

De-energised MPAN reporting to National Grid for TNUoS residual billing

1. Background

1.1 The question is in relation to how de-energised MPANs will be reported to National Grid for TNUoS residual billing. There doesn't seem to be a consistent approach across DNOs, and the hope is to get this clarified.

1.2 The below message from National Grid mentions that each DNO will provide a site count per day for each supplier, that they will then use for TNUoS residual billing:

*"For distribution sites (HH or NHH), it's less clear but the short answer is TNUoS will mirror DUoS. The longer (and more useful) answer of how we'll apply TNUoS to distribution connected sites in practice is that the DNOs will map MPANs to sites and sites to bands (via LLFCs, including non-chargeable MPANs/sites – for whatever reason – to a non-chargeable band). The DNOs will then give us from their billing system (so should align with their DUoS data) a site count per day for each band and Supplier. This is the data we'll use as the basis of TNUoS billing and this data flow is captured under the BSC (and created by BSC modification P402). So we won't know or have control over the specifics of individual sites and **it will be down to the DNOs and how they manage deenergised sites in the banding exercise. The idea is that since it's the same data as what the DNOs will be using for DUoS billing, if a site picks up a residual charge under DUoS, it'll also pick up the equivalent TNUoS charge too.**"*

1.3 Individual DNO's were asked whether they're intending to include de-energised MPANs in these counts, and mixed responses had been received so far:

DNO	Including de-energised MPANs in TNUoS count?	Context
UKPN	N	"meaning that de-energised are excluded"
WPD	Y	"HH- De-energised MPANs will be included as the spec for P402 does not exclude them"
SPOW	Y	"De-energised MPANS will be banded as per normal rules therefore included and chargeable."
NPG	N	"De-energised records were not in the counts."
NORW		Queried 19/04
SOUT	Y	"NHH de-energised mpans will not be included but HH will"

1.4 It is hoped that the above is sufficient enough information to stimulate a discussion on this topic.

2. Code Administrator's Thoughts

- 2.1 We'd suggest that the ultimate solution to this issue will sit outside of the DCUSA, as the DCUSA doesn't cover the arrangements relating to the reporting of sites between DNOs/IDNOs and National Grid ESO for the purpose of ongoing TNUoS residual billing. At first glance it would appear to be picked up under either the CUSC arrangements or via the BSC due to the arrangements introduced by [P402 'Enabling reform of residual network charging as directed by the Targeted Charging Review'](#)
- 2.2 P402 introduced new reporting requirements on LDSOs and BSCCo that will ensure the provision of data to enable the NETSO to set TNUoS demand residual tariffs and enable accurate billing of subsequent charges.
- 2.3 However, it would seem prudent to understand whether there is a potential difference in the data that will be reported by DNOs to NGESO for TNUoS residual billing purposes and if so, whether alignment could be achieved by way of a discussion on the interpretation of what is to be reported on. If alignment isn't achievable, then it might be worth confirming where such obligations sit within the industry codes so that a change can be raised in due course.