

DCUSA REQUIREMENTS RELATED TO THE IMPLEMENTATION OF ‘P432, HALF HOURLY SETTLEMENT FOR CT ADVANCED METERING SYSTEMS’ & DCP 414 ‘TRANSITIONAL PROTECTION FOR NHH CT CUSTOMERS AFFECTED BY REGULATORY CHANGE’

This document sets out various aspects of the solutions developed under P432 and DCP 414, and revised under DCP 458, and clarifies the requirements and obligations on DCUSA Parties purposes of ensuring that there is transitional protection for customers affected by BSC Modification P432 or MHHS (being Customers with CT metering which are required to become half-hourly settled by migrating to Measurement Class C or E, or any other CT Metering Points catered for by MHHS which are migrating to become half-hourly settled on a site-specific basis).

1. Where do I find the requirements and obligations on DCUSA Parties

- 1.1 Clauses 19.12 to 19.15 in Section 2A of the DCUSA contain the provisions related to the actions required of both DNO/IDNO Parties and Supplier Parties for the purpose noted above.
- 1.2 Paragraphs 179 to 183 of Schedule 16 (CDCM) contain the provisions related to the action required of the DNO/IDNO Parties in terms of DUoS charging arrangements, again, for the purpose noted above.
- 1.3 Clause 12.13B and 12.13C of Schedule 2B ‘National Terms of Connection’ contain the rights customers have in terms of the process undertaken to move them to HH Settlement and the provision of an associated Maximum Import Capacity value.

2. What actions are required of Parties (detailed)

2.1 The table below has been created to set out the actions needed, which Party needs to take the action and is ordered chronologically.

Action Owner	Action Reference	Action Description
DNOs/IDNOs	Clause 19.14	<i>“The Company shall provide contact details to the User relating to agreeing the Maximum Import Capacity.”</i> This means that DNOs/IDNOs are to proactively contact Suppliers to provide the contact details which the DNO/IDNO requires Suppliers to pass on to their customers for the purposes of agreeing the MIC.
Suppliers	Clause 19.15	Whilst it is not explicit within the text itself, one requirement for suppliers will of course be to identify any of their customers who will be impacted. Then in accordance with the Clause 19.15, each Supplier with customers who are impacted are to provide each of their impacted customers with the following information (at a minimum): • site address information, including MPAN and Meter Serial Number(s); • reason for the correspondence; • expected migration date; • the relevant DNO/IDNO Party’s contact details (as provided by the relevant DNO/IDNO Party under Clause 19.14 [step 1 above]); and • explanation of the process, including that the Company will set the Customer's enduring Maximum Import Capacity and charge capacity charges based on the site's highest peak import capacity over the 12-month transition period.
Suppliers	Clause 19.14	<i>“Prior to the transition, the User shall confirm to the Company, using those contact details, the contact details of all the Customers impacted by P432, or any other CT Metering Points catered for by MHHS, used in providing the information to the Customer under Clause 19.15.”</i> Essentially, this means that prior to the transition Suppliers are to provide the relevant DNO/IDNO Parties with the contact details of their impacted customers. The details to be provided are those which the Supplier used in providing information to their impacted customers as per the step above. In completing this step, it would appear that it is not only the customer contact details that need to be provided the relevant DNO/IDNO Parties but also some additional information that will be necessary for the relevant DNO/IDNO

		Parties to effectively track the sites in question. It therefore seems reasonable for Suppliers to provide the following data items: • Supplier Name (this could be useful where a single person acts on behalf of multiple Supplier parties and wishes to submit a single set of data) • Supplier MPID • MPAN • Meter Serial Number(s) • Expected Migration Date (this will be useful for DNOs/IDNOs to track the start/end dates for sites across multiple Suppliers) • Customer Name • Customer Phone Number (if available) • Customer Email (if available) • Customer Postal Address (if available) Assume that at least one of either Customer Email or Customer Postal Address will be necessary as one of these is likely to be the way in which a Supplier will have contacted their customer as per the requirement to let them know what is going on. A spreadsheet template has been created for use by Supplier Parties in providing the above information to the relevant DNO/IDNO Parties
Suppliers	Part 4 of Schedule 16	For any Metering Points which have been migrated to either Measurement Class C or E for BSC Modification P432 or are required to become half-hourly settled for MHHS, Suppliers must provide contact details for the Customer to the DNO/IDNO Party (in advance, in accordance with Clause 19.14 of the DCUSA) and in any case <u>by no later than three months after the date of first migration.</u> <u>IMPORTANT:</u> Metering Points for which Suppliers fail to provide contact details for the Customer within the time-period stipulated above will <u>not be eligible</u> for transitional protection.
DNOs/IDNOs	Part 4 of Schedule 16	For any Premises with CT Metering Points notified to them by Supplier Parties as per the above step, and which have been migrated to either Measurement Class C or E for BSC Modification P432 or required to become half-hourly settled for

		MHHS, the DNOs and IDNOs will need to make sure that the 'Domestic Aggregated or CT' tariff, or the 'Non-Domestic Aggregated or CT' tariff as applicable is applied.
DNOs/IDNOs	Part 4 of Schedule 16	After a period of 12 months from the date of the first migration of a Premises, the DNOs/IDNOs will allocate the Premises to a charging band based on the current price control residual band thresholds by applying a MIC set by reference to the highest peak import capacity billed during the 12-month transition period (unless and until a different MIC is agreed by the DNO/IDNO Party).

3. What actions are required of Parties (simplified)

19.14 The Company shall provide contact details to the User relating to agreeing the Maximum Import Capacity for the affected customers.

Prior to transition, the User shall confirm to the Company, using those contact details, the contact details of all the Customers impacted by P432, or any other CT Metering Points catered for by MHHS, used in providing the information to the Customer under Clause 19.15.

19.15 Prior to each Customer's transition (or on a change of Customer during the 12 months following first migration), the User shall (as a minimum) provide the Customer with the following information:

19.15.1 site address information, including MPAN and Meter Serial Number(s);

19.15.2 reason for the correspondence;

19.15.3 expected migration date;

19.15.4 the Company's contact details (as provided by the Company under Clause 19.14); and

19.15.5 explanation of the process, including that the Company will set the Customer's enduring Maximum Import Capacity and charge capacity charges based on the site's highest peak import capacity over the 12-month transition period.

1) Proactive Communication by Network Operators: DNOs and IDNOs should proactively contact Suppliers to provide the contact details which the DNO/IDNO wants the Supplier to pass on to their affected customers for the purposes of agreeing the MIC.

2) Identification of Impacted Customers: Suppliers will need to identify which customers are impacted and contact them with the required information. This is to be done prior to transitioning each customer into the new arrangements.

3) Confirmation to Network Operators: Suppliers must confirm to the networks which customers are impacted. This confirmation would likely be done through bilateral communication, such as email and that an agreed format would be useful. It is expected that Suppliers will provide several of the same pieces of information that they provide to their customers, including MPAN, Meter Serial Number(s), expected migration date.

4. Exception Handling

Exception	Background	Handling
Application of tariffs	How distributors should determine the appropriate tariff where customer classifications have changed.	Allocations should generally reflect the latest available information, although this could require additional assessment and may not always be supported by complete data.
Domestic/non-domestic precedence	Domestic/non-domestic markers should generally determine customer type.	Amend LLFCs where required to align with the customer classification.
Late supplier notifications and the three-month rule	How late supplier notifications should be treated where the notification is later than 3 months after the migration.	Meter Points that are not notified within the three-month period after the first migration are not eligible for transitional protection.
Transitional periods start date	When the 12-month transitional period begins	The period as commencing from the first full month following Migration.
Treatment of non-eligible MPANs	Whole current MPANs should not benefit from the transitional arrangements.	Reject the MPANs until the Supplier has corrected the relevant metering records.
Treatment of related MPANs	Where a related MPAN is received and it does not have an equivalent half-hourly/transitional LLFC.	Allocate the site to band 1.
Use of Band 1 as a default solution	Band 1 should be used as a pragmatic default where the correct allocation is unclear.	Allocate the site to band 1.

5. Legal Text Extracts

SECTION 2A - DISTRIBUTOR TO SUPPLIER/GENERATOR RELATIONSHIPS

Transitional Protection for Customers affected by BSC Modification P432 or MHHS

- 19.12 Part 4 of the CDCM contains transitional protection for Customers who may be affected by the implementation of BSC modification P432 or any other CT Metering Points catered for by MHHS. All DNO/IDNO Parties shall comply with Part 4 of the CDCM, including a DNO Party operating outside of its Distribution Services Area.
- 19.13 The User shall initiate the transition for all Customers covered under Clause 19.12. The Company shall conclude the transition for each Customer by allocating them to the correct site-specific tariff under the CDCM such that a Maximum Import Capacity is required (except for those domestic Customers who opt for an aggregated tariff under paragraph 132D of the CDCM).
- 19.14 The Company shall provide contact details to the User relating to agreeing the Maximum Import Capacity for the affected Customers. Prior to transition, the User shall confirm to the Company, using those contact details, the contact details of all the Customers impacted by P432, or any other CT Metering Points catered for by MHHS, used in providing the information to the Customer under Clause 19.15. The User shall also notify the Company, using those same contact details, on each and every occasion (if any) that there is a change of Customer at the Premises during the 12 months following the date on which the Premises is first migrated.
- 19.15 Prior to each Customer's transition (or on a change of Customer during the 12 months following first migration), the User shall (as a minimum) provide the Customer with the following information:
- 19.15.1 site address information, including MPAN and Meter Serial Number(s);
 - 19.15.2 reason for the correspondence;
 - 19.15.3 expected migration date;
 - 19.15.4 the Company's contact details (as provided by the Company under Clause 19.14); and
 - 19.15.5 explanation of the process, including that the Company will set the Customer's enduring Maximum Import Capacity and charge capacity charges based on the site's highest peak import capacity over the 12-month transition period.

SCHEDULE 16 - COMMON DISTRIBUTION CHARGING METHODOLOGY

Part 4 – Transitional Protection for Customers affected by BSC Modification P432 or MHHS

179 This Part 4 sets out the transitional protection for Customers who may be affected by BSC Modification P432, being Customers with CT metering which are required to become half-hourly settled by migrating to Measurement Class C or E, or any other CT Metering Points catered for by MHHS which are migrating to become half-hourly settled on a site-specific basis.

180 This Part 4 forms part of the CDCM, but also applies to IDNO Parties and to DNO Parties acting outside of their distribution services area.

181 Subject to paragraph 182 below, where:

- a. a Customer takes a supply of electricity at a Premises where the electricity conveyed to the Premises is recorded through a CT meter; and
- b. the Metering Point for such Premises has been migrated to either Measurement Class C or E for BSC Modification P432 or required to become half-hourly settled for MHHS; and
- c. the supplier has provided contact details for the Customer to the DNO/IDNO Party (in accordance with Clause 19.14 of the DCUSA) no later than three months after the date of first migration,

then, with effect from the date of the migration of the Premises, the Domestic Aggregated or CT tariff, or the Non-Domestic Aggregated or CT tariff as applicable shall be applied.

182 With effect from 12 months after the date of the first migration of a Premises, the DNO/IDNO Party shall allocate the Premises to a charging band based on the current price control residual band thresholds applying a MIC set by reference to the highest peak import capacity billed during the 12-month transition period (unless and until a different MIC is agreed by the DNO/IDNO Party).

183 In this Part 4, the following definitions shall apply:

BSC Modification P432	means the modification to the BSC referred to as modification ‘P432, Half Hourly Settlement for CT Advanced Metering Systems’, which was implemented on 15 th of April 2024.
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SCHEDULE 2B - NATIONAL TERMS OF CONNECTION: SECTION 3:

12 LIMITATION OF CAPACITY

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General

- 12.12 Except where a variation requires a Modification, either Party may propose a variation to the Maximum Import Capacity and/or Maximum Export Capacity by notice in writing to the other Party. The Company and the Customer shall negotiate in good faith such a variation, but where it is not agreed section 23 of the Act may entitle either Party to refer the matter to the Authority.
- 12.13 Any reduction in the Maximum Import Capacity or the Maximum Export Capacity pursuant to Clause 12.12 shall, where the Parties have within the preceding 12 months agreed the Maximum Import Capacity or the Maximum Export Capacity (as applicable), only take effect following the expiry of 12 months from the date of such previous agreement (unless the Company expressly agrees otherwise).
- 12.13A No reduction in the Maximum Import Capacity or the Maximum Export Capacity pursuant to Clause 12.12 shall have effect prior to the first day of the month following the date of the notice properly given under Clause 12.12, stating the required capacity (being, if the reduction initially requested is not agreed, the request for the reduction which is subsequently agreed).
- 12.13B Where Part 4 of Schedule 16 of the DCUSA applies to the Premises (and unless and until the Parties agree a different capacity), the Maximum Import Capacity determined under such Part 4 shall apply for the purposes of this Agreement (and the Company shall have no liability to the Customer should that capacity not be suitable and/or have an impact on the Connection Assets).
- 12.14 For the avoidance of doubt, all notices under this Clause 12 shall be sent, and shall be deemed to be served and received, in accordance with Clause 23.