DCP 282 'Embedded Distribution Network Operator (EDNO) UMSO

To: Claire Hynes
Email: DCUSA@electralink.co.uk
Response Deadline: 13 January 2017

Name:	Kevin Spencer
Organisation:	ELEXON
Role:	BSC 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 282?
Yes, we understand the intent of this DCP. This DCP does not affect the accuracy of Settlement. There should be no change to the incentives to have accurate inventories so as to ensure we have correct settlement of UMS, e.g. no UMS connections missing or double accounted for due to the change in responsibility from this DCP.

2. Are you supportive of the principles of DCP 282?
ELEXON believe the proposed approach will benefit UMS customers and resolve issues that EDNOs have with unmetered supplies, e.g. customer issues with having to have multiple MPANs to accommodate UMS on EDNO connections.

3. Do the rights and obligations created between DNO and Suppliers under Section 2A hinder the solution and need to be changed to facilitate the proposed solution of this CP? If yes, please indicate why and what needs to be changed.
No comment.

[1] All responses will be treated as non-confidential unless indicated otherwise.

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.

Confidential responses will not be published on the DCUSA website but submitted solely to the Working Group for the analysis of the CP. For all other confidentiality requirements please contact the secretariat at DCUSA @electralink.co.uk or 0207 7432 3017

4. The Working Group are interested in Parties views on whether you believe that the DNO is recovering the revenue on behalf of the EDNO? (a) If yes, how should this be dealt with in the price control? (b) If yes, should it be dealt with through inter-distributor billing?
No comment.

5. Do you prefer for this solution to be elective or mandatory for all Unmetered Customers? Please provide supporting evidence.
No comment.

6. Do you agree that the EDNO should be responsible for validating their data within a combined inventory?
Yes, we believe this should still be the responsibility of the EDNO.

7. Should there be Service Level Agreements (SLAs) in place for EDNOs to verify the content of the customer inventory submissions?
No comment.

8. If you believe, under the proposal, the DNO would be recovering DUoS on behalf of the EDNO do you have any thoughts on debt recovery?
No comment.

9. Parties are asked whether they perceive a risk of a supplier default and if so how it should be dealt with?
No comment.

10. Should this DCP introduce a mechanism for passing DUoS between the DNO and the EDNO?
No comment.

11. Do Parties believe the introduction of the proposal can be achieved without impacting any existing BCAs?
No comment.

12. In light of the advice provided by Elexon (see attachment 5), do you believe that a BSC and or BSCP change needs to be made? If yes, please specify the change required.
As set in attachment 5 we believe no BSC changes are required to implement these proposals. If a BSC party identifies a changes and wishes to raise it we will progress it through our usual change processes. From both a customer, Settlement and Supplier viewpoint the end result is identical and no BSC process will require amendment to facilitate adding inventory items to the host DNO MPAN(s).

13. Does the legal text as drafted meet the intent of the change?
No comment.

14. Do you have any comments on the proposed legal text?
No comment.

15. Would there be any system impacts or process changes required to implement this proposal? Please provide your rationale inclusive of any financial, resource or system impact or restriction.
No impact on ELEXON systems under the BSC.

16. Which DCUSA General Objectives does the CP better facilitate? Please provide supporting comments. **1 The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks** **2 The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent therewith) the promotion of such competition in the sale, distribution and purchase of electricity** **3 The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences** **4 The promotion of efficiency in the implementation and administration of this Agreement** **5 Compliance with the Regulation on Cross-Border Exchange in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.**
We believe objectives 1 and 2 are better facilitated as the process is more efficient and effective.

17. Do you require any lead time from the approval being made to comply with this change?
No

18. Are you aware of any wider industry developments that may impact upon or be impacted by this CP?
No

19. Are there any alternative solutions or unintended consequences that should be considered by the Working Group?
No.