

DCUSA SIG Sub-Group for DIF 86 and 87 - Meeting 02

22 September 2025 at 10:00

Attendee	Company
Working Group Members	
Kara Burke [KB]	NPg
Phill Mark [PM]	SSE
Tim Porter [TP]	SSE
Rachel Wallace [RW]	BU-UK
Gareth Evens [GE]	Water Wye
Meg Wong [MW]	Stark
Nik Willis [NW]	Stark
Peter Waymont [PW]	UKPN
Jo Brown [JB]	NGED
Jen StClair-Hughes [JSC]	Espug
Code Administrator	
Andy Green	Chair
Apologies	
Mark Bellman [MB]	ENWL

1. Administration

Recording

- 1.1 The Chair asked members if they were comfortable for this Subgroup to be recorded. No members objected to this request. The purpose of this recording is purely to aid the Technical Secretariat in producing an accurate report of the meeting. The recording will be deleted once these minutes have been approved.

Competition Law Guidance and Terms of Reference

- 1.2 The Working Group reviewed the “Competition Law Guidance” and “Terms of Reference”. All subgroup members agreed to be bound by the Competition Law Guidance for the duration of the meeting.

2. Purpose of the Meeting

- 2.1 The Chair set out that the purpose of the meeting was to discuss DIFs 86 and 87 RFI responses and decide on next steps.

3. Review of DIF 86 RFI responses

- 3.1 The Chair opened by stating that there were 7 questions for this RFI and that there had been 6 responses consisting of 4 DNO's, 1 IDNO and 1 supplier.

- 3.2 The responses to the questions can be found within attachment 1- DIF 86 Collated RFI Responses.

1. Have you had any experience of the issue explained and if so, what is this experience?

- 3.3 4 respondents stated they had experienced the issue previously although all 4 stated instances were rare.

- 3.4 The IDNO party stated they had not experienced the issue and a DNO party advised that they don't issue DUoS charges for multiple MPAN sites as all DUoS charges are issued at MPAN level and as such, they had no experience of the issue.

2. How do you charge for multi MPAN sites?

- 3.5 There were a number of different responses to this question ranging from billing is done separately by MPAN, so multiple MPANs would not be grouped on one site together to charge, to Multi MPAN sites are combined on one site, with the consumption and MIC combined for billing and one invoice is issued.

- 3.6 The supplier party stated N/A as this question was specific to distributors.

3. For scenarios 1, 2, 3 and 4, as described in the DIF, have these scenarios occurred in your licence area? If so, how many instances of each scenario have occurred? Are you aware of any other scenarios of a multi MPAN site potentially under, or overcharging capacity when one or more of the MPANs associated with site has some sort of significant event occurring? Please provide details.

3.7 3 respondents stated they had not experience any of the scenarios mentioned within the RFI, with on highlighting as a supplier the question wasn't relevant.

3.8 The other 3 respondents said they the above scenarios had occurred for them, but the instances were very rare.

4.What are your thoughts on the potential solution of splitting the billing periods so that the assessment for capacity charging is not made at the month end, but at the point in time of each relevant change?

3.9 The Subgroups conclusions to the responses to this question were that the majority of respondents stated that whilst the solution made sense, the instances were so rare that it may not be worth the effort/costs of fixing the issue due to the small benefits.

5.Is there another solution that hasn't been considered?

3.10 There were no other solutions offered by any of the respondents to this RFI, except for one DNO stating the process could be left as it is.

6.Is the issue prevalent enough for a change to be made to the DCUSA, or are the instances so rare that the costs in resolving the issue outweigh the benefits?

3.11 None of the responses to this question stated that the issue was prevalent enough for a change to be made.

3.12 One DNO party stated that it may help to describe the approach taken in these scenarios in DCUSA such that not changing the system is fully compliant.

7.Any other comments?

3.13 4 responses stated they had no further comment.

3.14 1 response noted that they did not believe the issue is material enough to warrant a change.

3.15 The supplier party stated that their DUoS invoice validation systems would require refinement work in both pre & post MHHS system versions.

3.16 They went on to list the processes that would need updating and highlighted that the high-level costs given to them for the changes to be implemented were between £100k-£150k.

3.17 After reviewing the responses, the Subgroup held a vote as to whether they felt the issue warranted a change being made.

3.18 8 of the 10 Subgroup members present believed that the costs and risks outweighed the benefit of making a change due to the rare instances of this issue.

3.19 Based on this outcome the issue raiser advised that they were happy that the issue can be closed and no further action would be taken.

4. Overview of DIF 87

4.1 The Subgroup then went on to discuss the DIF 87 RFI Responses, these can be found within 2- DIF 87 Collated RFI Responses

4.2 The Chair opened by stating that there were 5 questions for this RFI and that there had been 7 responses consisting of 4 DNO's, 2 IDNO's and 1 supplier.

1. Have you had any experience of the issue explained and if so, what is this experience?

4.3 5 responses stated that they had experienced the issue although it was rare.

4.4 1 DNO party stated their half hourly tariff and capacity changes are implemented on the 1st of the calendar month, so that they don't encounter this issue.

4.5 The other IDNO party stated that they haven't experienced the issue.

2. Have these scenarios occurred in your licence area? If so, how many instances of each scenario have occurred? What are your thoughts on the potential solution of splitting the billing periods, so the assessment of charges is not made at the month end but at the point in time of each relevant change?

4.6 Those who responded that they had examples of the scenarios explained in the RFI occurring in their areas went on to state that the instances were rare.

3. Is there another solution that hasn't been considered?

4.7 6 respondents didn't offer any other solution.

4.8 One respondent mentioned that change of measurement class could be done by using a new MPAN number as this means that changes could be made mid-month.

4.9 This alternative was dismissed as it would lead to a complex process, creating a number of different risks such as a new MPAN being created leading to welcome letters being issued to customers and the closing down of the current MPAN creating challenges in billing and settlements.

4. Is the issue prevalent enough for a change to be made, or are the instances so rare that the costs in resolving the issue outweigh the benefits?

4.10 6 responses stated that the issue wasn't prevalent enough to warrant a change.

4.11 An IDNO party stated that they could not give a quantitative comment.

5. Any other comments?

4.12 5 responses stated they had no further comment.

4.13 1 response noted that they did not believe the issue is material enough to warrant a change.

- 4.14 The supplier party stated that their DUoS invoice validation systems would require refinement work in both pre & post MHHS system versions.
- 4.15 They went on to list the process that would require updating and highlighted that the high-level costs given to them for the changes to be implemented were between £100k-£150k.
- 4.16 It was noted that this supplier party gave the same response in the RFI for DIF 86 and that the costs had not been broken down between the 2 DIFs.
- 4.17 After reviewing the responses, the Subgroup held a vote as to whether they felt the issue warranted a change being made.
- 4.18 8 of the 10 Subgroup members present believed that the costs and risks outweighed the benefit of making a change due to the rare instances of this issue.
- 4.19 Based on this outcome the issue raiser advised that they were happy that the issue can be closed and no further action would be taken.

5. Next Meeting

- 5.1 There will be no further meetings for both issues as it was agreed that both issues can now be closed.

6. Any Other Business

- 6.1 No other business was raised.

New and Open Actions

Action Ref.	Action	Owner	Update
02/01	AG to contact the responder from Eon UK to understand what was meant by SQ in their response to question 2 for DIF 87.	Andy Green	New Action
01/02	Chair to close the issues down as they had been taken as far as they could within the SIG group.	Andy Green	New Action

Closed Actions

Action Ref.			Update
01/01	Draft RFIs to be created for each DIF and shared with the subgroup to review	Andy Green	Closed.
01/02	Chair to send EC the DCUSA issues form	Andy Green	Closed

DCUSA

--	--	--	--