

**Response to Ofgem's consultation, 'Proposals for DCC's role in developing a Centralised Registration Service and penalty interest proposals'.**

**Additional clarification comments provided by Electricity North West**

**Sent by email, 3 February 2016**

**Question 1**

"We do agree with the proposed amendments to LC15.8 to remove the reference to the Data Transfer Services and we welcome Ofgem's undertaking to review the communications arrangements within the Centralised Registration Service (CRS) during the Blueprint Phase. I am a member of Ofgem's Regulatory Design User Group (RDUG) and I attended the first meeting of the RDUG this week at your offices. As a member of the RDUG I look forward to contributing to the design, assessment and documentation of governance arrangements, including licence and industry code provisions, that underpin the functional and non-functional requirements of the CRS; and fast and reliable next-day switching arrangements that would operate on the CRS."

**Question 9**

"We do not agree with the proposed drafting of LC36.17. Specifically, we do not believe that the DCC should take the value of 1 to "INT" in the event the Authority has not directed the DCC to apply any value. As such we do not believe that the LC36.17(b) should stand. We suggest that it should be replaced (or integrated within LC36.17(a)) by the following two requirements:

- the Authority to provide a decision within a certain time period time; and
- where the Authority determines that the DCC have justified, in part or whole, the "allowed" over recovery, we recommend the Authority direct the DCC to apply a value to "INT" of zero and when the Authority determines that the DCC have not justified the "allowed" over recovery, we recommend the Authority direct the DCC to apply a value to "INT" of 3

If you disagree with the above and wish to retain the LC36.17(b), it would still be beneficial for a 'non decision' to be time bound i.e. if Ofgem do not determine within x days/months the value of "INT" will be 1. Otherwise how would the DCC know whether to apply this value or not. There could be an argument that no value is used 'just in case' the Authority determine even if a year or so has lapsed. It gives the DCC an incentive to do nothing and retain the over recovery."