






DCUSA Consultation		At what stage is this document in the process?
<h1>DCP 458:</h1> <h2>Amend DCP414 process</h2> <p>Date Raised: 17 July 2025</p> <p>Proposer Name: Peter Waymont</p> <p>Company Name: Eastern Power Networks</p> <p>Party Category: DNO</p>		01 – Change Proposal
		02 – Consultation
		03 – Change Report
		04 – Change Declaration
<p>Purpose of Change Proposal:</p> <p>To apply a default capacity of 71kVA following the 12 months non-applicability of capacity charging arising from DCP 414</p>		
<div>  <p>This document is a Consultation issued to DCUSA Parties and any other interested parties in accordance with Clause 11.14 of the DCUSA seeking industry views on DCP 458 'Amend DCP414 process'.</p> </div> <div>  <p>The Working Group recommends that this Change Proposal should proceed to Consultation.</p> </div> <div>  <p>Parties are invited to consider the questions set in section 10 and submit comments using the form attached as Attachment 1 to dcusa@electralink.co.uk by 02 September 25.</p> </div> <div> <p>The Working Group will consider the consultation responses and determine the appropriate next steps for the progression of the Change Proposal (CP).</p> </div>		
<div>  <p>Impacted Parties: Suppliers/DNOs/IDNOs</p> </div>		
<div>  <p>Impacted Clauses:</p> <ul style="list-style-type: none"> Clause 19, Schedule 16 </div>		

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Any questions?

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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	18 August 2025
Change Report Approved by Panel	17 September 2025
Change Report issued for Voting	18 September 2025
Party Voting Closes	02 October 2025
Change Declaration Issued to Parties	03 October 2025
Change Declaration Issued to Authority	N/A
Authority Decision	N/A

1 Summary

What?

- 1.1. DCP414 introduced a process to manage P432 – the migration of CT metered customers to HH settlement. The process commences in April 2024 and has these steps;
 - 1.1.1 Distributor gives supplier contact details
 - 1.1.2 Supplier advises customer of process
 - 1.1.3 Supplier give distributor their customer contact details
 - 1.1.4 Supplier changes measurement class of customer
 - 1.1.5 Distributor applies new tariff with no capacity charge
 - 1.1.6 12-15 months later distributor contacts customer to agree a MIC
- 1.2. The proposer stated that in practice, they had set up a new mailbox and advised suppliers of this on 5 April 2024.
- 1.3. The proposer seen virtually no customer contact details and indeed there has been some industry discussion around the method of communicating those (including use of SDEP).

Why?

- 1.4. The proposer has, since April 2024, in good faith, applied the no-capacity charge to customers whose measurement class has been changed but have no means of contacting them now that the 12-month period is elapsed. There is also the risk that customers don't respond when contacted.
- 1.5. The proposer's expectation is that they will end up applying the highest demand in most cases. However, this requires analysis of the data for each customer.

How?

- 1.6 It is therefore proposed that a default capacity should be applied in all cases after the one year. CTs are usually installed on sites over 69kVA and so we propose that a default of 71kVA is used (being a relatively unused value such that defaults can be more easily identified, where Distributors are unable to classify them as such, and being a reasonable representation of sites that have CT metering and are not already in Measurement Class E.
- 1.7 This ensures the one-year transitional protection, while making the end to end process simple and easily understood, without removing the customer's ability to propose a change to the MIC at any time.

2 Governance

Justification for Part 2 Matter

- 2.1. It is urgent because the time to contact customers is upon us and we are unable to follow the expected process.

Current Next Steps

2.2 This Change Proposal should.

- Be treated as a Part 2 Matter;
- Be treated as a Urgent Change; and

3 Why Change?

Background of DCP 458

3.1 The proposer believes the DCP414 process is unwieldy and unworkable. A simpler solution is required. This proposal does not restrict the customers' ability to contact the Distributor to agree a capacity.

Q1: Do you understand the intent of DCP 458?

Q2: Are you supportive of the principles of DCP 458?

4 Working Group Assessment

Working Group Assessment

- 4.1 The DCUSA Panel established a Working Group to assess DCP 458. 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
- 4.2. The proposer explained to the Working Group that this CP had been raised as they'd received very little communication from Suppliers in regards to the MPANs they were looking to migrate as part of [DCP 414](#).
- 4.3. The Proposer went on to explain that DCP 414 was seeking to offer transition protection to CT customers who were migrating to HH settlement.
- 4.4. As outlined in section one of this consultation, part of this process obligates suppliers to provide the MPANs and contact details of the customers they are migrating so that the Distributor knows which sites are being migrated and so that they have contact details for them.
- 4.5. As the Distributors haven't received many details of the customers who are being migrated, this has made it difficult to contact customers to agree a capacity for these MPANs and that there is no consistent process to follow in these cases, so the capacities often end up being set at a default.
- 4.6. Several other DNOs and IDNOs agreed that they'd had similar experience of what the proposer had described.
- 4.7. It was highlighted that the window for the DNOs to contact the customer to agree the capacity was 6 months following receipt of 12 months' consumption data i.e. up to 18 months after the change of measurement class.

- 4.8. It was suggested that contact details or customer on a site may have changed during the 12–18-month window, or that customers could forget previous conversations about the need to agree and pay for their capacity. Several Working Group members agreed with this position.
- 4.9. The Proposer noted that they proposed a default capacity of 71 kVA as it is unusual to be used as a “real” capacity value and would be more likely to be identified as a default capacity, though noted that UKPN’s billing systems allow default capacities to be flagged.
- 4.10A Working Group member noted that 71 kVA had been used by them for P272 previously, so was not unheard of. This supported the suggested solution as this meant there was a precedent for setting a default capacity of this value.
- 4.11It was also agreed that it would be unusual for a customer to request a capacity of 71 kVA for a new connection.

Q3: Is applying a default capacity, rather than trying to agree one with the customer appropriate?

Q4: Is the initial suggested default capacity of 71 kVA appropriate?

- 4.12The Working Group were keen to understand Parties experiences of using default capacities and, for those who had used default capacities in the past, the reasons that they were applied.
- 4.13Several Distributors in the Working Group said they had used default capacities in the past, particularly as part of the P272 migration and-.
- 4.14A Working Group member queried whether in setting a default capacity, this would have a knock-on effect on the process for sending connection agreements, noting that customer details were not known. The Proposer agreed that it would not, it was a billing approach and did not prevent agreeing a different capacity value.
- 4.15Due to the above, the Working Group are also keen to get Party views on any potential consequences to applying default capacities.

Q5: Have you used default capacities in other circumstances? If so, what were these circumstances and what defaults were applied?

Q6: Are you aware of any potential consequences of applying a default capacity? If so, what are/were these consequences?

- 4.16As part of the discovery work for this CP, it was suggested that it would be useful to understand what process suppliers intended to take on sharing the relevant details for customers they are migrating as part of the DCP 414 obligation.
- 4.17It was highlighted by several Distributors that they had reached out to suppliers to remind them of the DCP 414 process and their contact details to be used for providing the customer details, but that they had still not received updates from many of them and in the cases where an update was received, they were much lower in terms of the expected volumes.
- 4.18The Working Group agreed that it would be useful to understand the proportion of customers Distributors had received contact details for against the volumes they were expecting to migrate.

Q7: What proportion of the customers that you are expecting to migrate as part of the DCP 414 obligation have you received contact details for?

4.19 It was also suggested that understanding the challenges/barriers suppliers had been faced with when it came to identifying which customers they were intending on migrating as part of the DCP 414 obligation would be useful, as this may highlight if there was something that parties could do to support each other in identifying the customers and sharing the correct information.

Q8: For suppliers only- How do you intend to share with Distributors which customers you are migrating as part of the DCP 414 obligation.

Q9: For suppliers only- Are there any barriers/challenges to suppliers in identifying which customers are to be migrated as part of the DCP 414 obligation i.e. no contact, access etc?

4.20 A Working Group member stated that rather than apply a default capacity, the distributor would have information on maximum demand usage to set a more appropriate capacity.

4.21 It was stated that if there was a desire to consult on a different approach, this could be presented as an alternative in the consultation and change report.

4.22 It was also explained that this proposal would keep the process simple and relatively automated, by applying a default capacity and limiting the amount of effort to check for data and calculate the capacity.

Q10: Is there an alternative process that has not been considered within this CP? If so what is this process?

4.14 As this CP has urgent status, and as it's been confirmed by several Distributors that we are 12 months on from the implementation of DCP 414 and they find themselves in a position where little information relating to the customer from suppliers has been received, the consultation window should be 10 working days.

5 Relevant Objectives

Assessment Against the DCUSA Objectives

5.10 For a DCUSA Change Proposal (CP) to be approved it must be demonstrated that it better facilitates the DCUSA Objectives.

5.11 It has been agreed that DPC 458 will be assessed against the DCUSA General Objectives.

5.12 There are five General Objectives. DCP 458 will be measured against the DCUSA General Objectives, which are set out in the table below:

	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

5.13It introduces a solution that can be applied equally, removes the need for discussion of methods for Suppliers providing customer data and makes the Distributor's process manageable.

Q11: 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.

6 Impacts & Other Considerations

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

6.10None.

Does this Change Proposal Impact Other Codes?

BSC..... ☐ SEC..... ☐

CUSC..... ☐ REC..... ☐

Grid Code..... ☐ None..... ☒

Distribution Code.. ☐

6.11As written, this change does not directly impact any other codes

Q12: Are you aware of any wider industry developments that may impact upon or be impacted by this CP?

Q13: How are you impacted by the outcome of this CP?

7 Implementation

7.10 Extra release 2 weeks after approval.

Q14: Do you agree with the Working Group's proposed implementation date? If not, please provide your rationale.

8 Legal Text

8.10 Amend Clause 19 as follows;

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.

19.15- Prior to each Customer's transition, 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); 1

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 the use of a default capacity of 71kVA for Use Of System Charges and the Company's contact details for the Customer to propose a Maximum Import Capacity.

Amend Schedule 16 as follows;

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 183 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 P432 or required to become half-hourly settled for MHHS,

then, following 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 Following the period of 12 months from the date of the first migration of a Premises, the LV Site Specific Band 1 tariff shall be applied and the DNO/IDNO Party shall apply a default MIC of 71kVA.

Text Commentary

8.3 The legal text applies the outcome as per the proposal.

Q15: Do you have any comments on the draft legal text?

Q16: Do you have any other comments on DCP 458?

9 Code Specific Matters

9.1 N/A.

10 Consultation Questions

10.1 The Working Group is seeking industry views on the following consultation questions:

Number	Questions
1	Do you understand the intent of DCP 458?
2	Are you supportive of the principles of DCP 458?
3	Is applying a default capacity, rather than trying to agree one with the customer appropriate?
4	Is the initial suggested default capacity of 71 kVA appropriate?
5	Have you used default capacities in other circumstances? If so, what were these circumstances and what defaults were applied?
6	Are you aware of any potential consequences of applying a default capacity? If so, what are/were these consequences?
7	What proportion of the customers that you are expecting to migrate as part of the DCP 414 obligation have you received contact details for?
8	For suppliers only- How do you intend to share with Distributors which customers you are migrating as part of the DCP 414 obligation.
9	For suppliers only- Are there any barriers/challengers to suppliers in identifying which customers are to be migrated as part of the DCP 414 obligation i.e. no contact, access etc? For Suppliers only – Are there any barriers/challenges to you in identifying which

	customers are to be migrated as part of the DCP 414 obligation? (e.g., no contact, access, etc.).
10	Is there an alternative process that has not been considered within this CP? If so what is this process?
11	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.
12	Are you aware of any wider industry developments that may impact upon or be impacted by this CP?
13	How are you impacted by the outcome of this CP?
14	Do you agree with the Working Group's proposed implementation date? If not, please provide your rational.
15	Do you have any comments on the draft legal text?
16	Do you have any other comments on DCP 458?

10.2 Responses should be submitted using Attachment 1 to dcusa@electralink.co.uk no later than, 02 September 2025.

10.3 Responses, or any part thereof, can be provided in confidence. Parties are asked to clearly indicate any parts of a response that are to be treated confidentially.

Attachments

- Attachment 1: DCP 458 Consultation Response Form
- Attachment 2: DCP 458 Change Proposal Form
- Attachment 3: DCP 458 Draft Legal Text