

DCP 458

'AMEND DCP414 PROCESS'

COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

Company	Confidential/ Anonymous	1. Do you understand the intent of DCP 458?	Working Group Comments
Engie	Non-confidential	Yes	
Indigo Power	Non-confidential	Yes	
UK Power Networks	Non-confidential	Yes	
SP Energy Networks	Non-confidential	Yes	
National Grid Electricity Distribution	Non-confidential	Yes	
Northern Powergrid	Non-confidential	Yes	
TotalEnergies Gas & Power	Non-confidential	Yes, as Supplier I confirm I understand the intent DCP 458	
Npower Commercial Gas Ltd	Non-confidential	Yes	

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Drax Group plc	Non-confidential	Yes	
The Electricity Network Company	Non-confidential	Yes	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Yes	
British Gas	Non-confidential	Yes	
Working Group Conclusions: All respondents understood the intent of the change proposal.			

Company	Confidential/ Anonymous	2. Are you supportive of the principles of DCP 458?	Working Group Comments
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Engie	Non-confidential	Yes	
Indigo Power	Non-confidential	Yes	
UK Power Networks	Non-confidential	Yes	
SP Energy Networks	Non-confidential	Yes	
National Grid Electricity Distribution	Non-confidential	Yes	
Northern Powergrid	Non-confidential	<p>No, we do not support applying a default capacity.</p> <p>The purpose of DCP414 ‘Transitional Protection for NHH CT Customers affected by regulatory change’ was to protect customers from inappropriate capacity charges. Applying a default capacity in all cases does not do this.</p> <p>In their DCP414 decision Ofgem ruled out the use of default capacities in the 12-month period post migration because it may mean that customers are charged inappropriate capacity charges. They also stated that under the approved solution “when [customers] do attract capacity charges, they will be based on a maximum import capacity (MIC) more likely to reflect their actual capacity requirements”</p>	

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		<p>The use of a default MIC after the 12-month transition period undermines Ofgem’s decision on DCP414.</p> <p>In addition, due to the implementation of DCP385 ‘No Retrospective Capacity Reductions’, if a default capacity is applied and it is inappropriate for the Customer then the Customer would only be able to change their capacity going forwards and would still be liable for higher capacity charges for the period up until they requested a decrease, even though they had no input into the default capacity that was applied for their site. They could also be liable for excess capacity charges if the default capacity was too low for their requirements. The use of a MIC calculated based on their actual usage is more likely to ensure an appropriate capacity is put in place.</p> <p>Furthermore, it is unclear how a DNO/IDNO is able to establish if an MPAN moving to HH is a transitioning CT customer or a Business As Usual (BAU) change without the supplier notifying them. DCP414 is only for “Customers who may be affected by the implementation of BSC modification P432 ‘Half Hourly Settlement for CT Advanced Metering Systems’ or any other CT Metering Points catered for by MHHS”. No other MPANs should be using the DCP414 solution.</p> <p>A default capacity would also mean that these MPANs are all allocated to charging band 1, so this impacts both the capacity charge and the fixed charge. It would be difficult to move these customers to the correct band once allocated, if the MIC that they actually require would put them in a higher charging band.</p>	
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		<p>The issue identified in this DCP, i.e. Suppliers not providing the customer contact details to allow Distributors to meet their DCUSA obligations, has arisen due to Suppliers not meeting their DCUSA obligations under Clause 19.14. We believe a more appropriate solution is for intervention from the appropriate authority to ensure Suppliers comply with their obligations.</p> <p>If a solution is still believed to be required then we believe that a more appropriate solution would be that, in the specific circumstance that the customer details have not been provided by the Supplier or the Distributor is unable to contact the customer because the contact details are incorrect, then the Distributors can apply the capacity, as “reasonably assessed”, based on the data collected during the 12 months following migration as described in paragraph 182 of Schedule 16, without contacting the customer. This would maintain the majority of Ofgem’s approved decision whilst allowing Distributors to apply a capacity where they cannot, through no fault of their own, meet the requirement to contact the Customer to agree such capacity</p>	
TotalEnergies Gas & Power	Non- confidential	Yes, fully.	
Npower Commercial Gas Ltd	Non- confidential	We are supportive of the principle to simplify the DCP 414 solution, but do not support the proposed solution.	

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Drax Group plc	Non-confidential	Yes, we fully support DCP 458. This change will make it clear to the customer that they need to agree a maximum kVA with the DNO if the default is not appropriate.	
The Electricity Network Company	Non-confidential	Yes	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	We are not supportive of the principles of DCP 458, we believe that an alternative solution should be sought to ensure engagement from Suppliers which would result in a solution that does not rely on default capacities being used. We need to establish why the information is not being provided by the supplier and working to resolve this.	
British Gas	Non-confidential	We are supportive of a default being set in limited circumstances, but this should still be based on actual customer data.	
<p>Working Group Conclusions: Eight respondents were supportive of the change proposal.</p> <p>Two respondents were supportive of the intent of this change proposal but not supportive of the proposed solution. Two respondents were not supportive of the intent of this change proposal.</p> <p>Reasons to not support the intent of the change proposal were</p> <ul style="list-style-type: none">• If actual data has been collected, it should be used when calculating a capacity.			

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- Closer engagement with suppliers should be made in order to ensure that they are providing Distributors with the correct customer details.
- The purpose of DCP414 ‘Transitional Protection for NHH CT Customers affected by regulatory change’ was to protect customers from inappropriate capacity charges. Applying a default capacity in all cases does not do this.
- If the Default capacity is set too high, the customer can only amend this moving forwards as there is no process to retrospectively back date and refund the incorrectly applied higher capacity charge.
- it is unclear how a DNO/IDNO would be able to establish if an MPAN moving to HH is a transitioning CT customer or a Business As Usual (BAU) change without the supplier notifying them.
- A default capacity would also mean that these MPANs are all allocated to charging band 1, so this impacts both the capacity charge and the fixed charge.

Company	Confidential/ Anonymous	3. Is applying a default capacity, rather than trying to agree one with the customer appropriate?	Working Group Comments
Engie	Non-confidential	Provided the customer can easily change the default capacity to a site specific one, yes.	
Indigo Power	Non-confidential	We agree to apply the default capacity if the DNO/IDNO is not able to contact the customer to agree a MIC. If it is possible to contact the customer, it would be more appropriate to agree a MIC to ensure transparency with the customer.	
UK Power Networks	Non-confidential	While a number of these customers do have connection agreements, the DCP414 process overrides this and instead imposes the burden of	

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		<p>contacting tens of thousands of customers, and then taking part in iterative dialogue if they do respond - to agree the same or a different capacity – or, if they don’t respond, basing the capacity on maximum demand, which itself requires an assessment.</p> <p>Using a default value for billing purposes removes the administrative burden without denying the customer the right to propose a more appropriate capacity value if they require it.</p> <p>Our experience, in writing to customers under P272, is that most do not engage with the process until after they have been charged a capacity value, at which point they may seek to vary it.</p> <p>In addition, as the Network Operator we have not been provided with customer contact details by Suppliers, as had been expected as part of the solution approved under DCP414, to make those communications.</p>	
SP Energy Networks	Non-confidential	Yes, it could be used as an initial capacity. This capacity means that the MPAN would be assigned to band 1, for DUoS billing purposes.	
National Grid Electricity Distribution	Non-confidential	Yes. The customer can make contact and agree a different MIC at any point.	
Northern Powergrid	Non-confidential	No. In most cases half-hourly data should be available 12-months post migration which would enable the calculation of an appropriate capacity for each customer by using their peak import capacity (‘peak kVA’) in that period. The DCUSA already allows for Distributors to “reasonably assess the	

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		capacity based on metered data”, and to base this capacity on the peak kVA if the DNO/IDNO and customer are unable to agree a MIC. Expanding this to allow for the MIC to be based on the peak kVA if the DNO/IDNO has been unable to contact the customer should provide a suitable solution for the issue identified by the proposer, without fundamentally changing the solution approved by Ofgem.	
TotalEnergies Gas & Power	Non- confidential	Agree appropriate	
Npower Commercial Gas Ltd	Non- confidential	<p>We do not support applying a default capacity level following the 12-month protection period and believe it to be inappropriate to set a default capacity that is not informed.</p> <p>This is because part of the intent that sits behind DCP 414 12 month protection period is to enable both the customer & DNO to build up enough actual metered data over all seasons of the year from metered data to learn what their actual capacity should be, thus enabling an informed discussion & in turn customer/DNO agreement as to what the correct KVA level should be for each site that is impacted by P432 or MHHS migration.</p> <p>Once the 12-month protection period expires the capacity charge will then become chargeable to the customer so if the default value is too low the agreed capacity will be over charged, if set too high then excess capacity charges will apply at the same pence per KVA as the agreed rate under the current arrangements would not offer any customer incentive to agree a higher capacity than the default proposed.</p>	

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Drax Group plc	Non-confidential	Yes. We are proactively notifying customers of the need to contact the DNO post conversion. Applying a default capacity value acts as a further prompt for the customer to engage.	
The Electricity Network Company	Non-confidential	Yes, we believe it is appropriate to apply a default capacity, it would make the P432 process smoother and more efficient, it would also result in the MPANs being easily identifiable within our billing system.	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	We do not believe that applying a default capacity rather than trying to agree one with the customer is appropriate.	
British Gas	Non-confidential	No we believe a MIC should be agreed with the customer in the first instance.	
<p>Working Group Conclusions: Responses to this question were mixed. Eight respondents stated yes, with one stating it would only be appropriate if the capacity can easily be changed and another stating it would only be appropriate if the customer cannot be contacted.</p> <p>Four responses stated they felt it was not appropriate, with two of these saying they believe the capacity should be based on actual metered data.</p>			

Company	Confidential/ Anonymous	4. Is the initial suggested default capacity of 71 kVA appropriate?	Working Group Comments
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Engie	Non-Confidential	No comment	
Indigo Power	Non-confidential	Yes	
UK Power Networks	Non-confidential	Yes, this is a value which is not typically used for “real” capacities and so would be easily identifiable as a default and so could be reported on if needed.	
SP Energy Networks	Non-confidential	Yes	
National Grid Electricity Distribution	Non-confidential	Yes	
Northern Powergrid	Non-confidential	<p>We do not agree with the approach of using a default capacity for these sites, however one item of note is that when Solution A for DCP414 was developed, the use of a single standard default capacity for all DNOs was ruled out with one reason stated as “<i>these values are already part of some distributors’ systems and processes</i>” (see paragraphs 5.18 – 5.20 in the DCP414 Change Report). This remains true in this case.</p> <p>In addition, in the responses to Consultation 2 of DCP414 (paragraph 5.43 of the Change Report) stated “The majority of the responses (five) were in favour of the distributor determining the Default MIC value”</p>	

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		Each DNO has their own processes which they need to follow and average demand may also be different in different licence areas, meaning that a default value that is suitable for one area may not be suitable for another.	
TotalEnergies Gas & Power	Non-confidential	Fully support.	
Npower Commercial Gas Ltd	Non-confidential	<p>We do not believe any default set KVA value is appropriate for the reasons given in response to Q3.</p> <p>On the basis metered data will be available after 12 months after becoming HH settled the DNOs should base any default KVA values on the highest peak in demand over the preceding 12 months for that site.</p>	
Drax Group plc	Non-confidential	Yes	
The Electricity Network Company	Non-confidential	We don't believe 71kVA is used by us for any other purpose, so yes it seems appropriate.	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	We do not believe that applying a default capacity is appropriate for an enduring solution	

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British Gas	Non-confidential	No, we believe that for this group of customers a default capacity of 71 kVA is too high. We understand that CTs were only historically installed on sites where the capacity exceeded 69kVA. However we believe many of these sites will have changed there usage patterns since the CTs were originally installed and that a default of 71 kVA is too high.	
<p>Working Group Conclusions: Seven respondents stated they felt the suggested default was appropriate.</p> <p>Three respondents felt it was not, as they did not support the use of a default and believe the capacity should be based on the metered data received during the 12-month transition period.</p> <p>One of these pointed out that the use of a standard default across all Distributors was consulted on under DCP414 with the outcome that Distributors should be able to set their own default MIC value as a single value might not be appropriate for all regions. The respondent also pointed to Ofgem’s DCP414 decision which ruled out the use of a default capacity for the transition period as it may mean that customers are charged inappropriate capacity charges and that “when [customers] do attract capacity charges, they will be based on a maximum import capacity (MIC) more likely to reflect their actual capacity requirements”.</p> <p>One respondent believed that a default of 71 kVA was too high as they believed many of these sites will have changed their usage patterns since the CTs were originally installed.</p>			

Company	Confidential/ Anonymous	5. Have you used default capacities in other circumstances? If so, what were these circumstances and what defaults were applied?	Working Group Comments
Engie	Non-confidential	No comment – energy supplier	

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Indigo Power	Non-confidential	No, we do not use default capacities	
UK Power Networks	Non-confidential	Yes, we used default capacities as part of the solution for P272, which was the same value as proposed by this change, 71kVA. Customer engagement under P272 was negligible until after they had migrated and been charged capacity charges.	
SP Energy Networks	Non-confidential	Yes, P272 MPAN used 71kva as the default capacity.	
National Grid Electricity Distribution	Non-confidential	N/A	
Northern Powergrid	Non-confidential	No	
TotalEnergies Gas & Power	Non-confidential	Yes, P272 Measurement class E.	
Npower Commercial Gas Ltd	Non-confidential	Default Capacities was utilised as part of the implementation of BSC modification P272 – in this circumstance any site moving to Measurement Class E had a default capacity applied from the HH EFD in or around the level set (small variants by DNO between 69-71KVA nationally).	

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		<p>We would like to highlight a circumstance whereby a default capacity was considered but not taken forward as DCP 414 also proposed a default capacity is used under solution A along with the now DCUSA baseline (solution B), as DCP 414 was correctly treated as a part 1 matter Ofgem considered both solutions in its decision making, determining that “Solution B is overall a far more acceptable solution due to the level of protection it brings to consumers as well as negating any negative impacts on competition that Solution A could bring”.</p> <p>There is very little difference between the Solution A under DCP 414 & what is being proposed under DCP 458 in the context of the legal text proposed, as this would simply revert any customer who do not make contact to agree a capacity level via a connection agreement with the DNO to a default in turn undermining Ofgem’s DCP 414 decision, particular in light on DCP 458 being treated as an urgent Part 2 matter.</p>	
Drax Group plc	Non-confidential	No	
The Electricity Network Company	Non-confidential	Not that we are aware of.	
Southern Electric Power Distribution plc and Scottish Hydro Electric	Non-confidential	Yes, during P272. We set two different default capacities across our licence areas, SEPD = 50kVA and SHEPD = 53kVA.	

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Power Distribution plc			
British Gas	Non-confidential	No comment.	
<p>Working Group Conclusions: Five respondents stated that they had used default capacities as part of the solution for P272.</p> <p>Four respondents said they had not used default capacities before.</p> <p>Three respondents offered no comment as they were suppliers.</p>			

Company	Confidential/ Anonymous	6. Are you aware of any potential consequences of applying a default capacity? If so, what are/were these consequences?	Working Group Comments
Engie	Non-confidential	No comment – energy supplier	
Indigo Power	Non-confidential	Not at this time.	
UK Power Networks	Non-confidential	No, we are not aware of any issues because of using a default capacity. Customers have the ability to propose to vary their capacity at any time.	
SP Energy Networks	Non-confidential	The customer max demand may be reflecting this default value ie they could be sufficiently lower.	

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National Grid Electricity Distribution	Non-confidential	N/A	
Northern Powergrid	Non-confidential	<p>The capacity may not be appropriate for all customers. Due to the implementation of DCP385, if a default capacity is applied and it is inappropriate for the Customer then the Customer would only be able to change their capacity going forwards and would still be liable for higher capacity charges for the period up until they requested a decrease, even though they had no input into the default capacity that was applied for their site. They could also be liable for excess capacity charges if the default capacity was too low for their requirements.</p> <p>Relying on the customer to contact the DNO to revise the capacity may be problematic, as the customer may not be aware of their MIC and/or whether that MIC is appropriate for their needs and so may not contact the Distributors until a later date, which will mean that they remain liable for the inappropriate charges for a long period of time, as the capacity cannot be backdated.</p> <p>Using a default of 71kVA will mean that these customers will also be allocated to the lowest charging band and will therefore not, in cases where there actual requirement is higher than the band 2 boundary (80kVA in ET2 and 90kVA in ET3), be paying their fair share of the DUoS residual charge, meaning that other customers are paying more. Reallocation to a higher band, even if a MIC is agreed in the future, could be problematic (we do not believe these sites would fall into the AAR, and it is rare to increase the</p>	

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		charging band under exceptional circumstances, which would require the MIC to increase by more than 50%) and may require further changes to Schedule 32.	
TotalEnergies Gas & Power	Non-confidential	May increase customer queries.	
Npower Commercial Gas Ltd	Non-confidential	<p>The current proposed solution is likely to place customers who choose not to engage onto an inappropriate capacity charge despite there being readily available data provided to DNOs to place them an appropriate capacity level, due to no clarity with regard to if a customer placed on a default would be able to backdate changes to their capacity level charged in the event they make contact after the default bis applied.</p> <p>We also understand that the agreed capacity level set will also influence DNO network infrastructure planning, as it is account for to understand where network constraints exist so the default may send false signals to DNOs that parts the network are under or over utilized triggered reinforcement in either planning or for customers seeking to increase capacity levels.</p>	
Drax Group plc	Non-confidential	No	
The Electricity Network Company	Non-confidential	Not that we are aware of.	

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Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Where the site is exceeding the default capacity during the 12-month period, there is the risk the customer will exceed the default capacity once applied. New Connections Agreements would have to be sent out to all affected customers, and which could result in an increase in complaints from customers. Would there also be a risk that a DNO may be in breach of Schedule 2B DCUSA, section 3 of the National Terms of Connection if there is a default capacity but no agreement between the network operator and the legal entity	
British Gas	Non-confidential	This group of customers have not previously had to engage with either the DNO or their Supplier regarding their capacity. We believe applying a default capacity that is too high will drive customer complaints/rebiling requests and queries.	
<p>Working Group Conclusions: Two respondents stated no comment and two others stated they are not aware of any potential consequences of applying a default capacity.</p> <p>One response outlined that the capacity may not be appropriate for all customers and that changes to the capacity requested by the Customer after the default has been put in place will not be able to be made retrospectively and so the customer would be liable for higher capacity charges for the period between the default being put in place and the request to reduce the capacity being received.</p> <p>One response noted that the agreed capacity level set will also influence DNO network infrastructure planning.</p> <p>Another respondent stated that where the site is exceeding the default capacity during the 12-month period, there is the risk the customer will exceed the default capacity once applied. The response noted that new Connections Agreements would have to be sent out to all affected customers which could result in an increase in complaints. The response questioned whether there would be a risk that a DNO may be in breach of Schedule 2B DCUSA, section 3 of the National Terms of Connection if there is a default capacity but no agreement between the network operator and the legal entity.</p>			

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Company	Confidential/ Anonymous	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?	Working Group Comments
Engie	Non-confidential	No comment – energy supplier	
Indigo Power	Non-confidential	All	
UK Power Networks	Non-confidential	0.035%	
SP Energy Networks	Non-confidential	Majority of supplier have provided only supplier contact details not customers, it is noted that most supplier has not provided any MPAN information relating to DSCP 414 related MPANs	
National Grid Electricity Distribution	Non-confidential	None	
Northern Powergrid	Non-confidential	<p>We have not received the contact details for any customers so far. However, we are also not aware of any MPANs that have migrated under the circumstances covered by DCP414.</p> <p>In addition, we are aware from the DCMDG that the Suppliers present on those calls have not started their migrations yet and are intending to</p>	

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		<p>provide the customer contact details via either e-mail or SDEP once their migration plans are fully in place.</p> <p>We have also been contacted recently by at least two Suppliers asking for the contact details they need to provide us the information.</p> <p>All of this suggests that most Suppliers are aware of their obligations and are intending to meet these obligations in the coming months as they begin to migrate their customers.</p>	
TotalEnergies Gas & Power	Non-confidential	Approximately 45% hold some contact details which may not be current.	
Npower Commercial Gas Ltd	Non-confidential	As supplier we hold contact details for all our affected customers	
Drax Group plc	Non-confidential	We are confident in the quality of our data and have a dedicated team that will proactively be updating customer contact details to ensure we can convert the supplies and notify the relevant DNO pre and post conversion.	
The Electricity Network Company	Non-confidential	We have had very limited supplier contact regarding customer contact details, although applying the 71kVA will help identify the customers expecting to migrate, we still require supplier uptake to fully understand the proportion of those customers we have received contact details for.	
Southern Electric Power	Non-confidential	We have received contact details of approximately 0.15% of customers as part of DCP 414	

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Distribution plc and Scottish Hydro Electric Power Distribution plc			
British Gas	Non- confidential	No comment.	
<p>Working Group Conclusions: Responses to this question were mixed. With one IDNO respondent stating all, one IDNO stating a limited amount, one DNO stating 0.035% and one DNO stating 0.15% and one DNO stating none.</p> <p>One supplier outlined that they have a team that will be updating their data proactively.</p> <p>One supplier noted that they have all contact information, and another supplier stated 45%.</p>			

Company	Confidential/ Anonymous	8. For suppliers only- How do you intend to share with Distributors which customers you are migrating as part of the DCP 414 obligation?	Working Group Comments
Engie	Non- confidential	We would expect to use SDEP	
Indigo Power	Non- confidential	N/A	

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UK Power Networks	Non-confidential	N/A	
SP Energy Networks	Non-confidential	N/A	
National Grid Electricity Distribution	Non-confidential	N/A	
Northern Powergrid	Non-confidential	N/A	
TotalEnergies Gas & Power	Non-confidential	Mpan sites will be shared to Distributors via spreadsheet template of intention when migrating as agreed with meter operators.	
Npower Commercial Gas Ltd	Non-confidential	We will share contact information via email & password protected spreadsheets to DNO mailbox contacts provided, where DNOs have not shared this information with us then we will provide this information directly to the DCUSA contract manager for dispersal within their organisations.	
Drax Group plc	Non-confidential	We will notify the relevant DNO prior to conversion, providing the conversion date along with updated customer contact details. We will also notify the relevant DNO once the conversion has been completed. As part of this process, we will be advising the customer to contact their DNO so a connection agreement can be set up.	

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The Electricity Network Company	Non-confidential	N/A	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	N/A	
British Gas	Non-confidential	We would prefer to share customer contact through secure means either via SDEP or password protected files via email.	
<p>Working Group Conclusions: One response stated that they would use SDEP and two stated they would use password protected spreadsheets to share the information.</p> <p>One response stated that they would use either SDEP or password protected spreadsheets</p>			

Company	Confidential/ Anonymous	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?	Working Group Comments
Engie	Non-confidential	No contact and access issues remain the major issues, for non-domestic suppliers these are exacerbated where we supply large group customers	

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		(for example in the utility sector) with dispersed hard to reach premises with poor meter location data.	
Indigo Power	Non-confidential	N/A	
UK Power Networks	Non-confidential	N/A	
SP Energy Networks	Non-confidential	N/A	
National Grid Electricity Distribution	Non-confidential	N/A	
Northern Powergrid	Non-confidential	N/A	
TotalEnergies Gas & Power	Non-confidential	Legacy meters requiring exchange, access, DNO works or customer details.	
Npower Commercial Gas Ltd	Non-confidential	Yes, however these challenges exist more so post BSC mod P432 implementation after Milestone M14/October 2026, as P432 requires that site moves to HH (either via CoMC or MHHS migration) that meet the Advanced meter licence definition.	

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		<ul style="list-style-type: none"> • if a CT meter does not meet the Advanced meter definition so falls under All Reasonable Steps, then it is almost certain that a site visit will be required to manually reconfigure or replace the metering to move to HH settlement to record the KVARh data required via MHHS migration by milestone M15. • If a CT meter does meet the Advanced meter definition, then site visits are expected to be the exception, as most can be reconfigured remotely to record KVARh. Those that cannot be done remotely will likely need a site visit due to either Comms instability or incorrect or unknown level 3 passwords to access the meter 	
Drax Group plc	Non-confidential	As a non-domestic supplier there are always challenges with any site works, particularly in relation to unmanned sites and rural locations. Many of our supplies can be converted to HH remotely, removing the site access challenges that suppliers can face. We will apply an 'all-reasonable steps' principle to ensure we maximise the number of conversions prior to the early option window for MHHS	
The Electricity Network Company	Non-confidential	N/A	
Southern Electric Power Distribution plc and Scottish Hydro Electric	Non-confidential	N/A	

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Power Distribution plc			
British Gas	Non-confidential	We have identified the customers that will need to be migrated as part of the DCP 414 obligation.	
<p>Working Group Conclusions: One response noted that no contact and access issues remain the major challenges.</p> <p>Another response highlighted legacy meters requiring exchange, access, DNO works or customer details.</p> <p>Another respondent highlighted that there are barriers however that these challenges exist more so post BSC mod P432 implementation after Milestone M14/October 2026, as P432 requires that a site moves to HH (either via CoMC or MHHS migration) to meet the Advanced meter licence definition.</p> <p>Another response noted that there are always challenges with site works, particularly in relation to unmanned sites and rural locations, however many sites can be converted to HH remotely.</p>			

Company	Confidential/ Anonymous	10. Is there an alternative process that has not been considered within this CP? If so, what is this process?	Working Group Comments
Engie	Non-confidential	No comment.	
Indigo Power	Non-confidential	Not at this time.	
UK Power Networks	Non-confidential	No, as proposer of this change, we believe that the solution put forward to be the most pragmatic.	

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SP Energy Networks	Non-confidential	The max demand could be reviewed and a suitable capacity chosen for individual MPANs, it should be noted that this could be time consuming if a high volume of MPANs needed to be reviewed.	
National Grid Electricity Distribution	Non-confidential	N/A	
Northern Powergrid	Non-confidential	We would support a change to the legal text that would enable DNOs to apply calculated capacities based on the customer’s usage in cases where we have been unable to contact customers due to not having customer contact details provided to us or where the customer has not engaged with the process (although we believe the latter is already accounted for under the wording “In the event the DNO/IDNO and customer are unable to agree a MIC”).	
TotalEnergies Gas & Power	Non-confidential	No alternative considered as blank approach seems consistent across all parties.	
Npower Commercial Gas Ltd	Non-confidential	Yes. The alternative is to set the MIC based on the highest peak in capacity within the preceding 12 months based on HH metered data after the 12-month protection period has expired, thus removing the baselined 6-month window currently set for customer & DNO to agree a MIC. This approach is fairer as it based on something realistic, will ensure a non-communicating customer is treated fairly & consistently across all DNOs whilst also reducing the “unwieldy and unworkable” claimed burden as set out by the proposer of the modification.	

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Drax Group plc	Non-confidential	Not that we’ve considered.	
The Electricity Network Company	Non-confidential	Not that we are aware of.	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	The need to raise DCP 458 clearly indicates that at present DCP414 is not meeting the objectives that it set out to achieve, and as such a more during solution should be found that does not rely on default capacity – but is this achievable	
British Gas	Non-confidential	We agree with paragraph 4.20 that the distributor should have information on maximum demand usage to set a more appropriate capacity. We would support an initiative to use data to agree a more accurate MIC.	
<p>Working Group Conclusions: Seven responses stated they were not aware of an alternative process.</p> <p>One respondent preferred the existing process.</p> <p>Four respondents suggested that customer’s usage should be used to calculate their capacities rather than using the default. In cases where they have been unable to contact customers due to not having customer contact details provided or where the customer has not engaged with the process.</p>			

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Company	Confidential/ Anonymous	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.	Working Group Comments
Engie	Non-confidential	Yes, objective 4 as this change will facilitate the smooth migration of these customers and reduce dependency on being able to contact difficult to reach customers	
Indigo Power	Non-confidential	4	
UK Power Networks	Non-confidential	We believe that DCUSA General Objective 4 is better facilitated by this change as it introduces a solution that can be applied equally whilst also removing the need for discussion of methods for Suppliers providing customer data and makes the Distributor's process manageable and efficient.	
SP Energy Networks	Non-confidential	4.The promotion of efficiency in the implementation and administration of the DCUSA	
National Grid Electricity Distribution	Non-confidential	It facilitates General Objective 4.	
Northern Powergrid	Non-confidential	No. We do not believe that the DCUSA Objectives are better facilitated by this CP than by the existing, Ofgem approved, DCP414 solution. Although	

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		<p>applying a default capacity may be “simpler” and require less effort on the DNOs part than calculating a capacity for each site, there may be more work in the long run as Customers identify that their allocated default capacity is inappropriate for their site and look to increase, or decrease, their agreed capacity as appropriate. Additionally, without the Suppliers providing the relevant information DNO/IDNOs it is unclear how DNOs/IDNOs will identify which MPANs are migrating under P432/MHHS and which are migrating due to Business as Usual reasons (such as the site having CTs installed).</p> <p>We also believe that DCUSA Charging Objective 3 is negatively impacted as the charges “as far as is reasonably practicable” will not reflect the costs incurred by individual sites if a default capacity is applied rather than a capacity derived from their actual usage.</p>	
TotalEnergies Gas & Power	Non- confidential	The proposal is clear process to follow which supports meeting industry target.	
Npower Commercial Gas Ltd	Non- confidential	<p>We do consider DCUSA general objective 1 is negative within this change as the consequence of defaults could contribute to inappropriate outcomes as per our response to Q6.</p> <p>We do concede that the proposed solution is simpler and therefore agree that DCUSA objective 4 would be better facilitated, however this would be at cost to the unengaged consumer for which there is no DCUSA general objective to consider.</p> <p>On this basis we do not consider this proposal better facilitates DCUSA general objectives.</p>	

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Drax Group plc	Non-confidential	Yes. We believe the proposal better facilitates DCUSA General Objective 4 (The promotion of efficiency in the implementation and administration of the DCUSA) as it incentivises (where necessary) the customer to agree an appropriate capacity value which means less follow-up action needed by DNOs and Suppliers.	
The Electricity Network Company	Non-confidential	We agree with the proposers view that General Objective 4 is better facilitated by this change, as the solution can be applied equally and makes the overall P432 process more manageable and efficient.	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	We do not believe that this change proposal better facilitates any of the DCUSA General Objectives.	
British Gas	Non-confidential	We do not believe the solution as currently drafted better facilitates any of the DCUSA General Objectives. By setting a default capacity the solution could be said to be negative against objective 1 and 2 as the default may be unrealistic of the actual capacity being used by the customer.	
<p>Working Group Conclusions: Eight respondents stated that the proposal better facilitates General Objective 4.</p> <p>Two respondents stated that they do not consider this proposal better facilitates any DCUSA general objectives.</p>			

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One stated that none of the objectives are better facilitated as any benefits are outweighed by the impacts of recalculating capacities further down the line. They also stated that Charging Objective 3 is negatively impacted.

The final responses stated that they did not believe the solution as currently drafted better facilitates any of the DCUSA General Objectives. They went on to note by setting a default capacity, the solution could be said to be negative against objective 1 and 2 as the default may be unrealistic of the actual capacity being used by the customer.

Company	Confidential/ Anonymous	12. Are you aware of any wider industry developments that may impact upon or be impacted by this CP?	Working Group Comments
Engie	Non-confidential	No.	
Indigo Power	Non-confidential	Not at this time.	
UK Power Networks	Non-confidential	<p>The DCMDG has worked on facilitating SDEP as a means of communication of customer contact details. We do not believe that this is an optimal solution (and are concerned that parties may see that as a better option) as we have already encountered issues where SDEP is used as a mail service for purposes for which it was not designed.</p> <p>SDEP is already heavily used for BAU for Registration / MPAS queries and the MHHS Data Cleanse. It is not a user-friendly system, it does not allow messages to be sent directly to a specific person or team and does not appear to allow any data to be accessed which has also been encrypted. As</p>	

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		a result, we would like to see any customer contact information sent by email ONLY, which can be password protected, with the password itself sent on a separate email to provide suitable security.	
SP Energy Networks	Non-confidential	No.	
National Grid Electricity Distribution	Non-confidential	No	
Northern Powergrid	Non-confidential	No	
TotalEnergies Gas & Power	Non-confidential	No	
Npower Commercial Gas Ltd	Non-confidential	MHHS implementation – DCP414/P432 were raised to mitigate migration activities under this programme.	
Drax Group plc	Non-confidential	No	
The Electricity Network Company	Non-confidential	Not at this time.	

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Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	None	
British Gas	Non-confidential	No.	
<p>Working Group Conclusions: Ten respondents advised they were not aware of any wider industry developments that may impact upon or be impacted by this CP.</p> <p>One respondent highlighted that they feel that SDEP is not an optimal solution as they have already encountered issues where it is used as a mail service for purposes for which it was not designed.</p> <p>The respondent stated they would like to see any customer contact information sent by email only, which can be password protected, with the password sent on a separate email to provide security.</p>			

Company	Confidential/ Anonymous	13. How are you impacted by the outcome of this CP?	Working Group Comments
Engie	Non-confidential	This CP will simplify the MHHS migration process for NHH CT meters for suppliers.	

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Indigo Power	Non-confidential	Neutral. Due to the size and age of us as an IDNO, we have measures in place to ensure that we do not need to apply a default capacity.	
UK Power Networks	Non-confidential	As a DNO we have seen an increasing number of MPANs which have moved from NHH to HH arrangements, but we have not been provided with contact details for them in most cases. We are happy to default their capacity on the basis that they are not within the scope of DCP414, having not been pre-notified of them, but will need to consider whether we backdate that to the CoMC to fully reflect that they are not in scope.	
SP Energy Networks	Non-confidential	The capacity could assign once 12 months of max demands are obtained, any change to the capacity would then follow standard DNO processes.	
National Grid Electricity Distribution	Non-confidential	We have an estimated 15000 customers that should migrate by April 2026, and by setting the capacity to 71kVA we would need to raise 15000 Connection Agreements with whatever customer details we have at the time.	
Northern Powergrid	Non-confidential	<p>As a Distributor we are required to put capacities in place for migrated sites.</p> <p>We believe implementing a default capacity will be problematic in the long-run as it may not be appropriate for all sites, leading to the need to agree capacities with these customers at a later date, which would not be able to be backdated due to the rules introduced under DCP385.</p> <p>In particular we believe this approach will result in ‘winners’ and ‘losers’ and inevitably lead to customer complaints.</p>	

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		<ul style="list-style-type: none"> Losers will have a default MIC that is too high, and they will be paying more than they should with no ability to have this refunded. Winners will benefit from being allocated to a low charging band with no (current) higher excess capacity tariff for over-utilising their current MIC. They will have the best of both worlds – a low charging band and effectively a ‘flexible’ MIC. <p>The ‘Winners and Losers’ approach, undesirable as it may be, is sometimes unavoidable; however, in this instance is it entirely avoidable by sticking to the approach of calculating the MIC based on metered data.</p>	
TotalEnergies Gas & Power	Non-confidential	Not impacted.	
Npower Commercial Gas Ltd	Non-confidential	<p>Whilst this is likely to have a small impact on some of code obligations (EG credit cover)Our customers will be most impacted by this change by being placed onto a default capacity and in turn picking the costs for a broad brush default value that will in most cases not be appropriate for their needs.</p> <p>Whilst we do not challenge that a customer can amend/Change this at a later point, in the context of wider DCUSA changes that aim to introduce Excess capacity charges and prevent retrospective e changes to the capacity in place its likely this change as proposed would cause some customer detriment.</p>	

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Drax Group plc	Non-confidential	We are positively impacted by the CP as encouraging the customer to contact the DNO and agree their capacity will result in less follow-up action needed by ourselves.	
The Electricity Network Company	Non-confidential	The impact on us will be positive. This change helps to alleviate our concerns regarding how we would identify and keep a track of the MPANs without an agreed MIC, applying a default MIC will help to identify these.	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	If DCP 458 was approved with a default capacity of 71kVA we would anticipate a significant increase in customer complaints and capacity reviews.	
British Gas	Non-confidential	This could have a negative impact on us as a Supplier in having to deal with customer queries/rebill issues and complaints.	
<p>Working Group Conclusions: There were a number of different impacts raised as follows:</p> <ul style="list-style-type: none"> This CP will simplify the MHHS migration process for NHH CT meters for suppliers Increase in customer demand and potential increase in customer complaints. this approach will result in ‘winners’ and ‘losers’ and inevitably lead to customer complaints. <ul style="list-style-type: none"> i. Losers will have a default MIC that is too high, and they will be paying more than they should with no ability to have this refunded. ii. Winners will benefit from being allocated to a low charging band with no (current) higher excess capacity tariff for over-utilising their capacity. 			

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- A small impact on some code obligations (e.g. credit cover).
- Inappropriate capacities being set for customers.
- The change helps to alleviate our concerns regarding how we would identify and keep a track of the MPANs without an agreed MIC, applying a default MIC will help to identify these.

One respondent outlined that they have around 15,000 customers that should migrate by April 2026, and by setting the capacity to 71kVA they would need to raise 15,000 Connection Agreements with whatever customer details they have at the time.

Company	Confidential/ Anonymous	14. Do you agree with the Working Group’s proposed implementation date? If not, please provide your rationale.	Working Group Comments
Engie	Non-confidential	Yes	
Indigo Power	Non-confidential	We agree	
UK Power Networks	Non-confidential	Yes, it is important that this change is implemented as soon as possible after approval.	
SP Energy Networks	Non-confidential	Yes	
National Grid Electricity Distribution	Non-confidential	Yes	

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Northern Powergrid	Non-confidential	We do not agree with the proposed implementation date because we do not support the principles of this CP.	
TotalEnergies Gas & Power	Non-confidential	Agree.	
Npower Commercial Gas Ltd	Non-confidential	We agree that this change needs to be considered & any potential solution is implemented on an accelerated timeline because the window for meeting the P432 obligation is just over 12 months away so if there is to be a changer it must be conducted quickly in order to reduce to remove any risks to supplier's mandate under BSC modification P432.	
Drax Group plc	Non-confidential	Yes	
The Electricity Network Company	Non-confidential	Yes.	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	No, as we do not support this change.	

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British Gas	Non-confidential	Generally, we are not in favour of extra out of cycle releases. We would prefer this to align with the next standard release following Ofgem approval.	
<p>Working Group Conclusions: Nine respondents supported the proposed implementation date. One of the nine respondents that stated they supported the implementation date highlighted that the change needs to be progressed on an accelerated timeline as the window for meeting the P432 obligation is just over 12 months away.</p> <p>Two respondents noted that they do not support the DCP and as such did not support any implementation date.</p> <p>One responder stated that generally they are not in favour of extra out of cycle releases and that they would prefer this to align with the next standard release following Ofgem approval.</p>			

Company	Confidential/ Anonymous	15. Do you have any comments on the draft legal text?	Working Group Comments
Engie	Non-confidential	No	
Indigo Power	Non-confidential	Not at this time.	
UK Power Networks	Non-confidential	No, we are comfortable with the draft legal text.	
SP Energy Networks	Non-confidential	No	

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National Grid Electricity Distribution	Non-confidential	No	
Northern Powergrid	Non-confidential	<p>Not at this time.</p> <p>For the alternative solution suggested above, the legal text change would be much simpler and could be achieved as follows:</p> <p>182. Within 6 months following the period of 12 months from the date of the first migration of a Premises, the DNO/IDNO Party shall reasonably assess the capacity based on metered data and agree with the customer an appropriate MIC. In the event the DNO/IDNO is unable to contact the customer, or the DNO/IDNO and customer are unable to agree a MIC, it will be set on the highest peaked import capacity and the customer shall be informed of the new MIC (in accordance with the NTC notice provisions).</p>	
TotalEnergies Gas & Power	Non-confidential	No	
Npower Commercial Gas Ltd	Non-confidential	Please see attached proposed draft legal text for the alternatives proposed.	
Drax Group plc	Non-confidential	No	

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The Electricity Network Company	Non-confidential	<p>We have the following comments on the legal text.</p> <p>19.14 -We query why this requirement for suppliers to provide contact details of customers impacted by P432 has been removed from the legal text.</p> <p>182- It is unclear to us in the referenced legal text whether a customer is given the opportunity to agree a suitable MIC prior to or after the 71kVA default allocation. Currently the draft legal text states after the 12 months period the 71 kVA is applied but there is no mention of a customer being given the opportunity to agree a suitable MIC in advance or after this default MIC has been applied.</p>	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	<p>Paragraph 182 should be re-written to state where no data is available, and no contact has been made capacity should be set at default on 71kVA.</p> <p>We believe that where data is available from the previous 12months this should be used to set capacity as this is a fairer solution for the customer.</p>	
British Gas	Non-confidential	No.	
Working Group Conclusions: Eight respondents provided no comments on the legal text.			

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One respondent noted that for an alternative solution retaining the existing DCUSA process but allowing the Distributor to apply the capacity calculated based on the metered data when they are unable to contact the Customer, could be achieved in a simple way by amending paragraph 182 to add “the DNO/IDNO is unable to contact the customer”.

One responder provided legal text for an alternative solution which was retaining the original 12-month period for collating data and then applying a capacity, based on the metered data without agreeing the capacity with the customer if the customer couldn’t be contacted or if a capacity couldn’t be agreed.

Another response stated that paragraph 182 should be re-written to state where no data is available, and no contact has been made then the capacity should be set at a default of 71kVA.

They went on to say they believed where data is available from the previous 12 months this should be used to set capacity as this is a fairer solution for the customer.

The final response stated that they had the following comments on the legal text.

19.14 -We query why this requirement for suppliers to provide contact details of customers impacted by P432 has been removed from the legal text.

182- It is unclear to us in the referenced legal text whether a customer is given the opportunity to agree a suitable MIC prior to or after the 71kVA default allocation. Currently the draft legal text states after the 12 months period the 71 kVA is applied but there is no mention of a customer being given the opportunity to agree a suitable MIC in advance or after this default MIC has been applied.

Company	Confidential/ Anonymous	16. Do you have any other comments on DCP 458?	Working Group Comments
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Engie	Non-confidential	No	
Indigo Power	Non-confidential	Not at this time.	
UK Power Networks	Non-confidential	No.	
SP Energy Networks	Non-confidential	No	
National Grid Electricity Distribution	Non-confidential	No	
Northern Powergrid	Non-confidential	<p>We do not believe this is a part 2 matter. We believe that this impacts on the interest of electricity consumers as it fundamentally changes the solution of an Ofgem approved DCP. We believe that this change, in its current form, should also be approved by Ofgem as it goes against Ofgem's previous decision.</p> <p>We understand that the Proposer is seeking to resolve an issue arising due to Suppliers not meeting their obligations to provide customer contact details to the Distributor. However, we do not believe that a large number of customers are currently impacted and we believe that the majority of Suppliers are yet to begin their migrations and have a plan in place to provide the required information to the Distributors, as discussed at the</p>	

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		<p>DCMDG. We also believe that an alternative solution which would not significantly change the solution would be to allow Distributors to apply the “reasonably assessed” capacity, generally calculated from the maximum demand of each site, without agreeing it with the customer, where the customer contact details have not been provided to the Distributor.</p> <p>In addition, if the Suppliers are not meeting their DCUSA obligations to provide these details then we believe this should be escalated to the appropriate authority to enforce compliance. We would ask the DCUSA secretariat what the appropriate course of action to be followed for this enforcement is.</p>	
TotalEnergies Gas & Power	Non-confidential	No.	
Npower Commercial Gas Ltd	Non-confidential	<p>Yes, we have a few other comments:</p> <ul style="list-style-type: none"> • We do not agree that DCP 414 process is unwieldy or unworkable, as per the proposers outlined change case there simply has not been much activity under the vires of DCP 414’s implementation informs that the process has not actually really been tried and tested, that said we do perceive it could be simplified as per our suggested alternative solution, • The lack of suppliers to DNO communications to date is more likely to relate to the 2X MHHSP replanning exercises that shifted to M14 milestone to October 2026. As P432 is itself pinned to this very milestone. Consequently, not commencing the CoMC activity as its less disruptive to the end consumer at customer level by retaining existing DUoS rates for 	

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		<p>longer. As DNOs are MHHS participants they will be also aware of these replanning exercises over the course of the MHHSP development phases but may be less aware of how P432 dates have changed in line with MHHSP replanning.</p> <ul style="list-style-type: none"> • We would also challenge the notion that it is. • We would also challenge the rationale for this change being treated as part 2 matter, as any changes to how & when capacity is to be applied would be chargeable to the consumer which meets part 1 criteria as set out in DCUSA clause 9.4.1 	
Drax Group plc	Non-confidential	No	
The Electricity Network Company	Non-confidential	Not at this time.	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	No comment	

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British Gas	Non-confidential	No.	
<p>Working Group Conclusions: Ten respondents did not provide any additional comments.</p> <p>Two respondents stated that they feel the change should not be classed as a Part 2 matter and should be reviewed by Ofgem. One of these respondents highlighted that if Suppliers are not meeting their DCUSA obligations to provide the contact details, this should be escalated to the appropriate authority to enforce compliance.</p> <p>One respondent stated that the lack of Supplier to DNO communication is likely to relate to the 2 times MHHSP replanning exercises that shifted the M14 milestone to October 2026. As P432 is itself pinned to this very milestone. Consequently, not commencing the CoMC activity as it's less disruptive to the end consumer at customer level by retaining existing DUoS rates for longer. As DNOs are MHHS participants they will be also aware of these replanning exercises over the course of the MHHSP development phases but may be less aware of how P432 dates have changed in line with MHHSP replanning.</p> <p>All other points raised to this question had already been raised at earlier stages of the consultation responses</p>			