




DCUSA Consultation		At what stage is this document in the process?
<h1>DCP 451:</h1> <h2>Suspending Registrations</h2> <p><b>Date Raised:</b> 10 February 2025</p> <p><b>Proposer Name:</b> Peter Waymont</p> <p><b>Company Name:</b> Eastern Power Networks</p> <p><b>Party Category:</b> DNO</p>		01 – Change Proposal
		02 – Consultation
		03 – Change Report
		04 – Change Declaration
<p><b>Purpose of Change Proposal:</b></p> <p>To clarify the process for suspending registrations</p>		
	<p>This document is issued in accordance with Clause 11.20 of the DCUSA, and details DCP 451 'Suspending Registrations.'</p> <p>Parties are invited to consider the proposed amendment (Attachment 2) and submit their votes using the Voting form (Attachment 1) to <a href="mailto:dcusa@electralink.co.uk">dcusa@electralink.co.uk</a> by 18 June 2025.</p> <p>The voting process for the proposed variation and the timetable of the progression of the Change Proposal (CP) through the DCUSA Change Control Process is set out in this document.</p> <p>If you have any questions about this paper or the DCUSA Change Process, please contact the DCUSA by email to <a href="mailto:dcusa@electralink.co.uk">dcusa@electralink.co.uk</a> or telephone 020 7432 3011.</p>	
	<p>Impacted Parties: Suppliers/DNOs/IDNOs</p>	
	<p>Impacted Clauses:</p> <ul style="list-style-type: none"> <li>Section 2A 'Distributor to Supplier/Generator Relationships' – Clause 23.4</li> <li>Section 3 'General Legal Provisions' – Clause 54.2</li> <li>Schedule 1 'Cover' – Paragraph 3.5</li> </ul>	

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## Timetable

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

### Change Proposal timetable

Activity	Date
Initial Assessment Report	19 February 2025
Consultation Issued to Industry Participants	17 March 2025
Change Report Approved by Panel	28 May 2025
Change Report issued for Voting	28 May 2025
Party Voting Closes	18 June 2025
Change Declaration Issued to Parties	19 June 2025
Change Declaration Issued to Authority	NA
Authority Decision	NA
Implementation Date	The first DCUSA release after approval.

## 1. Executive Summary

### What?

1.1. Clarify the process used by a distributor for suspending registrations for a supplier.

### Why?

1.2. When the proposer sought to suspend registrations, there was confusion on the REC side as to the approach that should be taken under DCUSA.

### How?

1.3 Amend Clauses 23.4 and 54.2 and Schedule 1.

## 2. Governance

### Justification for Part 2 Matter

2.1. It does not meet the requirements for Part 1 or urgency.

### Current Next Steps

2.2 This Change Proposal should.

- Be treated as a Part 2 Matter;
- Be treated as a Standard Change; and
- Proceed to the Working Group phase.

## 3. Why Change?

### Background of DCP 451

3.1. The proposer wished to suspend registrations due to non-payment. DCUSA at Clause 23.4 states –

#### Material Breach

23.4 Failure by the [User](#) to remedy a [Payment Default](#) within four Working Days of receipt of a [Late Payment Notice](#) from the [Company](#) shall be a material breach of this [Agreement](#) by the [User](#) for the purposes of Clause 54.1.1, and the [Company](#) shall be entitled to take actions to suspend registration services in accordance with the provisions of the [Retail Energy Code](#). Where the [Company](#) takes such action, it shall send a copy of any notice that it is required to issue pursuant to those provisions to the [User](#) and the [Panel](#) (care of the [Secretariat](#)).

3.2. REC has two sections, within Schedule 24 that are relevant to suspending registrations -

Where a <a href="#">Regulatory Alliance</a> between an <a href="#">Electricity Supplier</a> and <a href="#">Distribution Network Operator</a> is ended						
4.10.7	Following notification from <a href="#">Distribution Network Operator</a> of an end to a <a href="#">Regulatory Alliance</a> with an <a href="#">Energy Supplier</a> .	Notify changed <a href="#">Regulatory Alliance</a> .	<a href="#">Distribution Network Operator</a>	<a href="#">CSS Provider</a>	<a href="#">Market Participant Role Alliance</a>	CSS API
4.10.8	Following 4.10.7 where the message has passed synchronous validation.	Update <a href="#">Regulatory Alliance</a> data.	<a href="#">CSS Provider</a>		Internal Process	

3.3.

Ref	When	Action	From	To	Information Required	Market Message Means
Where a <a href="#">Market Sanction</a> is applied or removed from an <a href="#">Energy Supplier</a> under this <a href="#">Code</a>						
4.11.1	As soon as reasonably practicable following instruction from the <a href="#">REC Performance Assurance Board</a> .	Update Registration Permission From Date or Registration Permission To Date.	<a href="#">Code Manager</a>		Internal Process	
4.11.2	Following 4.11.1.	Notify new or removed <a href="#">Market Sanction</a> .	<a href="#">Code Manager</a>	<a href="#">CSS Provider</a>	<a href="#">Market Participant Role</a>	CSS API
4.11.3	In conjunction with 4.11.2.	Notify new or removed <a href="#">Market Sanction</a> .	<a href="#">Code Manager</a>	<a href="#">Energy Supplier</a>	<a href="#">Sanction Notice</a>	Not defined
4.11.4	Following 4.11.2 where the message passes synchronous validation.	Update <a href="#">Market Sanction</a> data.	<a href="#">CSS Provider</a>		Internal Process	

## Market Sanction Definition

means that a Market Participant's right to make new Registrations is suspended (in accordance with Clause 16 of the main body of this Code), or is subject to similar restrictions under another Energy Code.

3.4. There was confusion as to which section of the REC should apply.

3.5. DCUSA goes on to say –

54.2.2 Clause 54.1.8, the [Panel](#) shall be entitled to instruct the [REC Code Manager](#) to procure suspension of [CSS](#) registration services for the [Breaching Party](#) under the [Retail Energy Code](#) and shall notify each [DNO/IDNO Party](#) and the [Authority](#) that the [Panel](#) has taken such action; and

3.6. In discussion with REC and DCUSA, it became apparent to the proposer that the LDSO may suspend registration by ending a Regulatory Alliance, whereas the DCUSA Panel may request that registrations are suspended using the Market Sanction Approach.

3.7. The proposer thought it would be good to amend DCUSA to clarify these points. Noting that distributors wish to enact these suspensions forthwith and so a hand off to DCUSA Secretariat and then another from them to REC is inefficient if the Market Sanction approach were used.

## 4. Working Group Assessment

### Working Group Assessment

4.1. The DCUSA Panel established a Working Group to assess DCP 451. This Working Group consists of Supplier, DNO, IDNO representatives and other interested industry participants. Meetings were held in open session and the minutes and papers of each meeting are available on the DCUSA website – [www.dcusa.co.uk](http://www.dcusa.co.uk)

4.2. The proposer stated that the process for suspending registrations is currently unclear between DCUSA and REC. As the desire is to follow the process as per DCUSA, where a registration is suspended in SMRS and then DCUSA/REC are notified, whereas REC Code Manager stated that DCUSA must be notified in the first instance, and then REC is notified. The aim is to be able to take

action quickly (as per the existing DCUSA process) and therefore they are suggesting amendments to Clauses 23.4 and 54.2 and Schedule 1.

- 4.3. A Working Group member from the REC Code Manager informed the Working Group that they currently have an equivalent change.
- 4.4. It was noted that this was discussed recently at the Cross Code Steering Group and that the consensus was that the DCUSA and REC changes were cross-code changes.
- 4.5. It was advised that the REC change ID is [REC Issue I0248](#).
- 4.6. The REC Code Manager representative noted that there may be a REC consultation required but for now they will promote the DCUSA consultation and review the responses with the DCUSA Secretariat ahead of the next Working Group.
- 4.7. It was also noted by the REC representative that the two changes would need to have their implementation dates aligned for the processes in both codes to operate correctly.
- 4.8. It was highlighted that this is likely the first time that this process has been used by a number of DNOs at the same time under REC, and all Working Group members agreed that the process itself should be as clear as possible with additional guidance if needed.
- 4.9. The Working Group agreed that seeking party views on their experiences of suspending registrations and if so, some context on what the experience was like would aid the development of the solution.
- 4.10. The process for reinstating registrations was also posed and the Working Group agreed that they believe that process is functioning as expected but wanted to seek insight from any party as to whether they have reinstated registrations previously and if so, some context on what the experience was like and if they had any concerns with the current process.

## 5. Consultation

- 5.1. The Working Group undertook one consultation during the development of the change proposal.

### Consultation

- 5.2. The consultation was issued to parties on 17 March 2025. There were eight responses received to the consultation. The Working Group's conclusions can be found in **Attachment 4 DCP 451 Consolidated Consultation Responses**, with a summary of each shown below.

**Q1: Do you understand the intent of the Change Proposal?**

**Q2: Are you supportive of the principles of this Change Proposal?**

- 5.3. Seven respondents said they understood the intent of the CP and supported it, one respondent stated N/A to both questions.

**Q3: For Distributors only – Have you had experience of the issue explained and what was that experience like?**

- 5.4. Five respondents have experienced the issue, two replied N/A and the other said they hadn't experienced the issue. Proposal?

5.5. The responders who stated they had experienced the issue noted the new process is unclear and too long. This can lead to suppliers still being allowed to take on new customers creating potential customer debt.

5.6. Advice received was also unclear as the direction was that the request to end the regulatory alliance should come from the DCUSA however the industry codes suggest it should be from the DNO to the CSS.

**Q4: For Distributors only – Do you have any concerns with the process for reinstating registrations? What are those concerns?**

5.7. There were no concerns raised with the process for unsuspending registrations.

**Q5: 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.**

5.8. Seven responders all said general objectives three & four were better facilitated by this CP.

5.9. The reasons given were because it will improve the efficiency of the process, give DNOs more control over their licence conditions, make the process clearer and it will limit DNOs exposure to a supplier failing.

**Q6: Are you aware of any wider industry developments that may impact upon or be impacted by this CP?**

5.10 Five responders said this CP had no wider industry impacts, one stated that a REC change would be required which has already been raised, another stated the code review and the last responder stated N/A.

**Q7: How are you impacted by the outcome of this CP?**

5.11 A number of responders noted they would be positively impacted by this CP as it would make the process clearer and improve efficiency.

5.12 There were no negative impacts noted by all responders.

**Q8: Do you agree with the Working Group's proposed implementation date? If not, please provide your rational.**

5.13 Of the seven responders who answered this question, all of them said they agreed with the implementation date.

**Q9: Do you have any comments on the draft legal text?**

5.14 Six responders noted they had no comments on the legal text.

5.15 The REC suggested adding into the DCUSA legal text a reference to the relevant REC schedules and clauses for this process (Schedule 24 Switch Data Management). This is consistent with the

approach the REC are taking as their legal text does reference the relevant DCUSA Schedules and clauses.

5.16 Another responder suggested slightly changing the legal text within Schedule 1, Clause 3.5 to state that *‘the company shall be entitled to take the following actions as a result of a Cover Default’*, rather than *‘following a cover default’*.

5.17 It was also noted by this responder that there was a superfluous *‘and’* following a comma and they also suggested amending the text to state that the process to reinstate the right to CSS registration services should be done *by* notifying the REC Performance Assurance Board.

#### Q10: Do you have any other comments on DCP 451?

5.18 There were no further comments that haven’t been raised previously or that were in scope for DCP 451.

## 6 Working Group Conclusions & Final Solution

6.10. After the consultation, as all responders were unanimous in their support for this CP, in agreeing with the view that general objectives three and four were better facilitated and as they were also unanimous in that the CP will only have a positive impact, the final area outstanding to be resolved was the suggested amendments to the legal text.

6.11. The Working Group initially believed that adding in to the DCUSA legal text, references to the relevant REC schedules was helpful as it would help anyone reviewing the process of where they would need to search within the REC to gain a full understanding of the process.

6.12. It was also agreed within the Working Group that amending the legal text to state, *‘the company shall be entitled to take the following actions as a result of a Cover Default’*, rather than *‘following a cover default’* read better so this amendment was accepted.

6.13. The suggestion to amend the text to state that the process to reinstate the right to CSS registration services should be done *by* notifying the REC Performance Assurance Board was rejected.

6.14. This was due to the process for CSS registration services being reinstated is not completed ‘by’ notifying the REC Performance Assurance Board (PAB), it is an additional step that needs to be taken.

## 7 Relevant Objectives

### Assessment Against the DCUSA Objectives

7.1 For a DCUSA Change Proposal (CP) to be approved it must be demonstrated that it better facilitates the DCUSA Objectives. There are five General Objectives. DCP 451 will be measured against the DCUSA General Objectives, which are set out in the table below:

	DCUSA General Objectives	Identified impact
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<input type="checkbox"/>	1. The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks	None
<input type="checkbox"/>	2. The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent therewith) the promotion of such competition in the sale, distribution and purchase of electricity	None
<input checked="" type="checkbox"/>	3. The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences	Positive
<input checked="" type="checkbox"/>	4. The promotion of efficiency in the implementation and administration of the DCUSA	Positive
<input type="checkbox"/>	5. 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.	None

7.1 The Working Groups view is that it is positive against Objective 3 as the Distributor is able to limit their exposure.

7.2 It has a positive impact on Objective 4 as it clarifies arrangements and hence aids efficient administration.

## 8 Impacts & Other Considerations

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

8.1 None.

**Does this Change Proposal Impact Other Codes?**

BSC..... ☐ SEC..... ☐

CUSC..... ☐ REC..... ☒

Grid Code..... ☐ None..... ☐

Distribution Code.. ☐

8.2 As noted earlier in paragraphs 4.3-4.7, there is a separate REC change tht has been raised which may be informed by the responses to this DCP.

8.3 To ensure the process works effectively across both codes, the REC and DCUSA changes will need to be aligned.

## 9 Implementation

9.1 The proposed implementation date for this CP is the first DCUSA release after approval.



## 10 Legal Text

10.1 Please see attachment 3 for the draft legal text. A summary of the legal text changes is below

- Add a new definition in Clause 1
- Amend Clause 23.4
- Amend Clause 54.2
- Add a new heading (Ending of Suspension) and a new Clause 54.4B
- Amend Schedule 1, Paragraph 3.5 (Actions in Relation to Cover Default)

### Text Commentary

10.2 It means the DCUSA and REC PAB Are aware of the situation. It intends to give consistency of description across all registration suspensions activities.

10.3 If a supplier is likely to go into liquidation, as might be indicated by non-payment of charges, this will prevent more customers being able to switch and being impacted by SoLR arrangements in a timely manner.

## 11 Code Specific Matters

11.1 N/A.

## 12 Recommendations

### Panel's Recommendation

12.1 The Panel approved this Change Report on 28 May 2025. The Panel considered that the Working Group has carried out the level of analysis required to enable Parties to understand the impact of the proposed amendment and to vote on DCP 451.

12.2 The Panel have recommended that this report is issued for Voting and DCUSA Parties should consider whether they wish to submit views regarding this Change Proposal.

## 13 Attachments

- Attachment 1: DCP 451 Voting Response Form
- Attachment 2: DCP 451 Change Proposal Form
- Attachment 3: DCP 451 Legal Text
- Attachment 4: DCP 451 Consultation Responses