







DCUSA Change Report		At what stage is this document in the process?
<h1>DCP 468</h1> <h2>Remove Redundant DataFlow from DTC/EMDS</h2> <p><b>Date Raised:</b> 14 November 2025  <b>Proposer Name:</b> Mark Bellman  <b>Company Name:</b> SP Electricity North West  <b>Party Category:</b> DNO</p>		01 - Change Proposal
		02 - Consultation
		03 - Change Report
		04 - Change Declaration
<b>Purpose of the Change Proposal</b> D0164 / MM00069 might be a redundant relic from 1998. The Proposer can find no current obligation, nor any right, under DCUSA which would either be discharged or exercised (respectively) by its use. If no longer required, any such redundant data flows should be removed from DTC/EMDS.		
	This document is issued in accordance with Clause 11.20 of the DCUSA. Parties are invited to consider the proposed amendment and submit their votes using the voting form (Attachment 1) to <a href="mailto:dcusa@electralink.co.uk">dcusa@electralink.co.uk</a> by no later than 12 June 2026. Votes received after this date cannot be counted.	
	The voting process for the proposed variation and the timetable of the progression of the CP through the DCUSA Change Control Process is set out in this document.	
	If you have any questions about this paper or the DCUSA Change Process, please contact the DCUSA by email to <a href="mailto:dcusa@electralink.co.uk">dcusa@electralink.co.uk</a> or telephone 020 7432 3011.	
	<b>Impacted Parties</b> Suppliers/ DNOs/ IDNOs	
	<b>Impacted Clauses</b> By definition, there is not expected to be any impacted DCUSA clauses.	

Contents		 Any Questions?
1	Summary.....	3
2	Governance .....	4
3	Why Change? .....	4
4	Initial Working Group Assessment – Pre Consultation .....	4
5	Working Group Consultation Review.....	5
6	Working Group Conclusions & Final Solution .....	6
7	Relevant Objectives .....	6
8	Impacts & Other Considerations .....	7
9	Implementation .....	8
10	Legal Text .....	8
11	Recommendations .....	8
12	Attachments .....	8
Timetable		
Activity	Date	
Initial Assessment Report	21 January 2026	
Consultation Issued to Parties	17 March 2026	
Change Report Approved by Panel	20 May 2026	
Change Report issued for Voting	21 May 2026	
Party Voting Closes	12 June 2026	
Change Declaration Issued	16 June 2026	

<b>Contact</b> Code Administrator
 <a href="mailto:dcusa@electralink.co.uk">dcusa@electralink.co.uk</a>
 0207 432 3011
<b>Proposer</b> SP Electricity North West
Mark Bellman  <a href="mailto:mark.bellman@enwl.co.uk">mark.bellman@enwl.co.uk</a>

# 1 Summary

## What?

- 1.1 The Proposer believes there is at least one dataflow (D0164 a.k.a. MM00069) that has existed since 1998, that meets no codified need, is no longer in use and therefore should be removed from the Data Transfer Catalogue (DTC) / Electricity Market Data Specification (EMDS).
- 1.2 The Proposer has looked for an obligation or right in DCUSA which might be met or exercised by the use of D0164, finding no such need for the flow.
- 1.3 In particular and considering the title of the flow, the Proposer considered whether it would meet the notice obligations in DCUSA for:
  - Incident Management as outlined in DCUSA 30.13.
    - the flow does not contain a data item for the no. of MSIDs. And 30.13 explicitly states 'by email' rendering a flow unnecessary.
  - Section 2A Clause 25.22 for System Outage.
    - the flow is not sent to 'Connectee'.
  - Section 2B Clause 41.2 & 41.6 for System Outage.
    - the flow is not sent to IDNO or OTS

## Why?

- 1.4 It is evident that existing market participants and code bodies have routinely produced D0164s during testing which are of no value, consuming resources unnecessarily. Secretariat has confirmed from sources within Electralink that:
  - Only 674 instances of D0164 have been sent since April 2012
  - These were sent from MPIDs of 12 IDNOs, 2 DNOs and 3 REC/MRA
  - Of which 565 were from REC/MRA and 32 from IDNOs, all tagged as 'test' flows.
  - Of the remaining 77 instances, 76 were sent in 4 batches
    - on two dates in 2013 (totalling 25) from 1 DNO, and
    - on two dates in 2023 (totalling 51) from 1 IDNO.
    - Although none of these batches were tagged as 'test', given their 'one-off batch' nature, it seems likely they were test, or at least unlikely that they related to actual supply interruptions.
  - That leaves 1, sent by a second DNO which was not tagged as 'test' flow.
  - The Proposer considers that it might be worthwhile for Secretariat to ask the two DNOs and the one IDNO to confirm that these 77 flows were indeed not 'live operational' dataflows.
- 1.5 Retaining redundant flows in EMDS runs the risk that they are sent/received erroneously to market participants. This could result in non-value time and effort to assess what it is to be used for.

- 1.6 It is also conceivable that market participants, particularly those new to the industry, could be misled into believing it has a role, worst case developing processes or systems to use it only to find it is of no practical value.
- 1.7 It is a simple principle of efficiency that unnecessary processes should be eliminated. The retention of redundant data flows is a credibility risk for industry, particularly at a time of criticism about complexity in the industry.

#### How?

- 1.8 The Proposer believes that there are two steps to take here, the first of which is the subject of this Change Proposal and the second of which is initiated by RECCo Panel engagement with this Proposal and progressed under the aegis of their own governance, if, and in the manner in which, they consider appropriate to reassure industry that all flows in EMDS remain in current use.

## 2 Governance

### Justification for Part 1 or Part 2 Matter

- 2.1 This CP should be considered a Part 2 Matter. The Proposer considers that the matter of removing a redundant dataflow is not something that warrants Authority determination since it should have no effect on competition.

### Requested Next Steps

- 2.2 The Panel considered that the Proposer has carried out the level of analysis required to enable Parties to understand the impact of the proposed amendment and to vote on DCP 466.
- 2.3 The DCUSA Panel recommends that this CP:
  - be issued to Parties for voting.

## 3 Why Change?

- 3.1 A change to the code is not proposed. Following implementation of DCP462 on 22nd October 2025, the process for amending DCUSA-owned dataflows (DCUSA Messages) follows the change process drafted in clauses 9 – 14 of DCUSA. The Proposer understands that if approved, then the Secretariat will advise REC to make the appropriate changes in EMDS As for the detailed reasons for the change see Why? In Section 1 above.

## 4 Initial Working Group Assessment – Pre Consultation

### Working Group Assessment

- 4.1 The DCUSA Panel established a Working Group to assess this CP. Meetings were held in open session and the minutes and papers of each meeting are available on the DCUSA website – [www.dcuda.co.uk](http://www.dcuda.co.uk).

### Working Group Discussions

- 4.2 The Working Group discussed the proposal and unanimously agreed with the Proposers solution. Members agreed that there are no reasons to retain the D0164 flow if it is not used.
- 4.3 For absolute clarity, the Working Group agreed that it would be beneficial to seek wider industry feedback to ensure that the D0164 flow is not used for any reasons that may be unknown prior to progressing this change.

- 4.4 The Proposer has looked for an obligation, or right in DCUSA which might be met or exercised by the use of D0164.
- 4.5 Working Group members agreed with the Proposer that there is no such need for the flow that can be found, however, members agreed to seek wider industry feedback for clarity.
- 4.6 The Proposer stated that there is at least one dataflow (D0164 / MM00068) that no longer meets a codified need and is therefore no longer in use. The Working Group support this and believe that unused flows should be removed from the Data Transfer Catalogue (DTC) / Electricity Market Data Specification (EMDS) to ensure efficiency.
- 4.7 The working group noted that it may be beneficial for a wider review of the DTC/ EMDS across all code ownerships to identify if there are any other unused flows. The recommendation is that this is raised at the Cross Code Steering Group (CCSG) initially to see if a wider review could take place.

## 5 Working Group Consultation Review

- 5.1 The Working Group issued a consultation to industry on 17 March 2026. The following section provides a summary of the responses received. The full consolidated version of the consultation responses can be found in Attachment 2.

### **Do you understand the intent of the CP?**

- 5.2 All respondents said they understand the intent of the Change Proposal.

### **Are you supportive of the principle of the CP?**

- 5.3 All respondents confirmed that they support the principle of the Change Proposal.

### **Do you believe the D0164 flow is needed?**

- 5.4 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.

### **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.**

- 5.5 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.

### **Are you aware of an obligation or right in DCUSA or anywhere else which might be met or exercised by the use of D0164?**

- 5.6 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.

### **Do you agree with the Proposer and Workgroup that retaining unused flows in the DTC / EMDS is inefficient?**

- 5.7 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.

**Do you agree that a wider DTC / EMDS review would be beneficial to reassure industry that they do not retain other redundant flows?**

- 5.8 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.

**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?**

- 5.9 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.

**Do you agree with the Proposer that the proposal better facilitates the DCUSA General Objectives? Please give supporting reasons.**

- 5.10 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.

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

- 5.11 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.

**Are you supportive of the proposed implementation date of this CP?**

- 5.12 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.

**Do you have any other comments?**

- 5.13 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.

## 6 Working Group Conclusions & Final Solution

- 6.1 Following the close of the industry consultation, the Working Group reviewed the responses received.
- 6.2 Based on the fact that all respondents agreed with the proposed solution and there were no points raised that required further consideration, the working group agreed that the D0164 / MM00069 Data Flow/ Market Message should be removed from the DTN/ EMDS.

## 7 Relevant Objectives

### Assessment Against the DCUSA Objectives

- 7.1 For a DCUSA CP to be approved it must be demonstrated that it better facilitates the DCUSA Objectives. This CP is being assessed against the DCUSA General Objectives.

	DCUSA General Objectives	Identified impact
--	--------------------------	-------------------

<input type="checkbox"/>	The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks	None
<input type="checkbox"/>	The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent therewith) the promotion of such competition in the sale, distribution and purchase of electricity	None
<input checked="" type="checkbox"/>	The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences	Positive
<input checked="" type="checkbox"/>	The promotion of efficiency in the implementation and administration of the DCUSA	Positive
<input type="checkbox"/>	Compliance with the EU Internal Market Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	None

- 7.2 Removing redundant dataflows from the DTC / EMDS will reduce wasted effort by existing and new market participants otherwise spent analysing, developing, assessing use of the redundant flows.
- 7.3 The proposal will also render the code administrators' (DCUSA and REC) maintenance of the data flow catalogue / specification more efficient by avoiding unnecessary activity.
- 7.4 The proposal will also reduce the likelihood that parties' IT departments continue to process dataflows during testing activities, thereby reducing non-value activity.

## 8 Impacts & Other Considerations

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

8.1 No

### Impacts on other Codes

8.2 The Proposal does not impact on other codes per se but could result in actions on other Code Secretariat or Panels to review the EMDS for redundant or relic dataflows.

### Consumer Impacts

8.3 N/A.

### Environmental Impacts

8.4 In accordance with DCUSA Clause 10.4.5A, the Proposer assessed whether there would be a material impact on greenhouse gas emissions if this CP were implemented. No impacts on greenhouse gas emissions were identified.

### Are there any wider industry impacts?

- 8.5 It seems likely that much if not quite all of DTC / EMDS has been thoroughly reviewed during the MHHS Programme. However, this flow has slipped through that net. The Proposer would therefore like the industry to receive assurance that there are no other redundant or relic data flows in the specification.
- 8.6 The Proposer would like the DCUSA Working Group to consider who best should provide this assurance, noting that could be from either RECCo (as holder of the EMDS) or the Secretariat of each Code that 'owns' Data Flows in EMDS.

- 8.7 Such assurances once obtained could be discussed by the DCUSA Working Group as to adequacy of the response and/or any contingent actions arising from residual exposures for parties and code administrators presented by redundant and relic dataflows.

## 9 Implementation

- 9.1 If approved, the D0164 / MM00069 Data Flow/ Market Message should be removed from the DTN/ EMDS on 5 November 2026.

## 10 Legal Text

- 10.1 Not applicable.

## 11 Recommendations

- 11.1 The Panel approved this Change Report on 20 May 2026. The Panel considered that the Working Group has carried out the level of analysis required to enable Parties to understand the impact of the proposed amendment and to vote on this CP.
- 11.2 The Panel has recommended that this report is issued for voting and DCUSA Parties should consider whether they wish to submit views regarding this CP.

## 12 Attachments

- 12.1 Attachment 1 - DCP 468 Voting Form
- 12.2 Attachment 2 - DCP 468 Consultation and Industry Responses
- 12.3 Attachment 3 - DCP 468 Change Proposal Form