

DIF 86

'Charges #1

COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

Company	Confidential/ Anonymous	1. Have you had any experience of the issue explained and if so, what is this experience?	Working Group Comments
Stark Infra	Non-confidential	No	
SP Energy Networks	Non-confidential	No, SPEN don't issue DUoS charges for multiple MPAN sites, all DUoS charges are issued at MPAN level.	
Eon Uk	Non-confidential	Yes however these tend to be rare instances whereby the conditions to relate meter points as set out in REC schedule 28 have not been met due to being different customers within a site liable for site specific charges, which enables the ability for 2+ Mpans to be registered to different suppliers.	
SP Electricity North West	Non-confidential	Yes, infrequent experience of the issue.	
Southern Electric Power Distribution plc (SEPD) and Scottish Hydro Electric Power	Non-confidential	Yes. In the past 12 months we've experienced one instance of scenario 4. There was another instance of an MPAN on a multi-MPAN site changing Supplier, but this change of supply took place on the 1st of the month.	

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Distribution plc (SHEPD)			
UK Power Networks	Non-confidential	Yes, different suppliers registering MPANs that are on the same site.	
<p>Working Group Conclusions: 4 respondents stated they had experienced the issue previously although all 4 stated instances were rare.</p> <p>The IDNO party stated they had not experienced the issue and a DNO party advised that they don't issue DUoS charges for multiple MPAN sites, all DUoS charges are issued at MPAN level and as such, they had no experience of the issue.</p>			

Company	Confidential/ Anonymous	2. How do you charge for multi MPAN sites?	Working Group Comments
Stark Infra	Non-confidential	<p>Our billing is always done separately by MPAN, so multiple MPANs would not be grouped on one site together to charge.</p> <p>This was a system design to avoid situations like the examples given within the nature of the issue.</p>	

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SP Energy Networks	Non-confidential	For multiple sites, specific MPANs are assigned to the same tariff, then tariff charges are adjusted to ensure that capacity and standing charges are split as appropriate.	
Eon Uk	Non-confidential	N/A as we are a supplier.	
SP Electricity North West	Non-confidential	Multi MPAN sites are combined on one site, with the consumption and MIC combined for billing and one invoice is issued that includes the data for all the MPANS in the multi MPAN arrangement. If one of the MPANs is then registered to a different supplier we have to manually split the MPANs and MIC onto separate sites to ensure that billing is correct. In MHHS world, DURABILL will bill the sites separately automatically, so any manual intervention will not be required.	
Southern Electric Power Distribution plc (SEPD) and Scottish Hydro Electric Power Distribution plc (SHEPD)	Non-confidential	<p>We charge for multi-MPAN sites as per our charging statement, para 2.24 (below)- 2.24 Where LV and HV Designated Properties or Designated EHV Properties have more than one point of connection (as identified in the Connection Agreement) then separate charges will be applied to each point of connection.</p> <p>It's unclear how the excess capacity charge issue can be resolved as you could be charging excess capacity to a supplier for a period when they were not the appointed supplier.</p>	

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UK Power Networks	Non-confidential	The intent is one fixed and one capacity charge but if a site is split across suppliers there will be more than one fixed charge and a split capacity charge.	
<p>Working Group Conclusions: There were a number of different responses to this question ranging from billing is done separately by MPAN, so multiple MPANs would not be grouped on one site together to charge, to Multi MPAN sites are combined on one site, with the consumption and MIC combined for billing and one invoice is issued.</p> <p>The supplier party stated N/A as this question was specific to distributors.</p>			

Company	Confidential/Anonymous	3. For scenarios 1, 2, 3 and 4, as described in the DIF, have these scenarios occurred in your licence area? If so, how many instances of each scenario have occurred? Are you aware of any other scenarios of a multi MPAN site potentially under, or overcharging capacity when one or more of the MPANs associated with site has some sort of significant event occurring? Please provide details.	Working Group Comments
Stark Infra	Non-confidential	No.	

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SP Energy Networks	Non-confidential	None	
Eon Uk	Non-confidential	N/A as we are a supplier.	
SP Electricity North West	Non-confidential	Yes, 4 across all scenarios over the last 5 years, 1 in the current year. Not aware of any other scenarios.	
Southern Electric Power Distribution plc (SEPD) and Scottish Hydro Electric Power Distribution plc (SHEPD)	Non-confidential	As per question 1, we have experienced one instance of scenario 4.	
UK Power Networks	Non-confidential	These have occurred but the volume will be tiny.	
Working Group Conclusions: 3 respondents stated they had not experience any of the above-mentioned scenarios, with on highlighting as a supplier the question wasn't relevant.			

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The other 3 respondents said they the above scenarios had occurred for them, but the instances were very rare.

Company	Confidential/ Anonymous	4. What are your thoughts on the potential solution of splitting the billing periods so that the assessment for capacity charging is not made at the month end, but at the point in time of each relevant change?	Working Group Comments
Stark Infra	Non-confidential	Splitting the billing periods at the point of time of each relevant change would seem a pragmatic solution. A change to DCUSA to make it clear what should happen in these situations would be required, which would be dependent on the scale and frequency of the issue	
SP Energy Networks	Non-confidential	No SPEN do not agree with this change. DNOs issue invoices at two specific periods every month. The half hourly invoice rebills are issued in the second week of every calendar month.	
Eon Uk	Non-confidential	We are neutral on this as we do not perceive this to be a significant issue.	
SP Electricity North West	Non-confidential	We believe this would not be necessary in view of the low incidence.	

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Southern Electric Power Distribution plc (SEPD) and Scottish Hydro Electric Power Distribution plc (SHEPD)	Non-confidential	We have to meet our obligations to correctly apply DUoS charges. However, having only experienced one instance of this over the past 12 months, the potential solution would likely require significant changes to our billing system (Durabill) and therefore we would question whether, all things considered, this represents value for money.	
UK Power Networks	Non-confidential	While it may be preferable to charge accurately in all cases, there is unlikely to be a cost-benefit for change to reflect these edge cases.	
Working Group Conclusions: The Subgroups conclusions to the responses to this question were that the majority of respondents stated that whilst the solution made sense, the instances were so rare that it may not be worth the effort/costs of fixing the issue due to the small benefits.			

Company	Confidential/ Anonymous	5. Is there another solution that hasn't been considered?	Working Group Comments
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Stark Infra	Non-confidential	No comment	
SP Energy Networks	Non-confidential	SPEN do not have an opinion: we do not bill multiple MPAN sites in this method	
Eon Uk	Non-confidential	None.	
SP Electricity North West	Non-confidential	As the incidences are low the process could be left as is.	
Southern Electric Power Distribution plc (SEPD) and Scottish Hydro Electric Power Distribution plc (SHEPD)	Non-confidential	No	
UK Power Networks	Non-confidential	Unknown.	

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Working Group Conclusions: There were no other solutions offered by any of the respondents to this RFI, with the exception of one DNO stating the process could be left as it is.

Company	Confidential/ Anonymous	6. Is the issue prevalent enough for a change to be made to the DCUSA, or are the instances so rare that the costs in resolving the issue outweigh the benefits?	Working Group Comments
Stark Infra	Non-confidential	Not in a position to answer	
SP Energy Networks	Non-confidential	SPEN do not have an opinion: we do not bill multiple MPAN sites in this method.	

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Eon Uk	Non-confidential	We do not believe so, we have a very small number of sites that are billed to us in this manner which is manageable.	
SP Electricity North West	Non-confidential	The issue is not prevalent enough for a change to be made to the DCUSA and the instances are so rare the costs in resolving would likely outweigh the benefits.	
Southern Electric Power Distribution plc (SEPD) and Scottish Hydro Electric Power Distribution plc (SHEPD)	Non-confidential	Please refer to our response to question 4.	
UK Power Networks	Non-confidential	It may help to describe the approach taken in these scenarios in DCUSA such that not changing the system is fully compliant	
<p>Working Group Conclusions: None of the responses to this question stated that the issue was prevalent enough for a change to be made.</p> <p>One DNO party stated that it may help to describe the approach taken in these scenarios in DCUSA such that not changing the system is fully compliant.</p>			

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Company	Confidential/ Anonymous	7. Any other comments?	Working Group Comments
Stark Infra	Non- confidential	No	
SP Energy Networks	Non- confidential	No.	
Eon Uk	Non- confidential	<p>Yes.</p> <p>It has been highlighted to us that our DUoS invoice validation systems would require refinement work in both pre & post MHHS system versions:</p> <ul style="list-style-type: none">• several key validation modules would need to be updated. Amending MHHS Site invoice validation would be significantly more straightforward than doing the equivalent in the legacy HH validation.• Legacy validation changes would be likely to include changes to MPAN and Lead MPAN forms, the forms that are used to	

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		<p>view legacy backing statements and discrepancies, as well as the package that calculates shadow charges.</p> <ul style="list-style-type: none">• Additionally, it is anticipated that increased complexity in this area would result in an increase in the number of queries and discrepancies, particularly considering that there is no formal reliable method of LDSOs communicating change of MPAN-to-site association or change of capacity to suppliers. <p>System upgrade costs provided by our service provider are £100-£150K to upgrade, this includes pre & post MHHS implementation for both DIF 86 & 87 potential solutions, Eon would contribute to this cost as an equal share with other users of the system picking the remaining share of the cost up if progressed.</p>	
SP Electricity North West	Non-confidential	SP ENW does not believe the issue is material enough to warrant a change.	
Southern Electric Power Distribution plc (SEPD) and Scottish Hydro Electric Power Distribution plc (SHEPD)	Non-confidential	No.	

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UK Power Networks	Non-confidential	None	
<p>Working Group Conclusions: 4 responses stated they had no further comment.</p> <p>1 response noted that they did not believe the issue is material enough to warrant a change.</p> <p>The supplier party stated that their DUoS invoice validation systems would require refinement work in both pre & post MHHS system versions.</p> <p>They went on to list the process that would require updating and highlighted that the high-level costs given to them for the changes to be implemented were between £100k-£150k.</p>			