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RWE npower's support for a proposal to increase significantly the notification period for changes to distribution use of system charges

Dear Bethany

As Ofgem will be aware, npower have been supportive of improved transparency and predictability of Network Charges for a number of years now. Regulated charges should, by their very nature, be more predictable, particularly since the revenue that Network Operators can collect through tariffs is known for an 8 year period. Yet Distribution Use of System (DUoS) Charges are probably one of the least predictable charges that suppliers and customers face. This therefore introduces considerable risk to market participants and many customers, given the size of these charges (circa 16% of a customer's bill) and that all parties paying DUoS are "price-takers" with no opportunity to mitigate price impacts.

There are 3 main sources of uncertainty within DUoS charges:

- The changeable nature of Revenues that DNOs need to recover
- The changes year on year in model inputs (e.g. usage / other inputs allocated per tariff)
- Changes to the charging methodology itself

Recently, there have been some positive decisions by Ofgem to reduce down the volatility of some of the charging model inputs (e.g. many of the inputs need 15 months notice if a DNO wishes to change them). In addition, the Ofgem Volatility Decision Document approved further lagging of incentive schemes and k-factors in order to give market participants more notice of revenue changes. While these improvements will give suppliers better insight into those particular data item changes, they do not go far enough to provide certainty for suppliers and customers around the charges they will need to pay. Changes in other model inputs (e.g. demand), changes in revenues and charging model algorithms which are not covered by the above still leave considerable uncertainty around charges. Customers and suppliers are therefore having to manage the resulting risk associated with volatility and unpredictability of DUoS charges. This results in an overall cost to consumers.

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Benefits of this Change

- Customers on pass through DUoS contracts (often, but not restricted to larger customers) bear the risk around DUoS charging volatility. Currently they do not have certainty of tariffs until circa 20th February for the charging year April – March (40 days notice). Over the last 4 years, since the implementation of CDCM and EDCM, many customers have seen large changes in the prices they pay. While DCP178 does not remove the volatility between tariff changes, it does provide consumers much more notice of what their prices will be. This additional forecast and budgetary certainty clearly assists customers in planning, expenditure and financing decisions
- Many customers agree 'fixed price' or 'non-pass through' contracts where the DUoS charge component is incorporated into the overall rates that the customer sees on their invoice. At a time of increased pressure on suppliers to reduce costs going into customer bills, this modification has very clear benefits through the reduction of the need to apply a risk premium for long periods of the contract.
- When pricing a non-pass through DUoS contract, Suppliers must forecast DUoS tariffs for when published tariffs are not yet known.
 - Under the current arrangements, if a supplier is pricing a customer in late Feb 2015 for an April15–March17 contract, indicative DUoS prices for April15-March 16 will be known, but suppliers will need to use their own forecast for April16-March17 (12 months of forecast data required). Under DCP178, DUoS prices would be known for the whole period (no forecast data required).
 - Under the current arrangements, if a supplier is pricing a customer in October 2015 for an October15 – September17 contract, final DUoS prices for October15-March16 will be known, but suppliers will need to use their own forecast for April 16-September17 (18 months of forecast data required). Under DCP178 the situation is improved as DUoS prices would be known for October 15-March 17 (only 6months of forecast data required) reducing the uncertainty and potential volatility of industry costs to the supplier and therefore the overall risk premia charged within the contract.
- Suppliers, faced with uncertainty of having to use DUoS forecasts, will apply risk to cover for uncertainty in out-turn DUoS costs. Irrespective of whether suppliers over or under forecast DUoS charges, this need for risk premium means that the DUoS cost stack is likely to be larger than it would have been were tariffs known. Under DCP178, the requirement to apply risk premia to DUoS costs is removed over that period since prices are known. This will result in a benefit to customers and prices will be more cost reflective of the actual DUoS costs that will be incurred.
- This reduced risk around DUoS charges may also allow suppliers to provide customers with a wider range of tariffs over longer timeframes (subject to other market factors) as it will reduce the risk to both the supplier and the customer.



Quantification of Benefits

To demonstrate the potential variability between forecast DUoS costs and actuals – and therefore the underlying variability in the DUoS cost stack used for pricing purposes – we would like to illustrate, using published industry data, how the information available to suppliers at the time of forecasting DUoS tariffs for pricing can vary to outturn. This will help to illustrate the issues faced by suppliers when forecasting tariffs and give an overview of the range of underlying risks using historical data.

Example

A supplier is forecasting DUoS tariffs in early Feb 2012 for a 2 year contract – April12 to March14.

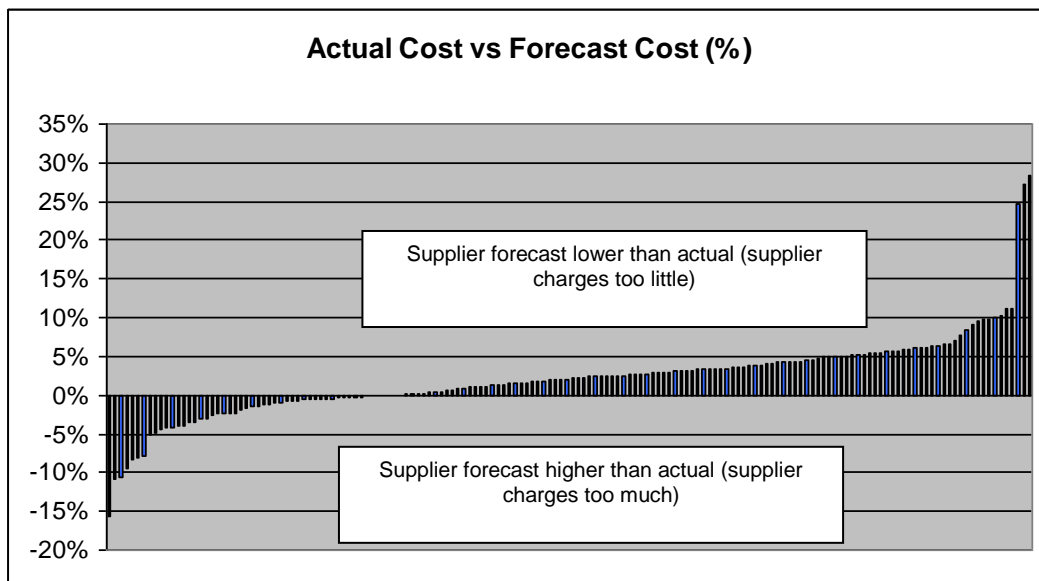
- Indicative DUoS tariffs are available to suppliers for April12 to March13 (Note: these may or may not change at final tariff publication circa 20th February).
- The supplier must therefore forecast April 2013 – March 2014 DUoS charges. **For illustration, we have taken the published DNO tariffs in the annual review packs. At that point in time, this could be assumed to be the best available market forecast.**
- For ease of comparison, we have assumed volumes / capacity (if applicable) for each tariff based on average CDCM model inputs in the ENWL area in order to calculate an average forecast cost for each tariff (£/average customer) over the contract period
- We have excluded some LV Sub Medium Non-Domestic and HV Medium Non-Domestic tariffs which did not have 2012/13 indicatives and also UMS from the analysis.
- These forecast costs were then compared to the actual final data that came through in Feb 2012 and Feb 2013 respectively.

The Results

The results are shown in **Appendix 1**.

Using indicative tariffs for 2012/13 and the DNO forecast data from the annual review pack as their forecast for 13/14, suppliers would have forecast less than outturn on 111 of the 162 tariffs shown here. 51 tariffs would have been forecasting higher than outturn.

The range of error is shown in the below - 16% over-forecast of the DUoS cost stack to 28% under-forecast by using this methodology).



Conclusion

At the time of forecasting DUoS tariffs, if a supplier had simply used the Indicative Tariffs for 2012/13 and DNOs Annual Review Pack Forecasts, they would have under-forecast DUoS costs going into the cost stack on two thirds of the tariffs. However, at the time of forecasting, the supplier is using the best information available – and knows there is a risk that they may be under-forecasting. Risk premia is therefore required to cover costs should charges change unfavourably.

If the supplier applies too much risk or outturn is lower than expected, the customer will be paying more for the DUoS component of their contract than is necessary; conversely, the supplier will lose money if they do not allow for the cost to be higher than the ARP forecast. DCP178 avoids this situation since DUoS charges will be known for the entire period and can accurately be reflected in consumer contracts. Clearly this reduction in risk is beneficial to both customers and suppliers since it provides certainty of costs and budgets.

Views From Our Customers

We have engaged with our customers to seek their views on the benefits (or otherwise) of DCP178. The vast majority have been very positive regarding the need to have the certainty of DUoS charges provided by DCP178.

On 6th March, we held a webinar, in conjunction with Andy Jenkins from Northern Powergrid, to discuss how DUoS charges were derived. This also provided a discussion of DCP178. The webinar was well represented with 111 attendees – including customers, consultants and industry experts. We asked attendees to provide their views on DCP178 (see Appendix 2).



The results of the webinar voting were as follows:

- 89% (80/90) respondents said they would see a benefit from DCP178 (split reasonably equally between increased budgetary certainty, more predictability of tariffs and more transparency of costs
- 3% (3/90) respondents said they would see no benefit
- 8% (7/90) respondents were not sure

Next Steps

Given the above benefits to customers and suppliers and the wide support from consumers of the change we would urge Ofgem to implement DCP178. Please feel free to contact me if you require any further clarification on the analysis contained within this document.

Kind regards.

Jonathan Wisdom
(sent via email so unsigned)

APPENDIX 1 **power**

FORECASTING DUOS TARIFFS IN EARLY FEB 2012 FOR A 2 YEAR CONTRACT – APR12 TO MAR14 USING ARP DATA

DNO	Tariff	Costs using Indic 12/13 tariffs	Costs using 13/14 ARP Forecasts	Total Cost expected Jan 12	Actual 12/13 cost	Actual 13/14 cost	Actual total Cost	Diff / £ per av cust Actual-Forecast	Diff % of actual	
MIDE	Domestic Unrestricted	84.68	86.18	170.86	85.49	95.04	180.54	9.68	5.7%	actual cost higher than ARP forecast
MIDE	Domestic Two Rate	88.57	90.17	178.74	89.49	94.72	184.21	5.47	3.1%	actual cost higher than ARP forecast
MIDE	Domestic Off Peak (related MPAN)	9.96	10.17	20.13	10.01	10.59	20.60	0.47	2.4%	actual cost higher than ARP forecast
MIDE	Small Non Domestic Unrestricted	232.12	236.27	468.39	234.69	234.32	469.02	0.63	0.1%	actual cost higher than ARP forecast
MIDE	Small Non Domestic Two Rate	300.54	305.91	606.45	303.81	311.44	615.25	8.80	1.5%	actual cost higher than ARP forecast
MIDE	Small Non Domestic Off Peak (related MPAN)	44.78	45.50	90.27	45.06	45.06	90.13	-0.14	-0.2%	actual cost less than ARP forecast
MIDE	LV Medium Non-Domestic	1341.53	1365.97	2707.50	1356.58	1493.67	2850.25	142.74	5.3%	actual cost higher than ARP forecast
MIDE	LV Sub Medium Non-Domestic	1454.22	1472.83	2927.06	1472.91	2174.80	3647.72	720.86	24.6%	actual cost higher than ARP forecast
MIDE	HV Medium Non-Domestic	2383.18	2423.12	4806.29	2414.95	2879.74	5294.69	488.40	10.2%	actual cost higher than ARP forecast
MIDE	LV HH Metered	9048.68	9221.08	18269.76	9140.76	9901.56	19042.32	772.56	4.2%	actual cost higher than ARP forecast
MIDE	LV Sub HH Metered	22688.48	23099.29	45787.76	22941.71	23545.51	46487.22	699.46	1.5%	actual cost higher than ARP forecast
MIDE	HV HH Metered	46462.59	47283.69	93746.28	47001.94	51556.27	98558.20	4811.92	5.1%	actual cost higher than ARP forecast
NEEB	Domestic Unrestricted	93.88	102.44	196.32	93.88	103.66	197.54	1.22	0.6%	actual cost higher than ARP forecast
NEEB	Domestic Two Rate	98.13	107.50	205.63	98.13	109.29	207.43	1.79	0.9%	actual cost higher than ARP forecast
NEEB	Domestic Off Peak (related MPAN)	17.39	20.28	37.67	17.39	18.76	36.14	-1.53	-4.1%	actual cost less than ARP forecast
NEEB	Small Non Domestic Unrestricted	276.31	313.83	590.14	276.31	299.86	576.17	-13.97	-2.4%	actual cost less than ARP forecast
NEEB	Small Non Domestic Two Rate	400.57	458.18	858.75	400.57	428.73	829.31	-29.44	-3.4%	actual cost less than ARP forecast
NEEB	Small Non Domestic Off Peak (related MPAN)	54.42	63.06	117.48	54.42	60.32	114.75	-2.74	-2.3%	actual cost less than ARP forecast
NEEB	LV Medium Non-Domestic	1458.74	1649.79	3108.53	1458.74	1556.10	3014.84	-93.69	-3.0%	actual cost less than ARP forecast
NEEB	LV Sub Medium Non-Domestic	2249.69	2477.79	4727.48	2249.69	2679.10	4928.79	201.31	4.3%	actual cost higher than ARP forecast
NEEB	HV Medium Non-Domestic	2931.06	3307.17	6238.22	2931.06	3237.63	6168.69	-69.53	-1.1%	actual cost less than ARP forecast
NEEB	LV HH Metered	8698.71	9644.76	18343.47	8698.71	9720.70	18419.41	75.95	0.4%	actual cost higher than ARP forecast
NEEB	LV Sub HH Metered	20492.87	22509.17	43002.03	20492.87	23256.62	43748.49	746.46	1.7%	actual cost higher than ARP forecast
NEEB	HV HH Metered	43060.92	48657.01	91717.93	43060.92	48527.90	91588.82	-129.11	-0.1%	actual cost less than ARP forecast
NORW	Domestic Unrestricted	101.95	105.44	207.39	102.24	114.91	217.15	9.76	4.7%	actual cost higher than ARP forecast
NORW	Domestic Two Rate	104.38	107.96	212.34	104.58	109.38	213.96	1.61	0.8%	actual cost higher than ARP forecast
NORW	Domestic Off Peak (related MPAN)	13.12	13.54	26.66	13.22	16.02	29.24	2.58	9.7%	actual cost higher than ARP forecast
NORW	Small Non Domestic Unrestricted	265.97	272.99	538.95	264.51	308.57	573.08	34.13	6.3%	actual cost higher than ARP forecast
NORW	Small Non Domestic Two Rate	343.87	353.16	697.03	342.01	382.84	724.84	27.81	4.0%	actual cost higher than ARP forecast
NORW	Small Non Domestic Off Peak (related MPAN)	32.11	33.11	65.22	32.25	36.28	68.53	3.31	5.1%	actual cost higher than ARP forecast
NORW	LV Medium Non-Domestic	1459.85	1494.91	2954.76	1454.61	1781.83	3236.44	281.67	9.5%	actual cost higher than ARP forecast
NORW	LV Sub Medium Non-Domestic	2164.86	2249.99	4414.85	2152.68	2666.39	4819.07	404.23	9.2%	actual cost higher than ARP forecast
NORW	HV Medium Non-Domestic	2542.32	2653.96	5196.27	2527.12	3252.37	5779.49	583.22	11.2%	actual cost higher than ARP forecast
NORW	LV HH Metered	10306.57	10587.73	20894.29	10265.42	12714.90	22980.32	2086.02	10.0%	actual cost higher than ARP forecast
NORW	LV Sub HH Metered	26758.07	27661.84	54419.91	26423.05	31176.43	57599.48	3179.58	5.8%	actual cost higher than ARP forecast
NORW	HV HH Metered	55520.97	57302.16	112823.13	54327.52	64601.58	118929.09	6105.96	5.4%	actual cost higher than ARP forecast
SEEB	Domestic Unrestricted	84.25	91.55	175.80	84.32	95.94	180.26	4.46	2.5%	actual cost higher than ARP forecast
SEEB	Domestic Two Rate	91.81	99.81	191.62	91.90	103.67	195.57	3.96	2.1%	actual cost higher than ARP forecast
SEEB	Domestic Off Peak (related MPAN)	18.97	20.60	39.57	18.97	22.71	41.67	2.11	5.3%	actual cost higher than ARP forecast
SEEB	Small Non Domestic Unrestricted	200.92	218.85	419.77	201.17	214.20	415.37	-4.40	-1.0%	actual cost less than ARP forecast
SEEB	Small Non Domestic Two Rate	238.09	259.31	497.40	238.36	268.84	507.20	9.80	2.0%	actual cost higher than ARP forecast
SEEB	Small Non Domestic Off Peak (related MPAN)	39.59	42.90	82.50	39.59	44.92	84.51	2.02	2.4%	actual cost higher than ARP forecast
SEEB	LV Medium Non-Domestic	1143.12	1244.72	2387.84	1144.49	1319.38	2463.87	76.03	3.2%	actual cost higher than ARP forecast
SEEB	LV HH Metered	8548.91	9274.92	17823.83	8555.94	9956.62	18512.56	688.73	3.9%	actual cost higher than ARP forecast
SEEB	LV Sub HH Metered	23231.55	25210.82	48442.37	23254.49	26939.74	50194.23	1751.86	3.6%	actual cost higher than ARP forecast
SEEB	HV HH Metered	45660.48	49817.32	95477.80	45718.33	49743.25	95461.58	-16.22	0.0%	actual cost less than ARP forecast
SOUT	Domestic Unrestricted	87.75	94.49	182.24	91.58	95.74	187.33	5.08	2.8%	actual cost higher than ARP forecast
SOUT	Domestic Two Rate	80.82	89.45	170.27	86.61	89.57	176.18	5.91	3.5%	actual cost higher than ARP forecast
SOUT	Domestic Off Peak (related MPAN)	14.59	14.17	28.77	13.96	13.38	27.34	-1.42	-4.9%	actual cost less than ARP forecast
SOUT	Small Non Domestic Unrestricted	223.95	245.65	469.60	237.72	223.29	461.01	-8.59	-1.8%	actual cost less than ARP forecast
SOUT	Small Non Domestic Two Rate	344.83	377.16	721.98	365.25	357.68	722.93	0.94	0.1%	actual cost higher than ARP forecast
SOUT	Small Non Domestic Off Peak (related MPAN)	37.86	38.58	76.45	37.58	38.73	76.31	-0.14	-0.2%	actual cost less than ARP forecast
SOUT	LV Medium Non-Domestic	1221.90	1320.92	2542.82	1279.37	1288.63	2568.00	25.18	1.0%	actual cost higher than ARP forecast
SOUT	LV Sub Medium Non-Domestic	1416.54	1532.99	2949.53	1479.17	1380.27	2859.44	-90.09	-3.1%	actual cost less than ARP forecast
SOUT	HV Medium Non-Domestic	2513.31	2818.74	5332.05	2727.24	4113.70	6840.94	1508.90	28.3%	actual cost higher than ARP forecast
SOUT	LV HH Metered	10366.79	11153.53	21510.32	10796.43	10798.62	21595.05	84.73	0.4%	actual cost higher than ARP forecast
SOUT	LV Sub HH Metered	25465.68	27139.56	52605.24	26292.72	24097.10	50389.82	-2215.42	-4.2%	actual cost less than ARP forecast
SOUT	HV HH Metered	68582.53	63061.07	131643.60	60972.22	60092.42	121064.64	-10578.96	-8.0%	actual cost less than ARP forecast



		Costs using	Costs using	Total Cost		Actual	Actual	Actual		Diff / £ per av cust	Diff	
DNO	Tariff	Indic 12/13 tariffs	13/14 ARP Forecasts	expected Jan 12		12/13 cost	13/14 cost	total Cost		Actual-Forecast	% of actual	
SPOW	Domestic Unrestricted	98.66	98.03	196.69		96.33	100.40	196.73		0.04	0.0%	actual cost higher than ARP forecast
SPOW	Domestic Two Rate	116.39	115.54	231.93		112.92	117.26	230.18		-1.76	-0.8%	actual cost less than ARP forecast
SPOW	Domestic Off Peak (related MPAN)	12.33	12.33	24.66		12.12	13.33	25.45		0.79	3.2%	actual cost higher than ARP forecast
SPOW	Small Non Domestic Unrestricted	276.90	274.47	551.37		271.42	272.75	544.17		-7.19	-1.3%	actual cost less than ARP forecast
SPOW	Small Non Domestic Two Rate	434.21	429.72	863.92		424.81	433.62	858.43		-5.49	-0.6%	actual cost less than ARP forecast
SPOW	Small Non Domestic Off Peak (related MPAN)	114.46	113.16	227.62		112.44	117.77	230.21		2.59	1.1%	actual cost higher than ARP forecast
SPOW	LV Medium Non-Domestic	1173.83	1163.29	2337.12		1150.82	1264.69	2415.51		78.39	3.4%	actual cost higher than ARP forecast
SPOW	LV Sub Medium Non-Domestic	1642.51	1620.10	3262.61		1614.79	1629.98	3244.77		-17.85	-0.5%	actual cost less than ARP forecast
SPOW	HV Medium Non-Domestic	2664.65	2646.66	5311.31		2604.03	2844.43	5448.45		137.15	2.6%	actual cost higher than ARP forecast
SPOW	LV HH Metered	9611.11	9526.14	19137.25		9397.25	9985.67	19382.92		245.67	1.3%	actual cost higher than ARP forecast
SPOW	LV Sub HH Metered	20501.89	20352.05	40853.95		20213.02	24600.32	44813.34		3959.40	9.7%	actual cost higher than ARP forecast
SPOW	HV HH Metered	53263.36	52735.23	105998.59		52204.46	55846.27	108050.73		2052.14	1.9%	actual cost higher than ARP forecast
SWAE	Domestic Unrestricted	112.46	125.56	238.02		111.86	133.96	245.82		7.79	3.3%	actual cost higher than ARP forecast
SWAE	Domestic Two Rate	112.67	125.84	238.51		112.08	132.35	244.43		5.92	2.5%	actual cost higher than ARP forecast
SWAE	Domestic Off Peak (related MPAN)	12.28	13.28	25.55		12.22	15.02	27.24		1.69	6.6%	actual cost higher than ARP forecast
SWAE	Small Non Domestic Unrestricted	297.50	333.44	630.94		295.78	361.39	657.17		26.23	4.2%	actual cost higher than ARP forecast
SWAE	Small Non Domestic Two Rate	435.47	488.34	923.81		433.06	519.86	952.91		29.10	3.2%	actual cost higher than ARP forecast
SWAE	Small Non Domestic Off Peak (related MPAN)	36.14	39.16	75.30		35.99	45.64	81.63		6.33	8.4%	actual cost higher than ARP forecast
SWAE	LV Medium Non-Domestic	1970.75	2207.86	4178.61		1959.81	2432.61	4392.42		213.81	5.1%	actual cost higher than ARP forecast
SWAE	LV Sub Medium Non-Domestic	2106.52	2381.96	4488.48		2093.67	2520.22	4613.89		125.41	2.8%	actual cost higher than ARP forecast
SWAE	HV Medium Non-Domestic	3538.30	4051.17	7589.46		3514.46	4301.68	7816.14		226.68	3.0%	actual cost higher than ARP forecast
SWAE	LV HH Metered	13510.84	15173.63	28684.46		13433.75	16289.10	29722.86		1038.39	3.6%	actual cost higher than ARP forecast
SWAE	LV Sub HH Metered	34375.94	38845.48	73221.42		34162.82	32907.78	67070.60		-6150.83	-8.4%	actual cost less than ARP forecast
SWAE	HV HH Metered	70474.26	79878.70	150352.96		70005.23	86632.60	156637.83		6284.87	4.2%	actual cost higher than ARP forecast
SWEB	Domestic Unrestricted	112.10	123.89	236.00		112.57	134.12	246.68		10.69	4.5%	actual cost higher than ARP forecast
SWEB	Domestic Two Rate	122.48	135.48	257.96		122.98	142.42	265.40		7.44	2.9%	actual cost higher than ARP forecast
SWEB	Domestic Off Peak (related MPAN)	11.96	12.59	24.55		11.96	11.33	23.29		-1.26	-5.2%	actual cost less than ARP forecast
SWEB	Small Non Domestic Unrestricted	329.74	366.51	696.25		331.21	335.98	667.19		-29.06	-4.2%	actual cost less than ARP forecast
SWEB	Small Non Domestic Two Rate	398.23	442.21	840.45		400.01	436.60	836.60		-3.84	-0.5%	actual cost less than ARP forecast
SWEB	Small Non Domestic Off Peak (related MPAN)	33.40	35.27	68.68		33.55	32.68	66.23		-2.45	-3.6%	actual cost less than ARP forecast
SWEB	LV Medium Non-Domestic	1691.40	1879.81	3571.21		1698.93	1909.12	3608.04		36.83	1.0%	actual cost higher than ARP forecast
SWEB	LV Sub Medium Non-Domestic	2608.35	2916.77	5525.12		2621.20	2980.46	5601.67		76.54	1.4%	actual cost higher than ARP forecast
SWEB	HV Medium Non-Domestic	3780.60	4282.62	8063.22		3801.26	4763.74	8564.99		501.77	6.2%	actual cost higher than ARP forecast
SWEB	LV HH Metered	16254.34	18167.23	34421.58		16331.02	18912.78	35243.80		822.22	2.4%	actual cost higher than ARP forecast
SWEB	LV Sub HH Metered	37085.84	41639.20	78725.04		37270.25	43680.60	80950.85		2225.81	2.8%	actual cost higher than ARP forecast
SWEB	HV HH Metered	79160.61	89904.44	169065.05		79606.10	95810.60	175416.70		6351.65	3.8%	actual cost higher than ARP forecast
YELG	Domestic Unrestricted	81.12	88.19	169.32		81.12	90.90	172.02		2.70	1.6%	actual cost higher than ARP forecast
YELG	Domestic Two Rate	86.80	93.22	180.02		86.80	97.44	184.24		4.22	2.3%	actual cost higher than ARP forecast
YELG	Domestic Off Peak (related MPAN)	22.13	26.03	48.15		22.13	18.44	40.57		-7.59	-15.8%	actual cost less than ARP forecast
YELG	Small Non Domestic Unrestricted	246.57	264.12	510.70		246.57	255.43	502.01		-8.69	-1.7%	actual cost less than ARP forecast
YELG	Small Non Domestic Two Rate	362.66	389.15	751.80		362.66	388.59	751.24		-0.56	-0.1%	actual cost less than ARP forecast
YELG	Small Non Domestic Off Peak (related MPAN)	71.12	82.64	153.76		71.12	67.96	139.08		-14.69	-9.6%	actual cost less than ARP forecast
YELG	LV Medium Non-Domestic	1354.56	1465.75	2820.31		1354.56	1460.72	2815.29		-5.02	-0.2%	actual cost less than ARP forecast
YELG	LV Sub Medium Non-Domestic	1543.79	1680.58	3224.37		1543.79	1740.58	3284.37		60.00	1.9%	actual cost higher than ARP forecast
YELG	HV Medium Non-Domestic	3041.29	3331.09	6372.38		3041.29	3296.82	6338.11		-34.27	-0.5%	actual cost less than ARP forecast
YELG	LV HH Metered	7468.95	8183.06	15652.01		7468.95	8160.89	15629.84		-22.18	-0.1%	actual cost less than ARP forecast
YELG	LV Sub HH Metered	16625.96	18248.62	34874.58		16625.96	18274.94	34900.90		26.32	0.1%	actual cost higher than ARP forecast
YELG	HV HH Metered	36113.37	40430.62	76543.99		36113.37	39728.98	75842.36		-701.63	-0.9%	actual cost less than ARP forecast



APPENDIX 2

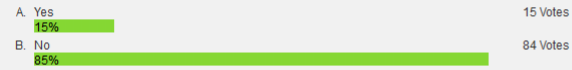
RESULTS FROM THE NPOWER / NORTHERN POWERGRID WEBINAR SURVEY

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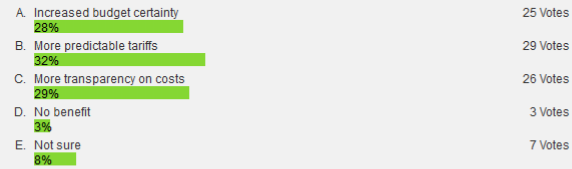
Q. Before today's webinar, were you aware of DCP178?

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Q. What benefits do you think DCP178 will bring to your business/business you represent? Tick the most relevant answer.

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Q. Do you have any concerns regarding DCP178?

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