




DCUSA Consultation		At what stage is this document in the process?
<h2>DCP 473:</h2> <h3>Non-consuming De-energised CT-Metered sites</h3> <p><b>Date Raised:</b> 31/03/2026</p> <p><b>Proposer Name:</b> Peter Waymont</p> <p><b>Company Name:</b> UK 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></p> <p>To provide mechanisms for Distributors to deal effectively with long term non-consuming CT-metered de-energised sites.</p>		
	<p>This document is a second Consultation issued to DCUSA Parties and any other interested Parties in accordance with Clause 11.14 of the DCUSA seeking industry views on DCP 473</p> <p>Parties are invited to consider the questions set in section 6 and submit comments using the form attached as Attachment 1 to <a href="mailto:dcusa@electralink.co.uk">dcusa@electralink.co.uk</a> by 10 <b>June 2026</b>.</p> <p>The Working Group will consider the consultation responses and determine the appropriate next steps for the progression of the Change Proposal (CP) to the Change Report phase.</p>	
	<p><b>Governance:</b></p> <p>The Proposer recommends that this Change Proposal should be:</p> <ul style="list-style-type: none"> <li>• Treated as a Part 1 Matter</li> <li>• Treated as a Standard Change</li> <li>• Progressed to the Working Group phase.</li> </ul>	
	<p><b>Impacted Parties:</b></p> <p>Suppliers/DNOs/IDNOs/CVA Registrants</p>	

**Impacted Clauses:**

Schedule 16, Clause 139

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## Timetable

**The Secretariat recommends the following timetable:**

Initial Assessment Report	15 April 2026
Consultation Issued to Industry Participants	19 May 2026
Change Report Approved by Panel	21 October 2026
Change Report issued for Voting	22 October 2026
Party Voting Closes	12 November 2026
Change Declaration Issued to Parties	16 November 2026
Change Declaration Issued to Authority	16 November 2026
Authority Decision	TBC

## 1 Summary

**This is a consultation on DCP 473, which has a direct link to DCP 463. DCP 463 has been consulted on twice, and the details of the consultation, the non-confidential responses and the Working Groups conclusions to the responses can be found [here](#)**

### What?

- 1.1 Distributors are obliged to run an efficient network. But they also have an obligation to maintain a connection. Associated to this is the maintenance of the capacity of the connection. Long term de-energised customers do not pay Distribution Use of System (DUoS) charges and often resist attempts to disconnect them on the grounds of it being “unreasonable” to maintain the capacity. This causes situations where a customer effectively reserves capacity on the network without paying for it, potentially causing reinforcement costs if other customers wish to connect.
- 1.2 DUoS is charged to recover the costs of maintaining the connection and the capacity but it is not charged for non-consuming de-energised sites on site-specific or aggregated billing. This causes the CDCM to not be cost reflective.
- 1.3 There is no restriction within Schedule 17 or 18 of DCUSA for EDCM Customers, and as a result DNOs can already charge a non-consuming, de-energised site which is connected at EHV or HV Sub.
- 1.4 This change only considers CT metered sites, which are billed DUoS on a site-specific basis, and where the impact of reserving capacity for free is most felt, due to the larger size of their supply.

### Why?

- 1.5 De-energised sites, with site-specific billing, are able to retain capacity on the network without being charged for it under the CDCM. The National Terms of Connection, at Section 3, do not allow DNOs to remove capacity except with the agreement of the customer. So other customers who are energised are faced with enduring capacity charges whereas any non-consuming de-energised customers can continue to “reserve” the capacity at no charge. This leads to inefficient cost signals being given.

### How?

- 1.6 DCP463 was raised to remove the carve-out for non-consuming de-energised site-specific billed sites in the methodologies, such that these would be billed from a point in time. However, during the Working Group’s assessment, a number of alternative solutions were identified, largely around the National Terms of Connection. These would not have met the intent of DCP463.
- 1.7 This DCP is raised to take forward the work of the DCP463 Working Group, while permitting alternative solutions to be tabled. As this change has been accepted into the process, the proposer is seeking to withdraw DCP463. In doing so the proposer expects the work of the DCP463 Working Group and its consultations to form part of the development of this proposal with no need for any of that to be repeated. It is therefore noted that the DCP463 working group and its papers are realigned to this DCP.

- 1.8 The proposer remains of the view that de-energised customers should be charged fixed and capacity charges in full, as their connection to the network is reserving their contracted capacity, preventing it being used by other customers. Moreover, it ensures fairness across all customers who are reserving such higher levels of capacity.
- 1.9 Note that it's recognised that there is a period after a connection is completed and before an MPAN is traded where a "not-yet-energised" site is not charged DUoS. This DCP does not intend to change that and is only intended to apply to "Traded" MPANs.
- 1.10 As part of the Work of DCP 463, other solutions have been identified which are detailed below.

**Charge the fixed and Capacity charges after a minimum period of 24 months has elapsed.**

- 1.11 The DCP 463 Working Group recognise that Suppliers have highlighted challenges in identifying customers to pass charges on. With this in mind, an alternative process has been raised that will follow a similar approach to the proposer's solution, but that has a minimum period of 24 months from the date of de energisation before the fixed and Capacity charges are applied.
- 1.12 This approach was raised as it is believed by Working Group members that it will give Suppliers time to inform customers of steps they can take to avoid any fixed and Capacity charges, and the consequences of what will happen and when if these steps are not taken.
- 1.13 It is also believed that the 24-month period before fixed and Capacity charges are applied gives all parties ample time to conduct the necessary investigations into sites where an occupier is unknown.

**The removal of any reserved Capacity after a period of 24-months has elapsed.**

- 1.14 A second alternative solution has been suggested where rather than charging the fixed and Capacity charges, the site would have its reserved Capacity removed after a period of 24 months has elapsed.
- 1.15 As with the initial alternative solution, it is believed that 24 months would allow enough time for parties to contact customers to explain what steps they can take to retain their Capacity, and also to allow parties time to investigate who is responsible for any sites where the occupier is unknown.

**The full-service removal/disconnection of an MPAN after a 24-month period has elapsed.**

- 1.16 This is a similar approach to the solution where reserved Capacity is removed after 24 months, with the difference being that rather than remove the Capacity for the MPAN, a full-service removal/physical disconnection is carried out after a minimum of 24 months has elapsed.
- 1.17 The Working Group acknowledge that this may be considered to be a very definitive approach to take, and that there are challenges with it such as what happens in the scenario where a customer refuses to pay for the service removal but the Working Group have included this solution so parties are able to have full transparency when being consulted on all the potential solutions available.

- 1.18 It was highlighted that in some cases, charging the Fixed and Capacity charges would only lead to Suppliers increasing their bad debt with no action to take to enforce payment., These scenarios included sites where meters had been de energised for bad debt and sites where the meter had been de energised for revenue protection issues. It was agreed that a carve out for the alternative solutions would be included that allows Suppliers in some exceptions to not have the Capacity and fixed charges applied where the site had been de energised for non-payment or revenue protection issues.
- 1.19 For the solutions that allow for a minimum of 24 months to pass before a Distributor can take action, the Working Group propose that the flowing steps must be followed by Distributors.

#### **Step 1**

The Distributor writes to the customer, at the site address and a registered address they reasonably believe is the customers registered office, landlord etc, copying in the Supplier (contract manager) saying if the capacity is still required DUoS charges will be incurred or the capacity will be set to zero at

(i) the end of the 24-month period from de energisation date or implementation date of the change, or

(ii) six months from the date of the letter, whichever is the later of the two dates, which will be specified."

#### **Step 2**

If the Distributor hasn't heard from the customer or the Supplier within 3 months of the end of the 24-month period, the Distributor contacts the Supplier and customer again, raising that the 24-month period is due to end in 3 months and that Capacity will be removed/charged at the end of the 24-month period if no instruction is given.

#### **Step 3**

If the customer contacts the Supplier to advise they want to keep the Capacity, the Supplier agrees and informs the Distributor, and DUoS charges are to be incurred at the end of the 24-month period. If the customer contacts the Distributor, the Distributor must direct the customer to the Supplier.

If the Supplier highlights that there is an exception for the Capacity charges to be incurred (i.e. due to previous bad debt, revenue protection issues etc), then at the end of the 24-month period, the Capacity is set to zero. This needs to be confirmed to the Distributor and the customer by the Supplier.

If the customer doesn't contact the Supplier nor the Distributor, the Capacity is set to zero at the end of the 24-month period.

If the customer contacts the Supplier or the Distributor and states they want to release the Capacity before the end of the 24-month period, the capacity is set to zero.

- 1.20 All these solutions exclude Whole Current metered non-consuming customers. These are more dispersed and their individual impact on the network reduced. To include such sites would require fundamental change to the data used in MHHS. This is not the right time to consider that.

## **2 Governance**

## Justification for Part 1 Matter

2.1 Methodology changes are Part 1 matters.

## Current Next Steps

2.2 Based on the answers provided by the Proposer to the above questions the Code Administrator believes that this Change Proposal should:

- Be treated as a Part 1 Matter;
- Be treated as a Standard Change; and
- Proceed to the Definition phase via a Working Group for further development.

## 3 Why Change?

### Background

- 3.1 In 2022, UK Power Networks raised [DCP 411-"Charging De-energised Sites"](#), in order to facilitate charging DUoS for de-energised sites. Ofgem rejected DCP411. In their decision, Ofgem highlighted [DCP 115 - NTC Amendments - Capacity Management \(Under Utilisation\)](#) as a solution (p1, p7), Supplier difficulty in passing on charges, leading to distortions (p5), the DCP411 solution encouraging more disconnections that are temporary in nature (p6), Unresponsive customers causing other customers to bear costs (p6), and Cross-subsidy (p8).
- 3.2 In practice there is already a cross subsidy as non-consuming de-energised customers are permitted to retain a connection for free while everyone else pays for their own connection and for the costs of maintaining those that are de-energised.
- 3.3 This is further complicated with new connection requests needing to assess the network capability where customers are not currently using their capacity but could do so at any future date. This can lead to a need to reinforce the network, the costs of which will be borne by all other customers. However, if the de-energised customer had to make commercial decisions about whether to continue to pay for a connection they do not currently use, they might reduce capacity or disconnect and save those other customers bearing the reinforcement costs and cross subsidising the de-energised customer's connection.
- 3.4 DCP115, as referred to by Ofgem, gives a process that can lead to disconnection of de-energised customers if the company reasonably considers that it is not required to maintain the connection under the Electricity Act i.e. where it is not reasonable in all the circumstances to maintain the connection. Following the rejection of DCP411 we have written to a number of customers pursuant to the DCP115 process. The reasonableness test is very difficult. Customers often cite planning permission on the site or business plans for redevelopment etc. We have also seen evidence of customers being charged capacity charges by their Supplier (despite Ofgem's view in their DCP411 decision that this could pose a difficulty) and saying it is therefore unreasonable for the Distributor to disconnect capacity that they are paying for (even though the Distributor is not receiving any revenue in respect of these customers).

- 3.5 In 2025 Ofgem approved DCP440 “Consuming “de-energised” sites”. They stated that it is consistent with their principal objective and statutory duties, as it promotes fairness in charging, supports cost recovery for network operators, and encourages timely correction of data inaccuracies that could otherwise lead to unbilled consumption.
- 3.6 The proposer believes that under the current arrangements the full costs to operate the network are not being recovered from those customers driving those costs and instead are being borne by all other customers. This change seeks to implement further fairness in charging. However, its scope is broader than that to allow other solutions to be identified.
- 3.7 It should also be noted that Ofgem’s draft Strategic Direction Statement includes objectives which may be relevant, such as Objective 1: Ensure fair prices, Objective 6: Expand electricity networks, Objective 9: Network performance and connections.

**Q1: Do you understand the intent of this CP?**

**Q2: Do you support the principles of this CP?**

## 4 Working Group Assessment

### Working Group Assessment

- 4.1 The DCUSA Panel established a Working Group to assess DCP 473. This Working Group consists of Supplier, DNO, IDNO representatives and other interested industry participants. Meetings were held in open session and the minutes and papers of each meeting are available on the DCUSA website – [www.dcusa.co.uk](http://www.dcusa.co.uk)
- 4.2 At the last DCP 463 meeting, the Working Group discussed four main solutions to de-energised CT metered sites reserving Capacity, charging for the Capacity, charging for the Capacity once a minimum of 24-months had elapsed, removing the Capacity, and physically disconnecting sites. There was support within the Working Group for all these options to be explored further.
- 4.3 The possibility of Distributors charging customers directly for Capacity and fixed charges was also explored but ultimately discounted as it became evident in the DCP 463 meetings that there wasn’t wide support for this approach.
- 4.4 The Proposer determined that they wish to move forward with the original solution as an option - to charge for capacity from the start of the de-energisation period but also stated that they would like to hear views on the alternative solutions raised in paragraphs 1.10-1.12 by the Working Group and whether there were other solutions that the DCP 463 and 473 Working Groups had not considered.

**Q3: Are there any alternative solutions that the Working Group have not considered, both as part of DCP 463 and 473? If so, please elaborate.**



- 4.5 It was highlighted that within the DPC 463 Working Group, a grace period was discussed that would create a window to allow Suppliers to investigate a site to confirm who was responsible for it, as well as contacting the customer to inform them of the potential consequences if the site was to remain de-energised whilst reserving capacity i.e. charges would start to apply, the capacity removed or the site physically disconnected.
- 4.6 It was suggested that two years was a reasonable timeframe for Suppliers to attempt contact customers and for customers to respond and take the appropriate action to release the capacity if they didn't want to pay for it so they wouldn't lose it.
- 4.7 It was noted that during that two-year period, the customer should be given opportunities to respond before their capacity is charged, reduced or removed.
- 4.8 The Working Group discussed the potential risks of gaming within the processes if a grace period was adopted, specifically how to stop customers from re-energising a site and then de-energise it again not long after to restart the grace period.
- 4.9 A potential solution highlighted was to have provisions within the legal text to have a set number of non-consecutive days a site could be de-energised during the grace period.
- 4.10 The Working Group are keen to hear the views of other industry parties on any potential gaming opportunities and what can be done to mitigate these.
- 4.11 Also, are there current process that parties follow that would mitigate any gaming risks ie Suppliers charging for re-energation and de-energisation appointments.
- 4.12 The Working Group would also like Party views on whether a 24-month grace period is appropriate and why, and if it is not appropriate, why not. The Working Group also welcome views on if another grace period would be more suitable i.e. 6 months, 12 months etc.

**Q4: Is a period of 24 months an appropriate timescale before any charges/capacity removal for de energised sites occurs? If not please explain why and provide any alternative timescales.**

**Q5: Which of the 4 suggested solutions do you prefer. Please explain rationale.**

**Q6: Which of the suggested solutions in your opinion most reduces the extent of socialisation of the cost of unused capacity?**

**Q7: What are your thoughts on the customer contact process that has been suggested for the 3 alternative solutions?**

**Q8: Are the processes open to gaming? If so, please elaborate on how and why and any steps that can be taken to mitigate?**

- 4.13 The Working Group discussed a risk raised as part of DCP 463, which was how to handle sites where the occupier was not known.
- 4.14 It was noted that whilst these sites were rare, they did cause Suppliers challenges in identifying the correct, responsible customer. It was also highlighted that charging sites where a customer was unknown, or where a site had been de energised for debt or for revenue protection purposes could also lead to increased bad debt for Suppliers as a site could incur charges without knowing who should be paying them, or for a customer who had no means of paying.

- 4.15 It was noted that there were already a number of processes that Suppliers take to establish who is responsible for a site when the occupier is unknown, such as writing to the site, raising site visits to investigate if the site is occupied and by whom, using the land registry to establish who is responsible as well as other processes.
- 4.16 With this in mind the Working Group would like to know what obligations Suppliers have to ensure de energisations/re energisations are valid and correctly recorded, as well as what actions are taken to establish who is responsible for a site.
- 4.17 It was also noted that a separate process for sites that had been de energised due to bad debt, revenue protection, liquidation/bankruptcy may require a separate process/exemption from capacity and fixed charges. The Working Group welcomed Party views on how these type of sites should be treated?

**Q9: For Suppliers only, what are the processes/obligations you have to follow to ensure that any de energisation or energisation change is valid and correctly recorded? If there are specific obligations, i.e. in the REC/BSC, what are they?**

**Q10: Are there any other steps you take to establish who is responsible for a site?**

**Q11: Should there be an exemption for certain type of scenarios such as a site that is de energised for revenue protection purposes, bad debt, bankruptcy etc. If so, what scenarios should be exempt and what should the process look like?**

- 4.18 The Working Group then went on to discuss the legal text of each solution and agreed that the text should be clear on what the grace period would be, what the consequences would be if no action was taken and also make it clear to all parties what the customer contact process should entail on a step by step basis.
- 4.19 The Steps the Working Group created are detailed in paragraphs 1.19 of this consultation document.
- 4.20 Working Group members discussed how long a Supplier should wait before sending the customer a letter. Members believe that this should be a commercial decision for parties to make but should be within 18 months of the de energisation date.
- 4.21 It was noted that writing to all customers as soon as they are de energised is not efficient as a large proportion will reconnect after a short period. Members agreed that Suppliers should make customers aware when they request de energisation, that if they stay de energised for a longer period there will be consequences.
- 4.22 It was highlighted that it would be helpful for the Supplier to contact the Distributor three months before the 24-month period ends, to confirm whether the customer has accepted the charges, wishes to release the Capacity, or has not responded. It was suggested that if the Distributor has not heard from the Supplier, they could contact them to advise that Capacity will be removed, or charged at the end of the 24-month period or as soon as the site is de-energised, if no instruction is given dependent on which of the solutions is adopted.

**Q12: Is the legal text sufficiently clear on what processes need to be followed before the Capacity is removed or DUoS charges are passed by the Distributor to the Supplier?**

## 5 Legal Text

### Solution Overview

5.1 The legal text can be found within Attachment 3 DPC 473 Legal Text

### Legal Text Commentary

**Solution A Charge Capacity and Fixed charges from the date of de energisation or the implementation date of this change, whichever is latest**

5.2 Revision of Clause 139 removes the differentiation between energised and de-energised sites for CT metered customers.

**Solution B Charge Capacity and fixed charges after a minimum period of 24 months has elapsed from the date of de energisation or the implementation date of this change, whichever is latest**

5.3 Add in new paragraphs 132D-132I to schedule 16 to allow for Capacity and fixed to apply after a minimum period of 24-months has elapsed from the date of de energisation or the implementation date of this change, whichever is latest of the two dates.

**Solution C The removal of any reserved Capacity after a period of 24-months has elapsed from the date of de energisation or the implementation date of this change, whichever is latest**

5.4 Add in new paragraphs 132D-132I to schedule 16 to allow for the Capacity to be removed/reduced after a minimum period of 24-months has elapsed from the date of de energisation or the implementation date of this change, whichever is latest of the two dates.

5.5 Add in new paragraph 12.11.a.b to schedule 2B 'National Terms of Connection' to allow Distributors to remove/reduce the Capacity after a minimum period of 24-months has elapsed from the date of de energisation or the implementation date of this change, whichever is latest of the two dates.

**The full-service removal/disconnection of an MPAN after a 24-month period has elapsed.**

5.6 Add in new paragraphs 132D-132I to schedule 16 to allow for the service to be removed/physically disconnected after a minimum period of 24-months has elapsed from the date of de energisation or the implementation date of this change, whichever is latest of the two dates.

5.7 Add in new paragraph 12.11.a.b to schedule 2B 'National Terms of Connection' to allow Distributors to remove/physically disconnect the service after a minimum period of 24-months has elapsed from the date of de energisation or the implementation date of this change, whichever is latest of the two dates.

## 6 Relevant Objectives

6.1 The Working Group agreed that this CP would be assessed against both the Charging Objectives and the General Objectives.

	DCUSA Charging Objectives	Identified impact
<input type="checkbox"/>	1. That compliance by each DNO Party with the Charging Methodologies facilitates the discharge by the DNO Party of the obligations imposed on it under the Act and by its Distribution Licence	Positive
<input checked="" type="checkbox"/>	2. That compliance by each DNO Party with the Charging Methodologies facilitates competition in the generation and supply of electricity and will not restrict, distort, or prevent competition in the transmission or distribution of electricity or in participation in the operation of an Interconnector (as defined in the Distribution Licences)	Positive
<input checked="" type="checkbox"/>	3. That compliance by each DNO Party with the Charging Methodologies results in charges which, so far as is reasonably practicable after taking account of implementation costs, reflect the costs incurred, or reasonably expected to be incurred, by the DNO Party in its Distribution Business	Positive
<input type="checkbox"/>	4. That, so far as is consistent with Clauses 3.2.1 to 3.2.3, the Charging Methodologies, so far as is reasonably practicable, properly take account of developments in each DNO Party's Distribution Business	None
<input type="checkbox"/>	5. That compliance by each DNO Party with the Charging Methodologies facilitates 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; and	None
<input type="checkbox"/>	6. That compliance with the Charging Methodologies promotes efficiency in its own implementation and administration.	None

	DCUSA General Objectives	Identified impact
<input checked="" type="checkbox"/>	1. The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks	None
<input type="checkbox"/>	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	None
<input type="checkbox"/>	3. The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences	None
<input checked="" type="checkbox"/>	4. The promotion of efficiency in the implementation and administration of the DCUSA	Positive
<input type="checkbox"/>	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.	None

6.2 The proposer believes that charging objective 1 is better facilitated as the License requires Distributors to work towards efficient and economic operations by ensuring that charges are applied to all Customers connected to the Networks.

- 6.3 The proposer also believes that charging objective 2 is better facilitated as capacity on the system is fairly charged such that connection decisions are optimised for both generation and supply connections.
- 6.4 Finally, the proposer also believes that charging objective 3 is better facilitated as the different treatment of costs of the network, between energised customers who pay DUoS and deenergised customers who don't pay DUoS is removed.
- 6.5 It was also the view of the Working Group and highlighted in the responses to the DCP 463 consultation that general objective 1 would be better facilitated as all solutions would help to optimise customer behaviour to release capacity where it is not needed.
- 6.6 General objective 4 was also believed to be better facilitated as all solutions create clear consistent processes which creates more efficiency.

**Q13: Do you consider that the proposal better facilitates the DCUSA Objectives?**

**If so, please detail which of the DCUSA Objectives you believe are better facilitated and provide supporting reasons.**

**If not, please provide supporting reasons.**

## 7 Implementation

### Proposed Implementation Date

- 7.1 01 April 2028. To allow Suppliers time to communicate with affected customers and prepare for the change. To allow time for de-energised customers to apply to the Distributor to reduce capacity they may no longer require.

**Q14: Do you agree with the proposed implementation date?**

**If not, please provide supporting reasons.**

## 8 Impacts & Other Considerations

- 8.1 This change could be impacted by the DUoS SCR, but that is unclear. On 22 April 2025, Ofgem issued an update titled 'Distribution Use of System Charges: Significant Code Review update' within which they stated:

*"We remain committed to addressing urgent issues as they arise in a pragmatic and proportionate manner, whether via the industry-led code modification process or other means, while leaving design-led enduring solutions for later work under the SCR when more is known on wider arrangements."*

- 8.2 Whilst this change is not necessarily urgent, the above would seem to suggest that changes such as this one, that is not a "design-led enduring solution" and is a relatively minor adjustment to the way the DUoS charges are managed and changes that Ofgem should be comfortable with the proposal.

8.3 As noted, some options for dealing with the issue may not be charging related in any case.

### Consumer Impacts

8.4 It is not believed that that this change will impact consumers in a significant way. There may of course be impacts for customers who are not currently receiving DUoS charges but who are retaining capacity, and they may feel this is a negative impact. Then there is the rest of the customer base, who it is assumed would feel this is likely to be a positive impact, however small it is per customer.

### Environmental Impacts

8.5 In accordance with DCUSA Clause 10.4.5A, it is not believed that there would be a material impact on greenhouse gas emissions if this change were implemented.

### Consideration of Wider Industry Impacts

8.6 It is not believed that there are any wider industry impacts as a result of this change and that there are no known impacts associated with the wider industry that will impact upon this change.

### Confidentiality

8.7 This Change Proposal can be treated as non-confidential.

### Does this Change Proposal Impact Other Codes?

8.8 It is not believed that there are any impacts to any other 'Industry Codes' as a result of the implementation of this CP.

Grid Code..... ☐ SEC..... ☐ CUSC..... ☐

Distribution Code... ☐ REC..... ☐ BSC..... ☐

None..... ☒

**Q15: Are you aware of any wider industry developments that may impact upon or be impacted by this CP?**

**Q16: Do you have any other comments on DCP 473?**

## 9 Consultation Questions

9.1 In this consultation, the Working Group is seeking industry views on the following questions:

Number	Questions
1	Do you understand the intent of this CP?
2	Do you support the principles of this CP?

3	Are there any alternative solutions that the Working Group have not considered, both as part of DCP 463 and 473? If so, please elaborate.
4	Is a period of 24 months an appropriate timescale before any charges/capacity removal for de energised sites occurs? If not please explain why and provide any alternative timescales.
5	Which of the 4 suggested solutions do you prefer?
6	Which of the suggested solutions in your opinion most reduces the extent of socialisation of the cost of unused capacity?
7	What are your thoughts on the customer contact process that has been suggested for the 3 alternative solutions?
8	Are the processes open to gaming? If so, please elaborate on how and why and any steps that can be taken to mitigate?
9	<u>For Suppliers only</u> , what are the processes/obligations you have to follow to ensure that any de energisation or energisation change is valid and correctly recorded? If there are specific obligations, i.e. in the REC/BSC, what are they?
10	Are there any other steps you take to establish who is responsible for a site?
11	Should there be an exemption for certain type of scenarios such as a site that is de energised for revenue protection purposes, bad debt, bankruptcy etc. If so, what scenarios should be exempt and what should the process look like?
12	Is the legal text sufficiently clear on what processes need to be followed before the capacity is removed or DUoS charges are passed by the DNO to the Supplier?
13	Do you consider that the proposal better facilitates the DCUSA Objectives?  If so, please detail which of the DCUSA Objectives you believe are better facilitated and provide supporting reasons.  If not, please provide supporting reasons.
14	Do you agree with the proposed implementation date? If not, please provide supporting reasons.
15	Are you aware of any wider industry developments that may impact upon or be impacted by this CP?
16	Do you have any other comments on DCP 473?

## 10 Attachments

- Attachment 1 – DCP 473 Consultation Response Form
- Attachment 2 – DCP 473 Change Proposal Form
- Attachment 3– DCP 473 Legal Texts (All solutions)