

DCC Communications Hub Order Policy Consultation
EDF Energy's response to your questions

Q1. Is the DCC Communications Hub orders policy described with sufficient accuracy and clarity?

EDF Energy is generally supportive of the arrangements proposed in the DCC Communications Hub orders policy document. We believe it could be improved by the addition of an illustrative end to end process diagram from order through to installation/return of the hub. We accept this is covered by different documents but it would be useful to SEC Parties to have a single policy document covering the full end to end process.

We believe the process and timings as laid out in the document are ambiguous and should be made clearer. In particular, submissions are required on a set day each month, this being 5 days before month end. We would prefer that the DCC published a schedule on an annual basis with specific dates for submission of Communication Hub forecast submissions.

We are concerned that all of the processes and examples set out in the policy are based on all suppliers submitting above (or below) their forecasts. It is not clear what would happen if one large supplier submitted an order that pushed it below the tolerance – but all other suppliers had submitted orders above the tolerance – i.e. it is only the one supplier that is causing the issue. Would only that supplier be altered up and others left alone, or would everybody have to be altered? This situation should be added to the process.

As the Communications Hub Order Policy is part of the comms hub process, we believe the Communications Hub Order Policy would be improved if the full end to end illustrative process was added to it, e.g. from order of the Communication Hub through to installation/return. We accept this is covered by different documents but it would be useful to have a simple view in this policy document of the full end to end process

Although we were pleased to see worked examples in the Policy to assist understanding, we believe these could be simplified by linking the elements for Threshold, Orders and Managing Non-compliant orders to the relevant sections of the SEC.

Q2. Is the DCC Communications Hub Orders Policy unduly discriminatory or disproportionate?

EDF Energy does not believe the proposed DCC Communications Hub Orders Policy to be unduly discriminatory or disproportionate to any SEC Party, based on the existing timetable. With the changes suggested above, we believe the process to be fair to all.

However, we would also note that the Joint Industry Plan and DCC delivery is likely to change. We believe that further consideration should be given as to how this is fed through into the Comms Hub Order Policy. Without this it is likely that this policy would be discriminatory against Suppliers who had submitted their orders in good faith against the current industry plan.

EDF Energy
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