





DCUSA Change Declaration		At what stage is this document in the process?
<h2>DCP 462:</h2> <h3>Impact of MHHS on certain DCUSA owned flows</h3> <p><b>Date Raised:</b> 12/09/2025</p> <p><b>Proposer Name:</b> Peter Waymont</p> <p><b>Company Name:</b> Eastern Power Networks</p> <p><b>Party Category:</b> DNO</p>	01 – Change Proposal	
	02 – Consultation	
	03 – Change Report	
	04 – Change Declaration	
<p><b>Purpose of Change Proposal:</b> 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><b>Governance:</b></p> <p>This document is issued in accordance with Clause 13.4 and sets out the result of the vote of DCUSA Parties. As DCP 462 is a Change Proposal that relates to a Part 1 Matter, the result of the Party vote is deemed to be a recommendation to the Authority that the proposal should be accepted or rejected.</p>	
	<p>For DCP 462, DCUSA Parties have voted to:</p> <ul style="list-style-type: none"> <li>Accept the proposed variation (solution); and</li> <li>Accept the implementation date.</li> </ul>	
	<p><b>Impacted Parties:</b></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><b>Impacted Clauses:</b></p>	
	<b>Section/Schedule</b>	<b>Clause/Paragraph</b>
	Section 1	Clauses 1, 9, 10, 11, 12, 13 and 14.

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## Timeline

**The Panel have approved the following timetable:**

Initial Assessment Report	12 September 2025
Consultation Issued to Industry Participants	N/A
Change Report Approved by Panel	18 September 2025
Change Report issued for Voting (5 Working Days)	18 September 2025
Party Voting Closes (5:30pm)	25 September 2025
Change Declaration Issued to Parties	25 September 2025
Change Declaration Issued to the Authority	25 September 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 MHHS-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

### Justification for Part 1 or Part 2 Matter

- 2.1 This is a Part 1 Matter as the changes impact the change control arrangements which is one of the criteria for a change to be a Part 1 Matter.

### Next Steps

- 2.2 As DCP 462 is a Change Proposal that relates to a Part 1 Matter, the result of the Party vote is deemed to be a recommendation to the Authority that the proposal should be accepted or rejected. Therefore, the next step is for the Authority to make their final decision on the Change Proposal.

## 3 Solution

### Background

- 3.1 Both RECCo and BSCCo created Data Transfer Network design documents for REC Technical Services 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 Scenario Variant 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 Scenario Variant for MSA and MSS	Confirmation Required
D0395	Confirmation that an electricity meter has been moved during a service alteration	DCUSA	New Scenario Variant for MSA and MSS	Confirmation Required

3.4 With respect to the D0164 data flow (see Attachment 3), 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 4) and D0395 (see Attachment 5) 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

### **DCUSA Legal Text**

3.6 The proposal is to amend several Clauses throughout Section 1C 'Change Control' to make the DCUSA text clearer in terms of what constitutes a change to the DCUSA. As it stands, it could be read that there is no variation to the agreement for changes to Market Messages or Data Items owned by the DCUSA and therefore no need for a change to be raised in instances such as this. There has been previous drafting included that sets the provisions of how changes are made to Market Messages and/or Data Items for a Change Proposal that results in a need to amend one or more of them but not how to deal with scenarios such as this which are not driven by a Change Proposal to the DCUSA or any of industry code change/modification. The Proposer does not think that these existing provisions are robust enough and thus believes the DCUSA needs to be amended.

### **Change to Market Messages**

3.7 The second component of this change is to facilitate changes to the EMDS, specifically with respect to the specifications for the D0164, D0394, D0395 data flows

3.8 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.

- 3.9 Once voting has finished, and an Ofgem decision made, 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. The REC Code Manager would then need to communicate this to ElectraLink, so the items can be included within the DTS release for MHHS M11.
- 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.

## 4 Legal Text

- 4.1 The legal text can be found in Attachment 1 to this Change Declaration, and the Proposer is comfortable that it meets the intent of the change.
- 4.2 It should be noted that within the Change Proposal form, the proposed amendments to the DCUSA only impacted Clause 9 and 10. However, following a review of the proposed legal drafting by DCUSA Ltd.'s legal advisors, the following suggestions were made:
- adding a definition of 'DCUSA Message' into Section 1A.
  - combining the change to Clauses 9.1A and 9.1B (thus returning the numbering to just 9.1).
  - additional references to 'DCUSA Message' throughout Section 1C so that wherever the text currently refers to the 'Agreement', a reference to DCUSA Messages has been added. These additions were believed to be necessary to make the text work if there is a change to a DCUSA Message on its own without any accompanying change to the Agreement.
- 4.3 The Proposer has confirmed that they are happy to proceed with these amendments.

## 5 Relevant Objectives

### Assessment Against the DCUSA Objectives

- 5.1 For a DCUSA Change Proposal to be approved it must be demonstrated that it better facilitates the DCUSA Objectives. There are five General Objectives and six Charging Objectives. The full list of objectives is documented in the DCUSA.
- 5.2 The Proposer considers that the following DCUSA General Objectives are better facilitated by this CP:

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#### DCUSA General Objectives

- |  |                 |
|--|-----------------|
| 1) The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks   | <b>Positive</b> |
| <hr/>  |                 |
| 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 | <b>Neutral</b>  |
| <hr/>  |                 |
| 3) The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences   | <b>Positive</b> |
-

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**

- 5.3 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.
- 5.4 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).
- 5.5 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).

## 6 Impacts & Other Considerations

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

- 6.1 There are likely positive impacts of this change on the MHHS SCR, and it is not believed that progressing this change would have impacts on any other ongoing SCR nor any other SCR or significant industry change projects that would impact the progression of this change.

### Impacts on Other Codes

- 6.2 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

- 6.3 This change does directly impact DCUSA owned data flows and the Proposer, 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

- 6.4 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

- 6.5 In accordance with DCUSA Clause 10.4.5A, the Proposer has considered whether there would be a material impact on greenhouse gas emissions if this CP were implemented and found none.

## 7 Implementation

### Lead Time for Implementation

- 7.1 The only lead time requirement for this Change Proposal will be that which is related to the amount of time needed by the REC Technical Services team at the REC Code Manager and the ElectraLink DTS team, in terms of the timelines for the new scenario variants to be introduced as part of M11. There has been trilateral engagement with those involved and it has been agreed that implementation on 22 October 2025 is achievable.

### Proposed Implementation Date

- 7.2 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.

## 8 Voting

- 8.1 The DCP 462 Change Report was issued to DCUSA Parties for voting on 18 September 2025.

### Part 1 Matter: Authority decision is required

#### Change Solution – Accept

- 8.2 For the majority of the Party Categories that were eligible to vote, the sum of the Weighted Votes of the Groups in each Party Category which voted to accept the change solution was more than 50%. In accordance with Clause 13.5, the Parties have been deemed to recommend to the Authority that the change solution be accepted.

#### Implementation Date – Accept

- 8.3 For the majority of the Party Categories that were eligible to vote, the sum of the Weighted Votes of the Groups in each Party Category which voted to accept the implementation date was more than 50%. In accordance with Clause 13.5, the Parties have been deemed to recommend to the Authority that the implementation date be accepted.

The table below sets out the outcome of the votes that were received in respect of the DCP 462 Change Report that was issued on 18 September 2025 for a period of 5 working days.

DCP 462	WEIGHTED VOTING					
	DNO	IDNO	SUPPLIER	CVA REGISTRANT	GAS SUPPLIER	SAFE ISOLATION PROVIDER
CHANGE SOLUTION	Accept	Accept	Accept	Not eligible	Not eligible	Not eligible
IMPLEMENTATION DATE	Accept	Accept	Accept	Not eligible	Not eligible	Not eligible

## 9 Recommendations

### DCUSA Parties Recommendation

- 9.1 DCUSA Parties have voted on DCP 462 and in accordance with Clause 13.5, the Parties have been deemed to recommend to the Authority that the Change Proposal be accepted.

## 10 Attachments

- Attachment 1 - DCP 462 Legal Text
- Attachment 2 - DCP 462 Consolidated Party Votes
- Attachment 3 - D0164 New Scenario Variant
- Attachment 4 - D0394 New Scenario Variants
- Attachment 5 - D0395 New Scenario Variants