


DCUSA Change Proposal (DCP)		At what stage is this document in the process?							
<h2>DCP 476:</h2> <h3>Treatment of multi MPAN sites</h3> <p>Date Raised: 01/06/2026</p> <p>Proposer Name: Chris Ong</p> <p>Company Name: Eastern Power Networks</p> <p>Party Category: DNO</p>		01 – Change Proposal							
		02 – Consultation							
		03 – Change Report							
		04 – Change Declaration							
<p>Purpose of Change Proposal:</p> <p>To determine how a site-specific billed site which has multiple MPANs but which are traded with different Suppliers should be treated</p>									
	<p>Impacted Parties:</p> <p> <input checked="" type="checkbox"/> Suppliers <input checked="" type="checkbox"/> DNOs <input checked="" type="checkbox"/> IDNOs <input checked="" type="checkbox"/> CVA Registrants <input type="checkbox"/> OTSO Party <input type="checkbox"/> Gas Suppliers <input type="checkbox"/> SIP Parties </p>								
	<p>Impacted Clauses:</p> <table border="1"> <thead> <tr> <th>Section/Schedule</th> <th>Clause/Paragraph</th> </tr> </thead> <tbody> <tr> <td>Schedule 16</td> <td>Paragraph 141 Note 7</td> </tr> <tr> <td>Schedules 17 and 18</td> <td>TBD</td> </tr> <tr> <td colspan="2"> </td> </tr> </tbody> </table>		Section/Schedule	Clause/Paragraph	Schedule 16	Paragraph 141 Note 7	Schedules 17 and 18	TBD	
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Indicative Timeline

The Secretariat recommends the following timetable:

Initial Assessment Report	17 June 2026
Consultation Issued to Industry Participants	August 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
Authority Decision	N/A

1 Summary

What?

- 1.1 Determine how a site-specific billed site with multiple MPANs, which are registered with different Suppliers should be treated for the allocation of the capacity and standing charges.

Why?

- 1.2 Currently where a site has multiple MPANs it is often billed one fixed charge and one capacity charge to recognise the connection agreement is with the whole site. However, there are no controls in industry processes that cause the MPANs to remain aligned and they can be split over more than one Supplier. This causes more than one billing account to be required, and capacity to be split (often pro-rated?) over the billing accounts. This results in two or more standing charges being applied to the site for both DUoS and TNUoS, increasing the costs ultimately to the Customer. It is important that this is fully considered in any proposed solution for this change, as using the whole site capacity for the banding of each MPAN could result in three higher bands being applied where the site has three MPAN each with different Suppliers, rather than three lower bands if the capacity was split, or a single higher band applied should all the MPANs be with the same Supplier.
- 1.3 Schedule 32 of DCUSA would appear to suggest that the site should be banded on the whole site's total capacity which leads to invoices quoting a (split) capacity that may not be aligned to the band the tariff is for.
- 1.4 However that may be unclear from an invoice validation perspective, and it could be preferable to change the band so that each billing account is billed based upon the capacity allocated to each MPAN.
- 1.5 This would lead to questions as to what should then happen if the MPANs become re-aligned.

How?

- 1.6 To include a clear definition of how a site with multiple MPANs which are registered to different Suppliers are treated for the allocation of their standing and capacity charges and also how they are banded.

Who?

- 1.7 DNOs, IDNOs, CVA Registrants and Suppliers would be impacted.

2 Governance

Proposers view on items that impact the progression of the CP

- 2.1 ☐ Tick this box if you feel that you are raising this change to try to address a current or imminent issue that has significant adverse commercial or safety implications or which would otherwise place Parties in breach of relevant regulations.
- 2.2 Do you believe this Change Proposal will have a significant impact on any of the following? (Select all that apply)
 - ☐ Electricity consumers
 - ☐ Supply
 - ☐ Distribution

- ☐ Generation
- ☐ Commercial activities connected with any of the above
- ☒ None of the Above

2.3 Do you believe this Change Proposal will? *(Select all that apply)

- ☐ Have a significant commercial impact on any a Party or Party Category or on customers
- ☐ Be likely to discriminate in its effects between at least one Party or another
- ☐ Be the subject of controversy between Parties
- ☐ Cause at least one Party to be in breach of this Agreement if not urgently addressed
- ☐ Change the governance or the change control arrangements applying to the DCUSA
- ☒ None of the Above

2.4 ☒ Tick this box if you either, haven't developed any proposed legal drafting or if you have, but you feel that further development will be required (i.e., via a Working Group)?

2.5 Although we have identified a problem, we believe that discussion in a working group would be appropriate to take this issue forward.

2.6 Proposer's view on prioritisation

Prioritisation Criteria	High Impact
Strategic Direction Statement Alignment: The CP strongly supports key government energy policy actions that require immediate progress and aligns with SDS priorities under the Act Now category.	No
Complexity: The CP is highly complex, with a fast-approaching deadline, significant implementation challenges, and a requirement for extensive stakeholder engagement.	Yes
Importance: The CP addresses a high-risk or critical issue, making timely action important for stakeholders as it is anticipated to deliver substantial benefits and value.	No
Priority Category (To be considered High priority all 3 Criteria must be High Impact.)	Standard Priority

2.7 We believe this change proposal should be prioritised as Standard priority as it does not obviously align with the SDS, is not overly important but could be considered quite complex (each as described in the guidance document).

Code Admin view on progression route for this CP

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

- Be treated as a Part 2 Matter;
- Be treated as a Standard Change; and
- Proceed to the Definition phase via a Working Group for further development.

- 2.9 In line with the Proposer's response to the above items we have indicated that it be treated as a Part 2 Matter, however, the Panel may wish to consider whether it should be a Part 1 Matter as it relates to the Charging Methodologies which are usually subject to Ofgem approval.

3 Reasons for raising the Change Proposal

- 3.1 As the existence of sites with multiple MPANs split across different Suppliers is largely invisible in DCUSA there is likely to be a variety of solutions in place across different DNOs / IDNOs and this change would look to put into place a clear definition of how the site is treated for the allocation of its total capacity (as detailed in to the connection agreement) and also how and on what basis the billing accounts should be banded.

4 Solution and Legal Text

Solution Overview

- 4.1 There are a number of possible solutions which could be utilised.
- 4.2 It could be that unless specifically stated in the connection agreement the capacity is split evenly across the available MPANs. This might need to be changed subsequently if one or more MPANs were then de-energised (as DUoS is not charged to de-energised MPANs) - the capacity could be redistributed over energised MPANs or else it could simply be reduced to reflect that MPAN no longer being used. Does that change the connection agreement and if so it would need to be considered what would happen if that MPAN was later energised, particularly if the capacity was no longer available?
- 4.3 The banding could either be based upon the split capacity (which could be three band 2 sites instead of one band 4 site for example) or the split MPANs could be banded on the overall site capacity. It should also be considered how each MPAN would be reported for TNUoS purposes in the P402 report.

Legal Text Commentary

- 4.4 Due to the solution not being determined no proposed legal text has been provided. However we believe that a solution could be achieved with a note under clause 141 of schedule 16, as this issue also exists for EHV sites a similar note would also be required to be added to Schedules 17 & 18.

Addition/Amendment to DCUSA Owned Market Message (Data Flow) or Data Item

- 4.5 N/A

Market Message (Data Flow) / Data Item Commentary

- 4.6 N/A

5 Relevant Objectives

- 5.1 Our view as to which of the DCUSA Objectives would be better facilitated by the implementation of this Change Proposal is set out below.

DCUSA Charging Objectives

1) The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks	Positive
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)	Neutral
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
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	Positive
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	Neutral
6) That compliance with the Charging Methodologies promotes efficiency in its own implementation and administration.	Positive
5.2 We believe that this change would better facilitate DCUSA Charging Objectives 1, 3, 4 & 6 as a result of ensuring that there is consistent treatment	

6 Impacts & Other Considerations

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

- 6.1 We do not believe that this CP impacts upon any current SCR or other significant industry change projects.

Impacts on Other Codes

- 6.2 We have considered whether any other industry codes might be impacted as a result of this Change Proposal, and our initial view is set out below.

Grid Code.....	<input checked="" type="checkbox"/>	SEC...	<input checked="" type="checkbox"/>	CUSC...	<input checked="" type="checkbox"/>	None.....	<input checked="" type="checkbox"/>
Distribution Code...	<input checked="" type="checkbox"/>	REC....	<input checked="" type="checkbox"/>	BSC.....	<input checked="" type="checkbox"/>		

Impacts on DCUSA Owned Data Flows

6.3 We do not believe that this change will require any amendments to DCUSA owned Data Flows (Market Messages) or the applicable Scenario Variants or any Data Items.

Consumer Impacts

6.4 We do not believe that this change will impact consumers.

Environmental Impacts

6.5 In accordance with DCUSA Clause 10.4.5A, we have assessed whether there would be a material impact on greenhouse gas emissions if this CP were implemented. We have not identified any material impact on greenhouse gas emissions from the implementation of this CP.

7 Implementation

Lead Time for Implementation

7.1 We believe that this change (if approved) can take effect on the next release, subject to any system changes required adding a sensible lead time.

Proposed Implementation Date

7.2 Next release following approval and lead time

8 Recommendations

The Code Administrator will provide a summary of any recommendations/determinations provided by the Panel in considering the initial Change Proposal. This will form part of a Final Change Report.