

DCUSA Change Report		At what stage is this document in the process?
DCP 478: Resolving Housekeeping Items Date Raised: 10/06/2026 Proposer Name: Peter Waymont Company Name: Eastern Power Networks Party Category: DNO		01 – Change Proposal
		02 – Consultation
		03 – Change Report
		04 – Change Declaration
Purpose of Change Proposal: The intent of this Change Proposal is to resolve housekeeping items 132, 133, 134, 135 and 136 and to correct any errors introduced as part of the implementation of the harmonised prioritisation process directed by Ofgem.		
	Governance: This document is issued in accordance with Clause 11.20 of the DCUSA, and details DCP 478 'Resolving Housekeeping Items'. Parties are invited to consider the proposed amendment (Attachment 1) and submit their votes by 06 August 2026 using either: - the manual voting form (Attachment 2) and sending to dcusa@electralink.co.uk; or - via the online voting form which will be available on the following page of the DCUSA website: DCP 478 'Resolving Housekeeping Items' The voting process for the proposed variation and the timetable of the progression of the Change Proposal (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 us by email: dcusa@electralink.co.uk or telephone: 02074323011.	
	 Impacted Parties: Suppliers/DNOs/IDNOs/CVA Registrants/Gas Suppliers/OTSO Party/SIPs	
	 Impacted Clauses: Various	

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Any questions?

Contact:

Code Administrator

DCUSA@electralink.co.uk

020 7432 3011

Proposer:

Peter Waymont

The Panel agreed to the following timetable:

Initial Assessment Report

17 June 2026

Consultation Issued to Industry Participants

N/A

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

10 August 2026

1 Summary

What?

- 1.1 Several housekeeping items have been added to the DCUSA Panel's housekeeping log over time that are of a simple textual tidy up nature. This change seeks to amend the DCUSA regarding those.
- 1.2 The items in the housekeeping log have been reviewed, and those that this change seeks to address are captured below (where the acronym HK stands for housekeeping):
 - HK132: "A missing "to" and a clarification in Schedule 32, Paragraph 6.3"
 - HK133: "Correct missing words in Clause 52Z.3 and potentially consider amend the references to Meter Operator Code of Practice to CoMCoP"
 - HK134: "Missing "Schedule 6 – Curtailable Connections" from table of contents of Schedule 13"
 - HK135: "Incorrect Term Used in Schedule 33"
 - HK136: "Determination of a Credit Allowance Factor (CAF) for users that do not have a Credit Rating from an Approved Credit Referencing Agency that is Ba3 / BB- or above"
- 1.3 This change will also be used to correct several errors introduced as part of the implementation of the harmonised prioritisation process directed by Ofgem.

Why?

- 1.4 This CP has been raised to resolve the issues that are periodically identified within the DCUSA which are recorded in the housekeeping log maintained by the DCUSA Panel. The implementation of this CP will ensure that the legal text throughout the DCUSA document is correct.

How?

- 1.5 By completing a review of the items recorded in the housekeeping log and subsequently revising the DCUSA document to incorporate the required amendments.

2 Governance

Justification for Part 2 Matter

- 2.1 As the amendments detailed in this Change Proposal are for housekeeping purposes, there is no material impact on Parties and thus, does not meet the criteria for it to be considered a Part 1 Matter.

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 478.
- 2.3 The DCUSA Panel recommends that this CP:
 - be issued to Parties for voting.

3 Why Change?

3.1 A number of housekeeping items have been added to the housekeeping register over time that are of a simple textual tidy up nature. The housekeeping items covered by this change include the following:.

HK132: “A missing “to” and a clarification in Schedule 32, Paragraph 6.3”

3.2 In paragraph 6.3 of Schedule 32, the following housekeeping change and point of clarification to be made:

- There is a missing word ‘to’ to be added; and
- The word ‘threshold’ to be made plural and the words ‘as applicable’ to be added.

6.3 *The exceptional circumstances described in Paragraph 6.1(b) will be subject to the following materiality thresholds, as applicable:*

HK133: “Correct missing words in Clause 52Z.3 and potentially consider amend the references to Meter Operator Code of Practice to CoMCoP”

3.3 The REC Code Manager have highlighted an issue with respect to the wording in Clause 52Z.3 which appears to be some missing words that results in the sentence not reading correctly:

Meter Operator Code of Practice

52Z.3 The Safe Isolation Provider shall only be entitled to exercise rights under this Section 2H while it is an accredited for the purposes of the Meter Operation Code of Practice under the Retail Energy Code. The Safe Isolation Provider shall comply with the Meter Operation Code of Practice in relation to the works undertaken pursuant to this Section 2H.

3.4 With respect to the missing wording, we believe this comes from some form of change to the legal drafting that was developed for DCP 394 which introduced that text. This is because at one point in time, towards the end of its development the following was the text that was circulated but then subsequently updated but without explanation:

Meter Operator Code of Practice

52W.3 The Safe Isolation Provider shall only be entitled to exercise rights under this Section 2G while it is an accredited Meter Operator Agent under the Retail Energy Code. The Safe Isolation Provider shall comply with the Meter Operation Code of Practice in relation to the works undertaken pursuant to this Section 2G.

3.5 The second component of their request relates to the defined terms used both in the body of the text but also in the sub-heading above it, with the two being different (i.e., as highlighted earlier the subheading is currently Meter Operator Code of Practice but the text below states Meter Operation Code of Practice. It should be noted that Meter Operation Code of Practice is the correct defined term in the DCUSA (see extract below):

3.6 This is complicated by the fact that it is not actually a defined term in the REC, but Meter Operator Code of Practice is defined:

<u>Meter Operator Code of Practice</u> Code of Practice	means the electricity metering code of practice that has now been incorporated into the <u>CoMCoP</u> and references to 'Meter Operator Code of Practice' or 'MOCOP' should read as references to the <u>CoMCoP</u>.
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3.7 One simple option might be to update the heading above Clause 52Z.3, to Meter Operation Code of Practice and then amend the defined term to state: “has the meaning given to the term Consolidated Metering Code of Practice in the Retail Energy Code” now that the Meter Operator Code of Practice has been incorporated into the Consolidated Metering Code of Practice. Otherwise, you could amend every reference of ‘Meter Operation Code of Practice’ to ‘Consolidated Metering Code of Practice’, however, this might be better dealt with as part of Code Consolidation as of the DCUSA and CUSC and part of Energy Code Reform.

HK134: “Missing “Schedule 6 – Curtailable Connections” from table of contents of Schedule 13”

3.8 In the table of contents for Schedule 13 ‘Bilateral Connection Agreement’, the text “Schedule 6 – Curtailable Connections” is not listed in the contents, but is in fact included on the last page as schedule that appears in Schedule 13.

3.9 It is believed that this was an oversight as part of the development of [DCP-405: Access SCR: Managing Curtailable Connections between Licensed Distribution Networks](#) which made those amendments to Schedule 13

HK135: “Incorrect Term Used in Schedule 33”

3.10 The erroneous term ‘Distribution Company’ is currently used in Paragraph 7.1 of Schedule 33. This term should be a reference to ‘DNO/IDNO Party’, which would be in line with the rest of Schedule 33.

7. LOGICAL DISCONNECTIONS – BULK UPDATES

7.1 A bulk update will be deemed to be 50 or more requests at any one time per Supplier Party. That Supplier Party will then enter into a bi-lateral agreement with the appropriate **Distribution Company**. The **Distribution Company** will determine the progress of such a request based on the number of similar requests received at any given time. It is expected that the requesting Supplier Party will have carried out all the relevant checks as per an individual request as outlined in Paragraph 6 above prior to submitting a bulk request.

3.11 This was introduced by DCP 391 ‘Retail Code Consolidation Significant Code Review’ which introduced Schedule 33 itself.

HK136: “Determination of a Credit Allowance Factor (CAF) for users that do not have a Credit Rating from an Approved Credit Referencing Agency that is Ba3 / BB- or above”

3.12 An industry party has proposed amending Schedule 1 paragraph 2.5(b) to replace the Paragraph references from being “2.12 to 2.14” to “2.12 to 2.15”. This is because the current referencing is not consistent with the referencing in paragraph 2.12 itself so potentially leaves a question over how Payment Record Factor (PRF) should be treated in the case of unpaid disputed invoices.

3.13 The relevant paragraphs and proposed change (in red) currently read as follows:

- 2.5 *Where the User does not have a Credit Rating from an Approved Credit Referencing Agency that is Ba3 / BB- or above, CAF shall be determined as follows:*
- a. *where there is, at the time of such determination, an Independent Credit Assessment that was carried out within the preceding 12 months and the User has not requested that the Company use the User’s Payment Record Factor, CAF shall be determined by reference to the Independent Credit Assessment provided pursuant to Paragraph 2.6 or procured pursuant to Paragraph 2.7 (and, in either case, in accordance with the table set out at Paragraph 2.10); or*
 - b. *where the User has requested that the Company use the User’s Payment Record Factor or there is not, at the time of such determination, an Independent Credit Assessment that was carried out within the preceding 12 months, CAF shall equal the Payment Record Factor (which shall be determined in accordance with the provisions of Paragraphs 2.12 to ~~2.14~~ 2.15).*
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- 2.12 *Where the User’s Payment Record Factor is to be used to determine the Credit Allowance Factor in accordance with Paragraph 2.5 (b), the Credit Allowance Factor shall equal the value of the Payment Record Factor determined in accordance with Paragraphs 2.13 to 2.15.*
- 2.14 *The Good Payment Performance Start Date shall:*
- a. *for Users under Section 2A, initially, be the date of the earliest of the first Initial Account, the first Reconciliation Account, or the first account issued pursuant to Clause 21 (each a **relevant account**);*
 - b. *for Users under Section 2B, initially, be the date of the earliest of the first account issued pursuant to Clause 44 or 45 (each a **relevant account**); and*
 - c. *for all Users, where the User fails (or has failed) on any occasion to pay any Charges on or before the applicable payment date required by this Agreement (and does not remedy that failure within 3 Working Days such that Paragraph 2.13(e) applies), be the date on which a relevant account is submitted in a month subsequent to the month in which such payment failure is remedied (unless, having regard to all the circumstances, including in particular the value, duration, and frequency of failure, the Company reasonably determines an earlier date).*
- 2.15 *Where any unpaid disputed invoice is found to have been disputed without merit, a failure to have paid the relevant account in accordance with the terms of this Agreement shall be treated as a failed payment and the provisions of Paragraph 2.14(c) shall apply accordingly.*

Ofgem Directed Amendments to the DCUSA relating to the introduction of a harmonised code modification prioritisation process

3.14 The Secretariat noted that when reviewing the DCUSA code text ([Annex E](#)) provided by Ofgem as part of their “[Energy code reform – decision on statutory consultation on modifications to industry codes to implement the harmonised code modification prioritisation process](#)”, a number of inconsistencies and minor drafting errors had been identified within the annexed legal text. These arose primarily due to formatting and the absence of fully track-changed documentation in the annex supplied by Ofgem. The Secretariat discussed these errors with Ofgem and that Ofgem had acknowledged and agreed that the errors were present in the Annex E drafting.

- 3.15 The Secretariat proposed that these inconsistencies and error be addressed through a forthcoming Housekeeping Change Proposal and noted that Ofgem agreed with this approach and stated a preference to correct these as quickly as practicable following implementations of the text.

4 Solution and Legal Text

Legal Text

- 4.1 A set of proposed amendments had been drafted and issued with the Change Proposal form. These were designed to resolve the relevant housekeeping log items noted in sections 1 and 3 above. The proposed amendments were reviewed by DCUSA Ltd.'s legal advisors.
- 4.2 The legal text can be found in Attachment 1 to this Change Report

Text Commentary

- 4.3 The proposed amendments are designed to resolve each of the relevant housekeeping log items as well as the errors introduced as part of the implementation of the harmonised prioritisation process directed by Ofgem.

5 Code Specific Matters

Reference Documents

- 5.1 None.

6 Relevant Objectives

Assessment Against the DCUSA Objectives

- 6.1 For a DCUSA Change Proposal to be approved it must be demonstrated that it better facilitates the DCUSA Objectives. There are five General Objectives and six Charging Objectives. The full list of objectives is documented in the DCUSA.
- 6.2 The Proposer considers that the following DCUSA General Objectives are better facilitated by this CP

	DCUSA General Objectives	Identified impact
☐	1. The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks	None
☐	2. 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
☐	3. The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences	None

☒	4. The promotion of efficiency in the implementation and administration of the DCUSA	Positive
☐	5. 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

6.3 Correcting the housekeeping items that have been periodically identified within the DCUSA document ensures that the legal text throughout the DCUSA document is fit for purpose and remains accurate. Doing so will aid comprehension, thereby improving efficiency which better facilitates DCUSA General Objective four.

7 Impacts & Other Considerations

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

7.1 It is not believed that this change will impact any SCR currently in progress and nor do any of the current SCRs impact upon this change.

Consumer Impacts

7.2 It is not believed that that this change will impact consumers.

Environmental Impacts

7.3 In accordance with DCUSA Clause 10.4.5A, it is not believed that there would be a material impact on greenhouse gas emissions if this change were implemented.

Consideration of Wider Industry Impacts

7.4 It is not believed that there are any wider industry impacts as a result of this change and that there are no known impacts associated with the wider industry that will impact upon this change.

Impacts on other Codes?

7.5 It is not believed that there are any impacts to any other 'Industry Codes' as a result of the implementation of this CP.

Grid Code..... ☐ SEC..... ☐ CUSC..... ☐
 Distribution Code... ☐ REC..... ☐ BSC..... ☐
 None..... ☒

8 Implementation

Proposed Implementation Date

- 8.1 It is proposed that this change be implemented 10 Working Days following party approval, which will be 24 August 2026.

9 Recommendations

Panel's Recommendation

- 9.1 The Panel approved this Change Report on 15 July 2026. 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 478.
- 9.2 The Panel have recommended this report be issued for voting and DCUSA Parties should consider whether they wish to submit views regarding this Change Proposal. The voting form acts as Attachment 2 to this Change Report or can be completed via the online voting form which will be available on the following page of the DCUSA website:
- [DCP 478 'Resolving Housekeeping Items'](#)

10 Attachments

- Attachment 1 – DCP 478 Legal Text
- Attachment 2 – DCP 478 Voting Form