

## DCP 440 Working Group Meeting 07

13 November 2024 at 10:00 - Web-Conference

Attendee	Company
<b>Working Group Members</b>	
Donna Jamieson [DJ]	IDCSL
Edda Dirks [ED]	SSE
Hazel Patterson [HP]	SPEN
Kara Burke [KB]	NPg
Kevin Woolard [KW]	Centrica
Mark Bellman [MB]	ENWL
Monique Pereira [MP]	Indigo Networks
Nik Wills [NW]	Stark
Peter Waymont [PW]	UKPN
Shaun McRaith [SM]	Ofgem
Simon Vicary [SV]	EDF
Victoria Burkett [VB]	SSE
<b>Code Administrator</b>	
Andy Green [AG]	Chair
Hannah Proffitt [HP]	Secretariat
<b>Apologies</b>	
Jenny Harvey [JH]	National Grid
Jo Brown [JB]	National Grid

## 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 the minutes are approved.

### Apologies

- 1.2 Apologies are noted in the table above.

### 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 ED suggested the following amendments to the minutes. The group agreed.
- Section 3.1 – addition of ‘was not adequate.’ to complete the sentence.
  - Section 3.4 – ‘2016’ corrected to ‘2013’.
  - Action 06/01 – ‘email’ amended to ‘RFI’ to add clarity.

- 1.5 An updated version of the minutes will be included as **Attachment 1**.

### Action Log

- 1.6 The Chair provided updates on the open actions contained in the Actions Log within the appendix.

## 2. Purpose of the Meeting

---

- 2.1 The Chair advised that the purpose of the meeting was to review the RFI responses, the Change Report and the Legal Text.

## 3. Review RFI Responses

---

- 3.1 The Chair presented the data received through the RFI to the group. The Chair advised that they had received data from 5 DNOs and that one IDNO had responded to advise that they cannot provide the data.
- 3.2 The Chair noted that one party had sent their data in a different format (not split out by year) and therefore it had been added to the totals. The Proposer of the change, PW, suggested that this is removed from the totals and noted separately. The Chair agreed and noted that they had responded to the party asking for the data split by year.

- 3.3 The Proposer also asked that the totals for columns B (MPANs) and E (DNOs with data in this year) are removed as they are not needed.
- 3.4 Regarding the data for 2024, ED asked how many months of 2024 this included. The Proposer clarified that the report shows a current view of MPANs for the period they were deenergised that had a non-zero read. Therefore, it would be a snapshot of when they ran the report, some late October and some early November 2024.
- 3.5 KB advised that they did not filter their data to exclude the zero reads, and therefore the data provided may not meet what the Working Group requires. KB advised that approximately half of the MPANs in that report had zero reads. KB suggested that other DNOs may have done the same and that it may be beneficial to clarify this.
- 3.6 KB noted that the Durabill report includes CVA MPANs and may also include MPANs that were manually deenergised in Durabill. KB noted that they have not included the CVA MPANs but may also need to exclude the pseudo MPANs too.
- 3.7 PW noted that they also excluded CVA MPANs and would discount inset MPANs rather than pseudo MPANs. HP also agreed they had excluded CVA MPANs.
- 3.8 The group agreed that a second email should be issued to DNOs clarifying these points to ensure that all data is consistent.

Action 07/01 – The Chair to issue an email to Parties asking for clarification on the data provided through the RFI.

- 3.9 ED advised that they had submitted some analysis of the original data ahead of the meeting. ED presented this to the group and asked for views on whether this type of analysis is likely to be useful. ED noted that if so, they will complete similar analysis once the updated data has been received.
- 3.10 ED presented three bar charts to the group, one for each parameter, MPANs, Days and Units. ED highlighted that they had made some observations regarding trends. For example, in all of the graphs, there are two year periods where there are sudden jumps in the numbers and then in two of the cases, the data sharply drops back.
- 3.11 ED noted that a case is being made that the current processes are not sufficient and that it is clear to see in the data that there have been instances in the past where a reduction has been achieved and noted it would be interesting to know how that was done.
- 3.12 The Proposer noted it would be difficult to draw any conclusions on this. ED noted that someone may recall an explanation based on what was happening in those years, such as a change in rules etc. The group agreed to add this question to their email to DNOs.
- 3.13 KB raised that the data included in the report shows demand and generation MPANs, and these have not been split. The Chair agreed that this can be flagged in the final analysis.
- 3.14 The group discussed and agreed for the following communication to be issued.

*'Upon reviewing the data provided within the Working Group, it was agreed that there were some areas of the data that needed to have some clarifications and the data possibly being resubmitted based on the clarifications. The points the Working Group would like clarifications on are below.*

- *Can you please confirm that your data doesn't include CVA MPANs.*
- *Please also confirm that it only includes De-energised MPANs and days for which they have recorded an actual non-zero advancing reading during a De-energised period.*
- *Where MPANs have been manually De-energised for billing purposes, outside of the settlements process e.g. difference metering, please confirm that these are not included.*

*If not, can you please resend with the above considerations.*

*Where there are apparent trends in the data or exceptions in the annual data e.g. where there's a high spike/marked drop in numbers, could you recall any explanation as to why this happened that would help the Working Group?'*

## 4. Review Change Report & Legal Text

---

4.1 The Chair presented the Draft Change Report to the Working Group for discussion.

4.2 A summary of the Working Groups decisions are as follows. An updated version of the Change Report is included as **Attachment 2**. (Please note, the Working Group are awaiting the RFI responses and therefore some sections will be updated prior to the next meeting.)

- Sections 4.2 to 4.7 – the Working Group agreed to move these to a new section 6 relating to the RFI, as the RFI was completed after the consultation.
- Section 1.4 – corrected, to remove measurement classes. Second sentence amended for clarity.
- Section 4.12 – the Working Group agreed to add an explanation of the consequence of errors being found through the audit.
- Section 4.14 – ED asked for clarity on the meaning of this section. NW confirmed that the problem is that reporting requirements are audited, but it is the obligation to act on them that is missing. The Chair confirmed that this is clarified further in the Change Report within the consultation discussions.
- Section 4.11 – clarity added that referring to a 'reporting obligation'.
- Section 7.12 – title amended to 'Should this change be extended to non MHHS sites also?'.
- Sections 7.7 and 7.8 – Working Group agreed to add new sections - 'One member of the Working Group also made the point that they believed that only the most recent energisation status can be changed in the registration system and that this can only been done by the Suppliers. So if an MPAN was erroneously flagged as "de-energised" but then

becomes flagged “energised” at a later date, the period of de-energisation could not be corrected, as the latest status would be correct.’

‘It was noted that this can be changed by an MPS super user in agreement with the Supplier and LDSO (this process can be found at BSC 604 and 501). It was noted that this is a very manual and time consuming process and is rarely used.’

4.3 The Chair presented the Legal Text to the group for discussion. A summary of the discussions is below.

- VB suggested that ‘However’ is added to the start of the second sentence. The Working Group agreed.
- Members agreed that the wording of the clauses are complicated and suggested that it should be simplified.
- The Working Group considered whether the clauses could be restructured to have a main paragraph and sub sections for non-migrated MPANs and migrated MPANs.
- The group agreed that ‘ensure’ should be amended to ‘request’.

4.4 The Working Group drafted a new structure and agreed to consider this further ahead of the next meeting.

## 5. Review/Update Work Plan

---

5.1 The group agreed on the following next steps.

- The Chair to issue the agreed email to DNOs requesting clarity on the data, with a two week deadline of 27 November 2024.
- The Working Group agreed to meet again on 02 December 2024 at 1pm, to discuss the updated data.

## 6. Any Other Business

---

6.1 No other business was raised.

## Attachments

---

- Attachment 1 - DCP 440 Working Group Meeting 06 - Draft Minutes v2.0
- Attachment 2 – DCP 440 Change Report v6.0

## New and Open Actions

Action Ref.	Action	Owner	Update
<b>07/01</b>	The Chair to issue an email to Parties asking for clarification on the data provided through the RFI.	Chair	<i>New action.</i> Sent on 13/11/24

## Closed Actions

Action Ref.			Update
06/01	The Chair to circulate an email to DNOs and IDNOs requesting further information regarding de energised data for all areas to support the solution drafted.	AG	<i>Action closed.</i> Complete.