









DCUSA Consultation 2		At what stage is this document in the process?
<h1>DCP 424:</h1> <h2>Use of System charging for complex sites</h2> <p>Date Raised: 10 May 2023</p> <p>Proposer Name: Mary Gillie (as proposer's representative)</p> <p>Company Name: Green Energy</p> <p>Party Category: Supplier</p>		01 – Change Proposal
		02 – Consultation
		03 – Change Report
		04 – Change Declaration
<p>Purpose of Change Proposal:</p> <p>This change proposal is consequential to BSC proposal P441, together with REC proposal I0268. All three proposals are being progressed in parallel and will be assessed jointly by the Authority.</p> <p>DCP424 seeks to enable the correct DUoS charges to be paid by meters that are Measurement Classes F or G within a Class 5 or Class 6 Complex Site, as described in BSC Modification P441 (where netting of Import and Export is to take place for BSC Settlement purposes), in a practical manner.</p> <p>Currently, for Measurement Classes F and G, the MPAN counts are included on the D0030 data flows, but the volumes are zero. Under P441, where generation and demand are to be netted before settlement, the gross values must be added to the D0036 or D0275 dataflows, using a pseudo MPAN for the gross value, to ensure the correct amounts of DUoS are charged.</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 424</p> <p>Parties are invited to consider the questions set in section 10 and submit comments using the form attached as Attachment 1 to dcusa@electralink.co.uk by 03 July 2026</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>Governance:</p> <p>The Proposer recommends that this Change Proposal should be:</p> <ul style="list-style-type: none"> Treated as a Part 1 Matter 	

	<ul style="list-style-type: none"> Treated as a Standard Change Progressed to the Working Group phase
	Impacted Parties: Suppliers/DNOs/IDNOs
	Impacted Clauses: Section 1A and Schedule 16 Part 2

Contents		 Any questions? Contact: Code Administrator  DCUSA@electralink.co.uk  020 7432 3011 Proposer: Mary Gillie (Green Energy) as representative of Green Energy  Mary@energylocal.co.uk  07757900408 Other: Insert name
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Timetable		
The timetable for the progression of the CP is as follows:		
Change Proposal timetable		
Activity	Date	
Initial Assessment Report	17 May 2023	

Consultation Issued to Industry Participants	24 October 2025	
Consultation 2 Issued to Industry Participants	12 June 2026	
Change Report Approved by Panel	15 July 2026	
Change Report issued for Voting	16 July 2026	
Party Voting Closes	06 August 2026	
Change Declaration Issued to Parties	07 August 2026	
Change Declaration Issued to Authority	07 August 2026	
Authority Decision	TBC	
Implementation Date	November DUCSA release	

1 Summary

What?

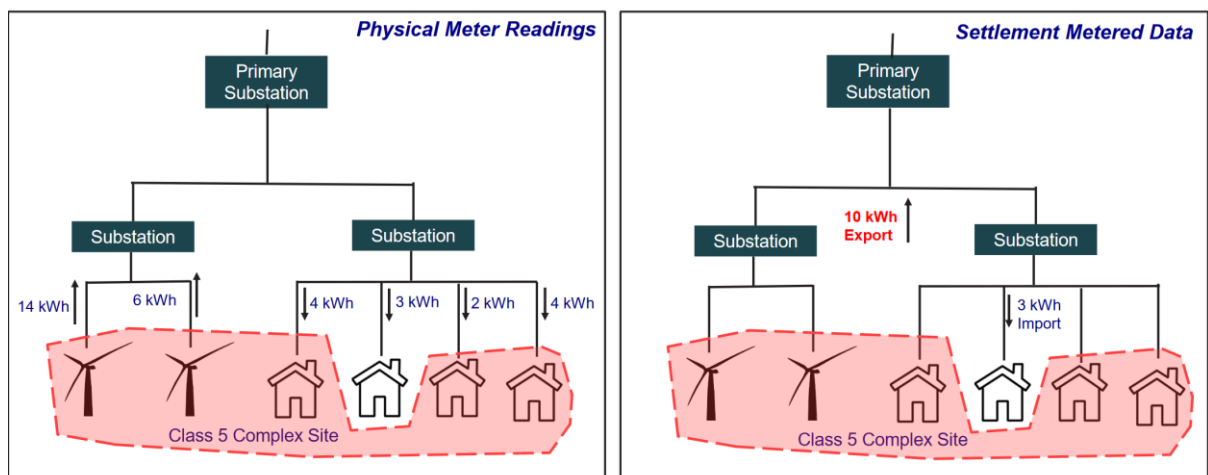
- 1.1 BSC change proposal P441 sets out that for certain types of Complex Site, (to be defined under that proposal), Half Hourly Data Collectors (HHDCs) may, for BSC Settlement purposes, net off Import and Export volumes, provided that they represent exempt supply by a generator to a customer within a local area. However, net volumes are not appropriate for calculation of DUoS charges. This creates an issue for MPANs in Measurement Classes F and G, as the CDCM currently requires billing for such MPANs to be based on BSC Settlement data received on the D0030 data flow which only records net volumes. The required change to the CDCM is therefore to allow charges for Measurement Class F and G customers within such Complex Sites to be calculated using gross metered data provided by the HHDC, rather than net Settlement data on the D0030 data flow.
- 1.2 DCP 424 is a consequential change to P441, which is an inflight proposal and the intention is that DCP 424 will be delivered to the Authority for decision alongside P441, as well as REC proposal I0268.
- 1.3 As part of consultation 1, it was agreed that this change should also apply to MHHS migrated MPANs

Why?

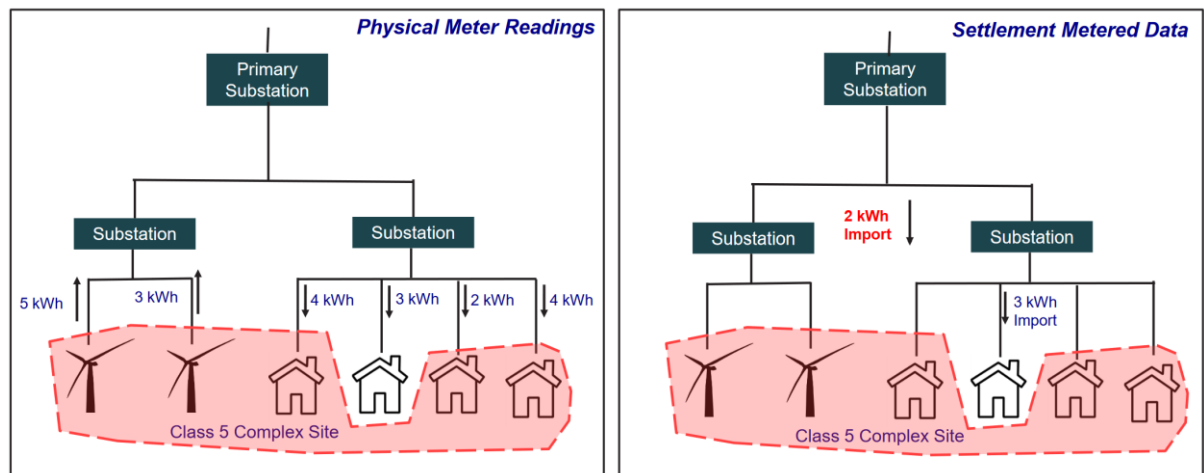
- 1.4 P441¹ is establishing clearer criteria for where complex sites can be used, including criteria for Class 5 and Class 6 Complex Sites. For these, half hourly metered data submitted to Settlement may 'net off' Import and Export, provided that it represents licence exempt supply by a generator to a customer beneath the same primary substation in which the electricity was generated. The diagram below illustrates an example, in which there is 20 kWh of Export, 10 kWh of which is supplied to customers within the Complex Site (as a licence exempt supply), and 10 kWh sold to a licensed supplier (to be supplied to customers outside the Complex Site). P441 seeks to formalise existing settlement arrangements in which only the 10 kWh of net Export from the Complex Site need enter Settlement, whereas the full (i.e. gross) 20 kWh of Export and 10 kWh of Import volumes are subject to DUoS charges. The D0036 flow sent to the Distributor will contain gross data.

¹ [P441 'Creation of Complex Site Classes' - Elexon BSC](#)

1.5 The impact on DUoS charges for this example is illustrated in the example below.



1.6 Conversely, the diagram below illustrates a scenario in which there is a net Import to the Class 5 Complex Site. The customers within the Class 5 Complex Site use 10 kWh, of which 8 kWh is a licence exempt supply from generators within the Complex Site, and 2 kWh is licensed supply from outside the Complex Site. P441 will formalise existing arrangements in which only the 2 kWh of net Import to the Complex Site need enter Settlement. However, the full 8 kWh of Export and 10 kWh of Import must still be subject to DUoS charges:



1.7 The solution proposed by the P441 Workgroup for settling this type of Complex Site can be summarised as follows:

- For BSC Settlement purposes, the HHDC may net Import and Export, but only to the extent that the netted values represent a licence exempt supply of electricity generated within the Complex Site to customer(s) within the Complex Site;
- The resultant net Import and/or Export values will be submitted to Settlement on an aggregated basis. In the example above, a single Import MPAN and a single Export MPAN might be used to submit the net values to Settlement. The proposed solution allows these to be pseudo MPANs (representing the Complex Site as a whole), but does not require it (e.g.

the Supplier could alternatively choose that the HHDC should use one of the generators' Import and Export MPANs to submit the net data for Settlement);

- Although data is being submitted to Settlement on a single pair of MPANs, each Import and Export customer will retain their own MPAN(s). The half hourly metered data reported to Settlement for these MPANs will be zero for as long as they remain within the Complex Site (as their Import and Export is being reported on the aggregated MPAN instead). Requiring each customer to retain their individual MPAN(s) will facilitate their exit from the Complex Site (when/if they choose to do that), ensure that the registration system retains an accurate record of all Entry and Exit Points, and allow accurate reporting of MPAN counts.

1.8 The P441 Workgroup proposes that this approach of having the HHDC aggregate different customers' metered data and report the aggregated values on a D0036 (or D0275) data flow can also work for DUoS charging purposes, provided that:

- The HHDC system must be capable of reporting different half hourly metered values to BSC Settlement and to the DNO (as the aggregated data reported to the DNO must be gross Import and Export, whereas the aggregated data reported to BSC Settlement can net Import and Export under certain circumstances).
- In order to ensure that DUoS charges are levied in accordance with the Common Distribution Charging Methodology, the data reported to the DNO may need to be at a more granular level. For example, suppose the Complex Site contained customers on a number of different DUoS tariffs. For BSC purposes, their net Import and Export could be reported on a single pair of MPANs, but for DUoS purposes a separate (primary or pseudo) MPAN would be required for each DUoS tariff.
- For sites currently billed on a site-specific basis, the volumes will continue to be received on the D0036 (assuming the first bullet point above is met), so their charges and the mechanism currently used by Distributors to calculate those charges will not change, so no DUoS solution is required.
- An appropriate mechanism can be found for customers in Measurement Classes F and G. Currently, paragraph 128 of the CDCM requires DUoS charges for these customers to be calculated from the D0030 data flow received from Settlement (not a D0036 or D0275 data flow received from the HHDC).

1.9 In the absence of a DCUSA change, paragraph 128 of Schedule 16 of the DCUSA would require DNOs to calculate DUoS charges using MPAN counts and consumption values from the D0030 data flow. Whilst the MPAN counts would continue to be included in the D0030 under the P441 solution, the consumption values would either be zero, or (if the MPANs used to submit data to Settlement were themselves registered to Measurement Class F or G) would be net values.

1.10 The P441 Workgroup meeting on 21 March 2023 discussed a number of potential solutions for DUoS charging of Measurement Class F and G MPANs in this type of Complex Site. Three of these (referred to as Options 1 to 3 in the P441 Workgroup material which can be found [here](#)) would have reallocated consumption for these customers to a site-specific Measurement Class (such as C or E), leading to these MPANs being charged (wholly or partially) on site-specific tariffs. It would be hard to argue that these approaches are consistent with Schedule 16.

1.11 The other solution considered by the P441 Workgroup (Option 4) was for these MPANs to remain in their true Measurement Class (F or G), but with the DNO charging using aggregated unit data provided on the D0036 (or D0275) for volumetric charges, rather than the D0030. The P441 Workgroup believes that this approach is the only one that allows correct DUoS charging of Measurement Class F and G customers within Class 5 and Class 6 Complex Sites, and this Change

Proposal therefore proposes to make the minor change to Schedule 16 that is required in order to support it.

- 1.12 Under MHHS Measurement Classes are no longer used so Measurement Class F and G, however MPANs included in a Class 5 and Class 6 site are required to have HH metering so must be identified as having the correct metering when they are added to the Complex Site. As such they do not need to be identified specifically within the Aggregated market sector under MHHS, which does not disseminate between Smart and Non-Smart meters in the registration data items. The solution under MHHS remains the same, with the MPAN counts remaining in the REP-002B and the aggregated unit data provided on the IF-021 for volumetric charges, rather than the REP-002B.

How?

Original Solution

- 1.13 As explained above, the P441 Workgroup proposes that for Measurement Class F and G, gross Import and Export should be reported by the HHDC to the DNO on a D0036 (or D0275) data flow, aggregated up to DUoS tariff level. To facilitate this, a separate pseudo MPAN would be registered for each aggregated DUoS tariff used within the Complex Site. The P441 Workgroup does not believe that this requires DCUSA changes for site-specific DUoS tariffs, but it does require a change for aggregated tariffs (where currently paragraph 128 of the CDCM requires that the D0030 data flow is used for billing).
- 1.14 To be clear, data used for charging aggregated tariffs to Measurement Class F and G customers in Class 5 Complex Sites (and Class 6 where appropriate) will be as follows:
- The fixed (p/MPAN/day) charge will be calculated from the MPAN counts in the D0030 data flow. These counts will still include all the Measurement Class F and G customers and generators within the Complex Site, as they retain their own MPANs (albeit with zero volumes reported against them in the D0030).
 - The unit charges will be calculated from the aggregated volumes reported in the D0036 (or D0275). A separate aggregated value will be reported for each DUoS tariff. In order to calculate these unit charges, the DNOs may need to set up the aggregated tariffs in their site-specific billing systems (with zero capacity charges, and flagged to not incur a fixed charge), for use only by aggregated Half Hourly customers in Class 5 and Class 6 Complex Sites.
- 1.15 Our working assumption is that the pseudo settlement MPANs (created for the purpose of reporting to the DNO aggregated consumption data for Measurement Class F and G customers in Class 5 and Class 6 Complex Sites) should be registered to the same Measurement Class F or G as the customers whose data they are being used to report.
- 1.16 It is noted that these Complex Sites will be due to migrate to Market-wide Half-Hourly Settlement (MHHS) by the M18 project milestone (October 2026) and as such, the change proposal will cater for both non-MHHS and MHHS MPANs.

Revised Solution

- 1.17 Following the first consultation it was agreed that the solution should be expanded to include MHHS MPANs as well as non-MHHS MPANs. Decisions were also taken on the use of pseudo MPANs and the method to be used to ensure the fixed charge is not applied to the pseudo MPANs.
- 1.18 The revised solution is as follows:

- The MPAN counts for any Whole Current metered MPANs in the Complex Site will be provided on the D0030 for non-MHHS MPANs and on the REP-002B for MHHS MPANs. This ensures the fixed charge is still applied for the same number of MPANs as if the Complex Site was not in place, meaning that the fixed charge recovered stays the same.
- The volumes will be aggregated against pseudo Settlement MPANs, with one pseudo settlement MPAN required for each DUoS tariff applicable. These volumes will be reported in the D0036 for non-MHHS MPANs and in the IF-021 for MHHS MPANs. This ensures that the volumes are reported against the same tariffs as if the Complex Site was not in place, meaning that the unit charge recovered stays the same.
- The pseudo settlement MPANs should be registered under the same classifications as the MPANs within the Complex Site.
- A flag will be added to the billing system to ensure that the pseudo settlement MPANs do not receive a fixed charge, as otherwise the fixed charge would be duplicated.

2 Governance

Justification for Part 1 and Part 2 Matter

- 2.1 The Proposer considers that this Change Proposal should be considered a Part 1 Matter as it satisfies one or more of the following criteria:
- a) it is likely to have a significant impact on the interests of electricity consumers;
 - b) it is likely to have a significant impact on competition in one or more of:
 - i. the generation of electricity;
 - ii. the distribution of electricity;
 - iii. the supply of electricity; and
 - iv. any commercial activities connected with the generation, distribution or supply of electricity.

Requested Next Steps

- 2.2 This Change Proposal should:
- Be treated as a Part 1 Matter;
 - Be treated as a Standard Change; and
 - Proceed to the Working Group phase.
- 2.3 This Change Proposal is linked to BSC Modification Proposal P441, which seeks to formalise the arrangements for Complex Sites. P441 has been discussed by the Cross Code Steering Group, and requires changes to the Retail Energy Code (REC) as well as the BSC and DCUSA.

- 2.4 The BSC (P441), DCUSA (DCP424) and REC (I0268) solutions are being progressed in parallel, so that they were initially consulted on at the same time. The final modification report for P441 was submitted to the Authority on 19 March 2026. The reports for DCP424 and I0268 should follow as soon as possible in order for a decision to be made on the entire solution at once.

3 Why Change?

- 3.1 P441 will remove ambiguity around the current Complex Site arrangements and aid in more efficiently facilitating the advancement of community energy schemes. However, to do this, it is important that it is clear how DUoS charges are applied correctly, which DCP424 seeks to do.
- 3.2 P441 will better enable BSC Parties to bring forward new solutions which then supports consumers through enabling better use with local energy schemes, provisioning for licence exempt supply arrangements to work with existing traditional licensed supply agreements in partnership. There are also environmental benefits as this will better enable consumer choice to take up low carbon, flexible energy solutions provisioned through local energy schemes supporting initiatives such as the joint Ofgem BEIS Smart Systems Flexibility Plan and future flexibility service provisions.
- 3.3 As well as market benefits that will help us reach net zero and give customers more choice, there are a number of benefits that are particularly useful to running networks efficiently, particularly via local energy schemes. This change in the means to charge DUoS will help facilitate this. For example:
- Encourages shift from peak load and reduces risk of imbalance;
 - Helps reduce network constraints via local balancing to use the network more efficiently, reducing costs;
 - Reduce costs of energy;
 - Innovative means of Demand Side Response (DSR) without the need for Balancing Mechanism (BM) or flexibility contracts.
- 3.4 This change proposal gives a clear and precise means for DUoS charges to be charged at the correct values with minimum change to existing processes.
- 3.5 It should be noted that this change was placed on hold in August 2023 due to Ofgem stating that further analysis was required on P441. When the Change restarted in July 2025, the Working Group discussed if the MHHS migrations, due to start in in October 2025 and be completed by October 2026, would need to be considered.
- 3.6 Before the first consultation, it was discussed that this would lead to the intent of this CP changing to the extent that it would need to be reapproved by the panel, and the solution would need to be redrafted. As the issue is something that requires being tackled in the current world quickly, the Working Group agreed to continue with the approach of making these changes for the current process, with a subsequent CP to be raised at a later to deal with MPANs migrated under MHHS.
- 3.7 After the first consultation this has been reconsidered and the Working Group agreed that although when this change was first raised it was ok to consider just the pre-MHHS processes, the world has now moved on and the MHHS processes would need to be considered. It was determined that this could be done under this CP, without the need to raise a separate CP to deal with MHHS specifically. This is reflected in the remainder of this document.

4 Working Group Assessment

DCP 424 Working Group Assessment

- 4.1 The DCUSA Panel established a Working Group to assess/develop DCP 424. Meetings were held in open session and the minutes and papers of each meeting are available on the DCUSA website – www.dcusa.co.uk.

Consultation 1

- 4.2 The Working Group issued a first consultation in October 2025. The Working Group's considerations on the nine responses are set out in **Attachment 3 – 'DCP 424 Consultation 1 Document and Responses'**, with some of the key points set out below.

Question 1: Do you understand the intent of the Change Proposal?

Question 2: Are you supportive of the principles of this Change Proposal?

- 4.3 All nine respondents understood the intent of the CP.
- 4.4 Six respondents were supportive of the principles of the CP.
- 4.5 One respondent that didn't support the principles of the change highlighted that there are gaps in the solution because it only caters for data provisioned under the pre-MHHS arrangements, but that sites which would be eligible to be classed as a complex site would have to have migrated to MHHS by late October 2026, meaning that the CP as it stands would be short lived, and it begged the question as to whether suppliers would feel the benefit in the here and now.
- 4.6 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., which were as follows:
- i) that the allowed revenues of the DNO will remain unchanged but would still need to be recovered which will result in all other customers paying more. It was also noted that this issue would grow as more complex sites come into existence;
 - ii) 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.

- 4.7 The Working Group acknowledged these concerns and agreed that these were probably more specific to the BSC change. They drew attention to the fact that this CP is looking to make sure that everyone

was paying the correct amount of DUoS, meaning that there would be no impact on recovery of allowed revenues or other customers which mitigates the concerns in the first point.

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, and only enter into one if they want to

The Working Group representative from Elexon also 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.

Question 03: 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.

- 4.8 Five respondents said they agreed with the solution highlighting that this is the most efficient way for DUoS to be charged for these Complex Sites and that this process removes the netting-related billing challenge by separating MPAN identification from energy volume reporting. Of these two highlighted that the solution would need to be revisited for MHHS and one did not believe the solution was sufficiently reflected in the legal text.
- 4.9 Two respondents did not agree with this solution, and two did not provide an opinion.
- 4.10 One of the respondents who did not agree with the approach highlighted that as the solution did not cater for MHHS it would be much too short-lived to be worthwhile implementing.
- 4.11 The other respondent who did not support this solution raised concerns around the obligations on the HHDC and the use of a pseudo MPAN in the D0036 and whether these are reflected in BSCP502, facilitated by P441.
- 4.12 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 and to make reference to BSCP502. They also agreed that the solution should be updated for MHHS.

Question 04 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:

- 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.

- 4.13 One respondent noted that they did not believe using pseudo MPANs was the right approach regardless of whether they are billing or settlement MPANs. This respondent 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 could be charged agent fees.

- 4.14 Some respondents 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.
- 4.15 It was highlighted that if pseudo billing MPANs approach was adopted, this would mitigate the double counting risk, as suppliers wouldn't have visibility of these MPANs.
- 4.16 For those who preferred pseudo settlement MPANs, reasons given were a greater visibility and because they currently have formal process in place for changes. The responses did note these MPANs may carry the risk of double counting if these MPANs were to be treated as the primary MPAN in error.
- 4.17 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. However, this lack of visibility was highlighted as a concern in a number of responses.

Question 05: Which of the two approaches of using Pseudo billing or pseudo settlement MPANs do you prefer? Please provide your rationale.

- 4.18 Three responses stated they preferred pseudo settlement MPANs, two said they prefer pseudo billing MPANs, three had no preference and one said neither.
- 4.19 As with the answers to question 4 it was noted that the benefit of using pseudo settlement MPANs were that they are visible to all parties and have robust processes on their processes and changes.
- 4.20 The main concern was that with improved visibility, the risk of double counting was increased.
- 4.21 As with question 4, it was noted that 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.
- 4.22 The Working Groups' conclusions on this can be found in paragraph 4.94 below.

Question 06: 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.

- 4.23 Of those who responded all stated 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. One respondent suggested that the process for this would need to be defined by the DNOs depending on implementation of this DCP.

Question 07: Distributors Only- Distributors only- How do distributors identify pseudo settlement and pseudo billing MPANs

- 4.24 For those who responded it was concluded that pseudo settlement MPANs have pseudo in address.

- 4.25 Pseudo billing MPANs have specific make up of MPAN and for CVA there is a flag in the billing system.
- 4.26 Registers of pseudo settlement MPANs and pseudo billing MPANs are also maintained.

Question 08: For Suppliers Only – How do Suppliers identify if an MPAN is a pseudo settlement or pseudo billing MPAN?

- 4.27 Of those who responded one respondent noted that they are only aware of pseudo MPANs for shared SVA sites and that these are identified by a unique meter timeswitch class, but this option is not available for MHHS registered MPANs.
- 4.28 Another responder noted that they can identify pseudo MPANs as they do not follow the standard configuration that normal MPANs have.
- 4.29 A third respondent noted that they have never seen a pseudo billing MPAN.

Question 09: Which option should be used to ensure pseudo MPANs do not incur additional fixed charges:

- 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. Please provide your rationale.

- 4.30 Three respondent supported using a flag, as this solution was easier to implement and easier for all parties including customers to understand and would not require any changes to the CDCM.
- 4.31 Two responses supported using a set of new tariffs with existing unit charges and a zero fixed charge.
- 4.32 Two respondents did not have a preference and said either solution was appropriate.
- 4.33 One respondent said that neither solution should be used, in line with their responses to previous questions.
- 4.34 One responder provided no comment.
- 4.35 The Working Groups' conclusions on this can be found in paragraph 4.101 below.

Question 10: Are there any additional/potential impacts to residual charging that the Working Group haven't considered?

- 4.36 Six respondents said there would be no additional impacts to residual charging, one said that there would be an impact and two did not specify.
- 4.37 Of these two of the respondents who said there would be no impact highlighted that this would be dependent on the DNOs still receiving the data for individual Measurement Class G MPANs, as currently received from Electralink, for use in residual banding processes.

- 4.38 The two respondents who did not specify also raised concerns around the data for Measurement Class G, specifically that while MPAN-level data will remain available, any delays or inaccuracies in data provision could affect the integrity of band reviews and allocations, leading to potential misclassification risks.
- 4.39 The final 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, such as opportunities to move to a lower residual band than would otherwise be possible.
- 4.40 The Working Group were unsure how or why this risk could occur as the data for Measurement Class G MPANs is received from Electralink and is not received through settlements. For Measurement Class F the MPANs are not allocated to bands, but are all on the single Domestic band so there is no risk for these MPANs.

Question 11: Do you have any comments on the drafted legal text?

- 4.41 Five respondents had no comments.
- 4.42 One respondent suggested inclusion of a definition of pseudo MPANs and their governance under DCUSA.
- 4.43 One respondent highlighted that the solution requires 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.
- 4.44 They also highlighted that a clear definition of a complex site should be included in the legal text for all impacted codes, or that the DCUSA should refer 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.
- 4.45 Another respondent 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.
- 4.46 A final respondent 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. The response stated that these may be considered as shortfalls on the BSC legal text in the BSC solution so these are not detailed here but can be found in Attachment 1.

Question 12: Do you believe are there further DCUSA schedules or legal text changes required to facilitate this change? Please provide further information if yes.

- 4.47 Five respondents stated there were no other changes that needed as part of this change.
- 4.48 One respondent noted that changes for the MHHS arrangements may be necessary.

4.49 Another respondent stated schedule 32 may need to be adapted to address the issues they had highlighted in their earlier responses.

4.50 One respondent 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.

4.51 Another respondent identified the following areas:

- 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.

4.52 The working group response to these is detailed in paragraph 4.105.

Question 13: Do you consider the solution better facilitates the DCUSA objectives? Please give supporting reasons.

4.53 Five respondents stated that charging objectives 2,3 and 4 are better facilitated.

4.54 One respondent answered “yes” to this question.

4.55 One respondent said charging objective 2 was negatively impacted however, if migrated MHHS customers are considered, then charging objective 3 and 4 would be better facilitated.

4.56 One respondent 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.

4.57 One respondent said that none of the DCUSA objectives were better facilitated and went on to say charging objectives 3 and 4 would be negatively impacted.

4.58 The respondent 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. 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.

Question 14: Are you aware of any wider industry developments that may impact upon or be impacted by this CP?

4.59 Two respondents noted MHHS, however several identified this within previous questions.

4.60 One respondent mentioned the wider Ofgem Significant Code Review.

4.61 One respondent highlighted BSC Modification P442.

Question 15: What date do you believe this change proposal should be implemented? Please provide rationale.

4.62 Five respondents noted that implementation of this change should align to the related BSCP and REC changes, if no changes to the CDCM or charging arrangements are required. It was noted by one of these respondents that if changes to the billing system and associated processes are required then a minimum of 6-9 months after approval would be appropriate.

4.63 One respondent highlighted they did not think that this change should be implemented before MHHS.

4.64 One respondent noted they didn't believe this CP should be implemented until the issues they'd highlighted within their responses to previous questions were resolved, specifically the ones relating to the lack of an enduring MHHS solution.

4.65 One respondent stated that this should be implemented as soon as possible, and the final respondent did not have a strong view on the matter.

Question 16: For Distributors Only-What are the potential impacts to billing systems based on the Working Groups approach?

4.66 An IDNO responses highlighted that new processes would need to be implemented around the use of pseudo MPANs, with potential system adaptations and new processes to incorporate.

4.67 A DNO response stated if the solution using 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.

4.68 They went on to also highlight that 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.

4.69 Another respondent stated that the changes would need to be scoped with the developers of the system and 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 in a piecemeal approach.

4.70 One DNO respondent believed that there is no impact if the pseudo settlement MPANs are chosen as the final solution.

4.71 A final respondent stated that there would be a need to store and process pseudo MPANs alongside existing MPANs, with support for flows carrying pseudo MPAN data.

Question 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?

- 4.72 One respondent offered no comments and two respondents 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.
- 4.73 Two respondents questioned whether a pseudo MPAN would still be required under MHHS.
- 4.74 Another respondent stated that changes under MHHS would need to be mapped across in order to understand any changes required.
- 4.75 Two respondents stated that a similar solution could be used under MHHS, using the relevant MHHS registration items and data flows. One of these noted 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)

- 4.76 The final respondent 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.
- 4.77 The Working Group concluded that the residual band allocation point did not need further consideration, as this has already been covered under the updates to the DCUSA for MHHS.
- 4.78 Further Working Group conclusions are given in paragraph 4.105.

Question 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?

- 4.79 Six respondents had no comments.
- 4.80 One respondent 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.
- 4.81 Another respondent 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.
- 4.82 The final respondent noted the below actions should be considered:
- 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.
- 4.83 As noted in the previous question, the Working Group do not believe that the issues around residual banding need further consideration, as Schedule 32 of the DCUSA has already been updated for the MHHS transition.
- 4.84 Other Working Group conclusions to the points raised in these responses are given in paragraph 4.105 below.

Question 19: Do you have any other comments?

- 4.85 Six respondents had no additional comments.

- 4.86 One respondent reiterated their earlier concern that consideration does need to be given for how the solution works for sites which have migrated under MHHS as the use of Measurement Class will no longer be maintained.
- 4.87 One respondent 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.
- 4.88 A final respondent reiterated the importance of ensuring this CP is correctly implemented, so that affected MPANs are correctly identified, correctly treated and to ensure there are no double counted connections due to the use of pseudo MPANs within settlement/billing.

Consultation 1 Conclusions

MHHS

- 4.89 The consultation respondents mentioned the lack of inclusion of MHHS in several places within their responses, identifying that the implementation of this change would be short lived if MHHS was not included, and would not be applicable to any MPANs once the MHHS migration is complete.
- 4.90 After discussion the working group agreed that the solution should be expanded to include MHHS MPANs.
- 4.91 Under MHHS the Measurement Class is no longer relevant and Aggregated MPANs would instead be identified as Whole Current and under the Smart Market Segment. Additionally, the data flows used to provide the data to the DNOs change from the D0030 to the REP-002B for aggregated data, and from the D0275/D0036 to the IF-021 for site specific data.
- 4.92 The solution under MHHS remains the same as under the legacy arrangement, but with the use of the MHHS data flows (market messages).
- 4.93 This has been reflected in the legal text in attachment [X](#).

Pseudo MPANs (Q5)

- 4.94 The Working Group discussed whether Pseudo settlement or billing MPANs should be used.
- 4.95 An area of concern for using pseudo settlement MPANs was that there was a risk of these MPANs being “double counted” for settlement and billing purposes. The Elexon Working Group member 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.
- 4.96 They 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, so any definition in the DCUSA for pseudo MPANs would only need to refer to the relevant BSC procedure (BSCP 550).

- 4.97 The Working Group concluded that as the “double counting” risk for pseudo settlement MPANs has mitigations in place, and as they had robust procedures around their use and any potential changes, as well as being visible to all parties, pseudo settlement MPANs would be utilised.
- 4.98 As part of the above it was agreed that the definition of pseudo settlement MPANs would be pseudo Secondary MPANs, as this was consistent with the BSCP and also made it clear what the MPANs were.
- 4.99 It was also highlighted that if there were issues with the identification and management of these pseudo MPANs, these could be raised via the industry issues groups and guidance documents created. The Working Group however believed these were not needed for now.
- 4.100 It was noted that the responsibility for how pseudo MPANs are created, maintained and used wouldn't fall into the DCUSA so it would be likely that any future guidance documentation would fall under the BSCP.

Fixed Charges (Q9)

- 4.101 The options considered in the consultation to ensure the pseudo MPANs do not have a fixed charge applied to them were:
- i) apply a set of tariffs with the existing unit charge and a zero fixed charge to the pseudo MPAN
 - ii) apply a flag in the billing system to ensure the pseudo MPAN does not incur a fixed charge.
- 4.102 The consultation responses were marginally more favourable for the option to apply a flag in the billing system.
- 4.103 The Working Group discussed the options and concluded that use of a set of tariffs would require changes to the CDCM and the Charging Statements, whilst using a flag in the billing system would require changes to the billing system but would not require any changes to the CDCM or the Charging statement. It was agreed that the flag in the billing system would be taken forwards as the preferred solution as it would be easier and quicker to implement and would not require additional tariffs to be created.
- 4.104

Legal Text

- 4.105 As already stated in paragraph 4.89, the Working Group agreed that the solution should be updated to cater for MHHS MPANs and this should be reflected in the legal text.
- 4.106 In addition, the following items were also identified in the consultation responses and have been addressed by the working group as follows:
- Consideration should be given to the inclusion of a definition of Pseudo MPANs and their governance under DCUSA

- The Working Group agreed that a definition should be added into Section 2A of the DCUSA, referring to the definition in the BSC.
 - A clear definition of Complex Site should be included in the legal text for all impacted codes
 - The Working Group agreed that a definition should be added into Section 2A of the DCUSA, referring to the definition in the BSC.
 - The legal text does not reflect the solution whereby the fixed charge is calculated using the MPAN count from the D0030
 - The Working Group agreed that the legal text should be updated to reflect this.
 - The original solution within consultation 1 infers a D0036 against a pseudo MPAN will be used for (DUoS) billing, but this isn't mentioned in the legal text.
 - It was agreed that as this is the intent then this should be reflected in BSCP 502, facilitated via P441.
 - The Elexon representative explained that there are references to the D0036 within the BSC so the legal text could be written to refer to BSCP 502.
- 4.107 It was agreed within the Working Group that changes to CDCM tariffs or charging methodologies are not proposed within this change, as the primary MPANs would continue to be billed in DUoS terms as usual.
- 4.108 It was explained that the change proposal relates to processing of data rather than tariff calculation so it was suggested that removing the term 'calculated' from the legal text and changing it with "applied" would make this much clearer.

Updated Solution

4.109 Following the first consultation and discussion within the Working Group the solution is now:

- The MPAN counts for any Whole Current metered MPANs in the Complex Site will be provided on the D0030 for non-MHHS MPANs and on the REP-002B for MHHS MPANs. This ensures the fixed charge is still applied for the same number of MPANs as if the Complex Site was not in place, meaning that the fixed charge recovered stays the same.
- The volumes will be aggregated against pseudo Settlement MPANs, with one pseudo settlement MPAN required for each DUoS tariff applicable. These volumes will be reported in the D0036 for non-MHHS MPANs and in the IF-021 for MHHS MPANs. This ensures that the volumes are reported against the same tariffs as if the Complex Site was not in place, meaning that the unit charge recovered stays the same.
- The pseudo settlement MPANs should be registered under the same classifications as the MPANs within the Complex Site.
- A flag will be added to the billing system to ensure that the pseudo settlement MPANs do not receive a fixed charge, as otherwise the fixed charge would be duplicated.

4.110 This has been reflected in the legal text in Attachment X.

5 Consultation 2

- 5.1 The Working Group highlighted that the main concerns raised by parties across all categories were that the initial solution did not cater for MHHS MPANs.
- 5.2 It was agreed within the Working Group that the solution would be updated to include both non-MHHS and MHHS MPANs.
- 5.3 Based on this the Working Group agreed to update the legal text to cater for both non-MHHS and MHHS and agreed that a second consultation would be needed.
- 5.4 The Working Group agreed that as questions had already been asked around the understanding of this change and if parties supported this change, these questions would not be asked again. As the solution has changed it was agreed that the question around which objectives had been better facilitated would be asked again.

MHHS and legal text updates

- 5.5 The working group has updated the solution to include both non-MHHS and MHHS MPANs, as detailed in paragraph 4.109 above and reflected in the legal text in attachment X.
- 5.6 The legal text has also been updated to reflect the items identified in paragraph 4.106.
- 5.7 The Working Group are seeking views on whether these changes fully cater for MHHS and for the other issues identified.

Question 01: Do you agree that the updated solution caters fully for both MHHS and non-MHHS MPANs? Are there any further changes needed?

Question 02: Do you agree that the changes to the legal text fully reflect the updated solution and the other issues identified? Are there any further changes needed?

6 Code Specific Matters

Reference Documents

- 6.1 Documentation for BSC Modification Proposal P441 can be found on the [Elexon website](#).

7 Solution and Legal Text

Legal Text

- 7.1 Update the following for MPANs in a Class 5 or Class 6 Complex Site:

- Schedule 16, Part 2, minor amendment to paragraph 128 to reference new paragraph added as 128A:

MPANs in Measurement Class F and G that are included within a Class 5 Complex Site or Class 6 Complex Site where netting of Imports and Exports occurs across the network will be charged on an aggregated basis, using aggregated data provided on the D0275 or D0036 or for MHHS customers the IF-021 or IF-013 or IF-014 industry data flows in accordance with BSC Procedure BSCP 502 established under the BSC (and any replacement or substitute BSC Procedure from time to time).

- Schedule 16, Part 2, new paragraphs are to be inserted as paragraphs 132E-132H to detail the use of a Pseudo Settlement MPAN (referred to as a Pseudo Secondary MPAN) for the gross consumption data of the MPANs within a Class 5 or Class 6 Complex Site.
- minor amendment to paragraph 128 to reference new paragraph added as 128A:
- Section 2A, Clause 1.1 - New definitions for Complex Site and Pseudo Secondary MPANs to be created, referring to the definition under the BSCP.

7.2 The legal text can be found within **Attachment 4- DCP 424 Legal Text**.

Text Commentary.

7.3 In order for Aggregated MPANs within a Class 5 or Class 6 Complex Site to be billed correctly for their volumes it is proposed that pseudo settlement MPANs are used to aggregate their volumes and these volumes are then submitted on a D0036 data flow for non-MHHS MPANs and on a IF-021 data flow for MHHS MPANs. The fixed charges will be billed using the MPAN counts on the D0030 data flow for non-MHHS MPANs and on the REP-002B data flow for MHHS MPANs. At present, only site specific tariffs are available for volumes on a D0036/IF-021 flow. It is proposed that the legal text is amended to allow volumes for Aggregated MPANs within a Class 5 or Class 6 Complex Site to be included in a D0036/IF-021 flow and billed on the existing LV Domestic Aggregated or CT and LV Non-Domestic Aggregated or CT tariffs.

Question 03: Do you have any comments on the drafted legal text?

8 Relevant Objectives

Assessment Against the DCUSA Objectives

8.1 The Working Group will seek industry views in relation to the DCUSA Objectives as part of this consultation.

	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	None

<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 checked="" 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	Positive
<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

8.2 Charging Objective one: no impact.

8.3 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.

8.4 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.

8.5 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.

8.6 Charging Objective five: no impact.

8.7 Charging objective six: no impact.

8.8 As detailed above the market and the distribution network must evolve to facilitate and support renewable generation to become zero carbon. One mechanism that supports this are local energy markets and these are facilitated by complex sites. Local energy markets will help distribution networks that they run more efficiently (for example by encouraging local balancing) (objective 1, general) whilst facilitating competition (objectives 2, general and charging). The proposed change ensures the correct charges are made in a fair and transparent manner (objective 3 charging) to charging process is proportionate and will enable DNOs to carry out the implementation of DCUSA in an efficient manner (objective 1 and 6 charging).

Question 04: Do you consider the solution better facilitates the DCUSA objectives? Please give supporting reasons.

9 Impacts & Other Considerations

Does this Change Proposal impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

- 9.1 We do not believe that this CP or the related BSC and REC changes have any impact on SCRs or other significant industry change projects.
- 9.2 The P441 Workgroup did discuss whether P441 and related DCUSA and REC changes have an impact on the Market-Wide Half Hourly Settlement (MHHS) Programme, and concluded that there is no direct impact, as P441 is just formalising Complex Site arrangements that are already in use. There is an issue with the MHHS design not fully capturing current Complex Site requirements (which has been captured as Work Off Item D-008), but that issue is independent of P441.
- 9.3 We also believe that this CP does not impact the DUoS Charges SCR, as it is a technical change to the data flows used for charging (and does not have any impact on what DUoS charges are payable).

Impacts on other Industry Codes

- 9.4 The Proposer and Working Group agree that there are potential impacts to the BSC and REC as explained earlier in this consultation.

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

10 Implementation Date

- 10.1 The intended implementation date is to align to the P441 and REC change R0133 implementation date is currently the November 2026 DCUSA release
- 10.2 The Working Group would like views on whether the implementation date is suitable.

Question 05: Do you agree with the proposed Implementation date?

Question 06: Do you have any other comments?

11 Consultation Questions

11.1 The Working Group is seeking industry views on the following consultation questions:

No.	Questions
1	Do you agree that the updated solution caters fully for both MHHS and non-MHHS MPANs? Are there any further changes needed?
2	Do you agree that the changes to the legal text fully reflect the updated solution and the other issues identified? Are there any further changes needed?
3	Do you have any comments on the drafted legal text?
4	Do you consider the solution better facilitates the DCUSA objectives? Please give supporting reasons.
5	Do you agree with the proposed Implementation date?
6	Do you have any other comments?

11.2 Responses should be submitted using Attachment 1 to dcusa@electralink.co.uk no later than, close of business on 03 July 2026

11.3 Responses, or any part thereof, can be provided in confidence. Parties are asked to clearly indicate any parts of a response that are to be treated confidentially.

12 Attachments

- Attachment 1 – DCP 424 Consultation 2 Response Form
- Attachment 2 – DCP 424 Change Proposal Form
- Attachment 3 – DCP 424 Consultation 1 Document and Responses
- Attachment 4 - DCP 424 Draft Legal Text