

DCUSA Consultation		At what stage is this document in the process?
<h2>DCP 440:</h2> <h3>Consuming “de-energised” sites</h3> <p>Date Raised: 15 April 2024</p> <p>Proposer Name: Peter Waymont</p> <p>Company Name: Eastern Power Networks</p> <p>Party Category: DNO</p>		01 – Change Proposal
		02 – Consultation
		03 – Change Report
		04 – Change Declaration
<p>Purpose of Change Proposal (CP): To ensure all consuming “de-energised” sites are charged DUoS</p>		
	<p>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 440 ‘Consuming de-energised sites.</p> <p>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 by 03 July 2024.</p> <p>The Working Group will consider the consultation responses and determine the appropriate next steps for the progression of the Change Proposal (CP).</p>	
	<p>Impacted Parties: Suppliers/DNOs/IDNOs/CVA Registrants.</p>	
	<p>Impacted Clauses: Schedule 16, Clause 140</p>	

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 **Any questions?**

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Timetable

The timetable for the progression of the CP is as follows:

Change Proposal timetable

Activity	Date
Initial Assessment Report	15 May 2024
Consultation Issued to Industry Participants	12 June 2024
Change Report Approved by Panel	21 August 2024
Change Report issued for Voting	22 August 2024
Party Voting Closes	12 September 2024
Change Declaration Issued to Parties	16 September 2024
Change Declaration Issued to Authority]	16 September 2024
Authority Decision	TBC

1 Summary

What?

1.1 Where an MPAN is marked as “De-energised” in the registration system but there are actual meter readings, it is clear that the MPAN is not actually De-energised. For NHH/Supercustomer/Aggregated DUoS charges, settlements includes actual consumption recorded against De-energised MPANs and counts the MPAN. However, the incorrect flagging of an MPAN means that site-specific charges are avoided, under the CDCM, unless the supplier corrects the status.

Why?

1.2 To reflect the true status of the MPAN and to ensure consistency between Site-specific and NHH/Supercustomer/Aggregated billed MPANs.

1.3 To give use of system charging consistency with settlements. The MHHS Programme have confirmed that actual data is accepted into settlements if it is on a De-energised MPAN. They stated that in this case a IF-014 will be sent, using event code (ConsumptionOnDEenergisedMPAN) as a warning to the Data Service/ Supplier that they may want to investigate why the MPAN is showing as De-energised.

How?

1.4 By amending Schedule 16 to detail how instances of De-energised sites with non-zero consumption are charged DUoS. Note it may be preferential to implement for MHHS migrated MPANs only due to potential system changes. For further details please see section 7.

2 Governance

Justification for Part 1 Matter

2.1 If approved, this would result in a change to Schedule 16 and the methodology for charging site specific sites incorrectly marked as “De-energised” in the registration system.

2.2 This Change Proposal should:

- Be treated as a Part 1 Matter;
- Be treated as a Standard Change; and

Proceed to the Working Group phase

Requested Next Steps

2.3 Following a review of the Consultation responses, the Working Group will work to agree the final detail of the solution for this CP and if appropriate progress to the Change Report phase.

3 Why Change?

- 3.1 To reflect the true status of the MPAN and to ensure consistency between Site-specific and NHH/Supercustomer/Aggregated billed MPANs.
- 3.2 The intent is to charge DUoS to those who are using the system in the scenario where the MPRS system says a site is De-energised but actual, advancing meter readings are being received.

Question 1: Do you understand the intent of DCP 440?

Question 2: Are you supportive of the principles of DCP 440?

4 Working Group Assessment

- 4.1 The DCUSA Panel established a Working Group to assess this CP. This Working Group consists of Supplier, DNO, IDNO and Generator representatives. Meetings were held in open session and the minutes and papers of each meeting are available on the DCUSA website – www.dcusa.co.uk.
- 4.2 It was initially asked within the Working Group if there is any data/volumes that highlight how many De-energised MPANs were reporting non zero consumption. A Working Group member requested that this information should be obtained from the central settlement source as this would give the Working Group an anonymised, snap shot view of how many De-energised MPANs could have non zero consumption.
- 4.3 A parallel request for this data was raised to Elexon re the BSC and Gemserv re the REC and this data will be presented within the Change Report.
- 4.4 It was queried if there were currently any reports that identified where a De-energised site was consuming energy. It was noted that within the Balance and Settlement Code (BSC) there were obligations on suppliers to investigate instances where consumption is detected on De-energised MPANs.
- 4.5 The obligations are captured within the exception reporting procedures within BSCP503¹ and there is a specific exception report where there is nonzero consumption data received for a De-energised SVA Metering System. Further information on these exceptions can be found on the Elexon website [Exception Reporting in the Half Hourly Market - Elexon Digital BSC](#).

¹ [BSCP503: Half Hourly Data Aggregation for SVA Metering Systems Registered in SMRS - Elexon Digital BSC](#)

- 4.6 It was highlighted that the above obligation for suppliers is audited annually by Elexon to ensure compliance to the obligation.
- 4.7 The Working Group were unclear on all reporting that existed between distributors and suppliers that identified if an MPANs Energisation status was set as incorrectly De-energised. With this in mind the Working Group would like party views on any other reports that exist in industry to identify such instances.

Question 3: For measurement class C and E MPANs only- What current reporting exist between DNOs/Suppliers that identify if an MPANs Energisation status is incorrectly De-energised?

- 4.8 The Working Group were also unsure if there were any other industry codes that obligated Parties to take action where consumption was detected on a De-energised MPAN, and as such, would like to gain Party views on what other processes/obligations exist in industry to identify incorrect energisation statuses within other industry codes.

Question 4 What existing process across the industry are in place to identify incorrect energisation statuses within other industry codes? Can you please be specific to the processes and codes that are already in place.

- 4.9 The Working Group discussed how a De-energised MPAN could be consuming energy. One Working Group member noted that usually theft would be a scenario where an MPAN could get energised without the industry being informed.
- 4.10 It was highlighted that it is not uncommon for these cases to be picked up after a change of tenancy has occurred, meaning the issue is inherited by the new occupier.
- 4.11 The Working Group are keen to understand what other scenarios exist where De-energised sites are Re-energised without the correct industry parties being made aware and so would like to ask the below question.

Question 5 For measurement class C and E MPANs only-In what instances would a De-energised site be consuming energy i.e. theft, COT/COS.

- 4.12 A Working Group member also raised that sometimes it can be difficult to contact the right areas to investigate where consumption has been identified on a De-energisedMPAN or to get the correct industry flows to update the MPAN to an energised state.
- 4.13 The Working Group would like to understand if there are any challenges/barriers in the industry that can cause an MPAN to not get updated from De-energisedto energised.

Question 6 What causes the energisation status to not get updated?

Question 7 In instances where the energisation status is not updated, what are challenges to getting the relevant information to confirm if the status is incorrect and resolve the status?

- 4.14 A Supplier Working Group member noted that if this change was to be accepted, it could have an impact on resources and training due to new processes being implemented.
- 4.15 It was also noted that it could lead to increased bad debt as it would result in MPANs that were previously receiving zero charges to be back billed. Other Working Group members mentioned that it could also lead to changes to billing systems if the change was to be approved.
- 4.16 The Working Group would like to gain industry views on what impacts to their organisation this change could have if it were to be approved.
- 4.17 The Working Group were also keen to understand the impacts that customers could also face if the change were to be approved.

Question 8 If this change was to be approved, what would the impact to your organisation be? I.e. additional resource, training, changes to billing systems, additional bad debt etc?

Question 9 If this change was to be approved, what are the potential impact to customers?

- 4.18 A supplier Working Group member noted that there are also situations in which the site is listed as energised, however is De-energised, and questioned whether the Supplier in this situation would get a credit. The member noted that there are a number of changes being introduced that involve passing charges down to the Supplier, and these costs will ultimately need to be passed to customers where possible.
- 4.19 The Working Group questioned how it would be possible to identify when a site is energised but not consuming, as it could be that there is a reason the site was not consuming for a period of time, such as an outage.
- 4.20 The Chair highlighted that within the BSCP there are processes for long term vacant sites that stop settlements and billing if a site has been identified as vacant so there are genuine examples of energised sites that report back zero consumption.
- 4.21 The Working Group concluded that the above situation was out of scope as there was no method to identify if an MPANs status was incorrectly Energised by receiving zero readings alone.

5 Assessment Against the DCUSA Objectives

- 5.1 For a DCUSA CP to be approved it must be demonstrated that it better facilitates the DCUSA Objectives. There are five General Objectives and six Charging Objectives. DCP 440 will be measured against the DCUSA General Objectives, which are set out in the table below:

DCUSA Charging Objectives <i>(please tick the relevant boxes. [See Guidance Note 10])</i>		Identified impact
<input type="checkbox"/>	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	None
<input type="checkbox"/>	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)	None
<input checked="" type="checkbox"/>	2. 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
<input type="checkbox"/>	3. 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	None
<input type="checkbox"/>	4. 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	None
<input type="checkbox"/>	5. That compliance with the Charging Methodologies promotes efficiency in its own implementation and administration.	None

5.2 This change ensures usage is charged for and creates consistency.

Question 10: Do you consider that the proposal better facilitates the DCUSA General Objectives?

If so, please detail which of the General Objectives you believe are better facilitated and provide supporting reasons.

If not, please provide supporting reasons.

6 Impacts & Other Considerations

6.1 N/A.

Significant Code Review (SCR) or other significant industry change projects

6.2 No impacts have been identified.

Cross Code Impacts

BSC..... REC..... Distribution Code..
CUSC..... SEC..... Grid Code.....
None.....

Consideration of Wider Industry Impacts

6.3 It is not considered that there are any wider impacts because of this CP nor any that will impact upon this CP.

Question 11: Are you aware of any wider industry developments that may impact upon or be impacted by this CP?

7 Implementation

- 7.1 01 April 2026. This will require a lead time for any system changes.
- 7.2 In the proposal, the proposer questioned if this should apply to MHHS MPANs only in order to simplify system changes on the assumption that future looking changes may be preferable to updating legacy systems.
- 7.3 The Working Group would like views on whether or not to limit the change to MHHS MPANs only.

Question 12: What are the system impacts for this change and should it be limited to MHHS MPANs only?

Question 13: Do you agree with the proposed implementation date? If not, please provide rationale.

8 Legal Text

Legal Text

8.1 Amend as follows.

139 There will be no charges applied to correctly de-energised HH MPANs/sites as determined by the de-energisation status in MPAS.

*140 Where a site is incorrectly de-energised, i.e. **for any day** when actual **non-zero** metering advances are received **[and the MPAN has migrated under MHHS]**, **charges will apply** and the DNO Parties should contact suppliers to ensure the status is corrected. **If a site is found to be energised and its status corrected**, charges will be back dated to the date of energisation-*

Text Commentary

8.2 The change to Clause 140 ensures consistency and the correct treatment of incorrectly flagged customers. It should be noted that contacting suppliers does not “ensure” anything is corrected. Further, in MHHS it may be that the supplier’s agent is responsible for this data item so the supplier may have to act through a third party. Note also that no similar wording exists for generation sites, LDNO Charges or EDCM sites but it is expected that these are currently treated in the same way as demand sites i.e. not charged. The outcome of this change should mean these will be charged but it is believed there is nothing in the DCUSA to prevent that at present:

Question 14: Do you have any comments on the proposed legal text?

Question 15: Do you have any other comments on DCP 440?

9 Code Specific Matters

9.1 Note that this change differs to DCP411, which considered “correctly” flagged De-energised MPANs whereas this change focusses on incorrectly flagged MPANs.

10 Consultation Questions

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

No.	Questions
1	Do you understand the intent of DCP 440?
2	Are you supportive of the principles of DCP 440?
3	For measurement class C and E MPANs only-What current reporting exist between DNOs/Suppliers that identify if an MPANs Energisation status is incorrectly De-energised.
4	What existing process across the industry are in place to identify incorrect energisation statuses within other industry codes? Can you please be specific to the processes and codes that are already in place.
5	For measurement class C and E MPANs only-In what instances would a De-energised site be consuming energy i.e. theft, COT/COS.
6	What causes the energisation status to not get updated?
7	In instances where the energisation status is not updated, what are challenges to getting the relevant information to confirm if the status is incorrect and resolve the status?
8	If this change was to be approved, what would the impact to your organisation be? I.e. additional resource, training, changes to billing systems, additional bad debt etc?

9	If this change was to be approved, what are the potential impact to customers?
10	Do you consider that the proposal better facilitates the DCUSA General Objectives? If so, please detail which of the General Objectives you believe are better facilitated and provide supporting reasons. If not, please provide supporting reasons.
11	Are you aware of any wider industry developments that may impact upon or be impacted by this CP?
12	What are the system impacts for this change and should it be limited to MHHS MPANs only?
13	Do you agree with the proposed implementation date? If not, please provide rationale.
14	Do you have any comments on the proposed legal text?
15	Do you have any other comments on DCP 440?

10.2 Responses should be submitted using Attachment 1 to dcusa@electralink.co.uk no later than, **03 July 2024**.

10.3 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.

11 Attachments

- Attachment 1: DCP 440 Consultation Response Form
- Attachment 2: DCP 440 Draft Legal Text
- Attachment 3: DCP 440 Change Proposal Form