

## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

Company	Confidential/ Anonymous	1. Do you understand the intent of the Change Proposal?	Working Group Comments
<b>SPEN</b>	Non-confidential	Yes	Noted
<b>Northern Powergrid</b>	Non-confidential	Yes	Noted
<b>BU-UK</b>	Non-confidential	Yes	Noted
<b>UK Power Networks</b>	Non-confidential	Yes	Noted
<b>British Gas</b>	Non-confidential	Yes	Noted
<b>Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc</b>	Non-confidential	Yes	Noted
<b>SSE Energy Supply Ltd (SSE Business Energy)</b>	Non-Confidential	Yes	Noted

## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

<b>ScottishPower Energy Retail Limited</b>	Non-Confidential	Yes	Noted
<b>Stark</b>	Non-confidential	Yes	Noted
<b>ENWL</b>	Non-confidential	Yes	Noted
<b>Working Group Conclusions</b> All respondents said they understood the principles of the changes			

Company	Confidential/ Anonymous	2. Are you supportive of the principles that support this Change Proposal?	Working Group Comments
<b>SPEN</b>	Non-confidential	Yes, we believe that it is appropriate that all sites are billed on the basis that they are using energy, there should be no reason for a site not to be billed due to a failure to update a status flag when there is evidence that energy is being used.	Yes
<b>Northern Powergrid</b>	Non-confidential	No. We believe that the current verbiage of the DCUSA is suitable for dealing with de-energised sites, as it says "If a site is found to be energised charges will be back dated to the date of energisation." This means that the volumes will be charged UoS charges once the energisation status has been corrected.	No

## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

		<p>We do not support a change that would require parties to bill de-energised sites. The principles of this change align closely with that of DCP411 which was rejected by the Authority.</p> <p>We believe there are existing processes within other codes which identify where an MPAN has been de-energised incorrectly and should lead to Suppliers investigating and correcting this status.</p> <p>If the current process is not working we believe this should be addressed within the codes responsible for those processes, rather than by introducing additional complexity to UoS billing processes.</p>	
<b>BU-UK</b>	Non-confidential	Yes	Yes
<b>UK Power Networks</b>	Non-confidential	Yes	Yes
<b>British Gas</b>	Non-confidential	We agree that where a site is consuming energy then mechanisms should be put in place to ensure that Duos is appropriately charged and Suppliers can recover these costs from the consumer.	Yes
<b>Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc</b>	Non-confidential	Yes, we support the principle that a site which has recorded non-zero consumption (and therefore is not in fact de-energised) should be charged DUoS. However, the issue appears to have arisen due to incorrect classification and there should be a process in place to have this corrected in a timely manner where identified.	Yes
<b>SSE Energy Supply Ltd (SSE)</b>	Non-Confidential	No, we are not. An assumption has been made that introducing charges for consuming de-energised sites will fix the issue which has been identified. We	No

## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

<b>Business Energy)</b>		appreciate that a site which is classed as de-energised should not be consuming energy. However, as the proposal stands, suppliers may become liable to network charges without first having had the opportunity to investigate and rectify the reason for the mislabelling of an MPAN. We don't think this is right, and we believe there is a fundamental issue with the current processes, which should be rectified ahead of any changes being made to the DCUSA. Without this, suppliers' debt will increase with charges being passed on by the DNO where there is no customer to bill. These costs will need to be recovered and ultimately, those customers who already pay will likely see an increase in their charges to cover this shortfall. It is our understanding that the network Price Controls require DNOs to minimise revenue losses. We consider that DNOs should be required to fully investigate the sources of missing revenue first, before billing suppliers. This proposal would take away the incentive on the DNOs to do so.	
<b>ScottishPower Energy Retail Limited</b>	Non-Confidential	We are supportive of this change as long as it only relates to actual data on a de-energised MPAN	Yes
<b>Stark</b>	Non-confidential	Yes, in principle, however there was to be a report of the extent of the possible issue however as of writing this has not been received. This is important to making any decision making and should be available if issue is significant.	Yes
<b>ENWL</b>	Non-confidential	Yes	Yes

## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

**Working Group Conclusions:** Of the 12 who responded, 10 supported the change and 2 did not. It was noted that there are already processes in place that should lead to investigations for de energised sites that have recorded non zero consumption. The Working Group agreed that there was a point around the efficacy of the existing processes that needed to be discussed further.

It was also noted that the analysis into the size of the issue had now been received and that there were 160k NHH MPANs that had recorded non zero consumption and over 700k de energised HH MPANs so the size of the issue was significant. It was also noted that the analysis received from Elexon was a snap shot in time and that it would be help if the data could be enhanced to show how long the MPANs had been de energised for.

Company	Confidential/ Anonymous	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?	Working Group Comments
<b>SPEN</b>	Non-confidential	We are not aware of any standard Industry reports, however our internal process is to advise the Supplier via email of sites identified.	No industry reports but has interanl process. Manual process to contact customers.
<b>Northern Powergrid</b>	Non-confidential	We have an internal process whereby each month we extract de-energised records (for all measurement classes) from the registration database. Checks are run to identify whether any D0010 meter reads have been received. Where they have, the records are issued to suppliers and we request that investigations are performed and where it is identified that the energisation status is incorrect, it is updated	No industry reports but has interanl process. Manual process to contact customers.
<b>BU-UK</b>	Non-confidential	Unaware of any industry-wide reporting, this would be for DCUSA to confirm with the other Code bodies. Our internal review system is highly manual and relies on a comparison between last month's/current data and analysing and discrepancies revealed.	No industry reports but has interanl process. Manual process to contact customers.

## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

<b>UK Power Networks</b>	Non-confidential	eMailing of exception reports from systems.	No industry reports but has internal process.. Manual process to contact customers.
<b>British Gas</b>	Non-confidential	None that we are aware of. Only the D0235 reporting from HHDA already detailed in the consultation.	D0235 from HHDA
<b>Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc</b>	Non-confidential	The 'De-energised Data' report in Durabill shows details of metering data that has been received for de-energised sites.	No industry reports but has internal process.
<b>SSE Energy Supply Ltd (SSE Business Energy)</b>	Non-Confidential	We are not aware of any such reports being defined in code, however, we are aware that a report is provided by e-mail	No industry reports identified in code. Receives email from distributors.
<b>ScottishPower Energy Retail Limited</b>	Non-Confidential	The DNOs do not charge currently for consumption on de-energised MPANs, regardless of whether the data is actual or estimated. The HHDA does create D0235 999 exceptions which as Supplier we would investigate. This requires us to check flows and billing systems to see if there is anything to indicate that the MPAN has been reenergised. There are a rare number of occasions where the DNO may email us to advise they are receiving actual data on a de-energised MPAN but are unable to invoice.	D0235 from HHDA

## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

<b>Stark</b>	Non-confidential	<p>Currently there is no known reporting in use for IDNOs to identify if there is a mismatch between the registered energisation state &amp; physical state of metering.</p> <p>This lack of mandatory reporting seems to be a significant factor, as the responsibility for taking actions lies with Supplier &amp; DNO's and impact time taken for a possible resolution.</p>	No known reports. Highlights lack of mandatory reporting is a factor in process flaws as unclear on whos responsible.
<b>ENWL</b>	Non-confidential	There is an existing report in our billing system that identifies where we are receiving D0036s containing actual data on de-energised MPANS. This information is shared with suppliers on a monthly basis.	D0235 from HHDA
<p><b>Working Group Conclusions:</b> The process to identify these instances is very manual and labour intensive. A number of working group members highlighted that the email reports of consumption on de energised sites to the relevant supplier, but these aren't always updated.</p> <p>It was noted that if consumption is received on a de energised MPAN via a remote reading, this should be sufficient evidence that the MPAN is energised.</p>			

Company	Confidential/ Anonymous	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?	Working Group Comments
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## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

<b>SPEN</b>	Non-confidential	Information relation to the Energisation/De-Energisation of sites is referenced in the REC Schedule 14 - Metering Operations document, however there is no reference to any reporting.	REC Schedule 14.
<b>Northern Powergrid</b>	Non-confidential	BSC, particularly the Supplier Volume Allocation Rules. There is an established process between the supplier and its agents (data collector, data aggregator) to identify and communicate exceptions (such as non-zero reads on registered de-energisation). A supplier party or Elexon would be better placed to provide further detail on this existing process.	BSC has an establish processed.
<b>BU-UK</b>	Non-confidential		Noted
<b>UK Power Networks</b>	Non-confidential	Unknown	Noted
<b>British Gas</b>	Non-confidential	None that we are aware of other than D0235 reporting from HHDA.	D0235
<b>Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc</b>	Non-confidential	Not aware of anything other than the above mentioned Durabill report.	Noted
<b>SSE Energy Supply Ltd (SSE)</b>	Non-Confidential	We have identified the following obligations for an incorrect de-energisation status although we have also identified that an additional scenario variant of	REC schedule 14 and BSC 503.3



## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

<b>Business Energy)</b>		the D0139 should be developed, which we have detailed within Q15. REC Schedule 14 – Metering Operations details the processes in which the Supplier, DNO and MEM need to take in order to ensure the correct energisation status is held. BSCP 503 4.3(d) covers Consumption Data Received for a De-Energised Meter. These anomalies are reported via D0235 dataflow from HHDA to Supplier '.	
<b>ScottishPower Energy Retail Limited</b>	Non-Confidential	No comment.	Noted
<b>Stark</b>	Non-confidential	<p>Under the BSC:</p> <p>BSCP502 places an obligation on HHDC to remote dial at least once a month:</p> <p>“In respect of de-energised SVA MSs where communications equipment is available on site, attempt remote data collection.”</p> <p>And Annually:</p> <p>“In respect of de-energised SVA MSs which do not include communications equipment or for which the communications equipment is not functioning correctly, make a site visit to attempt data collection”.</p> <p>Where consumption is identified the Supplier is immediately notified to investigate within timescales of BSCP 502 &amp; reference to REC Schedule 14 Metering Operations.</p> <p>Mutual agreements can speed up this process.</p> <p>As mentioned in consultation document this is part of annual audit process.</p> <p>SVA Risk 016 – SVA Energisation status</p>	BSC 502

## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

		<p>The risk that the energisation status held in SMRS or by any party in the Supplier Hub does not match the physical energisation status of the SVA metering system resulting in erroneous or estimated data in Settlement.</p> <p>As also stated in consultation BSCP 503 describes the D0235 exceptions from HHDA which is also part of the audit process.</p> <p>Upon receipt HHDC must investigate and report to Supplier to action within 5wds.</p>	
ENWL	Non-confidential	<p>Currently, under BSC an exception (either D0095 or D0235) is generated by the Data Aggregator and sent to the Supplier for investigation if they receive actual data (either an AA in a D0019 or a D0036 respectively) from the Data Collector for an mpan that is shown as de-energised in its registration table (updated from MPAS).</p> <p>In addition it's not clear whether there might need to be a changes to CUSC and BSC (see response to Q15).</p>	BSC
<p><b>Working Group Conclusions:</b> It was believed by the Working Group that whilst there are a number of obligations within a few other codes, these obligations don't highlight who is ultimately accountable for updating the status (Supplier, DNO, DC, MOP etc). This can often lead to no party taking ownership of the issue. If these obligations were clearer as to who's required to update the energisation status, this would help the process.</p>			

Company	Confidential/ Anonymous	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?	Working Group Comments
SPEN	Non-confidential	We have identified 3 scenarios where this may be the case.	Noted

## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

		<ul style="list-style-type: none"> <li>COS where supplier has incorrect de-energised the MPAN during the registration process.</li> <li>Supplier has incorrect back dated a de-energisation date into a period where actual reads have been received.</li> <li>Where the fuses have been re-fitted, but the agents have not been notified of this re-energisation – i.e., Theft</li> </ul>	
<b>Northern Powergrid</b>	Non-confidential	We believe Suppliers are better placed to answer this.	Noted
<b>BU-UK</b>	Non-confidential	We would not be privy to this level of context, as de-energisation is a primarily supplier led process and that level of detail would not often be provided to us.	Noted
<b>UK Power Networks</b>	Non-confidential	If an MPAN is De-energised then it should not be consuming energy. Where it is this could be relating to Theft, but could also be where the Energisation Status has not been correctly set by the Supplier, which could arise due to their not having been informed of a change.	Noted
<b>British Gas</b>	Non-confidential	<ul style="list-style-type: none"> <li>Incomplete desktop process such as failure to send a valid D0205 to update MPAS after a Meter Installation or Energisation.</li> <li>Incorrect data carried over from previous Supplier's supply period.</li> <li>Theft.</li> </ul>	Noted

## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

		<ul style="list-style-type: none"> <li>• Failure of DNO to inform MOP of Energisation change.</li> <li>• Undetected work undertaken by party other than MOP or DNO.</li> <li>• Incorrect conclusions during Supplier's Demolished process.</li> </ul>	
<b>Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc</b>	Non-confidential	As mentioned in the Consultation document, theft and COT/COS are potential reasons de-energised sites could be consuming energy. Also, Suppliers not updating the energisation status after being sent a D0139 by the LDSO – We believe that there have been a small number of instances previously.	Noted
<b>SSE Energy Supply Ltd (SSE Business Energy)</b>	Non-Confidential	A consuming de-energised site could be caused by an outgoing update to the energisation status failing, whereby a flow has not been received by the receiving party gateway, or the flow being rejected and not being actioned. In instances where a COT has occurred, in which the new customer at a site has instructed a private electrician to reconnect the supply, a dataflow would not be sent in these instances. The new customer may be unaware of the consequences for this. In instances where there has been a COS, we would gain the site as de-energised, if there has been a failure of data flow we would be unaware of the update to the status. Consuming de-energised sites would also be caused by theft, where the consumer has illegally reconnected the supply. We would like to note that not all de-energised sites are associated to a customer who can be billed. There are instances where a site is empty and we do not have a customer's details to set up an account. There would be no way to chase for payment where no customer is available.	Noted

## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

<b>ScottishPower Energy Retail Limited</b>	Non-Confidential	Yes theft, COT and possibly COS. New connections if the MPAN is de-energised from start of supply but on-site situation changes, and actual data starts getting recorded but flows not issued to energise MPAN.	Noted
<b>Stark</b>	Non-confidential	<p>We do not see the intention of the question, as if this is a significant material issue we would expect these factors to be known.</p> <p>Is this again an area identifying lack of reporting.</p> <p>However examples are:</p> <p>New Connections.</p> <p>Change of Tenancy</p> <p>Planned physical work e.g. meter exchange not going ahead and de-energisation status not changed back when/if work completed.</p> <p>Where LDSO or MOA responsible for De-energisation</p> <p>Site reported as demolished / meter not found however meter not physically actioned.</p> <p>A logical disconnection has taken place by DNO and temporary de-energisation status not updated.</p>	Noted
<b>ENWL</b>	Non-confidential	In the majority of instances we believe that the issue is caused because the energisation status is not being updated promptly following a physical change to the status on site. This may be because D0139s are not being issued, or are not being processed by suppliers, resulting in D0205 not being sent to update Registrations. Also, there may be instances where D0205 rejections (i.e. D0203s) may not be being worked by the Supplier.	Noted

## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

**Working Group Conclusions:** The majority of respondents noted that the below scenarios were the main drivers that could cause a previously de-energised site to become energised again.

- Incomplete desktop process such as failure to send a valid D0205 to update MPAS after a Meter Installation or Energisation.
- Incorrect data carried over from previous Supplier's supply period.
- Theft.
- Failure of DNO to inform MOP of Energisation change.
- Undetected work undertaken by a party other than MOP or DNO ie a private electrician.
- Incorrect conclusions during Supplier's Demolished process.

A supplier party noted that it is not always known who the occupiers for these type of sites which can cause later issues with debt collection if the occupier of the site isn't known.

Company	Confidential/ Anonymous	6. What causes the energisation status to not get updated?	Working Group Comments
SPEN	Non- confidential	<p>This can occur as a result of agents not notifying the supplier, or this information not being acted upon.</p> <p>This can also occur where the industry flow to energise is not sent/received or has incorrect information or is rejected and not rectified.</p>	Noted

## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

<b>Northern Powergrid</b>	Non-confidential	N/A. We believe Suppliers are better placed to answer this, as they are responsible for maintaining the energisation status.	Noted
<b>BU-UK</b>	Non-confidential	As de-energisation is a primarily supplier led process, this would be for supplier parties to confirm.	Noted
<b>UK Power Networks</b>	Non-confidential	A failure in the processes, as the supplier may not have been informed that the meter had been energised or may not have updated the registration system	Noted
<b>British Gas</b>	Non-confidential	<ol style="list-style-type: none"> <li>1. Not receiving the update.</li> <li>2. Automated processes failing.</li> <li>3. Subsequent contradictory evidence</li> </ol>	Noted
<b>Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc</b>	Non-confidential	Suppliers not updating the energisation status after being sent a D0139 by the LDSO.	Noted
<b>SSE Energy Supply Ltd (SSE Business Energy)</b>	Non-Confidential	As we have detailed in the previous question, where a flow has either not been sent, actioned or failed, these sites would not have their energisation status updated. Although there is a defined process within the REC for changing the status of the MPAN, we believe there needs to be tighter	Could potentially update REC schduel 14 to obligate parties to use SDEP to report instances of consumption on de energised sites.

## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

		controls in place for when this has not happened. A process within the Secure Data Exchange Portal (SDEP) could be developed which would require a consequential change within the REC to be raised.	<p>The contacts are formally agreed and have structured escalation points.</p> <p>SDEP is also auditable whereas the current process relies on emails and has no SLA.</p>
<b>ScottishPower Energy Retail Limited</b>	Non-Confidential	This could be because of a breakdown in operational processes or lack of information to suppliers.	Noted
<b>Stark</b>	Non-confidential	<p>Lack of exchange of the relevant information i.e. D0139 flows not being sent by LDSO or MOA or not containing correct dates.</p> <p>Relevant parties not taking required or appropriate action within guidelines.</p> <p>Difficult to update SMRS/MPAS if the status cannot be evidenced.</p>	
<b>ENWL</b>	Non-confidential	<p>See above</p> <p>In addition a Supplier might also process logical (i.e. not physical) de-energisations for sites that are not consuming at some point in time due to the nature of the site (very intermittent consumption, vacant, no access to reads, etc) in order to reduce their settlement EAC exposure; this might be done instead of, or in addition to the NHHDC setting a Zero EAC under the BSC Vacants Process or the Supplier sending DC an appropriate Supplier EAC.</p>	Noted



## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

		This should be managed by Elexon as a BSC non-compliance. In such cases ENWL would agree with the Proposal to charge DUoS on receipt of reads.	
<p><b>Working Group Conclusions:</b> One respondent noted that suppliers not getting information back from a welcome pack to allocate someone for billing when an occupier moves out of a property.</p> <p>The correct flows not being sent or none or some of the relevant flows not being sent at all.</p> <p>Automated processes not working correctly when the flows to re energise an MPAN are received.</p> <p>Another respondent stated that these instances could occur because of a breakdown in operational processes or lack of information to suppliers.</p> <p>One supplier respondent noted that there is a defined process within the REC for changing the status of the MPAN and that they believed there needs to be tighter controls in place for when this has not happened.</p> <p>They went on to suggest that a process within the Secure Data Exchange Portal (SDEP) could be developed which would require a consequential change within the REC to be raised outside of this change.</p>			

Company	Confidential/ Anonymous	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?	Working Group Comments
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## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

<b>SPEN</b>	Non-confidential	The DNO may not have the correct supplier contact that were responsible for de/energisation of the MPAN, which means that requests to update the information will not be processed.	Noted
<b>Northern Powergrid</b>	Non-confidential	N/A. We believe Suppliers are better placed to answer this, as they are responsible for maintaining the energisation status.	Noted
<b>BU-UK</b>	Non-confidential	The primary challenge we have witnessed at our stage of the process is a lack of communication from suppliers. However, we are aware that it is possible lack of details given from suppliers may reflect a lack of details being given to suppliers from consumers/developers etc.	Noted
<b>UK Power Networks</b>	Non-confidential	The existence of actual meter reads indicates the status is incorrect.	Noted
<b>British Gas</b>	Non-confidential	<ul style="list-style-type: none"> <li>• Lack of customer interaction.</li> <li>• Site access for MOP.</li> <li>• Limited evidence to determine date of Energisation</li> </ul>	Noted
<b>Southern Electric Power Distribution plc and Scottish Hydro Electric</b>	Non-confidential	If there is a query over whether an MPAN has been energised or not, we can request this information internally from the LDSO Project Manager. As highlighted in the consultation document, we struggle sometimes to contact the right areas within the supply businesses. It would be useful if suppliers	

## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

<b>Power Distribution plc</b>		provided their contact details within the D0134 flow they send when requesting to change of energisation status	
<b>SSE Energy Supply Ltd (SSE Business Energy)</b>	Non-Confidential	Where a status has not been updated, we unfortunately experience issues with parties taking responsibility for the update. We reach out to the MEM and DNO, however, neither party wishes to take responsibility for the de-energisation status. As there is currently no responsibility for the energisation status and until there is a hierarchy of responsibility, we will continue to experience issues in resolving this issue.	
<b>ScottishPower Energy Retail Limited</b>	Non-Confidential	Trying to determine who energised the supply as this can be done via MOP or DNO and they don't always communicate effectively between themselves. Establishing the right customer contact to discuss energisation can also be difficult.	
<b>Stark</b>	Non-confidential	Communication, lack of response to requests to action by responsible Parties.  Lack of access to sites to investigate energisation status.  Incorrect or insufficient site ownership details.	
<b>ENWL</b>	Non-confidential	As a DNO we have limited control over this process, other than to highlight to suppliers where we are receiving actual data on a de-energised site. We receive a mixed response from suppliers when we provide this information, with some suppliers actively engaging and sending D0205s to update the status, where others do not engage.	

## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

**Working Group Conclusions:** Several distributors noted that it can be difficult to contact the correct person at a supplier and maintaining up to date and relevant contact information is challenging.

It was also noted that the REC and BSC obligations are not clear when defining who is ultimately accountable for leading on updating energisation statuses which can lead to a lack of ownership.

Lack of evidence can also be a driver, particularly when the customer is unknown so the energisation can't be discussed or to arrange site visits.

Company	Confidential/ Anonymous	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?	Working Group Comments
<b>SPEN</b>	Non-confidential	The billing system will need to be altered, so that de-energised MPAN/site with actual reads are invoiced automatically. The billing system will only invoice MPANs that are currently energised.  Supplier's will challenge Duos billing on MPANs that are registered as de-energised on MPRS/ ECOES and can withhold payment.	Noted
<b>Northern Powergrid</b>	Non-confidential	The billing systems used by LDNOs do not currently bill de-energised sites, meaning that a change would be required to the systems to allow this driving additional cost. Lead times to implement the changes in a robust way would also need to be considered.	Noted

## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

		Additional changes would be needed to ensure that these sites are not included in the counts of sites sent to National Grid for calculation of their TNUoS residual charge, as de-energised sites are currently not included.	
<b>BU-UK</b>	Non-confidential	Any impact would only be able to be measured subject to quantities of energisation status changes received.	Noted
<b>UK Power Networks</b>	Non-confidential	<p>The Durabill system would need to be changed to process the data for De-energised MPANs, additional training of staff may also need to be undertaken, alongside an expected increased number of queries from Suppliers.</p> <p>In the last 14 months we estimate we would have invoiced an additional 10m kWh and 27k MPAN days.</p> <p>CT metered customers who are NHH settled and will migrate to HH under MHHS will receive the same charges for any periods where they are flagged de-energised but consuming energy before and after their migration.</p>	Noted
<b>British Gas</b>	Non-confidential	We have processes in place to investigate inconsistencies reported by the HHDA relating to energisation status for the current HH population.	Noted
<b>Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc</b>	Non-confidential	Current billing system (Durabill) design for MHHS Site Specific billing does not currently bill de-energised sites and would therefore need to be changed to accommodate this. St Clements have provided a High-Level Impact Analysis - these changes (provided by St Clements) have an estimated cost in the region of £25k - £30k, which would be split between all Durabill customers. This is based on the following assumptions –	Noted

## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

		<ul style="list-style-type: none"><li>• This DCP will only impact MHHS Site Specific billing and therefore no changes are required to HH billing.</li><li>• No changes are required to the REP900 to report separately the number of days billed for de-energised sites and energised sites. DCUSA Consultation DCP 440 Page 3 of 5 1.0</li><li>• The consultation highlights that the change to DCUSA specifically addresses CDCM sites but does not address generation sites, LDNO Charges or EDCM sites. However, the consultation states that it expects the outcome of this change should mean these will be charged as well as CDCM sites. There would be an increase to the estimated costs for distinguishing CDCM sites only.</li></ul> <p>The following clarification has also been requested from St Clements –</p> <ul style="list-style-type: none"><li>• The implementation date of the change is given as 1 April 2026. The consultation is unclear if billing of de-energised sites with non-zero consumption would be back dated with rebill functionality or only effective for settlement dates from 1 April 2026. If back dating is required, rules around when to cancel and rebill those sites would be necessary.</li><li>• If the DCP is approved, the rules are unclear for billing an MPAN on a multiMPAN site which has one de-energised MPAN but where the other MPAN on the site is energised. Costs are likely to be significantly higher if changes to legacy processing is required. Also, if any changes are required to the P402 billing data reports (see question 11), this will increase the cost. Dependant on what new processes need to be implemented, this could require additional resource/training.</li></ul>	
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## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

<b>SSE Energy Supply Ltd (SSE Business Energy)</b>	Non-Confidential	Once an account is de-energised, our system is set to stop all billing activity and all charges cease. No further charges are passed onto the customer, this would require a significant change to current systems to enable continuation of charges after the property has been de-energised. As we have alluded to in other questions, we don't always have the correct customer listed for charges to be passed on to due to COS/COT events or where there are instances of theft. Suppliers' debt will increase with charges being passed on by the DNO where there is no customer to bill, these costs will need to be recovered and ultimately, those customers who already pay will likely see an increase in their charges to cover this shortfall	Noted
<b>ScottishPower Energy Retail Limited</b>	Non-Confidential	We cannot confirm what impacts would be at this stage	Noted
<b>Stark</b>	Non-confidential	Change to IDNO billing system would be required in order to facilitate this change.  New reporting activities will need to be implemented however access to this information is not currently available as a business requirement.  Therefore they would need to build reporting and update systems to check in.  Additional training to facilitate will also be required to manage this change.	Noted
<b>ENWL</b>	Non-confidential	A change would be required to our billing system. The system vendor's impact assessment indicates a number of queries that could further affect their assessment, included in response to Q15, most notably the potential for changes to TNUoS.	Noted

## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

**Working Group Conclusions:** It was agreed this change would require changes to billing systems which have a lead time of a minimum of 6 months.

Company	Confidential/ Anonymous	9. If this change was to be approved, what are the potential impact to customers?	Working Group Comments
<b>SPEN</b>	Non-confidential	Customers would be correctly charged for sites that had been marked De-energised in error or not correctly updated.  The DNO can recover DUoS income that is due for actual usage, before ECOES has been updated by the supplier.	Correctly billed
<b>Northern Powergrid</b>	Non-confidential	We agree with Ofgem in the DCP411 decision that 'consumer bills would likely increase to recover legal and administrative cost of Suppliers and DNOs as well as covering unpaid DUoS charges levied against non-responsive parties'.	Increased debt
<b>BU-UK</b>	Non-confidential	Positive benefit - being billed correctly.	Correctly billed
<b>UK Power Networks</b>	Non-confidential	This would result in Customers who are consuming energy being charged DUoS to their Supplier, who would look to pass on the charge. It would however ensure that correctly Energised Customers are not paying additional costs to cover those of Customers who are currently not charged DUoS, even though they are consuming energy.	Correctly billed



## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

<b>British Gas</b>	Non-confidential	The impacts on consumers should be minimal. If Suppliers are currently investigating incorrectly de-energised HH sites and have processes in place to rectify these then the fact that the DNO will start to charge Duos for these sites should not have any material impact on customers.	Noted
<b>Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc</b>	Non-confidential	Customers would be impacted if back billing was required.	Noted
<b>SSE Energy Supply Ltd (SSE Business Energy)</b>	Non-Confidential	To be able to effectively charge a customer, suppliers will need to know who the customer is. This is not always the case for de-energised sites in our portfolio due to various factors such as Change of Supply and Change of Tenancy. There are also issues charging known customers who are currently under debt collection activity or are undergoing theft investigations. There is also the added complexity of billing arrangements for de-energised customers. Suppliers would need to implement additional risk premia to cover these instances. As we have mentioned in our other responses, we believe that due to various practical challenges of collecting charges from de-energised customers, there could be an increased cost, as non-payment of charges by de-energised customers will need to be recovered by other means. There is also a potential for financial impact on suppliers in an already volatile market with the added complexity of the cost of living crisis. These have to be considered.	

## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

<b>ScottishPower Energy Retail Limited</b>	Non-Confidential	We are unable to confirm at this stage	Noted
<b>Stark</b>	Non-confidential	Customers may face increased billing charges due to potential back-dating of charges to Suppliers,	Increased debt
<b>ENWL</b>	Non-confidential	This will result in all customers being treated equitably as everyone will be paying for actual usage recorded, subject to the exclusion of erroneous reads referred below.	Correctly billed
<p><b>Working Group Conclusions:</b> Several suppliers had raised concerns around some customer impacts.</p> <p>In relation to the responder who stated that its not always known who's responsible for these incorrectly de energised sites which can created problems in knowing who to bill, it was agreed that this is an existing issue wider than just de energised sites and that organisations should have their own existing processes for investigating who's responsible for a site.</p> <p>Concerns were also raised around this change pushing some customers into debt, or even further into debt if this change was accepted, it was acknowledged that if consumption has been detected via remote readings, its clear the site is consuming energy and so any DUoS passed on to the customer would be valid.</p> <p>Ultimately the Working Group understood that additional charges would be potentially passed on to customers, but these customers would be correctly charged for sites that had been marked De-energised in error or not correctly updated.</p> <p>The DNO could then recover DUoS income that is due for actual usage, before ECOES has been updated by the supplier.</p>			

## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

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Company	Confidential/ Anonymous	10. Do you consider that the proposal better facilitates the DCUSA General Objectives? <ul style="list-style-type: none"><li>If so, please detail which of the General Objectives you believe are better facilitated and provide supporting reasons.</li><li>If not, please provide supporting reasons.</li></ul>	Working Group Comments
<b>SPEN</b>	Non-confidential	Yes	2
<b>Northern Powergrid</b>	Non-confidential	No.  We do not agree that DCUSA Charging Objective 2 would be better facilitated by this change. We believe that the impact would be negative against DCUSA Charging Objective 2 in line with Ofgem's decision on DCP411, as Suppliers may not be able to identify customers for these site and therefore may not be able to recover the DUoS charges for de-energised sites.	2 negative
<b>BU-UK</b>	Non-confidential	Yes - The promotion of efficiency in the implementation and administration of this Agreement and the arrangements under it.	2

## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

<b>UK Power Networks</b>	Non-confidential	We believe that DCUSA General Objective 2 is better facilitated by this change as it creates consistency in the arrangements and where energy is consumed it is charged for.	2
<b>British Gas</b>	Non-confidential	We agree that DCUSA Charging Objective 2 is better facilitated by this change proposal. By charging Duos to de-energised sites that are actually consuming more accurately reflects the costs incurred by the DNO business.	2
<b>Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc</b>	Non-confidential	Yes, DCUSA General Objective 3. If an MPAN is physically energised and consuming, then it should receive DUoS charges against it	3
<b>SSE Energy Supply Ltd (SSE Business Energy)</b>	Non-Confidential	The consultation document indicates that this change proposal should be assessed against the Charging Objectives rather than the General Objectives. We note that it is considered that the proposal will better facilitate Charging Objective 2, i.e. should the proposal be implemented, charges would reflect the costs incurred by the DNOs. Whilst that may be the case, as the solution currently stands, there is a risk that suppliers may not be able to recover those costs from the relevant end consumers. We have made suggestions elsewhere in this response on how to address this issue.	2

## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

<b>ScottishPower Energy Retail Limited</b>	Non-Confidential	N/A	na
<b>Stark</b>	Non-confidential	We are unable to reach a conclusion from the information against DCUSA General objectives.	na
<b>ENWL</b>	Non-confidential	We agree that this proposal, with the clarifications referred below, could better facilitate objective 3 – see comments above.	2 and 3
<p><b>Working Group Conclusions:</b> Eight (8) responders agreed with the proposal that charging objective 2 would be better facilitated by this change</p> <p>Two responders agreed that general objective 3 was also better facilitated.</p> <p>Two responders offered no view.</p> <p>A DNO responder stated that they believed that charging objective 2 would not be better facilitated and highlighted that this view is in line with Ofgem's decision on DCP411, as Suppliers may not be able to identify customers for these site and therefore may not be able to recover the DUoS charges for de-energised sites.</p>			

Company	Confidential/ Anonymous	11. Are you aware of any wider industry developments that may impact upon or be impacted by this CP?	Working Group Comments
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## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

<b>SPEN</b>	Non-confidential	No	Noted
<b>Northern Powergrid</b>	Non-confidential	No	Noted
<b>BU-UK</b>	Non-confidential	As this information is typically received via a D205, should any changes be identified that could impact this flow, this may then be subject to the MHHS code freeze.	Noted
<b>UK Power Networks</b>	Non-confidential	No	Noted
<b>British Gas</b>	Non-confidential	No	Noted
<b>Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc</b>	Non-confidential	<p>St Clements have highlighted there is a principal under the Residual Network Charging TCR that the same sites should be applicable for residual charges for DUoS and TNUoS. If DCUSA is being changed such that some de-energised sites are to be billed, a corresponding change to TNUoS charging may also be required.</p> <p>Assuming that such a TNUoS change is required, the BSC obligation on DNOs to provide billing data to National Grid, introduced in Elexon Modification P402 will also need to be amended.</p> <p>The P402 billing data reports are issued directly from DURABILL, it is therefore likely that any changes to this obligation would require additional changes to DURABILL. Such changes have not been included in the costs detailed above.</p>	Noted

## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

<b>SSE Energy Supply Ltd (SSE Business Energy)</b>	Non-Confidential	No	Noted
<b>ScottishPower Energy Retail Limited</b>	Non-Confidential	N/A	Noted
<b>Stark</b>	Non-confidential	No.	Noted
<b>ENWL</b>	Non-confidential	No	Noted
<p><b>Working Group Conclusions:</b> The Working Group discussed if this change should be extended to NHH MPANs.</p> <p>The Working Group established that the process for NHH MPANs was more robust than the HH arena, so the issue wasn't as prevalent in for NHH sites as it was for HH sites.</p> <p>It was also noted that due to the MHHS programme, it wouldn't be efficient to extend this change to NHH MPANs as these would be diminishing in numbers so making changes to what would soon become legacy systems wouldn't be cost effective.</p>			

Company	Confidential/Anonymous	12. What are the system impacts for this change and should it be limited to MHHS MPANs only?	Working Group Comments
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## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

<b>SPEN</b>	Non-confidential	The DNO billing system will need to be updated to facilitate this process change, there is a major change currently underway to facilitate Duos billing requirements in MHHS, we would suggest that it is more prudent to incorporate into the MHHS area as this would be more cost and resource effective.	MHHS only
<b>Northern Powergrid</b>	Non-confidential	See answer to question 8 above.	Noted
<b>BU-UK</b>	Non-confidential	We believe this to be more of a use of systems issue rather than systems issue – i.e. ensuring early communication, data accuracy etc. We can understand the logic of MHHS MPANs at this point but believe there may potentially be need for a mop up exercise on legacy non-MHHS MPANs should any be identified.	MHHS only
<b>UK Power Networks</b>	Non-confidential	This will require system changes and, given other system changes in flight, we suggest that only MPANs which have been migrated under MHHS and are flagged as De-energised but consuming energy should be charged DUoS.	MHHS only
<b>British Gas</b>	Non-confidential	We agree that this change should be limited to MHHS MPANS only. We can then incorporate any changes required into our MHHS system build.	MHHS only
<b>Southern Electric Power Distribution plc and Scottish Hydro Electric</b>	Non-confidential	Billing system impacts have been detailed in section 8. St Clements have confirmed that any updates to legacy systems would significantly increase the cost required to accommodate DCP440. However, at present if a site is identified to be 'energised', we would back bill as far as necessary per statute of limitations. Unless this were to change (as a consequence of DCP 439 approval), this change should be progressed on the basis that back	



## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

<b>Power Distribution plc</b>		billing per statute of limitations would endure per the wording in DNO charging statements.	
<b>SSE Energy Supply Ltd (SSE Business Energy)</b>	Non-Confidential	This change can only work on HH MPANs due to the nature of NHH aggregation and the use of EACs. It would not be possible to identify consuming de-energised sites in the NHH market.	MHHS only
<b>ScottishPower Energy Retail Limited</b>	Non-Confidential	N/A	
<b>Stark</b>	Non-confidential	We do not understand the logic of restricting this change to MHHS MPANs. Migrated MPANs will presumably have met data cleanse standards and there will be new MHHS processes that could address the issues.  This may exclude impacted MPAN's however there is insufficient information on the scope of the issue.	both
<b>ENWL</b>	Non-confidential	A change would be required to our billing system. The system vendor's impact assessment indicates a number of queries that could further affect their assessment, included in response to Q15, most notably the potential for changes to TNUoS. But ENWL agree the change should be limited to MHHS sites only.	MHHS only
<b>Working Group Conclusions:</b> The Working Group discussed if this change should be extended to NHH MPANs.			

## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

The Working Group established that the process for NHH MPANs was more robust than the HH arena, so the issue wasn't as prevalent in for NHH sites as it was for HH sites.

It was also noted that due to the MHHS programme, it wouldn't be efficient to extend this change to NHH MPANs as these would be diminishing in numbers so making changes to what would soon become legacy systems wouldn't be cost effective

Company	Confidential/ Anonymous	13. Do you agree with the proposed implementation date? If not, please provide rationale.	Working Group Comments
<b>SPEN</b>	Non-confidential	Yes, as this allow time for the billing systems to be updated.	Noted
<b>Northern Powergrid</b>	Non-confidential	No. We do not agree with the change proposal and therefore do not agree with the proposed implementation date.	Noted
<b>BU-UK</b>	Non-confidential	Yes – although we would prefer earlier if possible, to allow for earlier consumer benefit.	Noted
<b>UK Power Networks</b>	Non-confidential	Yes	Noted

## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

<b>British Gas</b>	Non-confidential	We agree with the proposed implementation date of 1 <sup>st</sup> April 2026	Noted
<b>Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc</b>	Non-confidential	We believe the underlying problem of incorrect status application needs to be addressed as opposed to pursuing this solution at this time. There should be a routine process in place whereby if a site is identified to have non-zero consumption, the status should be updated to 'energised' and re-billed by DNOs accordingly i.e. no Durabill updates should be required.	Noted
<b>SSE Energy Supply Ltd (SSE Business Energy)</b>	Non-Confidential	We do not understand the rationale for proposing to implement this change in the middle of MHHS migration. If this change is restricted to MHHS migrated MPANs only, then it would seem sensible to wait until after migration in October 2026.	It was noted that the reason that April 2026 was the implamention date was because all methodology changes happen on the 1st April. It was agreed to call this out in subsequent documentation.
<b>ScottishPower Energy Retail Limited</b>	Non-Confidential	No comment.	Noted
<b>Stark</b>	Non-confidential	If this change is restricted to migrated MHHS MPANs, then the proposed implementation date seems appropriate.	Noted
<b>ENWL</b>	Non-confidential	Yes, due to current level of change linked to MHHS would be difficult to deliver earlier than proposed.	Noted

## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

**Working Group Conclusions:** Nine respondents agreed with the proposers view that the implementation date should be 01 April 2026.

A supplier respondent stated that they did not understand the rationale for proposing to implement this change in the middle of MHHS migration. If this change is restricted to MHHS migrated MPANs only, then it would seem sensible to wait until after migration in October 2026.

Another respondent stated that they believed the underlying problem of incorrect status application needs to be addressed as opposed to pursuing this solution at this time.

One of the responders who answered yes, they agreed with the proposed implementation date also stated they would prefer earlier, if possible, to allow for earlier consumer benefit.

One respondent offered no comment on this question.

Company	Confidential/ Anonymous	14. Do you have any comments on the proposed legal text?	Working Group Comments
<b>SPEN</b>	Non- confidential	No	Noted
<b>Northern Powergrid</b>	Non- confidential	The legal text makes no distinction between non-zero estimates and non-zero actual reads. We do not agree with billing a de-energised site, particularly on the basis of non-zero estimates received by the supplier's agent.	Noted

## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

		We believe the verbiage of the legal text as it currently stands is sufficient to ensure that UoS charges for any incorrectly de-energised sites will be collected once the status has been corrected by the Supplier	
<b>BU-UK</b>	Non-confidential	We would be in favour of adding an SLA for the status to be corrected upon identification of an energisation status mismatch.	Noted
<b>UK Power Networks</b>	Non-confidential	No	Noted
<b>British Gas</b>	Non-confidential	No	Noted
<b>Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc</b>	Non-confidential	The proposed legal text specifies that the charges will be backdated to the date of energisation, but reference should also be made to the statute of limitation timescales i.e. whichever is the shorter. If the status is corrected to 'energised' back to the date of energisation, why do we need to implement any Durabill changes i.e. could we not just charge as we do now for sites where the status has been amended?	The Working Group agreed that the current accepted process only allows an energisation status to be back dated to RF, so the statue of limitations doesnt come affect.
<b>SSE Energy Supply Ltd (SSE Business Energy)</b>	Non-Confidential	<p>We have taken note of a comments made at working group regarding the term 'incorrectly de-energised site', which we consider to be ambiguous. We believe paragraph 140 of the legal text should be amended as follows (notwithstanding the fact that we don't agree with the solution as it stands):-</p> <p>140 Where a site's status is marked incorrectly in industry systems as 'de-energised', i.e. for any day when actual non-zero metering advances are</p>	Agreed to upadte the legal text with the suggested text in this response.

## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

		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.	
<b>ScottishPower Energy Retail Limited</b>	Non-Confidential	No comment.	Noted
<b>Stark</b>	Non-confidential	No	Noted
<b>ENWL</b>	Non-confidential	<p>Legal Text states "If a site is found to be energised and its status corrected, charges will be back dated to the date of energisation"</p> <p>Further clarity is required. Specifically, if this change is approved, we would begin charging as soon as we received actual data for those dates for which we have actual data. So is the Proposer suggesting that, once actuals are received for a De-energised site, for any number of days in the De-energised period, DNOs should also bill to EACs from the date of the De-energisation for any dates for which there are not yet any actual reads?</p> <p>If so, then such backdating reference should refer to the settlement timetable (which reduces from 14 month reconciliation period to 4 month reconciliation period under MHHS).</p>	Noted

## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

**Working Group Conclusions:** In response to the comments made by a DNO that the legal text makes no distinction between non-zero estimates and non-zero actual reads. The Working Group reviewed the legal text and agreed that it does specifically refer to actual non-zero readings being the trigger for this process.

In relation to the suggested amendments to the legal text due to the term 'incorrectly de-energised site' being ambiguous, the Working Group agreed to these suggestions and the suggestions can be found in Attachment 2: DCP 440 Draft Legal Text.

In response to the comments made from an IDNO that they would be in favour of adding an SLA for the status to be corrected, the Working Group concluded that this was not in the scope of this change and that the intent for this change was just to ensure that de energised sites that had consumption detected would be charged DUoS moving forwards.

Company	Confidential/ Anonymous	15. Do you have any other comments?	Working Group Comments
<b>SPEN</b>	Non-confidential	No	Noted
<b>Northern Powergrid</b>	Non-confidential	No	Noted
<b>BU-UK</b>	Non-confidential	We would also need clarity on when it was retrospectively energised to ensure absolute understanding of the dates involved as this could easily cause settlement issues. What about the opposite scenario where an MPAN	Noted

## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

		is showing as energised but it's retrospectively de-energised? Would the same solution apply.	
<b>UK Power Networks</b>	Non-confidential	No	Noted
<b>British Gas</b>	Non-confidential	No	Noted
<b>Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc</b>	Non-confidential	Whilst this proposal would allow for the billing of sites incorrectly classified as deenergised, it appears there is an underlying process failure which needs to be addressed in the first instance and parties held to account to rectify any required status amendments in a timely manner, instead of pursuing system changes at additional cost.	Noted
<b>SSE Energy Supply Ltd (SSE Business Energy)</b>	Non-Confidential	It is our understanding that the network Price Controls require DNOs to minimise revenue losses. We consider that DNOs should be required to fully investigate the sources of missing revenue first, before billing suppliers. This proposal would take away the incentive on the DNOs to do so. Should this change be agreed, suppliers should have the opportunity to review and investigate the charges before they are being billed. Therefore, it would be beneficial for a delay in these charges being passed on to allow for these investigations to take place, although backdating of charges could still exist. There are instances where the incorrect date has been used in MPAS which needs to be updated, these updates can unfortunately take months to be fixed, therefore it would be beneficial for a process to be developed, which includes an expected resolution date. Charges can then be backdated to the	Noted



## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

		<p>correct date shown in MPAS. There are instances of New connections where they cannot be energised, however the relevant information hasn't been transferred to the MOP to complete the required processes detailed within the REC. We believe a data cleansing exercise is needed to understand the level of truly deenergised sites. This would require both the DNO and Supplier community to assess the records they have to determine whether the property has in fact been disconnected. We would welcome greater clarity on who in connection with deenergised premises can be held legally liable for the electricity bill, especially if the original customer is no longer in situ. We have had instances where a site has been demolished but the DNO does not have the relevant information to confirm this has been completed. When requests are sent for the DNO to attend site, these are rejected. Therefore, we believe that additional clarity in these situations should be sought. We would be interested to understand what volume of de-energised sites are consuming energy as this is a significant change to current processes. As we have responded to in Q4, we believe an additional flow variant of the D0139 should be developed which will enable the D0139 to be sent to the MOP, as this variant does not currently exist and will allow suppliers to request updates to be made</p>	
<b>ScottishPower Energy Retail Limited</b>	Non-Confidential	No comment.	Noted
<b>Stark</b>	Non-confidential	No	Noted
<b>ENWL</b>	Non-confidential	1) ENWL note that the Working Group assumptions throughout this consultation are that the meter advance is legitimately associated with a	Noted

## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

	<p>meter that is physically and logically de-energised. There are scenarios which should have been considered in which the site is physically de-energised but the read is not valid for that site. For example, where a read is erroneously associated with a physically de-energised mpan, as a result of either erroneous manual input or database errors. Under BSC a Supplier should investigate such exceptions (see Q4 above), make appropriate corrections and advise DNO.</p> <p>2) ENW consider that such a scenario should be excluded from the scope of this Proposal. The Working Group should therefore consider appropriate criteria to avoid this scenario falling into a catch-all billing clause.</p> <p>3) The implementation date of the change is given as 1 April 2026. The consultation is unclear if billing of de-energised sites with non-zero consumption would be back dated with rebill functionality or only effective for settlement dates from 1 April 2026. If back dating is required, rules around when to cancel and rebill those sites would be necessary.</p> <p>4) If the DCP is approved, the rules are unclear for billing an MPAN on a multi-MPAN site which has one de-energised MPAN but where the other MPAN on the site is energised.</p> <p>5) There is a principal under the TCR that a site subject to residual charges for DUoS should also be subject to residual charges under TNUoS. If DCUSA is being changed such that some de-energised sites are to be billed, a corresponding change to TNUoS charging may also be required.</p> <p>6) Assuming that such a TNUoS change is required, the BSC obligation on DNOs to provide billing data to National Grid, introduced in Elexon Modification P402 will also need to be amended.</p>	
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## DCP 440 'Backdating Tariff Changes'

### NON-CONFIDENTIAL COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

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**Working Group Conclusions:** In response to the comments stating that it was unclear how far back the de energisation update would be made to, the Working Group agreed that the backdating would go as far back as the point that consumption was detected and if suppliers wanted to then investigate further to clarify exactly when the site became energised, that was in their gift as this change was mainly seeking to ensure that DUoS would be billed moving forwards initially.

In relation to the two responders who requested clarity on how multi MPAN sites would be treated, the Working Group agreed that each MPAN would be viewed in isolation of any related/multi MPANs and as such, if one MPAN was de energised on a multi MPAN site, the consumption on the legitimately energised MPANs would not lead to the de energised site getting updated and charged DUoS.