

DCUSA SIG Meeting 165 Minutes

28 February 2025 at 10:00am: Web Conference

Attendee	Company
Working Group Members	
Peter Waymont (PW)	UKPN
Rebecca Nocks (RB)	NGED
Ladie Adekanle (LA)	Scottish Power
Edda Dirks (ED)	SSEG
Peter Douglas (PD)	Ethical Power
Komal Brown (KM)	Scottish Power
Monique Pereira (MP)	Indigo Networks
Owen Black (OB)	SPEN
Niki Willis(NW)	Stark
Donna Jamison (DT)	IDCSL
Kevin Woollard [KW]	British Gas
Simon Vicray(SV)	EDF
Karl Maryon (KM)	Drax
Kavya Kaya(KK)	Brook Green Energy
Mark Bellman (MB)	ENWL
Code Administrator	
Andy Green [AG] (Chair and Technical Secretariat)	ElectraLink

1. Administration

- 1.1 SIG members reviewed the “Competition Law Guidance”. All members agreed to be bound by the Competition Law Guidance for the duration of the meeting.
- 1.2 The Chair advised the meeting would be recorded and asked the Standing Issues Group if there were any objections to this. It was explained that the recording would be deleted after the Draft Minutes are approved. There were no objections.

2. Review of Previous meetings actions

- 2.1 Action 164/1, was for the secretariat to update the previous meeting minutes to include what the acronym for the LTDS project ([Long Term Development Statement direction | Ofgem](#)) was in clearer detail and for the actions to be clearly highlighted within the minutes.
- 2.2 It was explained that this action had been closed as the Chair advised these minutes have been updated and shared with the SIG which no feedback received.
- 2.3 Action 164/2 remained open as the subgroup to discuss the ECR (Embedded Capacity Register) change requests hadn't yet been set up, but the chair advised the invites to this subgroup will be issued shortly.
- 2.4 Action 164/3 was closed. This action was for the secretariat to keep the LTDS project updated with any ECR change requests that are in flight or newly raised within the DCUSA.
- 2.5 It was noted that actions 164/2 and 164/3 had typos as they were currently showing as 162/2 and 162/3, so the secretariat agreed to update this within the previous meeting minutes.

ACTION 165/01: AG to update the January meeting minutes so that the actions correctly show as 164/2 and 164/3

- 2.6 It was also agreed to include the previous meeting minutes with the agenda packs for SIG meetings moving forwards.

3. Review of DIFs 76, 77 and 78

- 3.1 The chair advised that there were four DIFs to review. It was explained that three of these DIFs (76, 77 and 79) were linked to three issues that had been previously reviewed by the SIG and subsequently closed. The previous DIFs linked to the new issues were DIFs 69, 70 and 71.
- 3.2 It was explained that these DIFs were closed due to them purely being raised for exploratory purposes and that they hadn't been discussed at the SIG for a number of months due to several personnel changes at the issue raisers organisation and as such, hadn't been revisited until now.

DIF 76 MPAN and GSP group correction and charges

- 3.3 The prosper for this DIF provided an overview of this DIF explaining that there had been an RFI raised under DIF 69 initially and provided the below summary of the responses to the RFI.

- Correcting this issue is time consuming due to the manual effort required and almost impossible to correct without customer engagement.
 - There is a large impact on Settlements - Under MHHS, correcting these issues would be more time limited as settlements would be crystallised after four months instead of the current 14 months.
 - There is a need to have some form of compensation pay to suppliers to recover costs for resolving the issue.
 - It would be more appropriate for the distributors to send initial comms to the customer explaining the situation.
 - A guidance document to support DNOs/IDNOs in setting up GSP group would be helpful
 - REC and BSC could help with this issue
 - There is no industry process or SLA for these instances
- 3.4 It was explained that the responses to the RFI indicated that there was an issue with the process as it wasn't clearly defined and had no SLAs in place to inform who should do what and by what timescales.
- 3.5 The proposed solution is below
- Documented industry process with SLAs
 - A guidance document
 - Updates to DCUSA, REC and BSC documents
 - Potential mechanism to recover lost revenue for settlements and time and resource spent remedying process failures.
- 3.6 It was noted that the process to rectify the issue was very manual and created confusion to the customers as accounts needed to be closed and re-created sometimes causing new customer communications to be sent customers when the changes to the account were purely cosmetic.
- 3.7 It was noted by a supplier SIG member that they weren't supportive of a financial penalty as this could be difficult to quantify but they did go on to state that the process does need to be clearer as although these instances are rare, they are very hard to correct and can take a lot of time.
- 3.8 A DNO member also raised concerns around introducing a charge and believed that having a clear process was the right approach to mitigate the issue occurring in the first instance.
- 3.9 An IDNO SIG member highlighted that within the BSC there is a process (BSCP 604) which defines the process for Error Resolution and Retrospective Manual Adjustments which may be helpful.
- 3.10 The link to this BSCP can be found at the following link [BSCP604 'Error Resolution and Retrospective Manual Adjustments'](#).
- 3.11 It was agreed that the issue was in relation to a process that was quite niche and that a SIG subgroup on this issue would be the best approach as this would ensure that the right industry experts could attend to drive a solution to this change.
- 3.12 It was also noted that there may be some cross code interactions, particularly with the REC so they would be contacted and invited to the subgroup.

ACTION 165/02: AG to create a subgroup to continue to investigate the issue.

DIF 77 Meter Bypass Notification Process

- 3.13 The prosper for this DIF provided an overview of this issue explaining that there had been an RFI raised under DIF 70 initially early in 2024 and provided the below summary of the responses to this RFI.
- DNOs have a duty of care and would not want to leave a vulnerable customer off supply due to a metering fault.
 - It is not always easy to identify the reason the meter is not working, and as suppliers set up meters differently
 - Meter bypass is done by DNOs only in circumstances where the Supplier is unable to provide

an out of hours response to the customer and when a customer is a vulnerable person, typically for medical reasons on our PSR database.

- Meter bypass is reported using D0001, D0126, D0136, emails or SDEP
- A new data flow suggested for reporting meter bypass
- DNOs don't have right contact details for supplier to report this issue
- General support to implement a formal process with defined timescales

3.14 It was noted there is currently no suggested solution however there needs to be a defined process to notify when a meter bypass is carried out.

3.15 It was advised that an Ofgem obligation for suppliers to provide an out of hours service had been implemented since the original DIF was raised however, it was highlighted by a supplier that they had offered an out of hours service/number to call before the obligation came into effect and that they were still seeing instances of meters being bypassed.

3.16 It was agreed to raise another subgroup to progress this DIF and that it would be helpful if the REC could be included in this subgroup as they may need to support on the solution for notification.

DIF 78 Use of generators at new developments before site can be connected to the network.

3.17 The prosper for this DIF provided an overview of this DIF explaining that there had been an RFI raised under DIF 71 initially early in 2024 and provided the below summary of the responses to the RFI.

- Although the volumes may not be high, there is a considerable safety concerns related to this issue which need to be addressed urgently
- Currently, there is no formal process in place, there should be a formal notification from ICPs/IDNOs to DNOs to notify such instances
- Roles and responsibilities must be clearly defined for this process to avoid any issues
- Suppliers are unable to bill the customer until the connection is made so any electricity used up to that point is effectively unidentified
- Settlements (trading disputes) and DUoS impact
- Manual intervention is required by the suppliers as they are not notified of the change of tenancy.
- Additional step to the new connection process could help resolve this issue
- Risk of customer being overcharged
- It is important to ensure that all health and safety concerns are drawn out and considered within this CP

3.18 It was noted there is currently no suggested solution however there needs to be a defined process to notify suppliers and distributors when a generator is installed and who installed it.

3.19 It was queried if these generators are always installed by distributors or if developers are installing them themselves.

3.20 This was unclear so the SIG members agreed to look at examples of generators being installed to see who fitted them.

ACTION 165/04: SIG members who have experienced this issue to see who had installed the generator and if metering had been installed on site

3.21 It was highlighted that all the scenarios, root causes and impacts were not fully understood, and it wasn't clear if the issue was being caused by a process that wasn't being followed or if there was just no process in place. It was agreed that the secretariat would get together with the issue raiser and the REC to try and put together a process map for the current process calling out the impacts and where some potential cross code interactions take place to aid the subgroup on understanding the causes and triggers to the issue.

- 3.22 Once this process map is created, it was agreed that a subgroup would be set up to drive the issue resolution.

ACTION 165/05: AG to create a subgroup to continue to investigate the issue.

ACTION 165/06: AG to support KB with the REC to draw a high-level process map for the installation of generators.

- 3.23 It was discussed if there needed to be separate subgroups for the three issues raised by Scottish Power. It was agreed that as these three issues would require different resource to support a solution, as they differed in nature, three separate subgroups would need to be created.

DIF 79 Credit Cover Clarifications

- 3.24 MB noted that he'd recently been reading schedule 1 'Cover' and had identified tht there were two areas that required some attention.
- 3.25 The first area the SIG group discussed was that there is no remedy for a Company that draws down on collateral following a Payment Default, where the resulting Indebtedness Ratio increases above the Indebtedness Ratio Limit and the User does not comply with 1.4, under which they are obliged to "provide additional Collateral to ensure that the Indebtedness Ratio is equal to or lower than the Indebtedness Ratio Limit".
- 3.26 If the User fails to make up the shortfall the remedy available at 3.2 is not available and the situation therefore does not fall under the definition of Cover Default at 3.3.
- 3.27 This is because 3.2 is limited to "(b) a decrease in the Credit Allowance Factor". This therefore precludes scenarios where the Indebtedness Ratio increases because Collateral (and therefore the Credit Limit) is reduced. This despite the heading of the section being "Increase in Cover Requirements Pursuant to a Change in the Value at Risk or Increase in the Indebtedness Ratio".
- 3.28 It was agreed by a DNO SIG member that there this was an area that need to be updated and that the suggested solution made sense.
- 3.29 The second area was explained as an Internal inconsistency in the test for Cover.
- 3.30 At paragraph 1.4 "the User shall provide additional Collateral to ensure that the Indebtedness Ratio is equal to or lower than the Indebtedness Ratio Limit"
- 3.31 However, at 3.2 the test for the User to take action is "Indebtedness Ratio equals or is greater than its Indebtedness Ratio Limit" so there seemed to an overlap as both 1.4 and 3.2 had an 'equals' in the calculation.
- 3.32 It was agreed that both points needed to be address and the issue raiser agreed to raise a DCUSA change proposal to have the legal text updated.

ACTION 165/07: MB to raise a DCUSA change proposal to resolve the issues raised in DIF 79.

4. Any Other Business

- 4.1 MB mentioned that in the calculation for RAV there is an uplift in the PCFM and an uplift in the DCUSA. The DCUSA uses the RPI index to uplift whereas the PCFM uses CPIH so there is an inconsistency.
- 4.2 It was noted that this wouldn't have a large impact but updating the DCUSA may be required to create consistency in the two calculations. It was agreed that it would be useful to have this discussed wider at the SIG in March so MB agreed to raise a DIF from so this could be discussed at the next SIG meeting.

ACTION 165/08: MB to raise an issue for March's SIG meeting to discuss the use of RPI and CPIH.

5. Date of Next Meeting:

5.1 The next SIG meeting will take place on 28 March 2025 at 10:00am, via Microsoft Teams.

6. Attachments

- Attachment 1: DIF 76
- Attachment 2: DIF 77
- Attachment 3: DIF 78
- Attachment 4: DIF 79

APPENDIX 1

New and open actions

Action Ref.	Action	Owner	Update
164/02	Secretariat to set up a subgroup to discuss ECR changes with a new set of terms of reference.	Secretariat	New Action.
165/01	AG to update the January meeting minutes so that the actions correctly show as 164/2 and 164/3	Secretariat	New Action
165/02	AG to create a subgroup to continue to investigate the issue.	Secretariat	New Action
165/03	AG to create a subgroup to continue to investigate the issue.	Secretariat	New Action
165/04	SIG members who have experienced this issue to see who had installed the generators	Secretariat	New Action
165/05	AG to create a subgroup to continue to investigate the issue.	Secretariat	New Action
165/06	AG to support KB with the REC to draw a high-level process map for the installation of generators.	Secretariat	New Action
165/07	MB to raise a DCUSA change proposal to resolve the issues raised in DIF 79.	Mark Bellman	New Action
165/08	MB to raise an issue for March's SIG meeting to discuss the use of RPI and CPIH	Mark Bellman	New Action

APPENDIX 2

Closed actions

Action Ref.	Action	Owner	Update
162/01	RC to request a housekeeping change is raised to change party to a lower-case p within the DCUSA legal text were the text lays out the process for who can raise an ECR change request.	Secretariat	Closed.
162/02	RT to liaise with the technical lead on the LTDS project to understand how a change could be implemented outside the project if that meant it could be delivered quicker than if it was done via the LTDS project.	Ryan Taylor	Closed.
162/03	RC to continue to liaise with RT offline post RT speaking with their technical LTDS project lead to discuss if and how the ECR changes could be dealt with and then bring these ideas to the SIG early in 2025.	Secretariat	Closed.
164/01	AG to update the November meeting minutes with what the LTDS acronym meant, insert a link to the LTDS guidance page and mark the actions captured within paragraphs 3.3 and 3.18-3.23 in a clearer fashion and add them to an action log and reissue.	Secretariat	Closed.
164/03	Secretariate to ensure that the panel receives regular updates on the ECR change requests	Secretariat	Closed