

DCP 440 Working Group Meeting 04

15 July 2024 at 13:00 - Web-Conference

Attendee	Company
Working Group Members	
Peter Waymont [PW]	UKPN
Edda Dirks	SSE
Victoria Burkett [VB]	SSE
Donna Jamieson [DJ]	IDCSL
Jo Brown [JB]	NGED
Kara Burke [KB]	NPg
Nik Wills [NW]	Stark
Lili Zou [LZ]	SSE
Ian Chadwick [IC]	Mua Group
Hazel Patterson [HP]	SPEN
Lucy Penketh [LP]	ENWL
Simon Vicary [SV]	EDF
Monique Pereira [MP]	Indigo Networks
Chris Ong [CO]	UKPN
Kevin Woolard [KW]	Centrica
Code Administrator	
Andy Green [AG]	Chair
Alysson Peña [AP]	Secretariat
Hannah Proffitt [HP]	Secretariat

1. Administration

Recording

- 1.1 The Chair asked members if they were comfortable for this Working Group to be recorded. No members objected to this request. The purpose of this recording is purely to aid the Technical Secretariat in producing an accurate report of the meeting. The recording will be deleted after 15 Working Days.

Apologies

- 1.2 No apologies were received ahead of the meeting.

Competition Law Guidance and Terms of Reference

- 1.3 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.

Minutes Review

- 1.4 Attendees noted that the minutes from the previous meeting have not been issued yet.

Action Log

- 1.5 The Chair provided updates on the open actions contained in the actions log within the appendix, given the time passed between meeting there were no updates to these actions to be announced during the meeting.

2. Purpose of the Meeting

- 2.1 The Chair advised that the purpose of the meeting was to continue reviewing the consultation responses and consider next steps.
- 2.2 A member asked if the data presented at the previous meeting could be included in the minutes for the previous meeting? This was agreed and these can be found within **Attachment 1**.

3. Review Consultation Responses

- 3.1 The Chair presented the remaining consultation responses to the Working Group. Noted that confidential so don't share outside group.

Question 10 – Do you consider that the proposal 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.

- 3.2 The Working Group noted that while it is taken into account for some of these sites the occupiers could be unknown and this change (if approved) would mean that additional charges are created, the Working Group concluded that due to these readings being received remotely, these sites are alive and therefore those customers would be billed accordingly.

- 3.3 It was also noted that the responsibility to identify those customers falls on the owners and suppliers. The issue of unknown occupiers is not unique to this change, and it was agreed that the charges created would be valid.
- 3.4 Several other responses felt that charging objective 2 was better facilitated and two responses felt general objective 3 was better facilitated. Two did not give a response.
- 3.5 The Working Group agreed that charging objective 2 and general objective 3 were positively impacted and none are negatively impacted. This will be reflected as the Working Group's position in the change report.

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

- 3.6 It was noted that several respondents answered that they were not aware of any wider industry developments that may impact upon or be impacted by this change proposal.
- 3.7 The costs of implementation were highlighted from one of the responses, however also noted that would not be a barrier to progression.
- 3.8 One noted that this information is typically received via D205 flow and if any changes were made it could be subject to the MHHS code freeze. Chair noted that this DCP is not looking to make any changes that would have an impact on the MHHS programme at this time. The Working Group agreed there would be no impact.
- 3.9 One noted that a corresponding change to TNUoS charging may be required. Likely changes will be needed to durabill. Currently the P402 report only includes energised demand sites at the moment de energised sites are excluded. The Working Group concluded that whilst this would be a consequential change to the BSC, it was not for this Working Group to raise.
- 3.10 The Chair did however agree to contact the BSC to provide an FYI that a change to P402 would likely be incoming.

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

- 3.11 For a number of reasons most responses felt that the change should be limited to MHHS MPANS as updating what would soon to become a legacy system is not worth the costs.
- 3.12 One of the most noted reasoning for the above being that we'd have to update a legacy system that is going to be shut down in the foreseeable future.

Question 13 – Do you agree with the proposed implementation date?

- 3.13 There were votes against progressing the change report and therefore these were not supportive of the implementation date. Reasons have been noted earlier in this document.

- 3.14 The Working Group noted and concluded if the change is to go ahead, the reason April 2026 was chosen as an implementation date was because all methodology changes happen on 1st April. It was agreed to highlight this in subsequent documentation.

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

- 3.15 One response noted that the legal text makes no distinction between non-zero estimates and non-zero actual reads. The Proposer noted that the legal text does make this clear, the Working Group reviewed the legal text and agreed it was clear and correct.
- 3.16 One response suggested an SLA is introduced, the Working Group discussed the possibility and agreed that this would be more of a REC obligation, and it is outside the scope of this change.
- 3.17 One response suggested that the statute of limitations should be referenced. The Working Group noted that the current process dictates that you can only back date to the date of energisation within the settlement time frames. It was discussed that the rules in MPRS allow backdating energisation back 14 months and with HHS you are only able to go forward. The Working Group agreed that statute of limitations does not need to be referenced and it is in the gift of the supplier on how far back they backdate any update
- 3.18 A question was raised around why durabill changes would be needed rather than to utilise the current process. The Working Group noted and agreed the reason being is the current process is not always being followed as pr the data received from Elexon.
- 3.19 An ongoing and common comment through the responses was regarding backdating and how far back this should be done. It was noted that the process is agnostic to what the supplier does, and all this change is seeking to achieve is to charge DUoS from the data non zero consumption is detected. If a supplier then wanted to investigate and find out the exact dates, then that is within their gift to do so.
- 3.20 SSE commented on the use of the term ‘incorrectly de-energised site’ and suggested that clarity is added, and amendments made to the legal text. The Working Group took this feedback onboard and agreed for the changes to be made.

Question 15 – Do you have any other comments?

- 3.21 The backdating element was once again mentioned on one of the responses, this was clarified earlier in this document. The Working Group agreed that this is to the Suppliers discretion.
- 3.22 It was noted that billing multi-MPAN sites is based the consumption on the de energised MPAN that is in question as MPANs would be view in isolation regardless of whether they were related or part of a multi-site arrangement
- 3.23 One response questioned what would happen in the reverse situation that MPAN is retrospectively deenergised. The Working Group reassured and agreed that current processes are in place to oversee this.
- 3.24 The response also asked for clarity on when it was retrospectively energised. The Chair noted that as discussed previously, it is within the supplier’s gift to do that investigation. Moving forwards from the

date that the first non 0 consumption has been received and if anybody wants to do an investigation, they are welcome to do that and back date as necessary.

- 3.25 One response noted that current processes are failing and suggested these need to be looked at. The Chair and Working Group noted that this is an ongoing conversation and can be an exercise carried out alongside side this change. It was agreed that the tightening up of the existing process fell outside of this DCUSA change and that the DCUSA change was not reliant on any other obligations in other industry codes being amended.
- 3.26 One response suggested a delay to charges being passed on to allow Suppliers to investigate. The member noted that tightening up of current processes in other codes will allow for investigations to take place. It was noted that if the change is implemented on 1 April 2026, then it gives time to look at current processes and potentially data cleanse.
- 3.27 A member noted that after a meeting with REC last week and this change was flagged to them as a number of obligations sit in REC regarding deenergised sites. It was highlighted to REC the number of effected sites in industry and suggested that this is something they need to look at. REC being aware could be beneficial when considering the work that can be done to improve the existing processes.
- 3.28 It was noted that the REC were not aware of this DCP and Working Group members agreed that this could be an indicator that the issue is being investigated within other codes already.
- 3.29 One response noted scenarios in which a site is physically de-energised, but the read is not valid for that site. The Chair noted that in this case we are looking specifically at remote reads. The Working Group agreed that this is not a risk and the Proposer noted that there is nothing in a D036 that flags this. The other points outlined in this response are addressed under previous questions.

4. Review/Update Work Plan

4.1 Next steps:

- Chair to chase Elexon for the further data/clarity requested.
- Chair to draft a Change Report and issue to group (by Thursday 25th July).

4.2 The Working Group agreed to meet again on Monday 29th July, 11am to 1pm to review the draft Change Report.

5. Any Other Business

5.1 No other business was raised.

6. Attachments

- Attachment 1 DCP 440 data

New and Open Actions

Action Ref.	Action	Owner	Update
01/02	The Chair to contact the Central Settlement Source requesting data on deenergised sites.	AG	<i>Action ongoing.</i> The Chair is awaiting a response from Elexon regarding the request for data on how long MPANs have been deenergised for.
02/02	The Chair to contact Martin at the BSC to gain further clarity in regards if the consumption is used in settlements or not, this is to be shared with the WG. This is also to be checked on the Consultation Document (section 1.3)	AG	<i>Action ongoing.</i>
02/03	The Chair to contact Elexon and share findings on the Consultation Document.	AG	<i>Action ongoing.</i>

Closed Actions

Action Ref.			Update
01/01	The Chair to contact the BSC to ask what they do when they receive consumption data from deenergised sites.	AG	<i>Action closed.</i>
02/01	The Secretariat to add an action to the meeting 01 minutes: The Chair to draft a Consultation Document for members to review.	AG	<i>Action closed.</i>