

DCP 440 Working Group Meeting 09

30 April 2025 at 13:00 - Web-Conference

Attendee	Company
Working Group Members	
Alex Pentecost [AP]	Eclipse
Chris Ong [CO]	UKPN
Edda Dirks [ED]	SSE
Hazel Paterson [HP]	SPEN
Isaac Hale [IH]	EDF
Kara Burke [KB]	NPg
Kevin Rayworth [KR]	Evolve
Kevin Woollard [KW]	Centrica
Nik Wills [NW]	Stark
Peter Waymont [PW]	UKPN
Philip Mark [PM]	SSE
Shaun McRaith [SMR]	Ofgem
Victoria Burkett [VB]	SSE
Code Administrator	
Andy Green [AG]	Chair
Mel Kendal [MK]	Secretariat

1. Administration

- 1.1 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.

- 1.2 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.
- 1.3 The Working Group reviewed the previous meeting minutes and agreed them to be an accurate reflection of the discussions held.
- 1.4 An action log has been created, and all updates are provided in **Appendix A**.

2. Purpose of the Meeting

- 2.1 The Chair explained that the purpose of this meeting is to review and discuss the Authority Send-Back Letter within the Working Group and agree next steps.

3. Discuss Authority Send-Back Letter

- 3.1 The Chair invited members to review and discuss the Authority Send-Back Letter and agree next steps – this was presented on screen.
- 3.2 The key points can be found below:
- 3.3 The Chair presented the Authority Send-Back Letter to the Working Group which stated *‘we do not believe it possible to make an informed decision of DCP 440 without further clarification as to the recovery period or charges’*.
- 3.4 PW stated that this is a proactive forward-looking method of charging DUoS. PW also stated that the settlement period will move from 14 months to 4 months, but this will be after the end of the Market-wide migration.
- 3.5 SMR requested further clarity around how different sites based on their category should be treated. PW explained that all sites will be in the 14-month pool and eventually will all be moved to the 4-month pool. PW stated that forward-looking charging will only be applied to those who have migrated in MHHS.
- 3.6 SMR confirmed that further clarity being provide within the Change Report will help to aid their decision on this change. The Working Group agreed that adding this clarity to the Change Report are the next steps to progressing this change.
- 3.7 ED noted that the Change Report for DCP 437 “ was recently updated in regard to an Authority send-back and suggested that this could potentially be used as a template for this change. The Chair confirmed that internal discussions will be had to ensure there is consistency between the send-back changes as and where appropriate.
- 3.8 The Chair informed the group that the send-back letter also stated that *‘we do not believe the Working Group has sufficiently addressed the risk to consumers where charges resuming following migration to MHHS. There also exists a risk that DUoS charges may be applied incorrectly following the detection of consumption on a de-energised MPAN. Without further understanding of the impact*

to this group of consumers we do not believe it possible to make an informed decision of this modification'.

- 3.9 PW queried why charging consumers for energy consumption is a risk – SMR confirmed that the charging for the consumers energy consumption itself is not a risk, it's the lack of communication to that consumer.
- 3.10 VB noted that within their Consultation response they stated that the legal text does not provide Suppliers the time to investigate the instances, including contacting the Customer to find out what is happening. VB reiterated that Suppliers need to be given the appropriate time to be able to investigate such instances, update the records and also be able to contact the Customer to communicate what will be happening – VB believes the current legal text does not allow for this. PW believes the legal text does not prevent a Supplier from investigating.
- 3.11 Following the above discussion, VB stated that the issue is the lack of processes before this point of investigation – there are no processes to state what should or should not happen to ensure the data is updated prior to charging the Customer. VB noted that the conversation with the Customer would be reactive as opposed to proactive.
- 3.12 VB explained that the current process in updating registrations is clearly failing; if this was working correctly, we would not be in the position of needing to raise this change.
- 3.13 After further discussion, PW suggested that the Authority send-back discussion points are addressed and added to the current Change Report to provide the further clarity that they have requested. The Working Group agreed with this approach.
- 3.14 PW suggested delaying the implementation date by a year (going from 2026 to 2027) to allow for the majority of Customers to have migrated to MHHS. This should help mitigate some of the concerns raised and discussed and also allow for necessary system changes.
- 3.15 The Chair reminded the group that the Working Groups views/decisions on this change does not need to be unanimous and suggested adding additional wording to the Change Report noting that there were conflicting views when discussing the solution. Ofgem's reasons can be addressed and an explanation to state that moving forward, the solution of this change allows for energy that is being used is billed appropriately.
- 3.16 VB confirmed that they have ongoing discussions with REC regarding the lack of processes.
- 3.17 After further discussion, the Working Group agreed that the best approach is update the current DCP 440 Change Report to reflect the discussions held during this meeting and to address the points mentioned by the Authority within the send-back letter. The Secretariat agreed to make these updates to the Change Report, including the change of implementation date, and circulate this to the Working Group offline for final review.
- 3.18 The Working Group agreed to schedule in an additional meeting to make any final changes on 12 May 2025, however, this meeting may be cancelled if the updated Change Report can be agreed offline.

ACTION 09/01: The Secretariat to make the necessary updates to the DCP 440 Change Report and circulate to the Working Group offline for final review.

4. Determine Next Steps

4.1 The group agreed on the following next steps.

- The Chair to make the necessary updates to the DCP 440 Change Report and circulate to the Working Group for final review.

5. Any Other Business

5.1 The Chair asked the group whether there were any other items of business to discuss.

5.2 There were no other items raised.

6. Date of Next Meeting – 12 May 2025

6.1 The next Working Group meeting will be held on 12 May 2025 at 10am. This meeting may be cancelled if the updated Change Report can be agreed offline.

New and Open Actions

Action Ref.	Action	Owner	Update
09/01	The Secretariat to make the necessary updates to the DCP 440 Change Report and circulate to the Working Group offline for final review.	Secretariat	New Action.

Closed Actions

Action Ref.			Update