


DCUSA Change Proposal (DCP)		At what stage is this document in the process?			
<h1>DCP 462:</h1> <h2>Impact of MHHS on certain DCUSA owned flows</h2> <p>Date Raised: 12/09/2025</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>The intent of the Change Proposal is to facilitate change to DCUSA owned Market Messages and to make updates to specific Market Messages, which have Scenario Variants that are solely owned by DCUSA, to align the requirements for MHHS, including any appropriate additional Scenario Variants that might need to be added for newly created for MHHS entities.</p>					
	<p>Impacted Parties:</p> <p><input checked="" type="checkbox"/> Suppliers <input checked="" type="checkbox"/> DNOs <input checked="" type="checkbox"/> IDNOs <input type="checkbox"/> CVA Registrants <input type="checkbox"/> OTSO Party <input type="checkbox"/> SIP Parties</p>				
	<p>Impacted Clauses:</p> <table border="1"> <thead> <tr> <th>Section/Schedule</th> <th>Clause/Paragraph</th> </tr> </thead> <tbody> <tr> <td>Section 1</td> <td>Clauses 9 and 10</td> </tr> </tbody> </table>		Section/Schedule	Clause/Paragraph	Section 1
Section/Schedule	Clause/Paragraph				
Section 1	Clauses 9 and 10				

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Indicative Timeline

The Secretariat recommends the following timetable:

Initial Assessment Report	12 September 2025
Consultation Issued to Industry Participants	N/A
Change Report Approved by Panel	17 September 2025
Change Report issued for Voting (10 Working Days)	17 September 2025
Party Voting Closes	01 October 2025
Change Declaration Issued to Parties	02 October 2025
Change Declaration Issued to the Authority (if needed)	02 October 2025

1 Summary

What?

- 1.1 As part of the MHHS Programme, a number of changes are due to be implemented for several industry codes as well as the data requirements that sit alongside them. We have recently identified that three data flows (also known as Market Messages) have been overlooked within a register which is used by the Programme to track the requirements for current and future data flows across the codes in preparation for MHHS.
- 1.2 The register (known as MHHSP-DES196 - D-Flow and Interface Mapping) contains several worksheets, one of which is labelled 'MHHS Change (Other)' and within that worksheet there were three data flows which were described as being under the ownership of the DCUSA. Within that worksheet, a column titled 'Status' suggests that what is happening with these data flows is still to be confirmed.
- 1.3 During the MHHS work undertaken by DCUSA it was recognised that DCUSA does not have a robust method for amending Market Messages, Scenario Variants or Data Items owned by it.

Why?

- 1.4 The worksheet in the register also has a column titled 'MHHS Change' and the values in those columns suggest that new Scenario Variants would be required as the data flows in question would also need to be sent to additional recipient types as there are new entities carrying out activities as part of MHHS. The flows in question and the potential entities that may need to send and/or receive those data flows are described in more detail in section 3 below.
- 1.5 If this change were not raised and progressed then there could potentially be compliance issues for Parties in the future, as data flows they might require won't be sent as there won't be a version of the flow that can be sent to them. This could have cascading effects through the system as a whole.

How?

- 1.6 By adding governance of DCUSA owned Market Messages, Scenario Variants or Data Items into DCUSA while at the same time seeking to amend these messages.
- 1.7 The raising of this change sets off a chain reaction of workflows between DCUSA and REC, to ensure the Energy Market Data Specification (EMDS), maintained under the REC is updated as quickly as possible following approval of this change.

Who?

- 1.8 Any of those market participants who would need to use the flow will be impacted and it is likely that end customers may also be impacted should this change not proceed at pace. Progressing this change urgently should mitigate those impacts.

2 Governance

View on items that impact the progression of the CP

- 2.1 Tick this box if you feel that you are raising this change to try to address a current or imminent issue that has significant adverse commercial or safety implications or which would otherwise place Parties in breach of relevant regulations.
- 2.2 Do you believe this Change Proposal will have a significant impact on any of the following? (Select all that apply)
- | | |
|--|---|
| <input type="checkbox"/> Electricity consumers | <input type="checkbox"/> Supply |
| <input type="checkbox"/> Distribution | <input type="checkbox"/> Generation |
| <input type="checkbox"/> Commercial activities connected with any of the above | <input checked="" type="checkbox"/> None of the Above |
- 2.3 Do you believe this Change Proposal will? *(Select all that apply)
- Have a significant commercial impact on any a Party or Party Category or on customers
 - Be likely to discriminate in its effects between at least one Party or another
 - Be the subject of controversy between Parties
 - Cause at least one Party to be in breach of this Agreement if not urgently addressed
 - Change the governance or the change control arrangements applying to the DCUSA
 - None of the Above
- 2.4 Tick this box if you either, haven't developed any proposed legal drafting or if you have, but you feel that further development will be required (i.e., via a Working Group)?

View on progression route for this CP

- 2.5 I believe that this Change Proposal should:
- Be treated as a Part 1 Matter;
 - Be treated as an Urgent Change; and
 - Proceed to the Change Report phase.

3 Solution and Legal Text

Background

- 3.1 Both RECCo and BSCCo created DTN design documents for REC Technical Services (RTS) to use to translate the design into the EMDS: [MHHS impacts to Data Transfer Network \(DTN\) Flows - MHHS Programme](#). This included redlined data flow documents developed by RECCo and the BSC DEL1712 which summarised the changes required to BSC flows: [DEL1712 MHHS impacts to BSC-owned DTN Market Messages v1.6.pdf](#).
- 3.2 RTS used the design docs to create the EMDS changes rather than the DES196 which is a summary document and shows the three DCUSA changes as requiring confirmation, i.e. not agreed. Updates to the EMDS, covering new/amended Data Transfer Network (DTN) and Data Integration Platform (DIP) messages, were issued for consultation several times so that any gaps could be identified.
- 3.3 The three data flows set out in the relevant worksheet mentioned above are set out below:

Data Flow Id	Data Flow Name	Meta Data Owner	MHHS Change	Status
D0164	Notification of New or Changed Interruption of Supply	DCUSA	New SV for LDSO to ADS	Confirmation Required
D0394	Notification of agreed or cancelled appointment to move a customer electricity meter during a service alteration	DCUSA	New SV for MSA and MSS	Confirmation Required
D0395	Confirmation that an electricity meter has been moved during a service alteration	DCUSA	New SV for MSA and MSS	Confirmation Required

- 3.4 With respect to the D0164 data flow (see Attachment 1), the table above suggests that a new Scenario Variant needs to be created so that applicable data can be passed between distributors and the Advanced Data Service (ADS) which is the 'Qualified' service that provides the Advanced Retrieval and Processing Service (ARP).
- 3.5 With respect to the D0394 (see Attachment 2) and D0395 (see Attachment 3) data flows, the table above suggests that new Scenario Variants are likely needed so that applicable data can be passed between distributors and the Metering Service (Advanced) (MSA), also known as the Advanced Metering Service which is the service in the MHHS Targeted Operating Model (TOM) that is responsible for the installation and maintenance of Meters in the Advanced Market Segment. It would also likely be needed for the Metering Service (Smart) (MSS) which is the service in the MHHS TOM that is responsible for the installation and maintenance of Meters in the smart and non-smart Market Segments.

Solution Overview

- 3.6 The proposal is to amend DCUSA to facilitate such EMDS change with transparency to DCUSA Parties and to update the specifications of data flows in the REC EMDS, being D0164, D0394, D0395.
- 3.7 In terms of the steps that need to be taken to achieve this, there will need to be collaboration between DCUSA and the REC Code Manager, to ensure, each party knows what is happening and when it needs to happen. This collaboration would involve DCUSA completing the required documentation for updating or creating new data flows or Scenario Variants and confirming completeness with the REC Code Manager prior to the change being issued to Parties for voting.
- 3.8 Once voting has finished, DCUSA would inform the REC Code Manager that the proposed new Scenario Variants and any other amendments could then proceed to implementation within the EMDS.
- 3.9 There may also be a need to have bilateral discussion with ElectraLink, as it may still be possible for these messages to be sent and for the required routing for the Scenario Variants to be set up.
- 3.10 Three attachments have been provided which are draft redlined EMDS templates in the style of those used by BSC and REC during the DTN design phase and subsequent phases which capture the necessary data/information to create the new Scenario Variants.
- 3.11 Changes to DCUSA itself are to amend Clause 9 and 10 as follows -
- 9.1A The main purpose of this Section 1C is to make provision for the terms and conditions of this Agreement to be varied.
- 9.1B This Section 1C also contains provisions for amending Market Messages, Scenario Variants, Data Items or other meta data listed in the Energy Market Data Specification as owned by DCUSA (each a “DCUSA Message”).
- 10.1 Each variation of this Agreement and/or DCUSA Message must commence with a proposal made in accordance with the provisions of this Clause 10 (a Change Proposal).
- 10.4.6 a statement as to which parts of the Agreement and/or DCUSA Message the Proposer considers would require to be changed in order to give effect to the proposed variation or as a consequence of that variation;

4 Relevant Objectives

- 4.1 Which of the DCUSA Objectives would be better facilitated by the implementation of this Change Proposal is set out below.

DCUSA General Objectives

- 1) The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks **Positive**
- 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 **Neutral**

3) The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences **Positive**

4) The promotion of efficiency in the implementation and administration of the DCUSA **Positive**

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 **Neutral**

4.2 This change proposal fixes an oversight related to the implementation of MHHS, and will better facilitate DCUSA General Objective (1) as the successful implementation of MHHS will ensure that charges to suppliers for wholesale electricity more accurately match actual consumption, rather than relying on estimates of consumer usage. This will incentivise suppliers to offer new tariffs and products that encourage a more flexible use of energy and help balance the system without the need for expensive infrastructure investment.

4.3 Whilst the detailed obligations for MHHS are set out within the industry codes, distributors have licence obligations of a 'duty to cooperate' with implementing the outcomes of an SCR and therefore, progressing this change will better facilitate DCUSA General Objective (3).

4.4 It is clearly more efficient to resolve this matter now than it is to leave it longer, which could cause issues for the implementation of the MHHS Programme, therefore, progressing this change will better facilitate DCUSA General Objective (4).

5 Impacts & Other Considerations

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

5.1 There are likely positive impacts of this change on the MHHS SCR, and therefore there are positive impacts.

Impacts on Other Codes

5.2 As already identified, there will be impacts on the REC and so has been considered during the development of this change, as well as a potential interaction with the BSC via the MHHS Programme which, again has been considered.

Grid Code	<input checked="" type="checkbox"/>	SEC	<input checked="" type="checkbox"/>	CUSC	<input checked="" type="checkbox"/>	None	<input checked="" type="checkbox"/>
DCode...	<input checked="" type="checkbox"/>	REC	<input checked="" type="checkbox"/>	BSC	<input checked="" type="checkbox"/>		

Impacts on DCUSA Owned Data Flows

5.3 This change does directly impact DCUSA owned data flows and ourselves and the DCUSA Code Administrator are aware of the process to be followed and have already been in communication with the MHHS Programme and the REC Code Manager.

Consumer Impacts

5.4 Any impacts on consumers as a result of the change is likely to be minimal but positive as it will assist with the timely implementation of the MHHS Programme, which the Authority has conducted an impact assessment for.

Environmental Impacts

5.5 In accordance with DCUSA Clause 10.4.5A, I have considered whether there would be a material impact on greenhouse gas emissions if this CP were implemented and found none.

6 Implementation

Lead Time for Implementation

6.1 There will be no lead time for this change.

Proposed Implementation Date

6.2 The updated data flows are required by MHHS Milestone 11 (M11) for compliance in advance of the start of Migration. Although it is recognised that these are edge cases that are unlikely to be triggered for migrated MPANs for some time. M11 is currently scheduled for 22nd October 2025.