

## DCP 424 Working Group Meeting 11

12 May 2026 at 13:00

Attendee	Company
<b>Working Group Members</b>	
Laura Quinn (LQ)	SPEN
John Greene (JG)	SSE Retail
Lili Zou (LZ)	SSE (Distribution)
Phillip Mark (PM)	SSE Distribution
Felix Leong (FL)	Ofgem
Benny Talbot (BT)	COOP Energy
Christopher Day (CD)	Elexon
Nik Willis (NW)	Stark
Hazel Patterson (HP)	SPEN
Louise Bunney (LB)	NPg
Meg Wong (MW)	Stark
Lorna Murray (LM)	SPEN
<b>Code Administrator</b>	
Andy Green [AG]	Chair
<b>Apologies</b>	
Chris Ong (CO)	UKPN
Edda Dirks (ED)	SSEG
Mary Gillie (MG)	Energy Local
Kara Burke (KB)	NPg

### 1. Administration

#### Recording

- 1.1 The Chair confirmed that the meeting was recorded to support the production of accurate minutes. The recording will be deleted once the minutes are approved.

#### Competition Law Guidance and Terms of Reference

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

### **Minutes & Actions Plus Apologies**

- 1.3 No feedback was provided on the minutes from the previous meeting. Updates on the actions are included in the appendix.

## **2. Purpose of the Meeting**

---

- 2.1 The Chair set out that the purpose of the meeting was to review the draft consultation document, review the legal text and agree on next steps.

## **3. Review of Legal Text**

---

- 3.1 The Chair started by reminding the Working Group that responses to the first consultation had raised concerns regarding the value of implementing a solution solely for pre-MHHS arrangements, and as such the Working Group agreed that the legal drafting should cater for both MHHS-migrated and non-migrated MPANs.
- 3.2 The Working Group noted that the previous draft legal text had been prepared against an older DCUSA version and requires transferring into the latest DCUSA legal text, which included MHHS-related updates. The Chair confirmed this would be completed post-meeting.
- 3.3 The Chair explained that new provisions had been drafted for the market-wide HH settlement context and were structured with sub-headings for clarity. These included:
  - complex sites,
  - gross consumption volumes,
  - pseudo-secondary MPANs for charging purposes, and
  - charging treatment.
- 3.4 It was explained that the drafting was seeking to ensure that DUoS charges are applied on gross consumption volumes associated with a complex site where settlement netting would otherwise provide only net volumes.
- 3.5 It was explained that the primary MPAN would reflect the output of the complex site settlement rule (net volumes) and that pseudo-secondary MPANs would be used to carry gross metered volumes for the purposes of DUoS billing.
- 3.6 The Working Group member from Elexon clarified that pseudo-secondary MPANs have multipliers set to zero so that gross volumes do not feed into settlement, but they can support billing calculations.

- 3.1 It was noted that gross volume data may be received via D0036 (legacy) or IF21 (MHHS) and that wording should be consistent with BSCP 550 terminology (pseudo-secondary MPANs) and avoid using 'calculated' where 'applied' better reflects the intent.
- 3.2 PM highlighted a potential billing risk which was if the pseudo-secondary MPANs are mapped to existing CDCM tariffs that include standing charges, a site could be double-charged for standing charges. The Working Group discussed whether DNOs may need tariff variants / DUoS tariff IDs with zero standing charges for pseudo-secondary MPANs.
- 3.3 The group agreed to include a targeted consultation question to test the previous working groups assumption that no new CDCM tariffs or methodology changes were required for this change.
- 3.4 It was explained that supplier invoicing is recalculated through successive settlement runs and that if a MPAN is assigned to the wrong tariff, correcting tariff mapping would be picked up in subsequent runs.

### Consultation Development

- 3.5 The Chair advised that the second consultation will focus on the draft legal text and proposed solution.
- 3.6 The Working Group reviewed the draft Consultation 2 document. It was noted that sections within the introduction and summary section read as if the solution was for were pre-MHHS MPANs only.
- 3.7 JG requested that the 'intent' and early narrative be updated to clearly reflect the revised scope (covering both migrated and non-migrated MPAN arrangements) and to reference the relevant data flows and agent roles for both scenarios.
- 3.8 The Chair stated that Consultation 2 would be avoiding repetition of questions already asked in Consultation 1 (e.g., understanding /supporting the change and objectives), and instead concentrate on the refined process and updated legal text.
- 3.9 Proposed questions to include agreement with the approach to cover migrated and non-migrated MPANs, agreement with use of pseudo-secondary MPANs for gross demand, if there are alternative solutions, views on whether additional DCUSA legal text changes are required, comments on drafted legal text, and whether any CDCM tariff changes are required.
- 3.10 It was highlighted that there are broader operational issues relating to complex sites and shared SVA under MHHS, and that an issue group would be raised to consider codifying approaches. The Working Group agreed this should be acknowledged in future documentation where relevant, without widening the DCP scope.

Number	Questions
1	Do you agree with the approach taken by the Working Group to cater for both MHHS-migrated and non-migrated MPANs?

2	Do you agree with the Working Group approach of using Pseudo Settlement (Secondary) MPANs for submitting gross demand data for class F and G sites in a Class 5 Complex Site to Distributors?
3	Do you believe are there further DCUSA schedules or legal text changes required to facilitate this change? Please provide further information if yes.
4	Are there any alternative solutions that the Working Group has not considered?
5	Do you have any comments on the draft legal text?
6	Are you aware of any wider industry developments that may impact upon or be impacted by this CP?
7	Do you have any other comments on DCP 424?

#### 4. Next Steps and Next Meeting Date

---

- 4.1 The Chair stated that he would share an updated version of the legal text and consultation document with the Working Group to review with the aim off sending the second consultation out on 19 May 2026. The next Working Group meeting was scheduled to take place on 15 June 2026 at 2pm.

#### 5. Any Other Business

---

- 5.1 No other business was raised.

#### New and Open Actions

---

Action Ref.	Action	Owner	Update
05/01	The Chair to update the Legal text and share with the Working Group	Chair	<b>New action.</b>
05/02	The Chair to create a second consultation document and legal text and share with the Working Group.	Chair	<b>New action.</b>

## Closed Actions

Action Ref.			Update
01/08	Working Group members to review paragraph 1.5	All	New action
02/08	The Chair update the consultation document with the new REC change ID as well as contacting the REC to find out their timelines for the consultation to be issued.	Chair	New action
03/08	Working Group to check the table in paragraph 4.11 to ensure all the pros and cons have been captured accurately.	All	New action
04/08	Chair to update the consultation and issue to the Working Group for review.	Chair	New action
01/01	Chair to draft a consultation and issue to the Working Group for review.	Chair	New action
02/01	Chair to issue the consultation to DCMDG and SIG members, in addition to the usual recipients.	Chair	New action
03/01	Secretariat to raise awareness of the DCP 458 consultation at the next DCMDG meeting.	Secretariat	New action

# DCUSA