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| **DCUSA Consultation** | | At what stage is this document in the process? |
| **DCP 424:**  **Use of System charging for complex sites**  **Date Raised:** 10 May 2023  **Proposer Name:** Mary Gillie (as proposer’s representative)  **Company Name:** Green Energy  **Party Category:** Supplier | | |  | | --- | | **01 – Change Proposal** | | **02 – Consultation** | | **03 – Change Report** | | **04 – Change Declaration** | |
| **Purpose of Change Proposal:**  This change proposal enables the correct DUoS to be paid by meters that are class F or G within a Class 5 or Class 6 Complex Site as described in BSC Modification P441 (where netting of Import and Export takes place for BSC Settlement purposes) in a practical manner. Under P441 where generation and demand are netted before settlement, the gross values must be added to the D0036 or D0275 to ensure the correct DUoS is charged. However, for class F and G the MPAN counts are included on the D0030 data flows, but the volumes are zero. In order for the volumes to be correctly charged DUoS it is proposed that these volumes are included in the D0036 or D0275 using a pseudo MPAN for the gross value. | | |
| Description: Description: YES_GREEN | This document is a Consultation issued to DCUSA Parties and any other interested Parties in accordance with Clause 11.14 of the DCUSA seeking industry views on DCP 424  Parties are invited to consider the questions set in section 10 and submit comments using the form attached as Attachment 1 to [dcusa@electralink.co.uk](mailto:dcusa@electralink.co.uk) by **xxxx**.  The Working Group will consider the consultation responses and determine the appropriate next steps for the progression of the Change Proposal (CP) to the Change Report phase. | |
| Description: Description: YES_GREEN | **Governance:**  The Proposer recommends that this Change Proposal should be:   * Treated as a Part 1 Matter * Treated as a Standard Change * Progressed to the Working Group phase   The Panel will consider the proposer’s recommendation and determine the appropriate route. | |
| Description: Description: High_Impact | **Impacted Parties:**  Suppliers/DNOs/IDNOs | |
| Description: Description: High_Impact | **Impacted Clauses:**  Section 1A and Schedule 16 Part 2 | |

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|  |

1. Summary

**What?**

## For certain types of Complex Site, Half Hourly Data Collectors (HHDCs) may (for BSC Settlement purposes) net off Import and Export values, provided that they represent exempt supply by a generator to a customer within a local area. For these types of Complex Site, the half hourly metered data submitted to BSC Settlement is netted, and therefore not appropriate for calculation of DUoS charges. This creates an issue for MPANs in Measurement Classes F and G, as the CDCM currently requires billing for such MPANs to be based on BSC Settlement data received on the D0030 data flow. The required change to the CDCM is therefore to allow charges for Measurement Class F and G customers within such Complex Sites to be calculated using gross metered data provided by the HHDC, rather than net Settlement data on the D0030 data flow.

**Why?**

* 1. BSC Modification Proposal P441 [[1]](#footnote-2)is establishing clearer criteria for where complex sites can be used, including criteria for Class 5 and Class 6 Complex Sites, in which half hourly metered data submitted to Settlement may ‘net off’ Import and Export, provided that it represents licence exempt supply by a generator to a customer beneath the same primary substation in which the electricity was generated. The diagram below illustrates an example, in which there is 20 kWh of Export, 10 kWh of which is supplied to customers within the Complex Site (as a licence exempt supply), and 10 kWh sold to a licensed supplier (to be supplied to customers outside the Complex Site). P441 will formalise existing arrangements in which only the 10 kWh of net Export from the Complex Site need enter Settlement (but the full 20 kWh of Export and 10 kWh of Import must still be subject to DUoS charges).
  2. The above relates settlement information and not for reporting data to the Distributor. The D0036 flow sent to the distributor will contain gross data.

Diagram, schematic

Description automatically generated

* 1. Conversely, the diagram below illustrates a scenario in which there is a net Import to the Class 5 Complex Site. The customers within the Class 5 Complex Site use 10 kWh, of which 8 kWh is a licence exempt supply from generators within the Complex Site, and 2 kWh is licensed supply from outside the Complex Site. P441 will formalise existing arrangements in which only the 2 kWh of net Import to the Complex Site need enter Settlement (but the full 8 kWh of Export and 10 kWh of Import must still be subject to DUoS charges):

Diagram, schematic

Description automatically generated

## The solution proposed by the P441 Workgroup for settling this type of Complex Site can be summarised as follows:

* For BSC Settlement purposes, the HHDC may net Import and Export, but only to the extent that the netted values represent a licence exempt supply of electricity generated within the Complex Site to customer(s) within the Complex Site;
* The resultant net Import and/or Export values will be submitted to Settlement on an aggregated basis. In the example above, a single Import MPAN and a single Export MPAN might be used to submit the net values to Settlement. The proposed solution allows these to be pseudo MPANs (representing the Complex Site as a whole), but does not require it (e.g. the Supplier could alternatively choose that the HHDC should use one of the generators’ Import and Export MPANs to submit the net data for Settlement);
* Although data is being submitted to Settlement on a single pair of MPANs, each Import and Export customer will retain their own MPAN(s). The half hourly metered data reported to Settlement for these MPANs will be zero for as long as they remain within the Complex Site (as their Import and Export is being reported on the aggregated MPAN instead). Requiring each customer to retain their individual MPAN(s) will facilitate their exit from the Complex Site (when/if they choose to do that), ensure that the registration system retains an accurate record of all Entry and Exit Points, and allow accurate reporting of MPAN counts.

## The P441 Workgroup proposes that this approach of having the HHDC aggregate different customers’ metered data and report the aggregated values on a D0036 (or D0275) data flow can also work for DUoS charging purposes, provided that:

* The HHDC system must be capable of reporting different half hourly metered values to BSC Settlement and to the DNO (as the aggregated data reported to the DNO must be gross Import and Export, whereas the aggregated data reported to BSC Settlement can net Import and Export under certain circumstances);
* In order to ensure that DUoS charges are levied in accordance with the Methodology, the data reported to the DNO may also need to be at a different level of aggregation. For example, suppose the Complex Site contained customers on a number of different DUoS tariffs. For BSC purposes their net Import and Export could be reported on a single pair of MPANs, but for DUoS purposes a separate (primary or pseudo) MPAN would be required for each DUoS tariff.
* An appropriate mechanism can be found for customers in Measurement Classes ‘F’ and ‘G’. Currently, paragraph 128 of the CDCM requires DUoS charges for these customers to be calculated from the D0030 data flow received from Settlement (not a D0036 or D0275 data flow received from the HHDC).

## In the absence of a DCUSA change, paragraph 128 of the CDCM would require DNOs to calculate DUoS charges using MPAN counts and consumption values from the D0030 data flow. Whilst the MPAN counts would continue to be included, the consumption values would either be zero, or (if the MPANs used to submit data to Settlement were themselves registered to Measurement Class F or G) would be net values.

## The P441 Workgroup meeting on 21 March 2023 discussed a number of potential solutions for DUoS charging of Measurement Class ‘F’ and ‘G’ MPANs in this type of Complex Site. Three of these (referred to as Options 1 to 3 in the P441 Workgroup material) would have reallocated consumption for these customers to a site-specific Measurement Class (such as ‘C’ or ‘E’), leading to these MPANs being charged (wholly or partially) on site-specific tariffs. It would be hard to argue that these approaches are consistent with the CDCM.

* 1. The other solution considered by the P441 Workgroup (Option 4) was for these MPANs to remain in their true Measurement Class (‘F’ or ‘G’), but with the DNO charging using aggregated unit data provided on the D0036 (or D0275) for volumetric charges, rather than the D0030. The P441 Workgroup believes that this approach is the only one that allows correct DUoS charging of Measurement Class ‘F’ and ‘G’ customers within Class 5 and Class 6 Complex Sites, and this Change Proposal therefore proposes to make the minor change to the CDCM that is required in order to support it.

**How?**

* 1. As explained above, the P441 Workgroup proposes that gross Import and Export should be reported by the HHDC to the DNO on a D0036 (or D0275) data flow, aggregated up to DUoS tariff level. To facilitate this a separate pseudo MPAN would be registered for each aggregated DUoS tariff used within the Complex Site. The P441 Workgroup does not believe that this requires DCUSA changes for site-specific DUoS tariffs, but it does require a change for aggregated tariffs (where currently paragraph 128 of the CDCM requires that the D0030 data flow is used for billing).
  2. To be clear, data used for charging aggregated tariffs to Measurement Class ‘F’ and ‘G’ customers in Class 5 Complex Sites (and Class 6 where appropriate) will be as follows:
* The fixed (p/MPAN/day) charge will be calculated from the MPAN counts in the D0030 data flow. These counts will still include all the Measurement Class F and G customers and generators within the Complex Site, as they retain their own MPANs (albeit with zero volumes reported against them in the D0030).
* The unit charges will be calculated from the aggregated volumes reported in the D0036 (or D0275). A separate aggregated value will be reported for each DUoS tariff. In order to calculate these unit charges, the DNOs may need to set up the aggregated tariffs in their site-specific billing systems (with zero capacity charges, and flagged to not incur a fixed charge), for use only by aggregated Half Hourly customers in Class 5 and Class 6 Complex Sites.
  1. Our working assumption is that the pseudo MPANs (created for the purpose of reporting to the DNO aggregated consumption data for Measurement Class ‘F’ and ‘G’ customers in Class 5 and Class 6 Complex Sites) should be registered to the same Measurement Class ‘F’ or ‘G’ as the customers whose data they are being used to report.

1. Governance

#### Justification for Part 1 and Part 2 Matter

## The Proposer considers that this Change Proposal should be considered a Part 1 Matter as it satisfies one or more of the following criteria:

1. it is likely to have a significant impact on the interests of electricity consumers;
2. it is likely to have a significant impact on competition in one or more of:
   1. the generation of electricity;
   2. the distribution of electricity;
   3. the supply of electricity; and
   4. any commercial activities connected with the generation, distribution or supply of electricity.

#### Requested Next Steps

## This Change Proposal should:

* Be treated as a Part 1 Matter;
* Be treated as a Standard Change; and
* Proceed to the Working Group phase.

## This Change Proposal is linked to BSC Modification Proposal P441, which seeks to formalise the arrangements for Complex Sites. P441 has been discussed by the Cross Code Steering Group, and requires changes to the Retail Energy Code (REC) as well as the BSC and DCUSA. We therefore propose that the BSC, DCUSA and REC solutions are progressed in parallel, so that they can be consulted on at the same time, and submitted to Ofgem for decision at the same time.

1. Why Change?

## P441 will remove ambiguity around the current Complex Site arrangements and aid in more efficiently facilitating the advancement of community energy schemes. However to do this, it is important that it is clear how DUoS is charged.

* 1. This will better enable BSC Parties to innovate new solutions which then supports consumers through enabling better use with local energy schemes, provisioning for licence exempt supply arrangements to work with existing traditional licensed supply agreements in partnership. There are also environmental benefits as this will better enable consumer choice to take up low carbon, flexible energy solutions provisioned through local energy schemes supporting initiatives such as the joint Ofgem BEIS Smart Systems Flexibility Plan and future flexibility service provisions.
  2. As well as market benefits that will help us reach net zero and give customers more choice there are a number of benefits that are particularly useful to running networks efficiently particular via local energy schemes. This change in the means to charge DUoS will help facilitate this. For example
* Encourages shift from peak load and reduces risk of imbalance;
* Helps reduce network constraints via local balancing to use the network more efficiently, reducing costs;
* Reduce costs of energy;
* Innovative means of Demand Side Response (DSR) without the need for Balancing Mechanism (BM) or flexibility contracts.

## This change proposal gives a clear and precise means for DUoS to be charged at the correct values with minimum change to existing processes.

* 1. DNOs will need to adapt their system to charge the right tariff on meters in the D0036/D0275 this could be akin to a setting up site specific rate. HHDCs participating would need to be able to add gross meter readings to the D0036/D0275. The supplier will receive more of the DUoS charge from D0036/D0275 readings rather than the supercustomer D0030 data flow.

Question 1: Do you understand the intent of the Change Proposal?

Question 2: Are you supportive of the principles of this Change Proposal?

1. Working Group Assessment

#### DCP 424 Working Group Assessment

## The DCUSA Panel established a Working Group to assess/develop DCP 424. This Working Group consists of representatives from DNOs, Suppliers, IDNOs, Generators and National Grid Electricity System Operator (NGESO), as well as observers from a number of consultancies and Ofgem. Meetings were held in open session and the minutes and papers of each meeting are available on the DCUSA website – [www.dcusa.co.uk](http://www.dcusa.co.uk).

* 1. The Working Group developed this consultation document to gather information and feedback from market participants on this DCP.
  2. The proposer walked the Working Group through the proposal and explained that DCP 424 is a consequential change and that there is a need to align timescales with the BSC change P441.
  3. The Working Group were informed that P441 was currently on pause whilst the associated DCUSA and REC changes (R0133[[2]](#footnote-3)) where being defined.
  4. The prosper explained that currently, the HHDC aggregates up and nets off import and export for a group of MPANs for a complex site, which will go into settlement on either two of the site MPANs or two pseudo MPANs.
  5. It was highlighted that there is no easy way to ensure that gross data, rather than net data, is being sent on the D0030 for MPANs in measurement classes F and G.
  6. It was advised that under the Proposal, the fixed p/MPAN/day charge will still be calculated from the MPAN counts in the D0030, but the unit data will be aggregated up from the volumes in the D0036, for each DUoS tariff.
  7. The Working Group were advised that the drafted legal text was to make it clear that aggregated class F and G data should be sent on the D0036.
  8. It was also explained that Schedule 16 is split between aggregated data (D0030) and half hourly data (D0036) and what P441 would do is allow aggregated measurement class F and G data on a D0036.
  9. The Working Group would like party views on the below question.

Question 3- 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.

* 1. It was agreed within the Working Group to check internally the processes for requesting or setting up pseudo MPANs. 4 Parties responded to the request and noted the processes as below.

**Responder 1- DNO**

* 1. The first responder explained the request would be for difference metering and that the DNO would recognise the need for pseudo billing MPANs and raise these as necessary.
  2. It was noted that CVAs are slightly different and are easier to spot and that they are provided the MSIDs for the sites.
  3. It was stated that making the process as automated as possible would be beneficial as currently the loading of the data is manual.
  4. It was clarified that for CVA sites, a four-letter pseudo MPID is created, which is not in MDD, so that this can be set up in Durabill and billed.
  5. It was asked whether if the DC created D0036 it would still be a manual process. It was confirmed that the settlement data is in the D0036, but this is not billed as the pseudo MPANs would be billed, and billing on the D0036 would end up double counting. It was however stated that if the DC removed that, this would remove this risk.
  6. It was explained that for CVA sites, the pseudo MPAN is known only to the DNO and not the DC. As such, the data must be mapped onto the pseudo MPAN.
  7. It was also noted that for pseudo settlement MPANs, an identifier can be placed into the address. The word ‘Pseudo’ is used within the address to highlight that the MAPN is a settlement pseudo MPAN.

**Responder 2- DNO**

* 1. It was explained that the process for CVA sites is the same as per responder 1’s process. The Working Group were informed that it will be a manual process to set up MPAN details and pseudo supplier MPID, if needed, in Durabill, which are both manual.

**Responder 3- DNO**

* 1. This responder explained that their IDNO business side had not encountered this situation as it did not have any complex sites but that it is a very manual process to create the pseudo MPANs and add these to ADQM and Durabill.

**Responder 4- Supplier**

* 1. It was explained by a supplier Working Group member that, a pseudo MPAN is created where there is no MPAN to bill to, so as soon as the correct MPAN is provided, the pseudo MPAN is replaced with the one provided by the DNO.
  2. The same supplier Working Group member stated that they have MPANs that are not billed up to the boundary point, but there will be third party network MPANs registered on ECOES but no tariff against them. It was noted that for CVA sites, there will be charges on the charging statements.
  3. A Working Group member stated that in relation to opening up charging statements, that his understanding was to enable these measurement classes F and G sites to be billed in line with the charging statements, rather than the charging statements being opened up, but ensuring existing customers can continue to be billed in line with the charging statements.

**The use of either pseudo settlement or pseudo billing MPANS.**

* 1. The Working Group discussed the benefits of utilising either pseudo billing or pseudo settlement MPANs for the process.
  2. In regards to the use of pseudo billing MPANs, the benefits of using these were
* If pseudo billing MPANs were used this would create clear lines between what’s being used in billing and what’s being used for settlement.
* Distributors have the ability to set up as many MPANs for a site as needed. This gives the distributor the ability to bill, set up and work the MPANs as they see fit. It also noted that Distributors usually have a list of MPANs create to be used for pseudo billing purpose.
* This is the current process so it wouldn’t require wider system changes.
  1. In regards to the use of pseudo settlement MPANs, the benefits of using these are
* Would only require the creation of one pseudo MPAN.
* Pseudo settlement MPANs have automated stop billing processes i.e. disconnections, change of supplier etc triggered.
  1. One of the risks identified by the Working Group in regard to using pseudo billing MPANs was that there may be a gap in Distributors being informed that a site required to stop billing, for example if a site changed supplier.
  2. It was noted that what would happen in a scenario like this, eg in a change of supply and/or if the complex site is taken apart, that if one meter comes out, it wouldn’t make a difference from a Distributor point of view. The Distributor would require an updated supplementary information and the D0036 and D0030 would be charged as before, but the volume would change. To summarise that if one of the MPANs is affected, the Distributor would see a reduced volume.
  3. It was also noted that these complex sites are very closely managed so it would be unlikely that a supplier wouldn’t know about these events happening in order to share with the distributor.
  4. It was queried what happens in the event of an erroneous transfer. It was confirmed that the BAU process would still be followed so it wasn’t a risk as that process wouldn’t be changed.
  5. The Working Group were unable to reach a consensus on whether to use pseudo billing or pseudo settlement MPANs and would therefore like to seek party views on what the risks and benefits to utilising these MPANs are and which of the two processes parties believed was the most fit for purpose.

Question 4: The Working Group identified two potential solutions for submitting gross demand data for class F and G sites to Distributors, 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?

Question 5: Which of the two approaches of using Pseudo billing or existing pseudo settlement MPANs do you prefer and why?

* 1. The Working Group would also like to seek parties views on what the process would entail for a supplier to request the creation of both pseudo billing (for DUoS billing purposes) and pseudo settlement MPANs (for settlement purposes) at the same time. This will only be a scenario that would occur if the approach was to utilise pseudo billing MPANs.

Question 6: 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.

* 1. It was noted that the process for requesting pseudo billing MPANs is currently very manual, and usually done via email. It was queried if there could be a way to automate the process within this change.
  2. It was explained that trying to move this into an automated process would potentially require a larger change than currently proposed which wasn’t the purpose for DCP 424. It was also highlighted that this larger change to processes and systems could put the implementation date at risk. It was suggested that automation of this could be created by a future Change Proposal.
  3. A vote was taken within the Working Group as to whether the process for now should just stick to the ‘must have’ requirement, which is to capture the consumption data on a HH MPAN and a majority of 7 out of 13 Working Group members agreed to stick the must have requirement for DCP 424 due to the complex nature of automating the process.
  4. It was highlighted that for SVA sites, the D0036 would come through via a DC and that CVA sites would require a manual upload. The difference in delivery of the D0036s flows would be a way of identifying which type of site the MPANs related too.
  5. It was asked how a pseudo settlement MPANs would be identified, and it was advised these MPANs have identifiers within the address that can be utilised to highlight if an MPAN is a pseudo MPAN or not.
  6. It was agreed that it would aid in the development of the solution if the process for identifying both pseudo billing and pseudo settlement MPANs was understood so the Working Group would like to seek views on the below questions.

Question 7: Distributors only- How do distributors identify if an MPAN is a pseudo settlement or pseudo billing MPAN i.e LLFCs etc?

Question 8: For Suppliers Only – How do Suppliers identify if an MPAN is a pseudo settlement or pseudo billing MPAN?

* 1. It was highlighted that although this change wouldn’t be creating additional charges or unit rates, a new zero rated tariff would be required for HH sites. This would mean changing some of the charging statements which would likely require a derogation or further legal text changes.
  2. It was noted that the HH standing charges would need to be withheld from being passed on to the supplier i.e. by deactivating the standing charges.
  3. It was noted that this would be a cosmetic change only and there would be no detrimental impact to customers.
  4. The Working Group agreed to seek additional legal advice on this by asking the following question to Gowlings ‘*’Customers will continue to pay the existing charges approved by Ofgem for Measurement Class F and G customers, but the standing and unit rate elements will be billed separately: standing charges through the supercustomer process, unit rates through the site-specific process using a pseudo MPAN. Are any additional legal text changes required to allow this?’’*
  5. The legal steer from Gowlings was that xx

1. Code Specific Matters

#### Reference Documents

## Documentation for BSC Modification Proposal P441 can be found on the [Elexon website](https://www.elexon.co.uk/mod-proposal/p441/).

1. Solution and Legal Text

**Legal Text**

* 1. Update the following:
* Schedule 16, Part 2 should be updated to include the following:

*Users in Measurement Class F and G that are included within a Class 5 Complex Site or Class 6 Complex Site where netting of Imports and Exports occurs across the network will be charged on an aggregated basis, using aggregated data provided on the D0275 or D0036 industry data flows in accordance with BSC Procedure BSCP 502 established under the BSC (and any replacement or substitute BSC Procedure from time to time).*

* 1. Proposed legal text (for Schedule 16) is included in Attachment 1. Relevant definitions (Class 5 Complex Site, Class 6 Complex Site) will also need to be added to Section 1A.

**Text Commentary.**

* 1. In order for MC F and G customers within a Class 5 or Class 6 Complex Site to be billed correctly for their volumes it is proposed that pseudo MPANs are used to aggregate their volumes and these volumes are then submitted on a D0036 data flow. At present only site specific tariffs are available for volumes on a D0036 flow. It is proposed that the legal text is amended to allow volumes for Measurement Class F and G MPANs within a Class 5 or Class 6 Complex Site to be included in a D0036 flow and billed on the existing LV Domestic Aggregated and LV Non-Domestic Aggregated tariffs.

Question 9: Do you have any comments on the drafted legal text?

Question 10: Do you believe there are further DCUSA schedules or legal text changes required to facilitate this change? Please provide further information if yes.

1. Relevant Objectives

#### Assessment Against the DCUSA Objectives

* 1. The Working Group will seek industry views in relation to the DCUSA Objectives as part of this consultation.

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|  | **DCUSA Charging Objectives** | **Identified impact** |
|  | 1. That compliance by each DNO Party with the Charging Methodologies facilitates the discharge by the DNO Party of the obligations imposed on it under the Act and by its Distribution Licence | Positive |
|  | 1. That compliance by each DNO Party with the Charging Methodologies facilitates competition in the generation and supply of electricity and will not restrict, distort, or prevent competition in the transmission or distribution of electricity or in participation in the operation of an Interconnector (as defined in the Distribution Licences) | Positive |
|  | 1. That compliance by each DNO Party with the Charging Methodologies results in charges which, so far as is reasonably practicable after taking account of implementation costs, reflect the costs incurred, or reasonably expected to be incurred, by the DNO Party in its Distribution Business | Positive |
|  | 1. That, so far as is consistent with Clauses 3.2.1 to 3.2.3, the Charging Methodologies, so far as is reasonably practicable, properly take account of developments in each DNO Party’s Distribution Business | Positive |
|  | 1. That compliance by each DNO Party with the Charging Methodologies facilitates compliance with the EU Internal Market Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators; and | Positive |
|  | 1. That compliance with the Charging Methodologies promotes efficiency in its own implementation and administration. | None |

* 1. Charging Objective one: better met, 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.
  2. Charging Objective 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. Charging Objective three: better met, as the change will ensure that the charges faced by suppliers supplying customers on a complex site are broadly equivalent to the charges faced by suppliers supplying the customer without complex site arrangements in place.
  4. Charging Objective four: better met, as the introduction of complex site class 5 will result in an increase in these kinds of arrangements for DNOs. Without the change and the regulatory clarity it seeks to create, there is a risk of a divergence in application of the common charging methodologies across DNO licensees.
  5. Charging Objective five: better met. EU internal market regulation has established Renewal Energy Communities as a recognised market participant which should be granted access on a level playing field. The Working Group understands that this has 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.
  6. Charging objective six: no impact.
  7. As detailed above the market and the distribution network must evolve to facilitate and support renewable generation to become zero carbon. One mechanism that supports this are local energy markets and these are facilitated by complex sites. Local energy markets will help distribution networks that they run more efficiently (for example by encouraging local balancing) (objective 1, general) whilst facilitating competition (objectives 2, general and charging). The proposed change ensures the correct charges are made in a fair and transparent manner (objective 3 charging) to charging process is proportionate and will enable DNOs to carry out the implementation of DCUSA in an efficient manner (objective 1 and 6 charging).

Question 11: Do you consider the solution better facilitates the DCUSA objectives? Please give supporting reasons.

1. Impacts & Other Considerations

#### Does this Change Proposal impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

## We do not believe that this CP (or the related BSC and REC changes) have any impact on SCRs or other significant industry change projects.

* 1. The P441 Workgroup did discuss whether P441 (and related BSC and REC changes) has an impact on the Market-Wide Half Hourly Settlement (MHHS) Programme, and concluded that there is no direct impact, as P441 is just formalising Complex Site arrangements that are already in use. There is an issue with the MHHS design not fully capturing current Complex Site requirements (which has been captured as Work Off Item D-008), but that issue is independent of P441.
  2. We also believe that this CP does not impact the DUoS Charges SCR, as it is a technical change to the data flows used for charging (and does not have any impact on what DUoS charges are payable).

#### Impacts on other Industry Codes

## The Proposer and Working Group agree that there are potential impacts to the BSC and REC as explained earlier in this consultation.

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| BSC……………... |  | MRA………… |  |
| CUSC…………… |  | SEC………… |  |
| Grid Code………. |  | REC………. |  |
| Distrbution Code.. |  | None………. |  |

1. Implementation Date

Question 12: Are you aware of any wider industry developments that may impact upon or be impacted by this CP?

## The intended implementation date is to align to the P441 and REC change R0133 implementation dates, which will be 01 April 2024.

## The Working Group would like views on whether the implementation date is suitable.

Question 13: What date do you believe this change proposal should be implemented? Please provide rationale.

Question 14: 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?

Question 15: Do you have any other comments?

1. Consultation Questions

## The Working Group is seeking industry views on the following consultation questions:

|  |  |
| --- | --- |
| **No.** | **Questions** |
|  | 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? |

## Responses should be submitted using Attachment 1 to dcusa@electralink.co.uk no later than, close of play on xxx 2023.

## Responses, or any part thereof, can be provided in confidence. Parties are asked to clearly indicate any parts of a response that are to be treated confidentially.

1. Attachments

* Attachment 1 – DCP 424 Consultation Response Form
* Attachment 2 – DCP 424 Change Proposal Form
* Attachment 3 – DCP 424 Draft Legal Text

1. [P441 'Creation of Complex Site Classes' - Elexon BSC](https://www.elexon.co.uk/mod-proposal/p441/) [↑](#footnote-ref-2)
2. [R0133 - Consequential Cross-Code Change for BSC P441 - Complex Site Classes Creation - REC Portal](https://recportal.co.uk/group/guest/-/r0133-consequential-cross-code-change-for-bsc-p441-complex-site-classes-creation?p_l_back_url=%2Fsearch%3Fq%3D133) [↑](#footnote-ref-3)