DCP 268 CONSULTATION RESPONSE FORM

To: Claire Hynes
Email: DCUSA@electralink.co.uk
Response Deadline: 08 June 2016

Name:	Kevin Spencer
Organisation:	ELEXON
Role:	Code Administrator
Email address:	Kevin.Spencer@elexon.co.uk
Phone number:	020 7380 4115
Response[1]:	Non-confidential

1. Do you understand the intent of DCP 268?

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.

2. Are you supportive of the principles of DCP 268?

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

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Anonymous responses will omit the detail of the submitting party but the content of the response will be provided to the Working Group and published on the DCUSA website.

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Domain Data.

3. Do you have any comments on the proposed legal text?
None

4. Please provide your views on the proposed mapping of tariffs set out in Attachment 4?
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).

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?
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.

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?
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.

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.**

DCUSA Charging objectives 2 and 3.

8. It is proposed that DCP 268 be implemented on the 01 April 2018. Do you agree with this approach?

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.

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

None, other than those that have been identified in the Change Proposal.

10. Are there any alternative solutions or unintended consequences that should be considered by the Working Group?
I refer you to the comments on non-traditional business models in Question 4.