

## DCP 468

### DCP 468 'Remove Redundant DataFlow from DTC/EMDS' - COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

Company	Confidential/ Anonymous	1. Do you understand the intent of the CP?
IDCSL	Non-confidential	Yes
Northern Powergrid	Non-confidential	We understand the intent of the CP, to remove the redundant D0164 / MM00069 market message.
SP Energy Networks	Non-confidential	Yes, we understand the high-level intent of the CP, which is to review whether the D0164 'Notification of New or Changed Interruption of Supply' flow remains required given its extremely low usage and lack of clear current obligations.
Npower Commercial Gas Limited	Non-confidential	Yes we understand the intent of the CP
Working Group Conclusions: All respondents said they understand the intent of the Change Proposal.		

Company	Confidential/ Anonymous	2. Are you supportive of the principle of the CP?
IDCSL	Non-confidential	Yes
Northern Powergrid	Non-confidential	Yes, we are supportive of the principles of this CR.

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SP Energy Networks	Non-confidential	Yes, SPEN is supportive of the principle of this Change Proposal. Given the very low usage of the D0164 flow and the absence of any operational dependency on it within SPEN, we support reviewing and potentially removing the flow if it is deemed redundant.
Npower Commercial Gas Limited	Non-confidential	Yes we support the removal of the D0164 flow
Working Group Conclusions: All respondents confirmed that they support the principle of the Change Proposal.		

Company	Confidential/ Anonymous	3. Do you believe the D0164 flow is needed?
IDCSL	Non-confidential	No, as identified in the change proposal and supporting consultation document, the flow appears to have mainly been used in testing and hardly at all in live operations. We believe it's use is a waste of resource as the main party impacted by the energy outages is the end consumer and the obligation to communicate with the end consumer is governed by the Guaranteed Standards of Performance and electricity distribution licence. We see no benefit in advising the Supplier of the scheduled outages or to update on prolonged unplanned outages.
Northern Powergrid	Non-confidential	We do not believe the market message is required and have no records of utilising this message.
SP Energy Networks	Non-confidential	No SPEN does not believe the D0164 flow is needed. We have no operational dependency on this flow, and only two instances were received in 2023, indicating extremely limited use. We are not aware of any current processes within SPEN that require the D0164, and therefore we see no ongoing need for it.

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Npower Commercial Gas Limited	Non-confidential	No we do not think that it is needed
<p>Working Group Conclusions:</p> <p>All respondents stated that they do not believe the D0164 flow is needed. The common view was that it is either not used at all or used extremely rarely, mainly in historic testing rather than live operations. Respondents also highlighted that communication with customers about interruptions is already covered by other obligations and processes, meaning the D0164 adds no practical value.</p>		

Company	Confidential/ Anonymous	4. Can you conceive a scenario whereby others may need to use the D0164 flow? If you have used this flow, and the reasons for using these.
IDCSL	Non-confidential	No we cannot envisage a scenario where the D0164 would be useful when other communication methods are more efficient and better targeted. IDCSL has never had cause to use the D0164.
Northern Powergrid	Non-confidential	As per answer to Q3, we are not aware of a scenario where D0164 will be required to be issued or received.
SP Energy Networks	Non-confidential	SPEN has no current operational use for the D0164 flow and does not rely on it for any part of our interruption-related processes. We have not identified any scenario in which SPEN would need to send or receive the D0164 going forward. Only two D0164 flows were received in 2023, and these were handled incidentally rather than as part of an active business requirement. On this basis, we cannot conceive of any scenario where SPEN or other parties would require ongoing use of this flow.
Npower Commercial Gas Limited	Non-confidential	We have not used the flow.

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#### Working Group Conclusions:

Respondents were unable to identify any realistic current or future scenarios where the D0164 flow would be required. None of the respondents currently use the flow, and those who had seen it historically said it was handled incidentally rather than as part of a defined business process. Overall, respondents could not see a situation where the flow would be needed going forward.

Company	Confidential/ Anonymous	5. Are you aware of an obligation or right in DCUSA or anywhere else which might be met or exercised by the use of D0164?
IDCSL	Non-confidential	No – in our opinion, the logical place for the use of the D0164 would be BSCP515 – Licenced Distribution (under the BSC); there is no reference to the D0164 in that procedure. We have been unable to locate a reference to the D0164 in the Retail Energy Code.
Northern Powergrid	Non-confidential	We are not aware of any requirement to utilise or send the D0164 in DUCSA, or via any other regulatory code obligation.
SP Energy Networks	Non-confidential	No, SPEN is not aware of any current obligation or right in DCUSA, or elsewhere, that requires or depends on the use of the D0164 flow. The DCUSA issue itself indicates that no clear obligation or right has been identified to justify its continued use, and our internal review has not found any SPEN processes or regulatory requirements that rely on this flow.
Npower Commercial Gas Limited	Non-confidential	No we are not aware of any obligation for which the flow might be used

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#### Working Group Conclusions:

No respondents were aware of any obligation or right, either in DCUSA or in other industry codes, that requires or relies on the use of the D0164 flow. Some respondents explicitly stated they had searched relevant codes and procedures and found no references to D0164. This reinforced the view that the flow has no clear regulatory basis for ongoing use.

Company	Confidential/ Anonymous	6. Do you agree with the Proposer and Workgroup that retaining unused flows in the DTC / EMDS is inefficient?
IDCSL	Non-confidential	Yes
Northern Powergrid	Non-confidential	We agree that the retention of data flows no longer used by industry parties is not efficient.
SP Energy Networks	Non-confidential	Yes, SPEN agrees that retaining unused or largely unused flows within the DTC/EMDS is inefficient. The D0164 flow has seen extremely limited usage (as evidenced by the very low volume reported by ElectraLink since 2012 and only two occurrences received by SPEN in 2023), and no current obligation or operational dependency has been identified. Removing redundant flows helps simplify industry processes, reduce maintenance overhead, and improve clarity within the data catalogue.
Npower Commercial Gas Limited	Non-confidential	Yes we agree that redundant flows should be removed from the should be removed from DTC / EMDs to remove any risk of them being sent erroneously

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##### Working Group Conclusions:

All respondents agreed that keeping unused or largely unused flows in DTC / EMDS is inefficient. The reasons given included unnecessary system complexity, ongoing maintenance effort, and the risk that redundant flows could be sent in error. Respondents supported simplifying the catalogue to reflect only flows with a real operational or regulatory purpose.

Company	Confidential/ Anonymous	7. Do you agree that a wider DTC / EMDS review would be beneficial to reassure industry that they do not retain other redundant flows?
IDCSL	Non-confidential	Yes
Northern Powergrid	Non-confidential	We agree that a wider DTC review is required, to allow industry conversation and review of other redundant data flows. This may improve efficiency and update coding and catalogues, potentially to a more streamlined set.
SP Energy Networks	Non-confidential	Yes, SPEN agrees that a wider review of the DTC/EMDS would be beneficial. The current Change Proposal highlights that the D0164 flow may be a legacy item with no remaining obligation or operational purpose, as noted by the proposer. A broader review would help identify and remove other similar redundant or unused flows, reducing complexity, improving data quality, and ensuring the catalogue accurately reflects current industry processes.
Npower Commercial Gas Limited	Non-confidential	Yes. Removing redundant flows requires system changes for us. An industry wide review would allow us to remove any redundant flows at the same time which reduce cost for us compared to an approach of removing flows individually when examples are found.

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##### Working Group Conclusions:

All respondents supported the idea of a wider review of DTC / EMDS to identify other redundant flows. It was noted that a coordinated, industry-wide review would be more efficient and cost-effective than removing flows on a case-by-case basis. A broader review was seen as a way to streamline systems and improve confidence that the data catalogue is up to date.

Company	Confidential/ Anonymous	8. Do you agree that CCSG should ask REC to review the wider DTC / EMDS to reassure industry that they do not retain other redundant flows?
IDCSL	Non-confidential	Yes
Northern Powergrid	Non-confidential	We agree that REC should be requested to review the wider DTC message catalogue for other redundant flows.
SP Energy Networks	Non-confidential	Yes, SPEN agrees that CCSG should ask REC to undertake a wider review of the DTC/EMDS. The D0164 Change Proposal demonstrates that some legacy data flows may no longer have a purpose or supporting obligation, and a broader review would help ensure that other redundant or obsolete flows are similarly identified and retired. This would support industry efficiency, reduce unnecessary complexity, and provide reassurance that the catalogue reflects current operational and regulatory needs.
Npower Commercial Gas Limited	Non-confidential	Yes for the same reason shown in question 7.

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#### Working Group Conclusions:

Respondents unanimously agreed that CCSG should ask REC to carry out a wider review. They considered this the appropriate route to ensure that any other obsolete or legacy flows are identified and addressed in a structured and coordinated way, rather than through individual Change Proposals.

Company	Confidential/ Anonymous	9. Do you agree with the Proposer that the proposal better facilitates the DCUSA General Objectives? Please give supporting reasons.
IDCSL	Non-confidential	We believe the proposal is neutral for all General Objectives as there is no reference to D0164 in the DCUSA and therefore no obligation or process to follow that is better facilitated. The D0164 is also not a flow that is 'owned' by the DCUSA.
Northern Powergrid	Non-confidential	Yes, we agree with the Proposer and with the reason's laid out in the Change Proposal, that this better facilitates DCUSA General Objectives 3 and 4.
SP Energy Networks	Non-confidential	Yes, SPEN agrees that this proposal better facilitates the DCUSA General Objectives. By identifying and removing a data flow that appears to be obsolete and unsupported by any current DCUSA obligation, the proposal promotes efficiency and reduces unnecessary administrative burden within industry data processes. Simplifying the DTC/EMDS by retiring unused flows helps maintain a clear and accurate data environment, supporting effective coordination and communication between market participants.
Npower Commercial Gas Limited	Non-confidential	Yes it supports the idea of efficient, coordinated network operation.

#### Working Group Conclusions:



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Most respondents agreed that the proposal helps better facilitate DCUSA General Objectives, particularly those related to efficiency and coordinated operation. One respondent viewed the impact as neutral, noting that D0164 is not referenced in DCUSA and so does not clearly facilitate or obstruct the objectives. Overall, there was no view that the proposal was detrimental to the objectives.

Company	Confidential/ Anonymous	10. Are you aware of any wider industry developments that may impact upon or be impacted by this CP?
IDCSL	Non-confidential	No
Northern Powergrid	Non-confidential	We are not aware of any other impacts, though the view of all parties should be considered.
SP Energy Networks	Non-confidential	No, SPEN is not aware of any wider industry developments that would impact, or be impacted by, this Change Proposal. From our perspective, the D0164 flow appears to be an isolated legacy item with no active links to current or forthcoming industry processes or obligations
Npower Commercial Gas Limited	Non-confidential	No
Working Group Conclusions: No respondents identified any wider industry developments that would be affected by, or would affect, DCP 468. The general view was that the D0164 flow is a standalone legacy item with no linkage to current or future industry initiatives.		

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Company	Confidential/ Anonymous	11. Are you supportive of the proposed implementation date of this CP?
IDCSL	Non-confidential	Yes
Northern Powergrid	Non-confidential	We agree with the proposed implementation for this DCP, as at 20 working days following approval.
SP Energy Networks	Non-confidential	Yes, SPEN is supportive of the proposed implementation date. As we have no operational dependency on the D0164 flow and do not foresee any impact on our internal processes, we have no objection to the proposed timeline.
Npower Commercial Gas Limited	Non-confidential	Yes we support the implementation date of 05/11/2026
<p>Working Group Conclusions:</p> <p>All respondents supported the proposed implementation date. This support was based on the fact that there are no operational dependencies on the D0164 flow and therefore no need for an extended implementation period. No concerns were raised about readiness or impact.</p>		

Company	Confidential/ Anonymous	12. Do you have any other comments?
IDCSL	Non-confidential	No
Northern Powergrid	Non-confidential	N/A

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SP Energy Networks	Non-confidential	No further comments from SPEN. We support the proposal and have no operational dependency on the D0164 flow.
Npower Commercial Gas Limited	Non-confidential	No
<p>Working Group Conclusions:</p> <p>Respondents did not provide any substantive additional comments. Where comments were made, they simply reiterated support for the proposal and confirmed that there is no reliance on the D0164 flow within their organisations.</p>		