








DCUSA Change Proposal (DCP)		At what stage is this document in the process?
<h1>DCP 460:</h1> <h2>Updating incorrect company names referenced throughout the DCUSA</h2> <p><b>Date Raised:</b> 12 August 2025</p> <p><b>Proposer Name:</b> Andy Green</p> <p><b>Company Name:</b> ElectraLink</p> <p><b>Party Category:</b> Secretariat</p>		<div>01 – Change Proposal</div> <div>02 – Consultation</div> <div>03 – Change Report</div> <div>04 – Change Declaration</div>
<p><b>Purpose of Change Proposal:</b></p> <p>The intent of this CP is to ensure that any references to the company names of specific Parties within the DCUSA are correct and to explore the possibility of future proofing these against any future changes.</p>		
	<p><b>Governance:</b></p> <p>The Proposer recommends that this Change Proposal should be:</p> <ul style="list-style-type: none"> <li>• Treated as a Part 2 Matter</li> <li>• Treated as a Standard Change</li> <li>• Progressed to the Change Report phase</li> </ul> <p>The Panel will consider the proposer's recommendation and determine the appropriate route.</p>	
	<p><b>Impacted Parties:</b></p> <p>DNOs / IDNOs</p>	
	<p><b>Impacted Clauses:</b></p> <p>Sections 2 and 3 of Schedule 2B and Paragraph 1.2 in both Schedules 17 and 18</p>	

Contents		 Any questions?
1	Summary	3
2	Governance	3
3	Why Change?	3
4	Solution and Legal Text	4
5	Code Specific Matters	6
6	Relevant Objectives	7
7	Impacts & Other Considerations	7
8	Implementation	8
9	Recommendations	8
Indicative Timeline		
The Secretariat recommends the following timetable:		
Initial Assessment Report	20 August 2025	
Consultation Issued to Industry Participants	N/A	
Change Report Approved by Panel	17 September 2025	
Change Report issued for Voting	18 September 2025	
Party Voting Closes	09 October 2025	
Change Declaration Issued to Parties	10 October 2025	
Change Declaration Issued to Authority	N/A	
Authority Decision	N/A	
		 DCUSA@electralink.co.uk
		 020 7432 3011
		Proposer: Insert name: Andy Green
		 Andy.green@electralink.co.uk

## 1 Summary

### What?

- 1.1 There are some company names referenced across several DCUSA schedules that are currently incorrect and should be amended.

### Why?

- 1.2 If the change is not made, then the issue of the DCUSA containing incorrect company names is being perpetuated and it is our view that the DCUSA should not contain incorrect information.

### How?

- 1.3 At a minimum, it is proposed that the incorrect company names be updated to reflect the correct company names and if, through exploration with DCUSA Ltd.'s legal advisors, a legally sound, and practicable to achieve option exists for future proofing the text, then that will be explored.

## 2 Governance

### Justification for Part 1 or Part 2 Matter

- 2.1 This is a Part 2 Matter as the changes are cosmetic and will not have any material impact to any market participants or customers.

### Requested 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 Change Report phase.
- 2.3 Please see Section 3 below for further thoughts on the progression of this Change Proposal.

## 3 Why Change?

- 3.1 As mentioned above, there are some company names referenced across several DCUSA schedules that are currently incorrect and should be amended.
- 3.2 As detailed in Section 5 below, this Change Proposal is being raised by the Secretariat following on from a discussion that was held during the July SIG meeting ([SIG 170](#)) as part of [DIF 85](#) where a vote was held to determine if the Secretariat should raise a CP to update the company names. The outcome of that vote was that 2 DNOs, 3 suppliers and 2 IDNOs had voted for the secretariat to raise a CP with no votes against and no votes abstaining. Further detail of the vote can be found within the DCUSA SIG 170 minutes by clicking on the SIG 170 link in above.

- 3.3 At that meeting it was discussed that the CP could go to a Working Group for further development but having considered the best approach we have opted for a different approach which is explained below.
- 3.4 We believe the best way forward would to avoid using industry time and resource on something that is technically a housekeeping Change Proposal and that to address the points raised during the SIG meeting as to whether or not there is a viable way to future proof the text, then this would be something that could be put to the legal advisors when issuing the legal text for their review. We believe that there are likely to be few credible routes by which future proofing can be achieved and therefore it would be best to use the most appropriate resource available.
- 3.5 If the legal advice were to come back with an array of different options to select, then we would be happy to take this back to the Panel and seek their steer as to whether or not a Working Group was now required in order to put options forward to Parties as to which they prefer.

## 4 Solution and Legal Text

### Legal Text

- 4.1 In Section 2 of Schedule 2B 'National Terms of Connection', the following change should be made:
- 16 *Governing law.* If the premises is located in Scotland (except where the network operator is ~~Northern Electric Distribution Limited~~Northern Powergrid (Northeast) plc (registered number 2906593) or Electricity North West Limited (registered number 2366949)), this agreement will be governed by, and interpreted in accordance with, Scots law, under the jurisdiction of the Scottish courts. In all other cases, this agreement will be governed by, and interpreted in accordance with, the laws of England and Wales, under the jurisdiction of the English and Welsh courts.
- 4.2 Section 3 of Schedule 2B, the following change should be made (noting that Section 4 was updated as a result of DCP 375 'Amendments to the Unmetered Supplies National Terms of Connection')

#### 25. GOVERNING LAW AND JURISDICTION

- 25.1 Subject to Clause 25.2, this Agreement will be governed by, and interpreted in accordance with, the laws of England and Wales, under the jurisdiction of the English and Welsh courts.
- 25.2 If the Connection Point is located in Scotland (except where the Company is ~~Northern Electric Distribution Limited~~Northern Powergrid (Northeast) plc (a company incorporated in England & Wales with company number 2906593) or Electricity North West Limited (a company incorporated in England & Wales with company number 2366949)), this Agreement will be governed by, and interpreted in accordance with, Scots law, under the jurisdiction of the Scottish courts.

4.3 In Paragraph 1.2 of Schedule 17 'EHV Charging Methodology (FCP Model)', the following changes should be made:

1.2 This Schedule 17 sets out the methods, principles, and assumptions underpinning the EDCM for the calculation of Use of System Charges by the following DNO Parties:

Scottish Hydro Electric Power Distribution plc;

Southern Electric Power Distribution plc;

SP Distribution Limited;

SP Manweb plc;

~~Western Power Distribution (East Midlands)~~National Grid Electricity Distribution (East Midlands) plc; and

~~Western Power Distribution (West Midlands)~~National Grid Electricity Distribution (West Midlands) plc.

4.4 In Paragraph 1.2 of Schedule 18 'EHV Charging Methodology (LRIC Model)', the following changes should be made:

1.2 This Schedule 18 sets out the methods, principles, and assumptions underpinning the EDCM for the calculation of Use of System Charges by the following DNO Parties:

Eastern Power Networks plc;

Electricity North West Limited;

London Power Networks plc;

Northern Powergrid (Northeast) ~~Limited~~plc;

Northern Powergrid (Yorkshire) plc;

South Eastern Power Networks plc;

~~Western Power Distribution (South Wales)~~National Grid Electricity Distribution (South Wales) plc; and

~~Western Power Distribution (South West)~~National Grid Electricity Distribution (South West) plc.

## Text Commentary

4.5 As noted in Section 3 above, having considered the discussion held during the SIG meeting, where it was agreed that the Secretariat should raise this Change Proposal; we have suggested an approach by which we seek clarity from DCUSA Ltd.'s legal advisors as to the question of future proofing the text so further updates, if a company name changes, can be avoided.

- 4.6 The above would be with the view of obtaining a view from the experts prior to taking up industry time and resource, when it may be the case that their advice is to just make the updates as they stand, or if they come back with only a single suggestion for how to future proof the text. If multiple suggestions were to arise, we would then seek the Panel's view as to the use of a Working Group.
- 4.7 In seeking guidance from DCUSA Ltd.'s legal advisors, we would use the points raised during the SIG meeting, which included
- That for the company names contained in the National Terms of Connection, would it be possible to say something to the effect of 'if you're in Scotland and your network operator is a Scottish company then Scots law applies, otherwise the laws of England and Wales will apply' and noting that consideration would need to be given to how this works for IDNOs.
  - That for the company names referenced in Schedules 17 and 18, would it be possible to utilise some other known industry identifier (e.g., Company Registration numbers, GSP groups or MPIDs).
- 4.8 We note that if future proofing is an option, then Section 4 of the National Terms of Connection would also need to be updated along with those already accounted for in the above proposed legal drafting.

## 5 Code Specific Matters

### Reference Documents

- 5.1 This Change Proposal is being raised as a result of the continued vigilance of the DCUSA Panel, DCUSA Parties, and the DCUSA Code Administrator. The incorrect company names were found and then the Panel was notified and where the Panel agreed to add this as an item to the Panel's 'Housekeeping Log' with a view to resolving the issue alongside other Housekeeping Items in the log.
- 5.2 Following a discussion at a recent Panel meeting, and the raising of DCP 457 'Housekeeping Items', it was agreed for the DCUSA Code Administrator to take this as a separate issue to the Stabding Issues Group for further consideration. The item was then discussed at the July SIG meeting ([SIG 170](#)) as part of [DIF 85](#) and where a vote was held to determine if the DCUSA Code Administrator (also known as the Secretariat) should raise a CP to update the company names.

## 6 Relevant Objectives

	DCUSA General Objectives	Identified impact
<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 type="checkbox"/>	3. The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences	None
<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

6.1 DCUSA General Objective 4 will be better facilitated by this change as it is clearly more efficient to correct incorrect company names than to leave them in place and in the case of future proofing the text moving forward, then that can only be seen as even more efficient than just correcting them.

## 7 Impacts & Other Considerations

### Impacts on any Significant Code Review (SCR) or other significant industry change projects

7.1 We do not believe that this CP impacts upon any current SCR or other significant industry change projects or that any significant industry change projects will impact upon the progression of the Change Proposal.

### Impacts on other Codes

7.2 We have considered whether any other industry codes might be impacted as a result of this Change Proposal and have concluded that there is no impact on any other industry codes if this Change Proposal is to be progressed.

Grid Code..... ☐ SEC..... ☐ CUSC..... ☐  
 Distribution Code... ☐ REC..... ☐ BSC..... ☐  
 None..... ☒

### Consumer Impacts

- 7.3 We have assessed whether there may be direct or indirect impacts on consumers and in doing so, we have concluded that there may be some very small positive impacts for consumers as a result of this Change Proposal progressing. The small positive impact could be realised if or when a consumer were to read through the National Terms of Connection and not come across incorrect company names which could otherwise cause confusion.

### Environmental Impacts

- 7.4 In accordance with DCUSA Clause 10.4.5A, we have assessed whether there would be a material impact on greenhouse gas emissions if this CP were implemented and following that assessment, we concluded that there would be no impacts on greenhouse gas emissions if this CP were implemented.

### Are there any wider industry impacts?

- 7.5 We do not believe there are any wider industry impacts as a result of this Change Proposal being progressed.

## 8 Implementation

### Proposed Implementation Date

- 8.1 We believe that a suitable implementation date to be the next standard DCUSA Release following Party approval which we note is likely to be 06 November 2025 or 26 February 2026 depending upon the progression route of the Change Proposal.

## 9 Recommendations

*The Code Administrator will provide a summary of any recommendations/determinations provided by the Panel in considering the initial Change Proposal. This will form part of a Final Change Report.*