tariffs.</p> <p>August – to align with the PCFM published by Ofgem in July for use in upcoming AIP.</p> <p>October – to align with the PCFM, which has been updated to reflect data published in the Regulatory Financial Performance Report.</p>	
UKPN	Non-Confidential	Having discussed this within the WG we support this approach, these three dates will allow the DNOs to provide data which is meaningful, which due to the timing of the current publication dates could happen today.	

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Working Group Conclusions:

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

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

- 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.”*
- 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.

Company	Confidential/ Anonymous	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?	Working Group Comments
Party 1	Anonymous	Yes.	
Centrica	Non-Confidential	We believe that what should be provided is a best view from the networks regardless of the latest PCFM submission. Sometimes the best view will align with the latest PCFM submission but if new information has come to light between PCFM submission and Cost Information submission then this should be included.	

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ENC	Non-Confidential	Yes.	
NGED	Non-Confidential	Yes for September and December.	
NPg	Non-Confidential	<p>Yes, as this would assure consistency between DNOs. Any changes to this that are expected to be included in the next PCFM submission could be included as sensitivities in Table 2.</p> <p>Inflation could be excluded from this as the forecast inflation in the PCFM will only be updated for the Autumn OBR forecast and will remain the same for the rest of the year so could be very out of date (except in the submission alongside published charges).</p>	
SPEN	Non-Confidential	No however this depends on what is meant by the latest submission, does this mean the latest iteration of the PCFM submitted to Ofgem as part of annual iteration process or the submitted version (i.e. the version submitted to cover pricing). If the dry run process is used, then this would restrict the updates that would be contained throughout the year. For example, the first dry run submission for ED companies is normally by the end of August. If the legal text is updated to reflect this, then any submission made prior to this date would have to match the pricing PCFM and result in no update.	
SSEN	Non-Confidential	No, due to the timing of publication and our internal governance requirements.	

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UKPN	Non-Confidential	It needs to be made clear that they latest information is utilised to ensure all DNOs are creating and publishing on the same basis, which we would assume would always be to utilise the PCFM.	
<p>Working Group Conclusions:</p> <p>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.</p> <p>Two responders stated that the legal text should make clear that the most up to date information be used.</p> <p>One responder said no, due to the timing of publication and their internal governance requirements.</p>			

Company	Confidential/Anonymous	8. Do you find the meetings convened under clause 35A (known as the ‘DCP 066A teleconference’) useful?	Working Group Comments
Party 1	Anonymous	Unfortunately we didn’t find the last meeting particularly useful as we found that the format/detail of information was inconsistent and the pace was too quick to absorb the information being shared.	No
Centrica	Non-Confidential	Yes.	Yes
ENC	Non-Confidential	As an IDNO, we find these meetings useful as they give insight and understanding into the DNO cost information and any changes which are expected, we use the information to view future annual price movements.	Yes

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NGED	Non-Confidential	These seem to be losing their value as less suppliers dial in and very few questions are asked so suppliers receive the same information from the spreadsheet as they do in the teleconference.	Yes but losing value due to lack of supplier engagement.
NPg	Non-Confidential	A supplier party would be better placed to answer this question.	NA
SPEN	Non-Confidential	The meeting serves a purpose however a lot of the material is repeated by DNO, which is expected as a lot of the reasons for changes in AR would be similar across each company (for example macroeconomic inputs like inflation etc). We would be interested in hearing how useful these meetings are to suppliers as ultimately, they are the target audience.	Yes although they're mainly aimed at suppliers.
SSEN	Non-Confidential	The question is more suited for suppliers, as DNOs are primarily there to explain the changes.	N/A
UKPN	Non-Confidential	As a DNO we present at these meetings, this is a question for Suppliers as its their views which are important to understand.	N/A
<p>Working Group Conclusions:</p> <p>Three DNO responders stated the question was more relevant to supplier parties, as the DNOs are primarily there to explain the changes.</p> <p>Four responders said that they find the teleconference useful as it gives insight and understanding into the DNO cost information and any changes which are expected and that they use the information to view future annual price movements.</p> <p>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.</p>			

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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.

Company	Confidential/ Anonymous	9. Are there any improvements that should be made, such as submitting questions in advance or use of an online tool such as slido?	Working Group Comments
Party 1	Anonymous	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. Additionally 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.	
Centrica	Non-Confidential	Submitting questions in advance via email or an online tool has the potential to add value. 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.	
ENC	Non-Confidential	Perhaps submitting questions in advance or poll-based questioning may be beneficial in obtaining more information. Participants may feel more comfortable asking questions this way.	

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NGED	Non-Confidential	See answer above, very few questions are asked. We have had 1 question in the last 2 teleconferences. If submitting questions in advance is done then we would need to monitor to see if this is used.	
NPg	Non-Confidential	A supplier party would be better placed to answer this question.	
SPEN	Non-Confidential	These are both good suggestions that help to make best use of the time available allowing for better informed answers/discussion.	
SSEN	Non-Confidential	We are okay with the current arrangements, as it is useful to limit the meetings to the time allocated for them.	
UKPN	Non-Confidential	Either or both of these approaches are used in other forums / meetings, and as above if this is supported by Suppliers this would be useful to at least trial.	
<p>Working Group Conclusions:</p> <p>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.</p> <p>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.</p> <p>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.</p>			

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A DNO responder stated that very few questions are asked. They noted that there had 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.

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

Company	Confidential/ Anonymous	10. Who should be responsible for hosting them – the ENA, the DCUSA secretariat or someone else?	Working Group Comments
Party 1	Anonymous	No comment.	
Centrica	Non-Confidential	We believe hosting should be undertaken by the Secretariat as per the DCMDG.	DCUSA
ENC	Non-Confidential	We believe the current ‘DCP 066A Teleconference’ is conducted efficiently by the ENA. We do not have a preference on who should facilitate this meeting. However, we do understand the reasoning in proposing to transfer responsibility to DCUSA.	No preference
NGED	Non-Confidential	ENA.	ENA
NPg	Non-Confidential	We have no preference between the ENA and the DCUSA secretariat.	No preference
SPEN	Non-Confidential	Given their knowledge and responsibility for the Code the DCUSA secretariat should be best placed to facilitate/host the meetings.	DCUSA

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SSEN	Non-Confidential	The DCUSA Secretariat.	DCUSA
UKPN	Non-Confidential	<p>We believe that the DCUSA Secretariat is best placed to facilitate these meetings, the approach taken when the DCMDG was introduced (to replace the DCMF) could be mirrored, this should also ensure that the most up to date DCUSA Contract Managers and Interested Parties are informed of the meetings. Additional changes to the legal text will be needed to allow this to happen, the meeting is currently referenced in clause 35A.7.</p> <p>One approach would 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. However, we would suggest it should always be at the start to allow those not interested in the wider DCMDG subject matter to be able to leave after the Cost Information has been discussed.</p>	DCUSA
<p>Working Group Conclusions:</p> <p>Four responders said that the DCUSA secretariat would be better suited to hosting the post publication calls.</p> <p>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.</p> <p>One responder said they would prefer the teleconference to remain with the ENA.</p> <p>The final responder offered no comment to this question.</p>			

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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.

Company	Confidential/ Anonymous	11. Should the meetings be held on a fixed day? Please provide your rationale.	Working Group Comments
Party 1	Anonymous	No comment.	
Centrica	Non-Confidential	We don't believe that the meetings need to be on a fixed day as long as they are scheduled and added to diaries sufficiently in advance e.g. agreed at the end of the previous meeting.	Not fixed
ENC	Non-Confidential	A fixed day 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. Alternatively, poll-based scheduling may be suitable to drive greater engagement. However, holding the meetings on a fixed day is our preferred approach.	Fixed
NGED	Non-Confidential	These could be held on a fixed day like the DCMDG.	Fixed
NPg	Non-Confidential	We believe the existing clause 35A.7 of meeting within 20 working days of publication is suitable.	Not fixed

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SPEN	Non-Confidential	As long as sufficient and timely notice of the meetings is given, they don't necessarily need to be held on a fixed day.	Not fixed
SSEN	Non-Confidential	Yes. Assuming the DCUSA Secretariat is hosting, it could be arranged to align with the DCUSA panel meetings.	Fixed
UKPN	Non-Confidential	We believe that it would be useful to do so, as it makes diary planning easier for both DNOs and Suppliers.	Fixed
<p>Working Group Conclusions:</p> <p>Four responders believed the meeting dates should be fixed for the below reasons:</p> <ul style="list-style-type: none">- 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. <p>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. However within the Working Group two of these three clarified that they did not have any real preference between a fixed or non-fixed date and had no objection to the date being fixed.</p> <p>The final responder offered no comment to this question.</p>			

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Company	Confidential/ Anonymous	12. Which of the DCUSA General Objectives do you believe would be better facilitated by the intent of the DCP? Please provide your rationale	Working Group Comments
Party 1	Anonymous	<p>We believe Objective 2 may be better facilitated by the intent of this DCP –</p> <p>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</p>	2
Centrica	Non-Confidential	<p>We agree with the change proposal that option A would better facilitate Charging Objectives 2 and 6.</p> <p>Charging Objective 2 – this change may improve the quality of information which DNOs provide to industry – most notably suppliers – and thus may enable suppliers to more accurately forecast their costs and so improve competition.</p> <p>Charging Objective 6 – this change will improve both the efficiency with which DNOs can provide information, and the usefulness of the information provided, thus improving efficiency in the implementation of the DCUSA.</p>	2 and 6
ENC	Non-Confidential	<p>We believe the DCUSA General Objectives which are better facilitated by this change proposal are:</p> <p>3. The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences.</p>	

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		<p>4. The promotion of efficiency in the implementation and administration of the DCUSA</p> <p>Efficiency in producing the information under Clause 35A (Schedule 15) and Clause 35B (Schedule 20) will be improved by this change. Having the same information published in multiple formats can be confusing and lead to inconsistencies in interpreting the data. Fewer formats of the same information would reduce the potential for confusion and inaccuracies.</p>	
NGED	Non-Confidential	Charging Objective 2.	
NPg	Non-Confidential	<p>We agree with the working group assessment that objectives 3 and 4 are better facilitated by this DCP.</p> <p>Combining the ARP and Cost Information requirements would remove duplication of information and effort for DNOs, and provide a more consistent view of final and forecast tariffs passed to IDNOs and Suppliers.</p>	
SPEN	Non-Confidential	<p>We agree with the Working Group that the CP should be set against the DCUSA General Objectives as there is no material impacts on the calculations within the charging methodologies. We further agree that General Objectives 3 and 4 would be better facilitated as it improves efficiency by removing duplication of requirements under Clause 35A (Schedule 15) and Clause 35B (Schedule 20).</p>	

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SSEN	Non-Confidential	The DCP will better facilitate DCUSA General Objectives 3 and 4, aiming to provide stakeholders with relevant, higher-quality information and reduce duplication.	
UKPN	Non-Confidential	We agree with the WG in that DCUSA General Objectives 3 & 4 are better facilitated by this change as the current duplication of data would be removed which not only should save time in producing the datasets, but also avoid adding to any confusion over similar but potentially different data in circulation.	
<p>Working Group Conclusions:</p> <p>Four responders believed that general objectives three and four were better facilitated by this change.</p> <p>Three responders believed charging objective two was better facilitated by this change.</p> <p>One responder stated that charging objective 6 was better facilitated by this change.</p> <p>It was noted in the responses that the above applied to both solution A and solution B.</p>			

Company	Confidential/ Anonymous	13. Are you aware of any wider industry developments that may impact upon or be impacted by this CP?	Working Group Comments
Party 1	Anonymous	Only that DCP437 will have an impact on this.	
Centrica	Non-Confidential	N/A.	No

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ENC	Non-Confidential	Not at this time.	No
NGED	Non-Confidential	No.	No
NPg	Non-Confidential	Not at this time.	No
SPEN	Non-Confidential	Not at the present time.	No
SSEN	Non-Confidential	Not at the moment.	No
UKPN	Non-Confidential	None that we are aware of at the current time.	No
<p>Working Group Conclusions:</p> <p>Seven respondents said they were not aware of any wider industry developments that could impact or be impacted by this change.</p> <p>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’.</p>			

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Company	Confidential/ Anonymous	14. The proposed implementation date for DCP 325 is the first scheduled DCUSA release following approval. Do you agree with the proposed implementation date?	Working Group Comments
Party 1	Anonymous	Yes.	Yes
Centrica	Non-Confidential	Yes.	Yes
ENC	Non-Confidential	Yes.	Yes
NGED	Non-Confidential	Yes.	Yes
NPg	Non-Confidential	Yes.	Yes
SPEN	Non-Confidential	Yes.	Yes
SSEN	Non-Confidential	Our preference is three months after approval.	
UKPN	Non-Confidential	Yes.	Yes
Working Group Conclusions:			

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COLLATED CONSULTATION 2 RESPONSES WITH WORKING GROUP COMMENTS

Seven responders stated they agreed with the proposed implementation date.

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

Company	Confidential/ Anonymous	15. Does the legal text suitably and clearly delivery the proposed solution? If not, please provide rationale.	Working Group Comments
Party 1	Anonymous	No comment.	
Centrica	Non-Confidential	Yes.	Yes
ENC	Non-Confidential	Yes.	Yes
NGED	Non-Confidential	Yes.	Yes
NPg	Non-Confidential	Yes.	Yes
SPEN	Non-Confidential	Yes.	Yes
SSEN	Non-Confidential	Yes – but see comments in Q16.	Yes

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UKPN	Non-Confidential	We believe that it does for both solutions, other than for the meetings if the DCUSA secretariat were to take responsibility for these.	Yes however text for the teleconference would need to be drafted if DCUSA were to facilitate this call.
<p>Working Group Conclusions:</p> <p>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.</p> <p>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.</p> <p>The other responder offered no comment to this question.</p>			

Company	Confidential/ Anonymous	16. Do you have any comments on the draft legal text?	Working Group Comments
Party 1	Anonymous	No comment.	No
Centrica	Non-Confidential	As per our answer to question 4, 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. We believe this should be changed so that the published tariffs are provided and not forecasts of the charges where the charges are already published.	
ENC	Non-Confidential	No.	No

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NGED	Non-Confidential	No.	No
NPg	Non-Confidential	We believe the draft legal text is suitable to deliver each relevant option.	No
SPEN	Non-Confidential	No.	No
SSEN	Non-Confidential	Clause 35A and B (Option A): The header should be amended to read “Provision of Cost Information Review Pack” (instead of “Provision of Cost Information”).	Noted
UKPN	Non-Confidential	As noted in the response to Q10 if the DCUSA Secretariat is taking on responsibility for the meetings alongside the Cost Information, then the DCUSA legal text will need to incorporate that.	Noted
<p>Working Group Conclusions:</p> <p>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.</p> <p>This was noted by the working group.</p>			

Company	Confidential/	17. Do you have any other comments?	Working Group Comments
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	Anonymous		
Party 1	Anonymous	Just one additional comment would be that if we are able to receive the ARP information in its current format more frequently it will be beneficial to enable us to update forecasts more frequently.	Noted
Centrica	Non-Confidential	N/A.	No
ENC	Non-Confidential	We are supportive of this change proposal.	Noted
NGED	Non-Confidential	No.	No
NPg	Non-Confidential	Not at this time.	No
SPEN	Non-Confidential	None.	No
SSEN	Non-Confidential	No comments.	No
UKPN	Non-Confidential	No.	No
Working Group Conclusions:			

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COLLATED CONSULTATION 2 RESPONSES WITH WORKING GROUP COMMENTS

One responder said that if they were *“able to receive the ARP information in its current format more frequently it will be beneficial to enable us to update forecasts more frequently.”*

There were no other additional comments.

This was noted by the Working Group.