

## DCP 424 Working Group - Meeting 05

08 September 2023 at 14:00 - Web-Conference

Attendee	Company
<b>Working Group Members</b>	
Benny Talbott [BT]	Co-Op
Hazel Paterson [HP]	SPEN
John Lucas [JL]	Elexon
Sally Musaka (SM)	SSE
Joe Boyle (JB)	SPEN
Mary Guille (MG)	Energy Local
Kara Burke (KB)	NPg
Edda Dirks (ED)	SSEG
Elanor Sutter (ES)	BU-UK
Laura Quinn (LQ)	SPEN
Tracey Pitcher (TP)	NGED
Lili Zou (LZ)	SSE
<b>Code Administrator</b>	
Andy Green [AG] (Chair)	ElectraLink
<b>Apologies</b>	
Lee Stone	E.ON
Paul Bedford (PB)	Drax

## 1. Administration

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- 1.1 The Working Group reviewed the “Competition Law Guidance” and “Terms of Reference”. All Working Group members agreed to be bound by the Competition Law Guidance for the duration of the meeting and agreed to the Terms of Reference.
- 1.2 An action log has been created and all updates are provided in **Appendix A**.

## 2. Actions Review

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- 2.1 01/03– The Chair confirmed the timelines had been circulated. This action was closed and that the legal advice was that it would be sensible for a derogation to be issued. It was noted that if the change was to be implemented on 01 April 2024, then the charging statements could be updated in line with this and no derogation would be needed.
- 2.2 01/04– The Chair confirmed this action will remain open and the Working Group can decide whether it can be closed when they reach that part of the consultation review.
- 2.3 02/04 – The Chair confirmed this action will be reviewed when the Working Group get to this part of the consultant review.

## 3. Review Of Consultation Document

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- 3.1 SM asked if this consultation would be issued at the same time as the REC and BSC MODs. The chair advised this was the plan and the intention was to consult for the usual 3 weeks.
- 3.2 The Consultation document can be found in **attachment 1 DCP 424 Consultation Document v3.0**
- 3.3 The Chair advised the Working Group that a conversation between the DCUSA, BSC and REC had taken place and the BSC had requested that the consultations be issued 06 October.
- 3.4 The Chair noted that sections 1,2 and 3 had been discussed so these sections didn’t require further review.
- 3.5 A number of Working Group members had been on annual leave recently and highlighted that they’d not had significant time to review the document so it was agreed to discuss the feedback that had been provided and then take the document away to review and meet again.
- 3.6 ED stated that she had some feedback for the objectives section and as ED would have to leave the call early, it was agreed to start the consultation review at section 7, objectives.
- 3.7 It was suggested that objectives 1 & 2 are better met by DCP 424, as the change will better facilitate the discharge by DNOs of their obligations to comply with the Charging Methodologies. In the absence of this proposal this would not be possible following BSC MOD P441.
- 3.8 The Working Group agreed with this suggested and the consultation document was updated.
- 3.9 It was also agreed that objective 2 was better met two: better met, as the change will ensure that charges for customers within a complex site are not distorted by the application of inappropriate use of system charges in respect of some or all customers within the complex site arrangement. This

proposal facilitates competition in so far as it ensures that correct charges are made under P441 and therefore does not distort the market.

- 3.10 BT also stated that he believed that objective 5 was also better met as EU internal market regulation has established Renewal Energy Communities as a recognised market participant which should be granted access on a level playing field.
- 3.11 The Working Group understood that this would have been interpreted by EU member states as a requirement to enable local supply by renewable energy communities and legislation has been brought into Spain, France to that effect. This MOD combined with P441 would therefore ensure the UK remains more closely aligned to EU emerging practice.
- 3.12 There were no further comments for the objectives section from the Working Group.
- 3.13 It was noted that the solutions section needed to have further clarification to inform the reader the approach of the Working Group with some examples. It was noted that there was a lot of assumed knowledge of the BSC change (P441 and the RECCo change (RO-113) within the current DCUSA consultation drafting. The Working Group agreed that it would help the reader if the other code changes were more clearly explained within the DCUSA document.
- 3.14 It was noted impacts to DUoS and the process for HH customers may need some additional clarity.
- 3.15 KB agreed to take an action away to review those areas of the consultation.
- 3.16 The Working Group agreed that the legal text was fit for purpose for now, so no changes required for those for now.
- 3.17 The Working Group agreed to ask the below questions within the consultation.
- Do you understand the intent of the Change Proposal?
  - Are you supportive of the principles that support this Change Proposal?
  - Do you agree with the Working Groups approach for measurement class F and G in class 5 complex sites of utilising the D0036 flow for DUoS unit rate billing and aggregated standing charge? If not what are the perceived risks/issues with this approach.
  - The Working Group identified two potential solutions for submitting gross demand data for class F and G sites, one to utilise Pseudo billing MPANs and another to utilise the existing Pseudo settlement MPANs. What are the benefits and risks to each of these approaches?
  - Which of the two approaches of using Pseudo billing or existing pseudo settlement MPANs do you prefer and why?
  - For Distributors Only- What would the process entail for a supplier requesting the creation of both pseudo billing and pseudo settlement MPANs? This will be a scenario that would only arise if the option to use pseudo billing MPANs was taken forwards.
  - For Distributors only- How do distributors identify if an MPAN is a pseudo settlement or pseudo billing MPAN i.e LLFCs etc

- For Suppliers Only – How do Suppliers identify if an MPAN is a pseudo settlement or pseudo billing MPAN?
- Do you have any comments on the drafted legal text?
- Do you believe there are further DCUSA schedules or legal text changes required to facilitate this change? Please provide further information if yes.
- Do you consider the solution better facilitates the DCUSA objectives? Please give supporting reasons
- Are you aware of any wider industry developments that may impact upon or be impacted by this CP?
- What date do you believe this change proposal should be implemented? Please provide rationale.
- For Distributors only- What are the potential impacts to billing systems and would this have any impact on the proposed implementation date based on the proposed solution?
- Do you have any other comments?

3.18 The Working Group agreed to review the updated consultation document and provide feedback prior to the next meeting for the Working Group to discuss.

#### 4. Any Other Business

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4.1 The Chair asked the group whether there were any other items of business to discuss.

4.2 There were no other items raised.

#### 5. Date of Next Meeting

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5.1 The Working Group had previously agreed to meet again on 19 September 2023 at 2pm.

#### 6. Attachments

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- Attachment 1 DCP 424 Consultation Document v3.0

## APPENDIX A

### New and Open Actions

Action Ref.	Action	Owner	Update
02/04	The Working Group to review paragraph 4.28 and see if this can be simplified.	All	New action
01/05	Review section 4 and provide feedback on how the section can be more focused on the solution	All	New Action

### Closed Actions

Action Ref.	Action	Owner	Update
02/01	Circulate the aligned timelines as soon as this is available.	<i>Chair</i>	<i>Closed</i>
05/01	Engage with St Clements to understand if the D0268 data can be published into Durabill and understand the feasibility, scale, timescales, etc., of this.	Chair	<i>Closed</i>
01/02	Collate all responses into a single document.	Chair	<i>Closed</i>
02/02	Find the rationale for why the D0168 was removed.	Chair	<i>Closed</i>
03/02	Check internally whether the pseudo MPAN is in the D0036 and whether this is loaded into Durabill.	Working Group	<i>Closed</i>
04/02	Check with St Clements whether the pseudo MPAN is in the D0036 and whether this is loaded into Durabill.	Chair	<i>Closed</i>

05/02	Pick up with LS re his email and the Working Group discussion.	Chair	<i>Closed</i>
06/02	Check whether a settlement MPAN can be used as a billing pseudo MPAN in Durabill.	Working Group (DNO)	<i>Closed</i>
07/02	Send REC wording to AG.	VB	<i>Closed</i>
08/02	Circulate DCP 414 rationale for a derogation and see if this indicates a derogation may be needed for DCP 424	Chair	<i>Closed</i>
09/02	Issue a Doodle Poll for the next meeting	Chair	<i>Closed</i>
02/03	Create draft consulting document and share with the Working Group prior to the next meeting	Chair	<i>Closed</i>
01/03	Seek legal advice on if a derogation is needed or specific legal text changes if the new zero-based tariffs are required in charging statements.	Chair	
01/04	The Working Group to review internally if there are any additional benefits to using pseudo settlement or pseudo billing MPANs and share with the Working Group	All	New action