

DCP 424

‘USE OF SYSTEM CHARGING FOR COMPLEX SITES’

COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

Company	Confidential/ Anonymous	1. Do you understand the intent of Change proposal?	Working Group Comments
SSE Energy Supply Limited	Non- Confidential	<p>We note that DCP424 is consequential to BSC proposal P441, together with REC proposal I0268.</p> <p>We understand that DCP424 seeks to ensure that certain types of distribution network DUoS payers (as initially identified by the P441 Working Group) do not inadvertently pay the incorrect (too low) amount of DUoS as a consequence of P441.</p>	
BU-UK	Non- Confidential	Yes.	
Eon Next Ltd & Npower Commercial Gas Ltd.	Non- Confidential	Yes	
NPg	Non- Confidential	Yes.	
SPEN	Non- Confidential	Yes	
Stark	Non- Confidential	Yes	

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British Gas	Non-Confidential	Yes we understand the intent of the Change Proposal	
UKPN	Non-Confidential	Yes	
Energy Local CIC	Non-Confidential	Yes, this allows for correct charging of DUoS within a complex site.	
Working Group Conclusions: All respondents understood the CP.			

Company	Confidential/Anonymous	2. Are you supportive of the principles of the change proposal?	Working Group Comments
SSE Energy Supply Limited	Non-Confidential	We are supportive of the principle that distribution network users’ DUoS bills should not change as a result of P441, as this is not an intended outcome of P441.	
BU-UK	Non-Confidential	Yes, in principle we support the concept of transitioning to an approach where separate billing of import and export consumption is implemented, as we agree that a separated approach is beneficial.	
Eon Next Ltd & Npower Commercial Gas Ltd.	Non-Confidential	No – there is gaps in this solution that only facilitate HH data provisioned for under the current market arrangements, as opposed to MHHS for which some suppliers have already commenced migration too. This Change proposal will be so short lived it begs the question as to why any supplier	

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		would actually make use of it, as it poses a contractual & customer risk to those customers that will have to move to MHHS arrangements from October 2026 when the wider Complex sites in existence are also to commence migration, which are in themselves a problem to identify and the lack any enduring transitional or enduring MHHS arrangements being proposed under this CP only places future uncertainty to anyone who chooses to take it up for these customers.	
NPg	Non-Confidential	Yes. We support a DCUSA change being in place so that the DUoS charging remains the same if BSC change P441 is approved and implemented.	
SPEN	Non-Confidential	Yes	
Stark	Non-Confidential	Yes	
British Gas	Non-Confidential	We are supportive of the principles that support this Change Proposal.	
UKPN	Non-Confidential	We have a number of concerns related to this change proposal. Firstly where customers are no longer paying DUoS charges, the allowed revenue of the DNO which will remain unchanged still needs to be recovered which will result in all other customers paying more, the size of any increase will become larger as more complex sites exist, is this fair on the wider group of customers?	

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		We are also concerned that there seems to be no guarantee that an end consumer will actually see the real savings and it could allow the generator to maximise any savings themselves and result in the customer saving nothing or even end up paying more, we believe that this needs to be fully considered and appropriate assurances put into place.	
Energy Local CIC	Non-Confidential	Yes, this is the most efficient means of managing these charges whilst enabling complex sites and local energy markets that will facilitate the network and market to be run more efficiently.	
<p>Working Group Conclusions: Seven responders were supportive of the CPs principles with comments stating that separating import and export would be beneficial, the new process would increase efficiency and another stating that they were supportive of the principle that distribution network users’ DUoS bills should not change as a result of P441, as this is not an intended outcome of P441.</p> <p>One respondent that didn’t support the principles of the change highlighted that sites which would be eligible to be classed as a complex site would have to have migrated to MHHS by late October 2026, and as this CP currently wasn’t looking to deal with the process post MHHS, it begged the question as to whether suppliers would feel the benefit in the here and now.</p> <p>It was explained that this does appear to be a specific issue with the DCUSA CP’s legal text as it references measurement class ids as well as well as DTC flows, which won’t be used in the MHHS world.</p> <p>The Working Group noted these risks and as it was confirmed that the BSCP mod, which is the lead mod for the cross-code changes, has an implementation date of November 2026, it made sense to take this change wider and cover MHHS migrated sites.</p> <p>Another responder didn’t explicitly say whether they supported the principles of the change or not, but they did highlight that they had concerns about the change.</p> <p>These concerns were that the allowed revenues of the DNO will remain unchanged but would still need to be recovered which could result in all other customers paying more. It was also noted that this issue would grow as more complex sites come into existence.</p>			

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They were also concerned that there seemed to be no guarantee that an end consumer would see any real savings, and that generators could keep these savings to themselves. This could result in the customer making no savings at all and in some potential cases, paying more.

The Working Group member whose organisation wrote this response highlighted that they’d only responded to the DCUSA consultation, and not the REC or BSC consultation due to time constraints and made the Working Group aware that their responses are for the overall changes, so includes concerns in relation the BSC, REC and DCUSA processes.

The Working Group acknowledged these concerns and agreed that these were probably more specific to the BSC change and drew attention to the fact that DCP 424 was looking to make sure that everyone was paying the correct amount of DUoS and not to avoid it. It was further noted that a lot of effort had been put into P441 to make sure the process was robust enough to mitigate any potential gaming risks.

In relation to the risk that customers might not see the savings, or end up paying more, the proposer also highlighted that there are mitigations in P441 and that customers are not forced to enter into a complex site agreement, unless they wanted too.

The Elexon Working Group member supported the proposers view that there are several safeguards within P441 to mitigate the risks highlighted and drew particular attention to the fact that a requirement of P441’s delivery is to conduct a post implementation review to ensure the process is working as intended and no gaming is taking place.

It was also highlighted that customers in a complex site agreement could leave it at any time and switch supplier if they wished to do so.

Company	Confidential/ Anonymous	3. Do you agree with the solution for Measurement Class F and G customers in a Class 5 Complex Site, to receive MPAN counts on the D0030 and to receive aggregated volumes on the D0036? Please provide your rationale.	Working Group Comments
SSE Energy Supply Limited	Non-Confidential	We do not believe that the use of pseudo MPANs is practical as a solution whilst the industry is in transition to MHHS. Once a supplier has qualified for MHHS, they are required to register any new connections as MHHS.	

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		The earliest this solution could be implemented would be 25th June 2026, by which time all SIT and wave 1 suppliers would be qualified and, therefore, would be unable to register the pseudo MPANs as measurement class F or G. By 28th October 2026, all suppliers are expected to be MHHS qualified and so no pseudo MPANs could be registered as measurement class F or G.	
BU-UK	Non-Confidential	No comment.	
Eon Next Ltd & Npower Commercial Gas Ltd.	Non-Confidential	No we do not agree with the solution. HHDC does not have a working knowledge of DUoS tariffs for Mpans supplier appoints nor is readily available data to them, they also do not perform any form of aggregation of HH data so these would be both new & undefined requirements that need to be laid out in BSCP 502 to become an obligated the requirement on the user/supplier. The consultation document infers a D0036 against a pseudo MPAN will be used for (DUoS) billing so if that is the intent then this should be reflected in BSCP 502, facilitated via P441, in its absence it does compliment the intent of the DCUSA legal text.	
NPg	Non-Confidential	<p>Yes, although it is not clear why the aggregated volumes cannot be added to the D0030 flows.</p> <p>Assuming there is a reason for this then it makes sense for the MPAN counts to remain on the D0030, as this will ensure the correct MPAN counts are maintained, and for the units aggregated by tariff to be on the D0036 as this will maintain the correct units for each tariff type.</p>	

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SPEN	Non-Confidential	Yes, the HH consumption provides the HH 48 periods, although this may need to be reviewed for MHH.	
Stark	Non-Confidential	Agree with the solution as it resolves the netting-related billing challenge by separating MPAN identification from energy volume reporting, ensuring correct charges for F and G customers even within complex netted sites.	
British Gas	Non-Confidential	We currently use the D0275 (Validated Half Hourly Advances) to process aggregated volumes.	
UKPN	Non-Confidential	Yes, we are comfortable with this approach although as noted in our response to Q11 this is not reflected in the legal text as drafted.	
Energy Local CIC	Non-Confidential	Yes this is the most efficient manner to enable DUoS to be charged and enable local energy markets that will help support the efficient operation of the distribution network.	
<p>Working Group Conclusions: Five respondents said they agreed with the solution highlighting that this is the most efficient way for DUoS to be charge and that this process improves the netting-related billing challenge by separating MPAN identification from energy volume reporting.</p> <p>Some responders who supported this solution raised attention to the fact that the process would need to be revisited for MHHS.</p> <p>The Chair advised that the legal text would be updated to include both migrated and unmigrated MHHS sites and then reissued for consultation.</p> <p>Another responder who didn't support this solution highlighted that consultation document infers a D0036 against a pseudo MPAN will be used for (DUoS) billing, but this isn't mentioned in the legal text.</p> <p>They went on to state that if that is the intent then this should be reflected in BSCP 502, facilitated via P441.</p>			

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The Elexon Working Group Member explained that there are references to the D0036 within the BSC so the legal text could be written to make reference to BSCP 502.

The chair agreed to reach out to this responder to discuss the comments further and noted that he would invite the Elexon Member to the discussion and any relevant points off the back of this discussion will be captured in the future legal text and change report.

One responder commented that they were comfortable with the suggested approach, but the legal text didn’t reference which flows the process uses. The Working Group agreed to update the legal text to clarify that the MPAN counts would be sent on the D0030 flow and the aggregated volumes would be issued on the D0036 flow.

Company	Confidential/ Anonymous	4. The Working Group identified two potential solutions for submitting gross demand data for class F and G sites in a Class 5 Complex Site to Distributors: <ul style="list-style-type: none">• to utilise Pseudo billing MPANs; or• to utilise Pseudo settlement MPANs. Are there any additional benefits and risks to each of these approaches not already identified by the working group? Please provide details.?	Working Group Comments
SSE Energy Supply Limited	Non-Confidential	We do not believe utilising pseudo MPANs is a workable solution, regardless of whether they are billing or settlement MPANs.	
BU-UK	Non-Confidential	If this CP is to be approved, the use of pseudo MPANs and the management of these would be a new process to be implemented and trained on within a business. This would also likely require some system adaptations and new processes to incorporate these as an identifiable category, with financial implications to be incurred in doing so.	

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Eon Next Ltd & Npower Commercial Gas Ltd.	Non-Confidential	<p>No we do not agree that gross data should be provided – for this data to be correct this needs to report the difference between Gross & net data to avoid double counting, this is because the net data will ultimately find its way into the D0030 whereas the gross data will include all metered volumes including the net volumes submitted into settlement.</p> <p>Pseudo billing Mpans – these are not made visible to the licenced supplier and so is not something we have any experience of and can only assume they exist in DNO billing systems. the example quoted of use in CVA sites is not visible to anyone else. The use of 4 digit Metering System Identifiers (MSIDs) is set out and they directly correlate to MSIDs registered in the Central Master Registration Service (CMRS) which is maintained by Elexon, those MSIDs directly correlate with the CVA registered MSIDs contained in DNOs published Schedule of charges and other tables in limited numbers under Annex 2A & 2B respectively, in small numbers (due to the limited nature of Distribution connected CVA registered sites).</p> <p>As such we can only assume whatever these are used for is outside of the SVA arrangements, as the very nature of the type of consumers that would fall into this are via registered 13 digit Mpan core numbers all of which operate under the Supplier Master Registration Service (SMRS) arrangements with active registration data held in Ecoes – so we completely discount Pseudo billing Mpans as it makes no sense.</p> <p>Pseudo settlement MPANs – these seem to make some sense as they are used in UMS arrangements and in some limited instances for BSCP 550 Shared SVA metering arrangements.</p>	
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		<p>We could perceive a user case for the pseudo Mpans relevant to allocated to MC D – as this is only seeking to cater for volumetric charging elements which the UMS arrangements do lend themselves better for the purpose proposed, however this would also require:</p> <ul style="list-style-type: none">• A mirrored UMS Domestic Aggregated (Related MPAN)• A Mirrored UMS non-Domestic Aggregated (Related MPAN) <p>This would avoid the need for many Pseudo Mpans (up to 5 non-domestic/MC G) to be aggregated as these tariffs already do not include a fixed charge as by their nature would ordinarily be attached to a site picking up a site charge on one of the other 5 aggregate non-domestic tariffs or domestic tariff.</p> <p>However the main problem with this approach is that this will require each DNO to obtain a derogation from Ofgem in order to meet the proposed implementation date, this is because of the 15 month DUoS tariff publishing requirement which by the time this modification completes its further development will need to amend charging years 2026-27, as well as 2027-28 and at the time of writing the latter are yet to be published.</p>	
NPg	Non-Confidential	<p>There is a risk that a pseudo settlement MPAN used in the D0036 for billing purposes could be registered by a Supplier erroneously.</p> <p>A pseudo billing MPAN would not be visible to Suppliers apart from on the invoices so the risk of a this happening is removed.</p>	

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Stark	Non-Confidential	<p>Using pseudo billing MPANs for DUoS charging offers benefits such as clearer separation of billing from settlement processes, improved transparency for customers by reflecting gross consumption, and flexibility to adapt to future tariff structures without impacting settlement systems. In contrast, pseudo settlement MPANs maintain consistency between DUoS billing and settlement data, support complex site aggregation, and align with BSC flows to reduce disputes.</p> <p>However, both approaches carry risks: pseudo billing MPANs introduce data governance complexity, potential for double counting, and regulatory compliance challenges, while pseudo settlement MPANs involve significant system integration costs, possible distortion of loss adjustment and group correction factors, and increased supplier settlement risk due to impacts on imbalance positions and credit cover calculations.</p>	
SPEN	Non-Confidential	<p>Pseudo Settlements MPAN are visible in MPRS/ ECOES system and standard registration processes apply including supplier appointment, energisation and disconnection. HH consumption via the D0036 is provided by the appointed data collector for the HH Settlement MPAN and any changes to this consumption is managed by this party. Utilisation of this solution would provide visibility rather than utilising what is essentially on ‘offline’ process.</p> <p>Pseudo billing MPANs are created by the DNO DUoS billing team using a manual update processes for creation of MPANs and assignment of suppliers and data collector. These MPANs will require the manual upload of D0036 flows from excel files.</p>	

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		The pseudo billing MPANs are not designed for continual changes to HH consumption, however the pseudo settlement MPANs can manage this process.	
British Gas	Non-Confidential	We have no identified any additional benefits or risks.	
UKPN	Non-Confidential	We currently have sites which have been set up using Pseudo Billing MPANs and we have never received the data as expected and so in our experience this arrangement should not be utilised for the potentially wide scale use which could be brought about by this change proposal. We believe that Pseudo Settlement MPANs would be a better approach, it would also provide all parties with visibility of the MPANs in ECOES.	
Energy Local CIC	Non-Confidential	No additional benefits or risks.	
<p>Working Group Conclusions One responder noted that they did not believe using pseudo MPANs was the right approach regardless of whether they are billing or settlement MPANs.</p> <p>This responder went on to state within the Working Group that this was due to the MPANs not being visible in the registration system and also that they would be charged agent fees.</p> <p>Some responders mentioned that they were concerned that if pseudo settlement MPANs were used this could lead to double counting of the volumes included with the flows. It was noted that this has been raised before and these type of MPANs are clearly identifiable as pseudo MPANs so this would mitigate the double counting risk.</p> <p>It was also noted that if pseudo billing MPANs approach was adopted, this would also mitigate the double counting risk, as suppliers wouldn't have visibility of these MPANs.</p>			

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It was noted that pseudo billing MPANs are not registered in MPRS/ECOES.

Due to the above, it would also mean that pseudo billing MPANs wouldn't incur agent fees as these MPANs wouldn't be visible.

The Npower/Eon response raised a number of points, which the chair noted he would take up with the responder as part of the wider action to discuss some of the responses to the consultation with responders who weren't present at the Working Groups. The chair will represent the relevant points from this discussion in all future legal texts and documents

For those who preferred pseudo settlement MPANs, reasons given were a greater visibility and because they currently have formal process in place for changes but carry the risk of double counting.

For those who preferred pseudo billing MPANs reasons given were they are easier to create, and the double counting risk doesn't exist as these MPANs aren't visible to suppliers.

It was stated that BSCP 550 has built in safeguards that stop pseudo MPANs being used in double counting as it directs that pseudo MPANs multipliers in the MTDs are set to 0.

The Elexon Member also went on to state that the BSC code was written at a high enough level to not hard code the use of pseudo MPANs as this future proofs the process.

It was noted that within the DCUSAs legal text it could state that for legacy MPANs 'Please refer to pseudo MPANs in BSEP 550'.

This would also future proof the DCUSAs legal text as if pseudo MPAN became a defined term in the DCUSA, this would need updating if the BSC changed its definition to ensure the codes were aligned.

In the main, there was support for the use of pseudo MPANs to be used to record/spilt volumes and counts.

Company	Confidential/ Anonymous	5. Which of the two approaches of using Pseudo billing or pseudo settlement MPANs do you prefer? Please provide your rationale.	Working Group Comments
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SSE Energy Supply Limited	Non-Confidential	As per our previous answer, we do not have a preference for either billing or pseudo MPANs.	None
BU-UK	Non-Confidential	Although we don't have a strong preference on either approach, we have concerns overall about the implied necessity of manual oversight required in either scenario. The manual oversight that we foresee is in ensuring the affected MPANs are correctly identified, correctly treated, and to ensure that there are no double counted connections due to the use of pseudo MPANs within settlement / billing.	No preference.
Eon Next Ltd & Npower Commercial Gas Ltd.	Non-Confidential	With our response to Q5 in mind the solution really can only be based on Pseudo Settlement Mpans. However we openly question if the amount of additional work to provision this within the DUoS charging arrangements is Actually beneficial when this would only facilitate arrangements of a limited time prior to MHHS migration, as MHHS is already seeing customers migrate and it a full migration of commencing in October 2026 a full set of industry migrations will commence and complete by May 2027.	Settlement
NPg	Non-Confidential	Pseudo billing MPAN would be preferable because the reads are to be used for billing and not for settlements. This removes the risk that a supplier registers the pseudo MPAN erroneously.	Billing
SPEN	Non-Confidential	SPEN believe that the creation of a Pseudo Settlement MPAN is the best option as this gives a greater level of visibility and traceability. Supplier registration and consumption changes are clearly defined and understood by all parties. This MPAN can be migrated into MHH, by the supplier and appropriate HH agents re-appointed. The MPAN registration details are easily obtainable by DNO and the appointed supplier via ECOES	Settlement

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Stark	Non-Confidential	Pseudo billing MPANs are the preferred approach because they: <ul style="list-style-type: none"> • Meet the requirement for aggregated DUoS billing volumes. • Minimize system changes and governance complexity. • Align with DCUSA processes without impacting settlement. 	Billing
British Gas	Non-Confidential	We do not have a preference.	No preference
UKPN	Non-Confidential	As stated in our response to Q4 we support the use of Pseudo Settlement MPANs for the reasons stated above.	Settlement
Energy Local CIC	Non-Confidential	There is less risk to a Pseudo billing MPANs causing confusion than a Pseudo Settlement MPAN that will also be used for other purposes in settlement but either could work.	Both
<p>Working Group Conclusions: Three responses stated they preferred pseudo settlement MPANs, two said they prefer pseudo billing MPANs, three had no preference and one said neither.</p> <p>It was concluded that the benefit of using pseudo settlement MPANs were that they are visible to all parties and have robust processes on their sue and changes.</p> <p>The main con was that with improved visibility, the risk of double counting was increased. It was noted however thr Working Group member from Elexon had already said that there are strong controls in place to mitigate the double counting risk.</p> <p>Pseudo billing MPANs are not visible to suppliers which removes any double counting risk but the lack of visibility of these MPANs does create challenges for suppliers.</p>			

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Company	Confidential/ Anonymous	6. Distributors Only-What is the process for a Supplier to request both pseudo billing and pseudo settlement MPANs? This will be a scenario that would only arise if the option to use pseudo billing MPANs was taken forwards.	Working Group Comments
SSE Energy Supply Limited	Non-Confidential	N/A	
BU-UK	Non-Confidential	N/A	
Eon Next Ltd & Npower Commercial Gas Ltd.	Non-Confidential	N/A	
NPg	Non-Confidential	Ad hoc, dependent of site. Supplier contacts the DNO when complex site is put in place. The need for pseudo settlement or pseudo billing MPANs is usually identified internally or flagged due to a metering dispensation being put in place or a new CVA site being created.	
SPEN	Non-Confidential	There is no single process for suppliers to request these additional pseudo settlement MPAN at this point. There are various internal processes that a Supplier/Customer/Agent can contact the DNO in relation to their existing/planned arrangements. We are of the view that a robust process would need to be introduced/agreed, this process would need to be defined by the DNOs depending on implementation of this DCP.	

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		The pseudo billing MPAN is created and maintained by the SPEN Energy Income billing team, this is a very manual, and essentially “offline” process.	
Stark	Non-Confidential	No comment.	
British Gas	Non-Confidential	No comment.	
UKPN	Non-Confidential	We would request that an email is sent detailing the site(s) in question where we can verify the request and would then raise the pseudo MPANs and provide these details to the party requesting them.	
Energy Local CIC	Non-Confidential	N/A	
Working Group Conclusions: Of those who responded it was noted that the request to create a pseudo MPAN is received and then the process to create them is manual. Once the MPANs are created the distributor provide the details to the party requesting them.			

Company	Confidential/ Anonymous	7. Distributors only- How do distributors identify pseudo settlement and pseudo billing MPANs.	Working Group Comments
SSE Energy Supply Limited	Non-Confidential	N/A	

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BU-UK	Non-Confidential	N/A	
Eon Next Ltd & Npower Commercial Gas Ltd.	Non-Confidential	N/A	
NPg	Non-Confidential	Settlements have pseudo in address. Billing MPANs have specific make up of MPAN and for CVA there is a flag in Durabill. Registers of pseudo settlement MPANs and pseudo billing MPANs are also maintained.	
SPEN	Non-Confidential	<p>For a pseudo settlement MPAN, SPEN’s internal process is currently to include reference to this in the first line of the address field. This information is identified when this has been ratified by an engineer. As per question six we believe this part of the process would also need to be agreed by DNOs to ensure consistency.</p> <p>Pseudo Billing MPAN have a non-standard format where DNO area two digit XX area number non-standard number format that is different from the DNO system generated MPANs. This MPAN must be able to be verified by the billing system.</p> <p>The LLFC and tariff id use non-standard letters and numbers that are not published in the LC14 statement of charges or schedule of charges. The LLFC and the tariff IDs are mapped on the system for billing purposes.</p>	

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Stark	Non-Confidential	<p>Pseudo Settlement MPANs are flagged in settlement systems and linked to the original boundary MPAN but carry gross consumption data rather than net values.</p> <p>Pseudo MPAN will appear in settlement reports alongside the original MPAN with zero volumes on D0030 flows but populated volumes on D0036/D0275 flows.</p> <p>Pseudo Billing MPANs are created outside settlement for DUoS billing purposes only, allowing LDSOs to invoice based on gross consumption without altering BSC settlement data.</p> <p>They are identified through distributor billing systems and flagged as non-settlement MPANs, often using a distinct MPAN suffix or internal marker to differentiate them from live settlement MPANs.</p> <p>The pseudo billing MPAN is associated with the same site and Line Loss Factor Class (LLFC) as the original MPAN but is excluded from settlement flows entirely.</p>	
British Gas	Non-Confidential	No comment.	
UKPN	Non-Confidential	After the first two digits of the MPAN to identify the DNO region, we have a different range of numbers used to identify a site as being a pseudo MPAN, we would also need to flag it with a different LLFC to allow for reporting purposes.	

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Energy Local CIC	Non-Confidential	N/A	
<p>Working Group Conclusions: For those who responded it was concluded that pseudo settlement MPANs have pseudo in address.</p> <p>Pseudo billing MPANs have specific make up of MPAN and for CVA there is a flag in the billing system.</p> <p>Registers of pseudo settlement MPANs and pseudo billing MPANs are also maintained.</p>			

Company	Confidential/Anonymous	8. For Suppliers Only – How do Suppliers identify if an MPAN is a pseudo settlement or pseudo billing MPAN?	Working Group Comments
SSE Energy Supply Limited	Non-Confidential	The only pseudo MPANs we are currently aware of are pseudo billing MPANs for shared SVA sites (BSCP550). These are identified by a unique meter timeswitch class, but this option is not available for MHHS registered MPANs.	Responder noted in the working group they meant pseudo settlement MPANs as Pseudo Billing MPANs are not referenced in BSCP 550.
BU-UK	Non-Confidential	N/A	
Eon Next Ltd & Npower Commercial Gas Ltd.	Non-Confidential	As per response to Q5 we have never seen in industry a pseudo billing MPAN – this is likely to be concept that only exists internally within market participants systems so that CVA registered sites can be set up and look like all other Mpans registered in SVA.	
NPg	Non-Confidential	N/A	

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SPEN	Non-Confidential	N/A	
Stark	Non-Confidential	N/A	
British Gas	Non-Confidential	We are able to identify pseudo MPANS as they do not follow the standard configuration that normal MPANS have.	
UKPN	Non-Confidential	No comment.	
Energy Local CIC	Non-Confidential	N/A	
<p>Working Group Conclusions: One responder noted that these are identified by a unique meter timeswitch class, but this option is not available for MHHS registered MPANS.</p> <p>Another responder noted that they can identify pseudo MPANS as they do not follow the standard configuration that normal MPANS have.</p>			

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Company	Confidential/ Anonymous	<p>9. Which option should be used to ensure pseudo MPANs do not incur additional fixed charges:</p> <ul style="list-style-type: none"> - apply a set of tariffs with the existing unit charge and a zero fixed charge to the pseudo MPAN - apply a flag in the billing system to ensure the pseudo MPAN does not incur a fixed charge. - Is there another alternative solution that the Working Group haven't considered. If so please provide details. <p>Please provide your rationale..</p>	Working Group Comments
SSE Energy Supply Limited	Non-Confidential	Please refer to our answers to previous questions.	Non
BU-UK	Non-Confidential	We do not have a preference.	Either
Eon Next Ltd & Npower Commercial Gas Ltd.	Non-Confidential	As per our response to Q5 - apply a set of tariffs with the existing unit charge and a zero fixed charge to the pseudo MPAN which can be based on the related Mpan tariffs for domestic & non-domestic.	Pseudo Settlement using a set of new tariffs with exiting unit charges.
NPg	Non-Confidential	<p>Our preferred option is to apply a flag in the billing system to ensure the pseudo MPAN does not incur a fixed charge. There is already an existing flag to exclude fixed charges in Durabill. An additional flag may be needed to identify the MPAN as part of a complex site.</p> <p>Applying a set of tariffs with the existing unit charge and a zero fixed charge would require a new set of tariffs to be output from the CDCM models,</p>	<p>Utalise a flag to highlight the site is pseduo and part of a complex site. This would not require any changes to modeling/CDCM</p> <p>The other solution would entail CDCM changes so would require some modelling support from CEPA/TNEI</p>

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		<p>which would a modelling request to CEPA/TNEI to update the models appropriately. This would also require new LLFCs/Tariff IDs to be raised in MDD/ISD for these tariffs.</p> <p>At present the CDCM includes “Aggregated or CT” tariffs, which can be used in both site specific (HH) and aggregated (NHH) billing. This tariff includes the unit and fixed charge elements, but no capacity or reactive charge elements (ie it allows a NHH tariff structure to be applied in HH billing, for specific MPANs). This tariff can only currently be used for HH sites which are migrating from NHH to HH and protected under part 4 of Schedule 16 of the DCUSA. Extending the use of this tariff to MPANs in these complex sites and using a flag in the billing system to make sure no fixed charge is applied would mean the MPANs are billed correctly with no changes to the CDCM model or new LLFCs/Tariff IDs required.</p>	
SPEN	Non-Confidential	<p>SPEN see that the only workable option is to apply a set of tariffs with the existing unit charge and a zero fixed charge to the pseudo MPAN. We are not able to apply a flag on the MPAN to prevent the billing of standing charges on a standard HH tariff.</p> <p>We have not identified any alternative solutions.</p>	Pseudo Settlement using a set of new tariff with exiting unit charges.
Stark	Non-Confidential	<p>Between the two options, the preferred approach is to apply a flag in the billing system to ensure the pseudo MPAN does not incur a fixed charge. This approach is simpler and more efficient than creating separate zero-fixed-charge tariffs, as it avoids tariff proliferation, reduces governance complexity, and allows greater flexibility for future DUoS changes. It also</p>	Apply a flag. Simpler to implament and is future proofed.

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		ensures consistent treatment of pseudo MPANs without introducing additional tariff codes that could confuse suppliers or customers.	
British Gas	Non-Confidential	We would be happy with either option.	Either
UKPN	Non-Confidential	We would not want to see any changes to the CDCM which are not required, which we do not believe they are for this change. We believe that having a flag in the billing system to only apply the required elements of a tariff rather than all which would otherwise be the case, however this might require a system change which could result in a longer lead time being required.	Apply a flag. Simpler to implament and is future proofed.
Energy Local CIC	Non-Confidential	None identified.	
<p>Working Group Conclusions: 3 responders supported using a flag as this solution was easier to implement, easier for all parties including customers to understand and would not require any changes to the CDCM.</p> <p>2 responses said using a set of new tariff with exiting unit charges and a zero fixed charge.</p> <p>2 responders said either,</p> <p>1 Said neither,</p> <p>1 provided no response.</p>			

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Company	Confidential/ Anonymous	10. Are there any additional/potential impacts to residual charging that the Working Group haven't considered?	Working Group Comments
SSE Energy Supply Limited	Non-Confidential	We haven't identified any.	
BU-UK	Non-Confidential	Not that we are aware of.	
Eon Next Ltd & Npower Commercial Gas Ltd.	Non-Confidential	<p>Yes.</p> <p>The pseudo Mpan taking DUoS volume out for charging is fine for recovering the cost set in the DUoS tariff but not for residual cost setting & recovery – this is especially true for non-domestic as the residual band allocation is based on the EAC value per site for all non-domestic Aggregated DUoS tariffs, which is informed through the settlement processes via Elexon's P0222 report on MC G.</p> <p>The gross data will not be visible to settlement so the EAC value it produces will be misinformed, so when used to inform the residual band when</p> <ul style="list-style-type: none"> • the Annual Allocation Review is conducted for newly connecting sites (roughly 12 months post new connection). • The Residual band thresholds review – year 3 of every 5-year price control (this has been completed in 2024 and won't be done again until April 2029 so only matters if adopted into MHHS arrangements) • If consumption changes by +/- 50% since allocated to its residual band via the 2 methods above (exceptional circumstances) 	

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		<p>Under these circumstances the volume billed for DUoS via pseudo MPAN but not entering settlement will not be captured for either review processes, meaning that non- domestic customers may make use of this arrangement to reduce consumption and in turn benefit from moving down residual charging bands.</p> <p>As such making use of class 5 complex sites under these arrangements presents a potential gaming opportunity which the TCR SCR was put in place to prevent.</p>	
NPg	Non-Confidential	No. As long as the MC G reads are still available and there is no impact on the P222 data received from Suppliers there should be no impact on residual charge calculations.	
SPEN	Non-Confidential	The annual consumption for non-final demand MPANs is included the NETSO report, MC F & MC G are included in the Domestic banding based on the D0030 flows. All HH import MPANs will need to have banding unless they are defined as non-final demand.	
Stark	Non-Confidential	One consideration is that while MPAN-level data will remain available, any delays or inaccuracies in data provision—particularly for Measurement Class G—could affect the integrity of band reviews and allocations, leading to potential misclassification risks.	
British Gas	Non-Confidential	We have not identified any additional/potential impacts.	

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UKPN	Non-Confidential	There should be no impact upon these arrangements, the data to band customers on Measurement Class G is currently received by DNOs from Electralink and so it would be worth making sure that they do not have any concerns that these sites would not be included in the dataset which could result in them being banded and charged where they shouldn't be.	
Energy Local CIC	Non-Confidential	None identified.	
<p>Working Group Conclusions: Six responders said there would be no additional impacts to residual charging.</p> <p>One of these six responders noted that as long as the MC G reads are still available and there is no impact on the P222 data received from Suppliers there should be no impact on residual charge calculations.</p> <p>A supplier response stated that the gross data will not be visible to settlement so the EAC value it produces will be misinformed, so when used to inform the residual band it may create issues.</p> <p>The Chair had already taken an action to speak with this responder offline to explore the comments in greater detail as the Working Group weren't sure on how or why this risk could happen.</p> <p>One responder noted that one consideration is that while MPAN-level data will remain available, any delays or inaccuracies in data provision—particularly for Measurement Class G—could affect the integrity of band reviews and allocations, leading to potential misclassification risks.</p> <p>Another responder noted that the annual consumption for non-final demand MPANs is included in the NETSO report, MC F & MC G are included in the Domestic banding based on the D0030 flows. All HH import MPANs will need to have banding unless they are defined as non-final demand.</p>			

Company	Confidential/ Anonymous	11. Do you have any comments on the drafted legal text?	Working Group Comments
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SSE Energy Supply Limited	Non-Confidential	No.	
BU-UK	Non-Confidential	We have reviewed the legal text and consider it consistent with the intent of this CP.	
Eon Next Ltd & Npower Commercial Gas Ltd.	Non-Confidential	<p>Yes . The DCUSA redline legal text provided in this consultation conflicts with BSCP 502 :</p> <ol style="list-style-type: none"> 1. this seems to set an expectation that HHDC perform some form of aggregation method and have knowledge of which Mpans relate to existing DUoS tariffs, so only sets out the requirement (via 4.9.6) that HHDC must submit the gross metered volumes for each specific Metering System within the Class 5 Complex Site to the LDSO against the Pseudo Secondary MSID for that particular Metering System”. How will the HHDC know which Pseudo Mpan relates to which DUoS tariff particularly in instances of domestic/non-domestic splits? 2. The “User” being the licensed supplier does have a working knowledge of DUoS tariffs, however it will only receive the net data so cannot meet the obligation under this solution. In addition, a Scenario variant change would be needed as suppliers cannot generate the D0036/D0275 dataflows even if Gross data was provided to the licenced supplier by some other means, meaning further change is required elsewhere in the industry code landscape if pursued. 3. In addition, P441 does not explain or offer any insight as to what the HHDC should do procedurally with the HH data it “aggregates” 	

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		<p>into the Pseudo Mpan, whilst the intent is for it to only find its way into DNOs DUoS billing arrangements and nowhere else - the lack of this being set out in BSCP 502 only means that volumes reported into the pseudo Mpan will follow BAU procedure resulting in its volumes being sent to HHDA and aggregated and submitted into settlement in any case, resulting in both Net & gross data being counted in settlement resulting in double counting of volumes.</p> <p>These challenges may be considered as shortfalls in the BSC legal text in the P441 solution however as DCP 424 is the change proposing use of Pseudo Mpans these are being highlighted here only on this basis.</p>	
NPg	Non-Confidential	<p>Depending on which option from Q9 above is used there would need to be changes to Schedule 16 to allow the solution to be implemented.</p> <p>Set of tariffs – requires the tariffs to be defined in Part 2 of Schedule 16</p> <p>Flag in Durabill – requires the use of the “Aggregated” tariffs in site specific billing to be expanded to include MPANs in these complex sites</p>	
SPEN	Non-Confidential	No	
Stark	Non-Confidential	<p>The drafted legal text for DCP424 appears to cover the core requirement: ensuring DUoS charges for Measurement Classes F and G within Class 5/6 Complex Sites are calculated correctly when netting occurs under BSC P441. One addition for consideration is the inclusion of a definition of pseudo MPANs and their governance under DCUSA.</p>	

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British Gas	Non-Confidential	We do not have any comments.	
UKPN	Non-Confidential	<p>We believe that the proposed changes to the legal text do not reflect what is stated in the consultation document. In paragraph 1.14 of the consultation document, it is clearly stated that the fixed charge would be calculated using the count of MPANs from the D0030, however this is not currently included in the legal text.</p> <p>We also believe that a clear definition of a complex site is included in the legal text for all impacted codes, or DCUSA for example refers to the BSC or where this is defined, which will avoid disputes or misunderstanding of who is (and isn't) able to be treated under these arrangements.</p> <p>Although not likely to be an issue in DCUSA we are concerned that where a complex site saw net demand, how would the Supplier(s) cascade the charges, this could happen where one demand customer uses a lot more energy than expected or where the generation on the site was not available for a period of time.</p>	
Energy Local CIC	Non-Confidential	No	
<p>Working Group Conclusions: Five responders said they had no comment.</p> <p>One responder highlighted that the fixed charge would be calculated using the count of MPANs from the D0030, however this is not currently included in the legal text.</p>			

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They also said they also believed that a clear definition of a complex site is included in the legal text for all impacted codes, or that the DCUSA refers to the BSC where this is defined, which will avoid disputes or misunderstanding of who is (and isn't) able to be treated under these arrangements.

Another responder noted that depending on which option from Q9 above is used there would need to be changes to Schedule 16 to allow the solution to be implemented such as below.

- Set of tariffs – requires the tariffs to be defined in Part 2 of Schedule 16
- Flag in Durabill – requires the use of the “Aggregated” tariffs in site specific billing to be expanded to include MPANs in these complex sites.

One responder noted that the DCUSA redline legal text provided in this consultation conflicts with BSCP 502 and went on to list a number of points within their response, these can be found within Attachment 1.

It had already been agreed that the Chair, and the Elexon representative would arrange a call with this responder offline to get great understanding of the response.

It was noted that the legal text will now be re-written in a way that carved out different treatments for migrated, and non-migrated MHHS sites. It was also noted that there had already been an agreement reached within the Working Group to have a reference in the DCUSA legal text to where in the BSC complex sites are defined.

Company	Confidential/ Anonymous	12. Do you believe are there further DCUSA schedules or legal text changes required to facilitate this change? Please provide further information if yes.	Working Group Comments
SSE Energy Supply Limited	Non-Confidential	Changes for the MHHS arrangements may be necessary.	
BU-UK	Non-Confidential	Not that we are aware of .	

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Eon Next Ltd & Npower Commercial Gas Ltd.	Non-Confidential	Yes – schedule 32 may need to be adapted in order to address the issues we have highlighted in response to Q10, in addition further development will be required to DCUSA schedule 16 to facilitate the use of differing & new tariffs.	
NPg	Non-Confidential	Yes. In order for NHH tariffs to be applicable for HH then a change is required to Schedule 16. See responses to Q9 and 11 above.	
SPEN	Non-Confidential	We are not aware of any further changes required to facilitate this change.	
Stark	Non-Confidential	Section 2 – Definitions Add a definition for “Pseudo MPAN” to describe its purpose and scope. Schedule 16 – Charging Methodology Insert clauses specifying that DUoS charges for Complex Sites are calculated on gross volumes represented by pseudo MPANs. Schedule 32 – Governance Define responsibilities for creation, maintenance, and validation of pseudo MPANs. Clarify that pseudo MPANs do not affect BSC settlement positions.	
British Gas	Non-Confidential	We do not believe that any further schedule or legal changes are required.	
UKPN	Non-Confidential	No, we believe all the necessary changes to the legal text would be part of Schedule 16 only.	

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Energy Local CIC	Non-Confidential	No	
<p>Working Group Conclusions: Five responses stated there were no other schedules that needed to be updated as part of this change.</p> <p>A supplier response noted that changes for the MHHS arrangements may be necessary, which the Working Group had already agreed to consider.</p> <p>A separate supplier response stated schedule 32 may need to be adapted to address the issues they had highlighted in their earlier responses.</p> <p>One distributor highlighted that depending on the approach the Working Group took, in order for NHH tariffs to be applicable for HH then a change may be required to Schedule 16.</p> <p>An IDNO responses stated the following areas,</p> <ul style="list-style-type: none">• Section 2 – Definitions-Add a definition for “Pseudo MPAN” to describe its purpose and scope.• Schedule 16 – Charging Methodology-Insert clauses specifying that DUoS charges for Complex Sites are calculated on gross volumes represented by pseudo MPANs.• Schedule 32 – Governance- Define responsibilities for creation, maintenance, and validation of pseudo MPANs.• Clarify that pseudo MPANs do not affect BSC settlement positions. <p>The Working Group agreed to revisit this question once the solution was better understood as this will determine if some of the areas raised above will need to be address.</p> <p>It was however noted that the responsibility for how pseudo MPANs are created, maintain and used wouldn’t fall into the DCUSA.</p>			

Company	Confidential/ Anonymous	13. Do you consider the solution better facilitates the DCUSA objectives? Please give supporting reasons.	Working Group Comments
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SSE Energy Supply Limited	Non-Confidential	No, we do not believe the solution better facilitates the DCUSA objectives, as we don't believe it is workable under the MHHS arrangements.	None
BU-UK	Non-Confidential	We agree with the working group's assessment that charging objectives two, three and four are better facilitated by this change. As using gross data for charging, instead of net data which may be misleading, will ensure charges are non-distortive, cost reflective, and promote effective competition.	2, 3 and 4
Eon Next Ltd & Npower Commercial Gas Ltd.	Non-Confidential	<p>No we do not agree this solution better facilitates any of the DCUSA charging objectives.</p> <ul style="list-style-type: none"> • Charging objective 2 will distort competition in the generation and supply of electricity because the residual cost allocations we have highlighted in Q10, so is negative. • Charging objective 3 is neutral because there is no change currently proposed that would impact costs recovered in accordance with Charging Methodologies. • Charging objective 4 is negative as the proposed change only links to BSCP 502 and does neither define or outline what a complex site class 5 is or make it aware and visible to the DNO 	<p>None</p> <p>3, 4 are negatively impacted.</p>
NPg	Non-Confidential	We agree with the assessment in the consultation that Charge Objectives 2, 3 and 4 are better facilitated by this change, for the reasons stated in the consultation.	2,3 and 4
SPEN	Non-Confidential	Yes.	Yes

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Stark	Non-Confidential	<p>Agree with the workgroup views that the DCUSA Charging Objectives that are better achieved are:</p> <p>Objective 2: This objective is better achieved because the change ensures DUoS charges for customers within a Complex Site are based on actual consumption rather than misleading net values. It also prevents the incorrect application of Use of System charges to some or all customers within the arrangement.</p> <p>Objective 3: This objective is better achieved because suppliers serving customers at Complex Sites will incur charges broadly comparable to those for standalone customers. It eliminates competitive distortions that would otherwise arise from netting import and export values.</p> <p>Objective 4: This objective is better achieved because introducing Complex Site Class 5 will expand the number of applicable arrangements. Without clear regulatory guidance, there is a risk of inconsistent application of the CDCM across licensees. The proposed change ensures consistency and supports compliance with the CDCM.</p>	2, 3 and 4
British Gas	Non-Confidential	<p>We agree that the following DCUSA objectives are better facilitated</p> <p>Charging Objective two: better met, as the change will ensure that charges for customers within a complex site are not distorted by the application of inappropriate use of system charges in respect of some or all customers within the complex site arrangement.</p>	2, 3 and 4

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		<p>Charging Objective three: better met, as the change will ensure that the charges faced by suppliers supplying customers on a complex site are broadly equivalent to the charges faced by suppliers supplying the customer without complex site arrangements in place.</p> <p>Charging Objective four: better met, as the introduction of complex site class 5 will result in an increase in these kinds of arrangements for DNOs. Without the change and the regulatory clarity it seeks to create, there is a risk of a divergence in application of the common charging methodologies across DNO licensees.</p>	
UKPN	Non-Confidential	<p>We believe that DCUSA Charging Objective 2 is negatively impacted by this change. As all sites within a complex site would surely need to be with the same Supplier, or at least the choice of Supplier would be restricted, as not all would offer these arrangements, the Customers would not have the choice which they currently have.</p> <p>If a solution for MHHS migrated customers was also included as part of this change then we believe that DCUSA Charging Objectives 3 and 4 are better facilitated as it will ensure that appropriate charges are levied which will ensure that all parties are treated on a consistent basis. However, by not including MHHS migrated Customers as part of the same change we would be treating some customers on a different basis which would likely have a negative impact, and if that is not addressed, we believe that these three objectives are negatively impacted as a result of this change as currently drafted.</p>	<p>2 negative 3 and 4 positive if MHHS migrated customers are included.</p>

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Energy Local CIC	Non-Confidential	Yes this provides an efficient charging mechanism and 1) it enables compliance with charging mechanisms for class F and G. 2) enables competition in generation and supply by enable local energy markets whilst complying with charges 3) the implementation and compliance costs are practical using existing systems as much as possible. 4) it will take into account develop of DNO businesses and allow compliant charges whilst enabling DNOs to support local energy markets to run their networks more efficiently	2, 3 and 4
<p>Working Group Conclusions: Five responders stated that charging objectives 2,3 and 4 are better facilitated.</p> <p>One responder answered “yes” to this question.</p> <p>Another responder said charging objective 2 was negatively impacted however, if migrated MHHS customer are considered, then charging objective 3 and 4 would be better facilitated.</p> <p>A supplier commented that they did not believe the solution better facilitates any of the DCUSA objectives, as they don’t believe it is workable under the MHHS arrangements.</p> <p>Another supplier responded by saying none of the DCUSA objectives were better facilitated and went on to say charging objectives 3 and 4 would be negatively impacted.</p> <p>The Chair drew attention again to the fact that the legal text would re-written to include MHHS migrated customers.</p> <p>The responder who said charging objective 2 was negatively impacted stated that this was because they believed all the customers in a complex site would be locked into the same supplier as all the other MPANs.</p>			

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It was clarified that this would not be the case and if a customer wanted to leave the complex arrangement, they were well within their rights for this to happen.

With this in mind the Chair advised that customers being allowed to opt out of these complex arrangements would be included in future documents for this change, so it was clear that all customers in a complex site still had full access to the market.

Company	Confidential/ Anonymous	14. Are you aware of any wider industry developments that may impact upon or be impacted by this CP.	Working Group Comments
SSE Energy Supply Limited	Non-Confidential	MHHS implementation We note that this proposal applies only to the relevant MPANs prior to their migration to MHHS, and that a separate change proposal will need to be raised for MPANs once migrated (by October 2026). We would welcome this to happen soon to create the necessary clarity around billing DUoS charges correctly.	
BU-UK	Non-Confidential	Not at this time.	
Eon Next Ltd & Npower Commercial Gas Ltd.	Non-Confidential	Yes BSC Modification P442 as that facilitates supply exemption which has a purposeful use in local energy markets and community energy schemes within the market today, but without the need for further complicated time consuming & resource intensive cross code change that has been underdevelopment for a number of years and still counting.	

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NPg	Non-Confidential	Not at this time.	
SPEN	Non-Confidential	No	
Stark	Non-Confidential	DUoS Significant Code Review (SCR): Ofgem is reviewing DUoS charging principles to align with flexibility and net zero goals. Future DUoS methodologies could change, potentially requiring DCP 424 logic to be revisited.	
British Gas	Non-Confidential	We are not aware of any wider industry developments that may impact upon or be impacted by the CP.	
UKPN	Non-Confidential	None that we are aware of.	
Energy Local CIC	Non-Confidential	It was agreed that the impact of MHHS would have to be reviewed at a later date.	
<p>Working Group Conclusions: Several respondents noted MHHS.</p> <p>Others mentioned the wider Ofgem significant code review.</p> <p>Another highlighted BSC Modification P442.</p>			

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Company	Confidential/ Anonymous	15. What date do you believe this change proposal should be implemented? Please provide rationale.	Working Group Comments
SSE Energy Supply Limited	Non-Confidential	We do not think that this change should be implemented before MHHS. A post MHHS change should have a different solution, and so a new change proposal is required.	
BU-UK	Non-Confidential	We do not have a strong view on this matter.	
Eon Next Ltd & Npower Commercial Gas Ltd.	Non-Confidential	We do not believe this change should be implemented without the many issues we have highlighted & specifically the lack of an enduring MHHS solution n so do not support any implementation date at this time.	
NPg	Non-Confidential	This should be implemented alongside P441 so that the complete solution (BSC/DCUSA/REC) is implemented at the same time.	
SPEN	Non-Confidential	On the basis that the current workplan indicates that this (and the other related CP's are intended to be with Ofgem in January, we are supportive of the indicative timeline in line with the BSC November 2026 release.	
Stark	Non-Confidential	To align with BSC modification P441 & REC R0268 releases.	
British Gas	Non-Confidential	We agree that the change proposal should be implemented to align with P441 and REC change R0133 implementation dates.	

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UKPN	Non-Confidential	If there are no changes needed for the CDCM or charging arrangements then we agree that this change should be implemented alongside the changes to the BSC and REC, however no proposed date is indicated in the consultation document, so it is impossible to know if we support the proposed date at this time. We (and likely other industry parties) would need to have certainty of the proposed final solution so that potential changes to billing systems alongside other associated systems and processes can be fully assessed. As a result, we believe that an implementation date of a minimum 6-9 months after approval would be appropriate.	
Energy Local CIC	Non-Confidential	As soon as practical.	
<p>Working Group Conclusions: A supplier response highlighted they did not think that this change should be implemented before MHHS.</p> <p>3Many responses noted that this change should align to the related REC and BSCP changes.</p> <p>It was noted that due to system changes, 6 months post approval would be sensible.</p> <p>A supplier responder noted they didn’t believe this CP should be implemented until the issues they’d highlighted within their responses to previous questions were resolved.</p>			

Company	Confidential/ Anonymous	16. For Distributors only-What are the potential impacts to billing systems based on the Working Groups approach?	Working Group Comments
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SSE Energy Supply Limited	Non-Confidential	N/A	
BU-UK	Non-Confidential	Please refer to our answer to question 4: If this CP is to be approved, the use of pseudo MPANs and the management of these would be a new process to be implemented and trained on within a business. This would also likely require some system adaptations and new processes to incorporate these as an identifiable category, with financial implications to be incurred in doing so.	
Eon Next Ltd & Npower Commercial Gas Ltd.	Non-Confidential	N/A	
NPg	Non-Confidential	<p>If a flag for no fixed charge is applied then Durabill would need to be updated to include a flag to identify that the MPAN is part of a complex site. Durabill already has the capability to flag that an MPAN is a pseudo billing MPAN for CVA so this would be an extension of this. There is already a flag in Durabill to identify that an MPAN should not be charged fixed charges. No additional tariffs would be required.</p> <p>If new tariffs are used (excluding the fixed charge element) then these tariffs would need to be added to the billing system, however this does not require any change to how the billing system operates, but rather a change would be required to the CDCM and LC14 charging statements.</p>	

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SPEN	Non-Confidential	SPEN believes that there is no impact if the pseudo Settlement MPANs are chosen as the final solution.	
Stark	Non-Confidential	<p>Potential impacts include:</p> <ul style="list-style-type: none">• Need to store and process pseudo MPANs alongside existing MPANs.• Additional fields for gross metered volumes in billing calculations.• Support new or updated flows (e.g., D0036/D0275) carrying pseudo MPAN data. <p>Validate consistency between pseudo MPAN and primary MPAN data.</p>	
British Gas	Non-Confidential	No comment.	
UKPN	Non-Confidential	This would need to be scoped with our developers of the system, as well as potential changes for other associated systems and processes. It would also be useful if the legacy arrangements (as stated in this change) as well as those required for MHHS were implemented at the same time to ensure that any changes are consistently applied rather than in a piecemeal approach which this change as drafted would do, which would also likely minimise the costs of making changes to systems.	
Energy Local CIC	Non-Confidential	N/A	

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Working Group Conclusions: An IDNO responses highlighted that new processes would need to be trained and how to/training guides would need to be created.

A DNO response stated if a flag for no fixed charge is applied then Durabill would need to be updated to include a flag to identify that the MPAN is part of a complex site. Durabill already has the capability to flag that an MPAN is a pseudo billing MPAN for CVA so this would be an extension of this. There is already a flag in Durabill to identify that an MPAN should not be charged fixed charges. No additional tariffs would be required.

They went on to also highlight if new tariffs are used (excluding the fixed charge element) then these tariffs would need to be added to the billing system, however this does not require any change to how the billing system operates, but rather a change would be required to the CDCM and LC14 charging statements.

Another responder stated that they believed that making all the system changes for NHH and MHHS would be better done in one CP and at the same, rather than piecemeal the changes in.

Company	Confidential/ Anonymous	17. What do you believe the future MHHS consequential impacts/change requirements will be post this change being accepted and what could the solution look like post MHHS?	Working Group Comments
SSE Energy Supply Limited	Non-Confidential	Under MHHS the EMDS dictates whether the data service sends IF-021 “UTC Settlement Period Consumption Data”. This is based on the connection type. If the connection type is “W” (Whole Current) then the data service is not required to send the consumption data to the LDSO. For all other connection types, the data service will send the IF-021 to the LDSO. Creation of a new Connection Type for these supplies (i.e. “Whole Current – Complex Site”) would therefore mean LDSO would receive the consumption	

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		data to enable them to correctly invoice DUoS charges, this would remove the complexity and unnecessary costs involved with utilising Pseudo MPANs.	
BU-UK	Non-Confidential	We cannot foresee at this time what the potential MHHS implications will be post implementation.	
Eon Next Ltd & Npower Commercial Gas Ltd.	Non-Confidential	We believe this for a working group to develop based on MHHS arrangements so decline to comment on this until the working group has considered MHHS operations.	
NPg	Non-Confidential	<p>MHHS changes the registration data for MPANs and removes measurement classes, meaning that the solution for MHHS, would need, as a minimum, to reflect the new registration items and data flows.</p> <p>If this solution was implemented in its current form for pre-MHHS then a similar solution could be implemented for post-MHHS.</p> <p>This would potentially require the following (but may need other changes not thought of here):</p> <ul style="list-style-type: none"> - CT metered MPANs <ul style="list-style-type: none"> o continue to receive MPAN and Unit data on the IF-21 (equivalent to the HH reads in the D0036 currently) - Whole Current MPANs 	

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		<ul style="list-style-type: none"> ○ MPAN reads on REP-002B (equivalent to D0030) <p>Unit reads on IF-21 (equivalent to D0036)</p>	
SPEN	Non-Confidential	The REP-002B flows are based on 48 hours period, therefore would the pseudo HH MPAN still be necessary once the MPAN have been migrated	
Stark	Non-Confidential	<p>Residual Band Allocation: The removal of Measurement Classes eliminates the current basis for banding, requiring a new framework aligned with MHHS segmentation.</p> <p>Pseudo MPAN Handling: Complex Site processes must adapt to MHHS-compliant data flows and gross metering principles.</p> <p>Cross-Code Consistency: Updates will be needed across DCUSA, BSC, and REC to maintain alignment and avoid compliance risks.</p>	
British Gas	Non-Confidential	No comment.	
UKPN	Non-Confidential	The changes for MHHS will be very similar to those proposed currently as part of this change, it would just be to make the same changes to the relevant MHHS dataflows as proposed for the legacy arrangements.	
Energy Local CIC	Non-Confidential	There will need to be mechanism in MHHS to take into account complex sites that have SMETs and AMR meters. The changes to remove the use of LLF etc. will need to be mapped across to understand any changes required.	

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Working Group Conclusions: A number of responses for all party category’s stated that they could not foresee at this time what the potential MHHS implications will be post implementation and that it was down to Working Groups to develop any solutions.

One DNO noted that MHHS changes the registration data for MPANs and removes measurement classes, meaning that the solution for MHHS, would need, as a minimum, to reflect the new registration items and data flows.

If this solution was implemented in its current form for pre-MHHS then a similar solution could be implemented for post-MHHS.

This would potentially require the following (but may need other changes not thought of here):

CT metered MPANs

- continue to receive MPAN and Unit data on the IF-21 (equivalent to the HH reads in the D0036 currently)

Whole Current MPANs

- MPAN reads on REP-002B (equivalent to D0030)

Unit reads on IF-21 (equivalent to D0036)

A DNO responder stated that the REP-002B flows are based on 48 hours period, therefore queried would the pseudo HH MPAN still be necessary once the MPAN have been migrated.

An IDNO responder stated that areas to consider are

Residual Band Allocation: The removal of Measurement Classes eliminates the current basis for banding, requiring a new framework aligned with MHHS segmentation.

Pseudo MPAN Handling: Complex Site processes must adapt to MHHS-compliant data flows and gross metering principles.

Cross-Code Consistency: Updates will be needed across DCUSA, BSC, and REC to maintain alignment and avoid compliance risks.

Finally a DNO responder believed that changes for MHHS would be very similar to those proposed currently as part of this change, it would just be to make the same changes to the relevant MHHS dataflows as proposed for the legacy arrangements.

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Company	Confidential/ Anonymous	18. Do you have any comments on actions which could be taken in the near future to ensure a smooth transition to the post MHHS process?	Working Group Comments
SSE Energy Supply Limited	Non-Confidential	A cross-code change between BSC and REC would be required if we were to use a new connection type to resolve this issue. This should be raised ASAP.	
BU-UK	Non-Confidential	Not at this time.	
Eon Next Ltd & Npower Commercial Gas Ltd.	Non-Confidential	None	
NPg	Non-Confidential	None at this time.	
SPEN	Non-Confidential	No further comments	
Stark	Non-Confidential	<ul style="list-style-type: none"> Develop an MHHS-Compatible Banding Methodology. Define new criteria for residual charging bands based on MHHS segmentation and consumption characteristics. 	

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		<ul style="list-style-type: none">• Update Complex Site Rules and Data Interfaces.• Ensure pseudo MPAN treatment and DUoS calculation logic align with MHHS data flows and gross metering requirements.• Coordinate Cross-Code Changes.• Work with BSC and REC governance to harmonize definitions and processes for Complex Sites under MHHS.• Plan for Transitional Testing and Assurance.• Implement targeted testing for Complex Sites to validate DUoS charging accuracy under MHHS conditions.	
British Gas	Non-Confidential	No comment	
UKPN	Non-Confidential	As mentioned earlier there is no reason why the legacy and MHHS arrangements could not be implemented at the same time using this change proposal. DCP424 has been in existence for over two years and the world has changed in that time; we believe that the DCUSA Panel would be comfortable to allow the changes required for MHHS to be delivered under the intent of this change. If that’s not the case, then the MHHS related change should be drafted and the work started ASAP and should be limited to not reopen the discussions from this change, but to simply deliver the minimum which is required for the MHHS arrangements.	

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Energy Local CIC	Non-Confidential	N/A	
<p>Working Group Conclusions: Six responders had no comment.</p> <p>A Supplier responder stated that a cross-code change between BSC and REC would be required if we were to use a new connection type to resolve this issue.</p> <p>A DNO responder stated that there is no reason why the legacy and MHHS arrangements could not be implemented at the same time using this change proposal. They went on to highlight that DCP424 had been in existence for over two years, and the world has changed in that time.</p> <p>An IDNO responder noted the below actions should be considered.</p> <ul style="list-style-type: none">• Develop an MHHS-Compatible Banding Methodology.• Define new criteria for residual charging bands based on MHHS segmentation and consumption characteristics.• Update Complex Site Rules and Data Interfaces.• Ensure pseudo MPAN treatment and DUoS calculation logic align with MHHS data flows and gross metering requirements.• Coordinate Cross-Code Changes.• Work with BSC and REC governance to harmonize definitions and processes for Complex Sites under MHHS.• Plan for Transitional Testing and Assurance.• Implement targeted testing for Complex Sites to validate DUoS charging accuracy under MHHS conditions. <p>It was noted by the Elexon Working Group Member that an issue had been created to tackle some of the existing issue with complex sites that sit outside of the intent of this CP and the related cross code changes that will resolve many of the issues highlighted above that DCP 424 is not looking to remedy at this time.</p>			

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Company	Confidential/ Anonymous	19. Do you have any other comments?	Working Group Comments
SSE Energy Supply Limited	Non-Confidential	No.	
BU-UK	Non-Confidential	We would like to reiterate the importance of ensuring this CP is correctly implemented, so that affected MPANs are correctly identified, correctly treated, and to ensure that there are no double counted connections due to the use of pseudo MPANs within settlement / billing.	
Eon Next Ltd & Npower Commercial Gas Ltd.	Non-Confidential	None	
NPg	Non-Confidential	None at this time.	
SPEN	Non-Confidential	No further comments	
Stark	Non-Confidential	<ul style="list-style-type: none"> Introduce clear industry guidance on pseudo MPAN usage. 	

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		<ul style="list-style-type: none">• Validation checks to confirm aggregation accuracy.• Audit mechanisms to reconcile aggregated and MPAN-level data periodically.	
British Gas	Non-Confidential	No comment	
UKPN	Non-Confidential	As mentioned in the response to the questions above, consideration does need to be given for how this works for sites which have migrated under MHHS as the use of Measurement Class will no longer be maintained. We note that in the consultation document it states that DCP424 only relates to non-migrated sites under MHHS and a separate change will be raised for sites which have migrated, but this will result in a lengthy delay in delivering a solution for all customers which will result in inconsistent treatment of customers, as a result we do not understand the decision of the WG to not deliver changes for all impacted customers as part of this change proposal/ Doing so under a single change proposal would be a cleaner and more consistent approach.	
Energy Local CIC	Non-Confidential	N/A	
<p>Working Group Conclusions: Six responders had no additional comments.</p> <p>A DNO stated that as mentioned in their response to earlier questions, consideration does need to be given for how this works for sites which have migrated under MHHS as the use of Measurement Class will no longer be maintained. This will be considered in the re-writing of the legal text.</p>			

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An IDNO party highlighted the below points that required further consideration.

- Introduce clear industry guidance on pseudo MPAN usage.
- Validation checks to confirm aggregation accuracy.
- Audit mechanisms to reconcile aggregated and MPAN-level data periodically.

The Elexon Working Group member advised that if industry guidance was required post implamention, this could be something that the BSC issues group develops. The Chair for DCP 424 also highlighted that there was an similar issues group within the DCUSA (The SIG) and that an approach could be that the BSC and DCUSA do a joint session on guidance, if one is required.