DCP 268 Consultation Responses – Collated Comments

Company	Confidential/ Anonymous	1. Do you understand the intent of DCP 268?
British Gas	Non-confidential	Yes
E.ON	Non-confidential	Yes. We are broadly supportive of the proposed modification. It would be logical to align both NHH and HH supplies to use the HH settlement data as it is more accurate and improved accuracy will ensure charging DuOS is more accurate. Currently, although charging structures are similar, they are different in structure which causes cost discrepancies between NHH and HH. We do, however, have concerns about system costs that may be associated with this change proposal, as currently NHH DuOS and HH DuOs are loaded differently into our systems. We recognise that as it currently stands, the system can act as a disincentive to voluntarily move to HH settlement. In context of potential move towards HH settlement across all profile classes, we see this as a positive move but also note the effect that it may have on Medium non-domestic tariffs, but we do understand that in customers with profile classes 5-8, these NHH tariffs will soon be of no relevance due to the advent of P272.
Ecotricity (The Renewable Energy Company)	Non-confidential	The intent is to lay the framework for time-of-use tariffs, which should provide more cost reflective DUoS charging in the long term.
EDF Energy	Non-confidential	Yes
Electricity North West	Non-confidential	Yes.
Elexon	Non-confidential	Yes, we understand the intent of the DCP. We have been of the opinion for a long time that there should not be a differential in Distribution Use of System (DUoS) tariff rates simply because a site moves from Non-Half-Hourly (NHH) Settlement to Half-Hourly (HH) Settlement. We also believe that this is an opportunity to reduce, simplify and

		rationalise the tariff structure. We also believe there is some further detail on the solution which will need to be defined to facilitate the appropriate aggregation of the relevant data for each tariff. For example, will the HH profile data and HH aggregate data need be aggregated to provide a single view for Low Volatage (LV) tariffs or do these need to be separate for transparency.
Anonymous	Anonymous	Yes. To facilitate the transition to half hourly settlement for non-half hourly profile classes 1-4 customers by allowing a transition to a time band charging basis using HH consumption data.
First Utility	Non-confidential	Yes.
Good Energy	Non-confidential	Yes
Northern Powergrid on behalf of Northern Powergrid (Yorkshire) plc and Northern Powergrid (Northeast) Ltd	Non-confidential	Yes.
RWE npower	Non-confidential	Yes
Scottish Hydro Electric Power Distribution plc and Southern Electric Power Distribution plc	Non-confidential	Yes.

Scottish Power Energy Retail Limited	Non-confidential	Yes
SP Distribution / SP Manweb	Non-confidential	Yes we understand the intent of DCP 268
SSE Supply	Non-confidential	Yes
The Electricity Network Company Limited	Non-confidential	Yes
UK Power Networks	Non-confidential	Yes
Western Power Distribution	Non-confidential	Yes

Company	**Confidential/ Anonymous**	**2. Are you supportive of the principles of DCP 268?**
British Gas	Non-confidential	The consultation is lacking in the detail that would allow us to conclude whether or not we support the principles of DCP 268 specifically. The working group have not set out the precise details of the proposal and there is no impact assessment showing the effect that the change will have across tariffs and across difference types of consumers in general.
E.ON	Non-confidential	Yes, as mentioned in question 1, alignment of both NHH and HH supplies to use the HH settlement data as it is more accurate and improved accuracy will improve accuracy of DuOS charges for consumer and supplier. This should also remove any worries around financial disincentives for

		voluntary movement from NHH to HH. It should also remove any stumbling block in regards to the possibility of profile classes 1-4 being settled HH, as P272 suffered from similar stumbling blocks. We would however want further clarity on whether this modification is merely a "stop-gap" in the interim period for HH settlement for profile classes 1-4, or a more permanent measure.
Ecotricity (The Renewable Energy Company)	Non-confidential	We would be supportive of this change.
EDF Energy	Non-confidential	EDF Energy is supportive of the principles outlined in DCP 268. We are mindful that our support of the principles considers that any consequential impact on DUoS for NHH does not drive an unacceptable or uncontrollable variation in cost
Electricity North West	Non-confidential	Yes.
Elexon	Non-confidential	Yes, we support the intent of the DCP in removing a perceived barrier to HH Settlement. The change is also aligned and sympathetic to Modification P339 'Introduction of new Consumption Component Classes for Measurement Classes E-G' which will provide the ability to aggregate HH export data which can be used for the new LV Generation Aggregate tariff (noting NHH export volumes will need to be included in the aggregation). The changes also align with the intent of the Ofgem work on HH Settlement which seeks to remove barriers to elective HH Settlement. The changes will also rationalise the Unmetered Supplies (UMSO) Tariffs by merging the NHH UMS categories and pseudo HH tariff. The existing structure does not need to differentiate UMS types or method of Settlement for DUoS charging. The change also has a number of potential benefits in reducing the size of the D0030 'DUoS Report' if Standard Settlement Configuration (SSC)/Time Pattern Regime (TPR) combination splits are no longer required in the flow (see answer to Question 6). Furthermore, it is likely to reduce the number of Line Loss Factor Class id (LLFC id) required for Tariff mapping. This could also provide a reduction in the size of Market Domain Data.
Anonymous	Anonymous	Yes
First Utility	Non-confidential	Yes. Once implemented, the Common Distribution Charging Methodology will be simplified.

Good Energy	Non-confidential	Yes
Northern Powergrid on behalf of Northern Powergrid (Yorkshire) plc and Northern Powergrid (Northeast) Ltd	Non-confidential	Yes.
RWE npower	Non-confidential	Yes, proposed changes support reducing the complexity & number of DUoS tariffs available, removes barriers for customers moving between NHH & HH settlement and builds on other recent modification changes to facilitate.
Scottish Hydro Electric Power Distribution plc and Southern Electric Power Distribution plc	Non-confidential	Yes.
Scottish Power Energy Retail Limited	Non-confidential	Yes
SP Distribution / SP Manweb	Non-confidential	Yes we are supportive of the principles of DCP 268

SSE Supply	Non-confidential	We recognise the long term justification of this proposal but have significant concerns relating to the price increases for some Off Peak and Heating tariffs.
The Electricity Network Company Limited	Non-confidential	Whilst we are supportive of the principles of the move towards half hourly settlement and the ability of customers to alter consumption patterns based on pricing signals from their suppliers we do not believe that settling customers on a half hourly basis based on profiled data is necessary nor does it aid in delivering any of the DCUSA objectives.
UK Power Networks	Non-confidential	Yes
Western Power Distribution	Non-confidential	Yes

Company	**Confidential/ Anonymous**	**3. Do you have any comments on the proposed legal text?**
British Gas	Non-confidential	We do not consider that the consultation has sufficiently discussed and explained all the issues relevant to this change proposal. We have not reviewed the legal text in the detail we would have liked since the detail of the proposal has not been provided against which to compare the legal text. We have, however, identified the following potential issues: **Paragraph 68:** The addition of the 'Not Used' text at the beginning of the paragraph suggests that the intention was to remove all of the current wording in paragraph 68. However the tracked changed version of the legal text shows that some wording has been left behind. Paragraphs 69 and 70 are unchanged yet relate to the now deleted text of paragraph 68. If the intention is for these paragraphs to now relate to paragraph 71 instead then the drafting should clearly reflect this. **Paragraph 72A**: The working group is proposing to remove paragraph 72A. Paragraph 72A currently requires 'correction factors' to be applied to ensure that average charges produced by the LV Network Domestic tariff and the LV Network Non-Domestic Non-CT tariff are equivalent to a volume-weighted average of the non-half-hourly-settled tariffs for profile classes 1 and 2 (for the

		Domestic tariff) and profile classes 3 and 4 (for the Non-Domestic tariffs). These correction factors can be significant (ranging from 0.41 to 1.50 for 2017/18 tariffs) and therefore removing them could have a significant impact on all tariffs, either directly or indirectly through the impact of scaling. Such a significant change requires a full impact assessment to be undertaken as the existing Aggregated tariffs for 2016/17 and 2017/18 will not be representative of the likely level of the Aggregated tariffs being proposed by this change if the intent is to remove these 'correction factors'. Even in a scenario where the correction factors remained, an impact assessment is necessary to understand the impact on different customer groups (i.e. domestic unrestricted vs domestic two rate vs domestic off peak). **Paragraph 74:** The proposed standing charge factors for the Off Peak tariffs (domestic and non-domestic) are being set to 0% at the LV level. Currently these are set to 100%. The rationale for this change has not been provided in the consultation. **Paragraph 84:** We do not think it is sensible for this DCP to remove the Medium Non-Domestic tariffs, especially since there is a separate change proposal (DCP 270) looking at the issues surrounding the removal of these tariffs. The intent of this change is simply to introduce RAG/BYG charges for all customers. This can be achieved whilst retaining the Medium Non-Domestic tariffs, an approach which would allow the separate issues surrounding the removal of these tariffs to be debated and consulted upon as part of DCP 270. This approach would also mean this DCP remained capable of approval even if it was decided that the Medium Non-Domestic tariffs should not yet be removed. **Paragraph 128:** refers to paragraph 135B. Paragraph 135B has been deleted. **Paragraph 129:** This paragraph states that the PC for HH aggregated demand will always be zero – this is not appropriate for NHH settled mpans. **Paragraph 130:** refers to paragraph 140B – this seems to be the wrong reference.
E.ON	Non-confidential	No
Ecotricity (The Renewable Energy Company)	Non-confidential	No Comment.

EDF Energy	Non-confidential	None
Electricity North West	Non-confidential	Schedule 16 para 68: My copy shows some text left in, despite the paragraph being not used. Para 70: Is this referring to the equation deleted in para 68?
Elexon	Non-confidential	None
Anonymous	Anonymous	No
First Utility	Non-confidential	No.
Good Energy	Non-confidential	No
Northern Powergrid on behalf of Northern Powergrid (Yorkshire) plc and Northern Powergrid (Northeast) Ltd	Non-confidential	There are some minor inconsistencies in the naming of tariffs in the legal text that should be amended. 'Aggregate' and 'Aggregated' are being used interchangeably.
RWE npower	Non-confidential	We do not have any comments to make at this time
Scottish Hydro Electric Power	Non-confidential	No.

Distribution plc and Southern Electric Power Distribution plc		
Scottish Power Energy Retail Limited	Non-confidential	No
SP Distribution / SP Manweb	Non-confidential	No comments on the proposed legal text.
SSE Supply	Non-confidential	No
The Electricity Network Company Limited	Non-confidential	No
UK Power Networks	Non-confidential	We are comfortable with the changes to the legal text but have identified a number of small additional changes which would need to be addressed. These are; Paragraph 44 incorrectly uses 'settled' this term should be removed. Paragraph 45 the words 'in each relevant time pattern regime' should be removed. Paragraph 68 (which is no longer used), there is some text which appears to be floating and should be deleted. Paragraph 128 includes some text which should be deleted '(as determined under paragraph 135B above)'.

		Paragraph 130 references paragraph 140B, this should be paragraph 129. Paragraph 132(c) should be a separate point and not shown as 132(c). Paragraph 132A – this relates to the metered section but appears to incorrectly include references to UMS, which should be moved to 140A. Paragraph 141 in the table for metered sites; it includes UMS, is this correct? Paragraph 142 it would appear that the labelling of the tariffs is incorrect and should read 'LV Generation Aggregated' and not 'Aggregated HH LV Generation'. Paragraph 143 should state that 'Reactive Power charges will not apply'. Table 8 shouldn't have a 'tick' in the reactive power charge box for LV Generation Aggregate. Table 9 should have RAG as unit charges for LV Generation Aggregate Table 9 should include 'LV Sub Generation Aggregate' and RAG as the unit rates
Western Power Distribution	Non-confidential	No

Company	**Confidential/ Anonymous**	**4. Please provide your views on the proposed mapping of tariffs set out in Attachment 4?**
British Gas	Non-confidential	We do not agree that Medium Non-Domestic tariffs should be mapped onto a HH site specific tariff with a default capacity value of 71kVA. • Such customers may not have a functioning amr meter to enable such a move. • Such customers may be WC metered and so the aggregated non-CT tariff would be more appropriate.

		There is no justification for an assumed capacity value of 71kVA, especially given that the protection offered by DCP 248 will have expired. Such a default capacity value would seem punitive to us.
E.ON	Non-confidential	The tariff mapping outlined seems sensible on the whole as there are less tariffs which should make the system and tariffs more intelligible if the changes were to be implemented. Having less tariffs clarifies the process
Ecotricity (The Renewable Energy Company)	Non-confidential	The proposed tariff mapping seems reasonable to us.
EDF Energy	Non-confidential	The naming is acceptable but the addition of the word "aggregate" is unnecessary.
Electricity North West	Non-confidential	The mappings are logical and seem to be correct. The use of the term 'site specific' could cause some confusion between these tariffs and the location-based (and hence 'site specific') EDCM charges.
Elexon	Non-confidential	We welcome the simplification and reduction from the existing 27 tariffs to the 11 new tariffs. Consideration should be given to merging the LV Domestic and LV Non-Domestic non-CT tariffs. We are aware of a number on non-traditional business models (NTBMs) (e.g. community energy schemes) that would like to aggregate across domestic and non-domestic data (or even net off Non-domestic generation from domestic supplies). Alternatively, a separate NTBM tariff could be considered (either in this DCP or as a potential further change in the future).
Anonymous	Anonymous	None
First Utility	Non-confidential	We have no specific views other than that the approach looks sensible.
Good Energy	Non-confidential	It is proposed for 'LV Medium Non-Domestic', 'LV Sub Medium Non-Domestic' and 'HV Sub Medium Non-Domestic' tariffs to be mapped to the relevant HH tariff with a default capacity value of 71kVA. Although most customers on these tariffs should have been migrated to different tariffs by April 2018 when the change is proposed to be implemented, we consider that those customers remaining on the tariffs should not be faced with a significant step change in DUoS charges from the application of a default capacity value of 71kVA. We propose that further consideration be given to

		the level of default capacity used, with perhaps different levels being used for 'LV Medium Non-Domestic', 'LV Sub Medium Non-Domestic' and 'HV Sub Medium Non-Domestic' tariffs respectively.
Northern Powergrid on behalf of Northern Powergrid (Yorkshire) plc and Northern Powergrid (Northeast) Ltd	Non-confidential	We have some comments on the proposed mappings: • We would question whether 'xx Site Specific Metered' is the most appropriate name for the traditional half hourly tariffs, simply because this implies that metering for other tariffs is not site specific. As a result, we would suggest that these tariffs are renamed 'xx Site Specific'. • We believe there may be an issue with the mapping of UMS tariffs. As things stand, it is proposed that both the Pseudo HH and the four NHH categories are mapped to the same tariff. Whilst we agree that the two should be charged the same tariff, we are concerned that by putting both groups onto a single line, we would lose the distinction between consumption information received on HH flows (i.e. the D0036) and the NHH flows (i.e. the D0030). We believe it would be more helpful to include two tariffs with the same rates, with a replacement for the four NHH categories named 'LV UMS Aggregate' and a replacement for the pseudo HH category names 'LV UMS (Pseudo Site Specific)'. • We do not believe the LV Sub Generation Aggregate tariff is needed. We would expect that all generation connected at LV Sub will be CT metered, and so will be site specific.
RWE npower	Non-confidential	Mapping detailed in attachment 4 appears appropriate and agree that the NHH tariffs have been mapped to the closest available HH tariff
Scottish Hydro Electric Power Distribution plc and Southern Electric Power Distribution plc	Non-confidential	These appear to be logical and appropriate.

Scottish Power Energy Retail Limited	Non-confidential	We understand the mapping of tariffs and support the proposal.
SP Distribution / SP Manweb	Non-confidential	We agree with the proposed mapping of tariffs in Attachment 4.
SSE Supply	Non-confidential	The mapping is correct.
The Electricity Network Company Limited	Non-confidential	We believe that the tariff mapping provided meets the purpose of this change proposal but we do not believe that reducing the number of tariffs to move all customers to time-band related tariffs delivers benefits to customers who's consumption is based on profiled data.
UK Power Networks	Non-confidential	We agree with the working groups view on the mapping of the tariffs.
Western Power Distribution	Non-confidential	It is unclear what would happen to a Small Non Domestic site with a CT. The mapping suggests that it goes to LV Non-Domestic Non-CT Aggregate but the name itself implies that the site does not have a CT. Does the name need to change to prevent ambiguity. The Mappings also suggest that LV Medium Non Domestic moves to LV HH regardless of whether the customer has a CT.

Company	**Confidential/ Anonymous**	**5. Do you agree with the proposed approach to the mapping of off peak tariffs as set out in paragraph 5.5 of this consultation?**
British Gas	Non-confidential	Not enough detail has been provided on the proposed approach for the off-peak tariffs to comment here. As highlighted above, there has been a change to the approach to standing charge factors which has not been explained in the consultation.

E.ON	Non-confidential	Mapping the effected tariffs to the HH counterpart is logical and we would support this as outlined. We also note the effect that it may have on Medium non-domestic tariffs, as previously mentioned. Although this should not be a problem in future if profile classes 1-4 were to be settled HH.
Ecotricity (The Renewable Energy Company)	Non-confidential	No Comment.
EDF Energy	Non-confidential	We agree with the mapping approach on the basis that the vast majority of customers will no longer be on 'LV Medium Non-Domestic', 'LV Sub Medium Non-Domestic' and 'HV Sub Medium Non-Domestic' tariffs by the date of implementation.
Electricity North West	Non-confidential	We are in agreement with the proposed approach.
Elexon	Non-confidential	We agree with the use of a new unique LLFC id for 'Off Peak' tariffs. However, the leading text in 5.5 suggests this relates to NHH tariffs only. We suggest the LLFC id would need to be retained on CoMC to HH such that the aggregation to the new 'pseudo SSC' is retained (assuming the customers will still have 2 HH MPANs e.g. where the landlord is responsible for the heating load). If all site energy is accounted for under a single HH MPAN then the double counting issue goes away.
Anonymous	Anonymous	No comment
First Utility	Non-confidential	Yes – the approach appears sensible.
Good Energy	Non-confidential	We have no comments on the mapping of off peak tariffs as set out in paragraph 5.5 of the consultation.
Northern Powergrid on behalf of Northern Powergrid	Non-confidential	We agree with the approach set out in the consultation as the 'path of least resistance' to enable the change to proceed. However, this may be an opportunity to simplify the arrangements for off-peak customers. Given that the unit rates of this tariff will be the same as the standard domestic tariff, it may be a simpler approach

(Yorkshire) plc and Northern Powergrid (Northeast) Ltd		to aggregate units to a site level before they are reported to the DNO in the D0030. This would then have the same effect, but under a single LLFC, which would be a simplification to the process currently in place.
RWE npower	Non-confidential	Yes
Scottish Hydro Electric Power Distribution plc and Southern Electric Power Distribution plc	Non-confidential	We agree that the "LV Medium Non-Domestic", "LV Sub Medium Non-Domestic" and HV Sub Medium Non-Domestic" tariffs should be mapped to the relevant HH tariffs. We do not, however, agree that a default capacity value of 71kVA is appropriate. Rather, we suggest that DNOs use the same default capacity kVA values used for P272.
Scottish Power Energy Retail Limited	Non-confidential	Scottish Power has no real concerns over the approach to off peak tariffs.
SP Distribution / SP Manweb	Non-confidential	Yes we agree with the proposed approach to the mapping of off peak tariffs as set out in paragraph 5.5 of the consultation.
SSE Supply	Non-confidential	Yes, but we want the DNOs to retain the existing settlement codes (SSC, TPR, LLFC) whenever possible due to their extensive use in the industry. If code changes are inevitable we would like as much advance warning as possible of the new codes.
The Electricity Network Company Limited	Non-confidential	Yes

UK Power Networks	Non-confidential	Yes, as failure to take this approach would likely cause parties (DNOs and Suppliers) billing issues, as primary MPANs (with a fixed charge) and the off peak (without a fixed charge) would otherwise use the same LLFC. This approach separates the two tariffs.
Western Power Distribution	Non-confidential	Yes WPD agree.

Company	**Confidential/ Anonymous**	**6. Please advise whether you have a preference for Elexon to provide the pseudo split of consumption data or for Parties to undertake the relevant work on their billing systems?**
British Gas	Non-confidential	Not enough detail has been provided on the proposed approaches to comment in detail here. There appears to be a view that the existing D0030 dataflow (post P300) introduced as part of the P272 suite of changes is sufficient for this proposed change, but we doubt whether this is the case. The difference between the aggregated HH settled data currently being added to the D0030 by the SVAA and the apparent proposal here is that all of the existing NHH settled data will already be included on the D0030, so adding it again creates a risk of double charging and is likely to require system changes to prevent it. It is also not clear that the process around the existing D0030 dataflow allow for the addition of data that is not HH settled (PC 0). The proposed legal text suggests that all HH aggregated data will be assigned a profile class of zero (including NHH settled data) which is not appropriate. We also consider that whilst the changes introduced as part of P272 may be sufficient to facilitate aggregated billing for the relatively small number of HH settled WC metered mpans (< 100,000), we are not convinced that the processes are sufficiently robust for the billing of all NHH mpans (c. 30,000,000). The use of 'dummy' MDD data under the existing D0030 process is not ideal and so extending its use across all NHH mpans needs to be carefully considered. We suggest the working group should provide a detailed process map of the options under consideration in order for the industry to provide feedback in this area.
E.ON	Non-confidential	Cannot currently provide comment

Ecotricity (The Renewable Energy Company)	Non-confidential	We would prefer for Elexon to undertake this activity, as it is also what they are doing for P272 customers, increasing consistency throughout the industry
EDF Energy	Non-confidential	EDF Energy would prefer the option for the DNOs to be responsible for breaking down the data on the D0030 for Profile Classes 1 – 8 into the Red, Amber and Green periods, using De-Linked tariffs. With This option, the impact will be less as our validation system already has the functionality to carry out this breakdown of data by utilising De-Linked Tariffs. It will therefore be possible to create and apply these tariffs to D0030 data flows for Settlement Dates 01/04/2018 onwards. We feel that this option will have the least impact and is less costly to deliver.
Electricity North West	Non-confidential	It would be preferable for Elexon to provide the pseudo split of consumption data. As mentioned in the documentation the same RAG arrangements used for other tariffs across each DNO region, which Elexon have had since 5 November 2015 as part of DCP179 being introduced, may be able to be used here.
Elexon	Non-confidential	We await industry views on these options. The use of a new 'Pseudo SSC' in Q5 above suggests that a BSC change will be required regardless of the approach. New P00239 mapping files would also be required to map the Red/Amber/ Green (RAG) times to the new SSC (noting that this will also be required for P339 to facilitate aggregation of HH export volumes). As noted we can see potential benefits in the long run in reducing the size of the D0030. It may be that in the short term additional aggregations are provided at the end of the existing flow in a similar way to the DCP179 changes. If ELEXON is to be asked to provide the split we would request that a clear set of requirements are provided. This includes the data that is to be aggregated and data that is no longer necessary. Any additional splits by RAG or Black/Yellow/Green (BYG) timings will need to be provided in a timely manner. There appear to be options which impact transparency of HH and NHH data depending

		whether separation is retained in the reporting requirements.
Anonymous	Anonymous	No comment
First Utility	Non-confidential	We believe Elexon is best placed to do the profiling. Elexon is an independent party and if they undertake this exercise, it would simplify the process and reduce the rate of any discrepancies.
Good Energy	Non-confidential	We have a strong preference for Elexon to provide the pseudo split of consumption data. This avoids smaller suppliers being potentially disadvantaged by relatively higher costs per customer from modifications to their billing systems and a lack of resources to undertake the relevant work.
Northern Powergrid on behalf of Northern Powergrid (Yorkshire) plc and Northern Powergrid (Northeast) Ltd	Non-confidential	Our preference is for this work to be undertaken by the DNO, for a number of reasons: • This would result in a significant simplification to the existing process by removing the reliance on SSC/TPR combinations. • The process by which 'pseudo' SSC/TPR combinations are provided by the DNO on an email to Elexon is weaker than the standard MDD process whereby valid settlement combinations are available to parties on a data flow. Whilst this was acceptable in the first instance to enable HH aggregate settlement on a small scale, we do not believe this process should be used for settling all NHH and HH aggregate customers. • Under the current process that Elexon utilises for populating HH aggregated data on the D0030, any data that they receive for an LLFC that they haven't received a mapping to a 'pseudo' SSC/TPR combination is not included on the D0030. The likelihood that Elexon receives data for an LLFC for which they haven't been provided a mapping is significantly increased if all data on the D0030 and D0314 is handled in this way, and we are not comfortable with the level of risk this poses for consumption to go 'unbilled'. • We would incur some costs to our billing processes should we continue with Elexon splitting consumption data but will incur no additional cost as a result of splitting the data ourselves.

		However we understand other DNOs may have issues with splitting the data themselves, and so would suggest the working group engage with Elexon on potential improvements to the 'pseudo' SSC/TPR process should this be required.
RWE npower	Non-confidential	Our preference is for Elexon to provide the pseudo split of consumption data to ensure consistent data set and validation provided to all industry parties
Scottish Hydro Electric Power Distribution plc and Southern Electric Power Distribution plc	Non-confidential	Our initial position would be to favour Elexon providing these data. The other option can be accommodated with adaptions to our DUoS Billing system. However, we need to better understand the potential costs and risks associated with both solutions before stating a definitive preference.
Scottish Power Energy Retail Limited	Non-confidential	Our preferred choice would be for Elexon to do the split, as previously carried out for P272/300.
SP Distribution / SP Manweb	Non-confidential	Our billing systems have the capability to provide the pseudo split of consumption data, so this would be our preference.
SSE Supply	Non-confidential	We would prefer Elexon to do this.
The Electricity Network Company Limited	Non-confidential	It would be preferable for Elexon to provide any split of consumption data to parties as it would ensure that there is a uniform approach across the industry and different billing systems (and invoice validation systems) would be in line. Parties who do not have this functionality in their billing systems already should not be disadvantaged by development costs being imposed upon them.

		Should any data or pseudo data be required to be created by Elexon we would like to see that this data is entered into MDD as we have previously faced issues with the move to measurement class F and G on some data flows.
UK Power Networks	Non-confidential	We consider that there is only one viable option, in cost efficiency and speed of implementation terms, and that is for Elexon to undertake this work which would mirror the arrangements put into place for DCP179 and P300; and importantly provide Suppliers with visibility of the 'common' data. Conversely any solution requiring individual Parties to undertake the relevant work on their billing systems would be uneconomical, time consuming, and risks the introduction of localised practices.
Western Power Distribution	Non-confidential	It would be more sensible for this to be done centrally.

Company	**Confidential/ Anonymous**	**7. Which DCUSA Charging Objectives does the CP better facilitate? Please provide supporting comments.** **1. that compliance by each DNO Party with the Charging Methodologies facilitates the discharge by the DNO Party of the obligations imposed on it under the Act and by its Distribution Licence** **2. that compliance by each DNO Party with the Charging Methodologies facilitates competition in the generation and supply of electricity and will not restrict, distort, or prevent competition in the transmission or distribution of electricity or in participation in the operation of an Interconnector (as defined in the Distribution Licences)** **3. that compliance by each DNO Party with the Charging Methodologies results in charges which, so far as is reasonably practicable after taking account of implementation costs, reflect the costs incurred, or reasonably expected to be incurred, by the DNO Party in its Distribution Business** **4. that, so far as is consistent with Clauses 3.2.1 to 3.2.3, the Charging Methodologies, so far as is reasonably practicable, properly take account of developments in each DNO Party's Distribution Business** **5. that compliance by each DNO Party with the Charging Methodologies facilitates 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.**
British Gas	Non-confidential	Not enough detail has been provided on the proposal for us to be able to comment on whether or not the DCUSA objectives are better facilitated.
E.ON	Non-confidential	2 and 3
Ecotricity (The Renewable Energy Company)	Non-confidential	We believe this change would best facilitate objectives 2 and 3. 2 – Would allow greater flexibility in the supply industry to offer time of use tariffs. 3 – Would more accurately represent the actual usage of different parties at different times, therefore, better reflecting the costs incurred.

EDF Energy	Non-confidential	DCUSA Charging Objective 3
Electricity North West	Non-confidential	In line with the working groups assessment we believe this change better facilitates Charging Objectives 2 and 3.
Elexon	Non-confidential	DCUSA Charging objectives 2 and 3.
Anonymous	Anonymous	No comment
First Utility	Non-confidential	The DCUSA Charging Objective best supported by this CP is number 3 given the improvements to cost reflectivity of the charging methodology that will be made.
Good Energy	Non-confidential	We consider that DCP 268 better facilities DCUSA Charging Objectives 2 & 3 for the reasons set out in Section 9 of the consultation. We believe the wider use of time of day charging to be important for the development by suppliers of innovative tariffs which will facilitate competition in electricity supply. Competition will also be facilitated by the simplification of DUoS billing arrangements and the reduction in the number of DUoS charging categories resulting from DCP 268 which eases the administrative burden on suppliers.
Northern Powergrid on behalf of Northern Powergrid (Yorkshire) plc and Northern Powergrid (Northeast) Ltd	Non-confidential	We feel the proposal better facilitates: • Charging Objective 2 as the wider use of time band pricing will make DUoS pricing more transparent, which will influence suppliers to respond to the cost signals, which we believe is a positive development. That said, if suppliers believe that this is not a positive step, they will be able to continue with the status quo, as the new tariffs should result in the same total DUoS charge for the average customer for the majority of tariffs; and • Charging Objective 3 as use of the specific DNO time bands more accurately reflect the costs of using the distribution network.

RWE npower	Non-confidential	We agree with summary provided by the working group in the consultation documentation - that DCP 268 better facilities DCUSA Charging Objectives 2 and 3. We consider that the proposal better facilitates charging objective 2 with the provision of appropriate cost signals to encourage efficient use of the distribution system. We consider that the proposal better facilitates charging objective 3 as it can be considered to more cost reflectively allocate costs.
Scottish Hydro Electric Power Distribution plc and Southern Electric Power Distribution plc	Non-confidential	We agree with the Proposer's assertion that DCUSA Charging Objectives 2 and 3 would be better facilitated by the implementation of this CP.
Scottish Power Energy Retail Limited	Non-confidential	Agree with objectives selected by WG.
SP Distribution / SP Manweb	Non-confidential	Charging objective two and three, for the reasons outlined in the consultation document.
SSE Supply	Non-confidential	It can be argued that the in the long term Objective 3 is better facilitated because the new prices are more cost reflective. It could also be argued that the impact on Off Peak and Heating tariffs may have a negative impact on customers because of the significant increases in their prices.
The Electricity Network Company Limited	Non-confidential	We do not believe that this change better facilitates any of the relevant charging objectives. We note that in the consultation document the working group have asserted that charging objective 2 is better facilitated. However, we remain unconvinced that this is the case as customers will not be able to respond to pricing signals if they are billed based on profiled data. This does not encourage users to increase their off peak consumption nor does it encourage them to reduced their peak

		consumption. Whilst a greater visibility among suppliers (and possibly users) will allow a broader understanding of the time based charging bands we do not believe that this will benefit consumers or distributors until such time as real consumption data can be used in settlement and billing. We do not agree with the working group's comment that this change proposal will better facilitate the third charging objective. We not do see how this change proposal will increase cost reflectivity as it allocates a time band charge not based on actual data. Consumers who use the system at different times will not be charged different prices to use of system and so there can not be considered to be any increase in cost reflectivity in these charges.
UK Power Networks	Non-confidential	We believe that charging objective three is better facilitated by this change as the costs of using the network will not be smeared, but based upon each Suppliers portfolio of customers.
Western Power Distribution	Non-confidential	WPD remains undecided on whether this Change proposal better facilitates any of the charging objectives.

Company	**Confidential/ Anonymous**	**8. It is proposed that DCP 268 be implemented on the 01 April 2018. Do you agree with this approach?**
British Gas	Non-confidential	At this stage we do not consider that sufficient information has been presented for us, or the industry, to understand the detail of the proposals and the impacts on systems and customers in order for us to conclude what an appropriate implementation date should be.
E.ON	Non-confidential	We see no problem with the timescales in question if system changes could be achieved. However, consistency in setting parameters to minimise cost disturbance is key. This is because DuOS charging is currently set 2 years in advance, There may be a disturbance in costs as a different set of data was used to set these costs, so consistency across NHH and HH is needed to avoid cost disturbance. This should be considered before this change is implemented.
Ecotricity (The Renewable	Non-confidential	This makes sense us as it would be the next round of DUoS charges to be released. However, if timelines in approving this Change proposal become tight, giving us little notice of the change, it may adversely affect our ability to update our customer tariffs.

Energy Company)		
EDF Energy	Non-confidential	We agree that 01 April 2018 is the earliest date for implementation but should the Authority determination to implement be given after DUoS tariffs have been published for the 2018/19 charging year then this should move to implementation from 01 April 2019.
Electricity North West	Non-confidential	Yes.
Elexon	Non-confidential	We believe that the proposed implementation date is achievable, noting the large amount of industry change at the present time. It is likely that BSC Modification P339 will be implemented before the end of 2017. This Modification will enable the aggregation required for HH export volumes.
Anonymous	Anonymous	No. This gives suppliers less than 6 months (Since charges will be published for April 18 and beyond in December 16) to make changes to systems/process that quote DUoS charges beyond April 18. With other concurrent regulatory changes such as Project Nexus and faster switching also needing to happen, it's important that implementation dates consider the impacts this will have on these changes too. We propose an implementation date of 01 April 2019 to give suppliers the opportunity to manage all of the changes successfully. Plus suppliers may have created contracts where DUoS costs are fixed on a NHH basis beyond April 18 and experience friction if DUoS is settled on a HH basis thereafter.
First Utility	Non-confidential	Yes. Although a delay would help address the issues we highlight under question 10, as long as industry is provided with at least 15 months notice, then we can work to this timeframe.
Good Energy	Non-confidential	Yes
Northern Powergrid on behalf of Northern Powergrid (Yorkshire) plc and Northern	Non-confidential	We agree with the proposed implementation date.

Powergrid (Northeast) Ltd		
RWE npower	Non-confidential	Implementation date of April 2018 is an appropriate date for this change proposal
Scottish Hydro Electric Power Distribution plc and Southern Electric Power Distribution plc	Non-confidential	No. The tariffs for 2018/19 will be set in December 2016; we do not think that this allows sufficient time for us to amend our forecasting models to facilitate reasonable consumption input data for CDCM table 1053. We would prefer DCP268 to be implemented on 1st April 2019.
Scottish Power Energy Retail Limited	Non-confidential	We agree with the proposed April 2018 implementation date.
SP Distribution / SP Manweb	Non-confidential	Yes we agree with the implementation date.
SSE Supply	Non-confidential	No. It should be implemented on the same date as mandatory Half Hourly settlement for Profiles 1-4. Also: Is the implementation of this DCP dependent on Ofgem mandating HH Settlement?
The Electricity Network Company Limited	Non-confidential	We would have some concerns with the implementation of this change proposal on a single date as it stands. We might rather see a phased approach to implementation whereby customers are migrated over a period of time until the older tariffs are removed. This preference is predicated on the fact that changes that may need to be made to industry data such as LLFC etc. This is discussed further in our answer to question 10.

UK Power Networks	Non-confidential	Yes
Western Power Distribution	Non-confidential	This is a fundamental change. Can it be achieved in the short space of time as DNO's are setting prices in December 16 for April 18.

Company	**Confidential/ Anonymous**	**9. Are you aware of any wider industry developments that may impact upon or be impacted by this CP?**
British Gas	Non-confidential	We note that Citizens Advice has recently published a report on 'Tackling Tariff Design - managing the tariff transition'. Link here: https://www.citizensadvice.org.uk/about-us/policy/policy-research-topics/energy-policy-research-and-consultation-responses/energy-policy-research/tackling-tariff-design-the-tariff-transition/ We believe the working group should consider this report.
E.ON	Non-confidential	Eventual HH settlement of profile classes 1-4, precursor in P272 and associated stumbling blocks.
Ecotricity (The Renewable Energy Company)	Non-confidential	No Comment.
EDF Energy	Non-confidential	No but this CP should be considered with the requirement for a CP to be raised to remove 'LV Medium Non-Domestic', 'LV Sub Medium Non-Domestic' and 'HV Sub Medium Non-Domestic' tariff types from the CDCM by the date of implementation.
Electricity North West	Non-confidential	None that we are aware of.
Elexon	Non-confidential	None, other than those that have been identified in the Change Proposal.
Anonymous	Anonymous	No

First Utility	Non-confidential	As highlighted in the DCP 268 consultation, significant drivers for this mod have been the CMA's and Ofgem's support for a move to half-hourly settlement which in turn is based upon the rollout of smart meters. As the rollout progresses, so will the driver for suppliers to elect HHS and help the industry in its implementation as the move to mandatory HHS comes closer.
Good Energy	Non-confidential	We are not aware of any wider industry developments that may impact upon or be impacted by the CP other than those mentioned in the consultation.
Northern Powergrid on behalf of Northern Powergrid (Yorkshire) plc and Northern Powergrid (Northeast) Ltd	Non-confidential	DCP 270 has some links to this CP (which has recently been raised) given that it is looking to remove tariffs. The removal of tariffs by DCP 270 should be reflected in this CP also should DCP 270 be progressed more quickly than this change. The advent of smart meters will revolutionise the methods to track and bill for electricity consumption. Assumed standard consumption patterns (NHH profiles) are expected to be replaced with half hourly metering and settlement. This CP is a step we can take now with NHH billing to prepare for this future direction, improve cost reflectivity and make the transition more straightforward in the future.
RWE npower	Non-confidential	None other than already identified by working group
Scottish Hydro Electric Power Distribution plc and Southern Electric Power Distribution plc	Non-confidential	No – P272 et al has been incorporated in DCP268.
Scottish Power Energy Retail Limited	Non-confidential	No

SP Distribution / SP Manweb	Non-confidential	We are not aware of any wider industry development that may impact upon or by impacted by this CP.
SSE Supply	Non-confidential	We need to be certain that Smart Meters can cope with Off Peak and Heating tariffs before embarking on a restructuring of their prices We are particularly concerned about Heating tariffs that rely on Radio Tele switching which is due to be abandoned in the near future. We believe that the Radio Tele switching situation should be resolved before implementing this Change Proposal, as it is difficult to see how the new DUoS billing could work for these customers due to the lack of supporting data flows. We have several thousand customers in this situation. We also note that there are questions outstanding over the suitability of Smart Meters for Off Peak and Heating tariffs in general. Also: What are the alternative arrangements for this DCP in areas where Smart comms may not be available due to signal issues or where customers refuse to have a smart meter? We are concerned about the IT implications of using profiled data to settle "pseudo half hourly DUoS billing" in this situation.
The Electricity Network Company Limited	Non-confidential	We are not aware of any current industry developments that would impact on this change.
UK Power Networks	Non-confidential	This would assist and minimise the impact of mandatory HH Settlement which Ofgem is looking to introduce from a date after 2018.
Western Power Distribution	Non-confidential	WPD have sent letters out to all their LV Medium Non Domestic, LV Sub Medium Non Domestic and HV Medium Non Domestic CT customers agreeing a deemed chargeable capacity for the migration caused by DCP179. This consultation suggests that for the remainder of DCP179 customers that haven't moved WPD should set the capacity at an arbitrary 71KVA. This would be wrong to do so, given they already have calculated MICs.

Company	Confidential/ Anonymous	10. Are there any alternative solutions or unintended consequences that should be considered by the Working Group?
British Gas	Non-confidential	We need further details on the proposals to be able to comment on this.
E.ON	Non-confidential	No comment
Ecotricity (The Renewable Energy Company)	Non-confidential	Suppliers may only move accounts to being HH settled if their usage patterns mean a lower DUoS bill. As this is the case, a forced method of conversion should be considered.
EDF Energy	Non-confidential	Not that we are aware of.
Electricity North West	Non-confidential	None that we are aware of.
Elexon	Non-confidential	I refer you to the comments on non-traditional business models in Question 4.
Anonymous	Anonymous	The information presented in this modification only briefly touches on how the impacts of a mid-year transition will be minimised for DUoS charging. Have other costs such as TNUoS been considered by the industry? A number of market participants have demonstrated that they are already having difficulties with the P272 transition. Is the industry making any changes or looking at ways to ensure that those difficulties are being tackled ahead of approving modifications that support the PC 1-4 transition?
First Utility	Non-confidential	Within the DCP 268 consultation, the working group is said to have established that only medium non-domestic tariffs will see a significant change and increase. Whilst it is true that for domestic customers, in aggregate, the level of charging should be equal to that under the old regime, First Utility customers are not reflective of the market average. As a result, we will likely see some negative cost impact given the higher levels of individual consumption and that charges are based only on unit rates. This is a particular issue where we already have customers signed up to fixed contracts up to April 2019. Given the absence of any fixed charges, the reliance on unit rates may lead to more frequent

		instances of under and over recovery. This will lead to greater volatility in pricing, although somewhat mitigated by the 15 month notice period. Overall, we welcome this proposal, but would urge as much early warning as possible. Normally charges are announced close to Christmas Eve, so if there are going to be changes to the CDCM model, then having early visibility of these would be very helpful. Given the Annual Review Packs corresponding with the CDCM model are published at the end of the year, a potential solution could be to publish earlier versions on an indicative basis.
Good Energy	Non-confidential	We are not aware of any alternative solutions (other than set out in response to Q4) or unintended consequences that should be considered by the Working Group.
Northern Powergrid on behalf of Northern Powergrid (Yorkshire) plc and Northern Powergrid (Northeast) Ltd	Non-confidential	This change will increase the proportion of DNO revenue which is recovered from the red time band. This could cause issues if, in the future, time of use supply tariffs become widespread for end customers. If a large number of customers were to respond in the short term to such time of use tariffs by moving load away from the DNO red time band, this could lead to significant under-recovery as the change would likely occur in the period between DNO charges being set and coming into force. The increased variability of DNO revenue could lead to higher correction factor in future years. The potential impact of this will be quantifiable once an impact assessment is produced; at present we believe the benefits of the change outweigh this potential issue.
RWE npower	Non-confidential	None that we are aware of at this time
Scottish Hydro Electric Power Distribution plc and Southern Electric Power Distribution plc	Non-confidential	Not that we are aware of.

Scottish Power Energy Retail Limited	Non-confidential	No
SP Distribution / SP Manweb	Non-confidential	None that we are aware of.
SSE Supply	Non-confidential	Off Peak and Heating tariff customers will see an increase of up to 1.4 p/kWh in their charges (The 1.4 p/kWh increase applies in the Sweb E10 peak period). This is not fair on customers, and is particularly inappropriate for a change that is “enabling” in nature and does not provide any immediate benefit for the customers. The increases could render the customers’ heating equipment economically unviable, which is of particular concern given many of these customers may not have a heating alternative and is of even greater significance where consumer vulnerability is identified. It’s disappointing that the consultation does not provide examples of the increases involved when they are so substantial. Before approving the change Ofgem need to consider how the industry should advise customers on the increases in their heating tariff prices.
The Electricity Network Company Limited	Non-confidential	We believe that the working group need to consider the impacts that this change proposal may have on Elexon. It should be noted that for P272 and the associated changes Elexon required a new set of LLFCs to be created for each Distributor party that would be used for customers who migrated to measurement classes F and G. We would like clarification as to whether this would also be required for all customers to be moved to aggregate billing. This would be a considerable piece of work and if this is the case then we would much prefer to see a phased implementation to this change proposal.
UK Power Networks	Non-confidential	No
Western Power Distribution	Non-confidential	We accept that all 5-8 customers should have migrated to E/C or G however the paper states that these tariffs should be mapped to the relevant HH tariff.

		However if the stragglers are still p/c 5-8 how can we charge a HH tariff with ASC etc. within Super customer , the consumption will still come through on the D0030, we will not receive D0036 HH data . We can't even change the LLF to M/C G as they will still be registered p/c 5-8 & not 0 (HH)