

DCMDG Subgroup 07 Meeting 01

13 July 2026 – Web-conference

Attendee	Company
Working Group Members	
Blessing Ekpe	SSEN
Chris Barker	ENWL
Chris Ong	UKPN
Diandra Orodan	BUUK
Ed Grimsey	BUUK
Elaine Carr	SPEN
Georgia Preece	NPg
Hazel Paterson	SPEN
Peter Waymont	UKPN
Ryan Farrell	NPg
Suen Adedapo	NGED
Code Administrator	
Richard Colwill (Chair)	ElectraLink
Craig Booth (Technical Secretariat)	ElectraLink

1. Administration

Recording

- 1.1. The Chair informed Working Group members that, as per the terms of reference, the meeting would be recorded for the purpose of aiding the Technical Secretary in producing an accurate record of the meeting. The recording will be deleted after no later than 60 days after the meeting.

Competition Law Guidance and Terms of Reference

- 1.2. The Working Group reviewed the “Competition Law Guidance” and “Terms of Reference”. All Working Group members agreed to be bound by the Competition Law Guidance for the duration of the meeting.

2. Purpose of the Meeting

- 2.1. The Chair set out that the purpose of the meeting was to discuss the issue raised at the DCMDG.

3. Overview of the Issues

Supplier communications and LLFC allocation

- 3.1. Ryan outlined a number of P432-related issues that appear to be linked and may be better addressed through agreed industry guidance rather than a formal change proposal. Northern Powergrid had experienced cases where supplier communications had not reached the appropriate teams, resulting in distributors receiving queries about P432 migrations without having first received the required notifications. Similar issues had been experienced by SSEN and UKPN.
- 3.2. The group discussed cases where related MPANs had been submitted under P432 despite there being no equivalent half-hourly LLFC available. This was thought to arise either because the MPAN had previously been allocated incorrectly or because it should not have been submitted through the process. Members noted that distributors were having to determine whether to allocate such MPANs to Band 1 on a temporary basis, allocate them using available P222 data, or reject them altogether.

Domestic and non-domestic flag mismatches

- 3.3. Ryan highlighted cases where MPANs had migrated from domestic aggregated LLFCs but were submitted with non-domestic indicators, creating conflicts between customer classification and available LLFCs. Similar issues had been experienced by other distributors and had resulted in ongoing discussions with suppliers. The group observed that distributors were generally left with two practical options: temporary allocation to Band 1 or reassessment using available consumption data.

Whole current MPANs submitted under P432

- 3.4. Ryan raised concerns about MPANs being submitted under P432 despite being recorded as whole current rather than CT-metered. Members agreed that P432 was intended to apply to advanced CT-metered sites and noted that distributors had challenged suppliers where whole current MPANs appeared to have been included incorrectly.

Missing or incomplete supplier notifications

- 3.5. Ryan explained that distributors had also received queries about sites that suppliers believed should have been migrated under P432, despite the relevant information never having been provided. The group considered that many of the issues discussed stemmed from failures in supplier communication and notification processes.

4. Potential Resolutions of the Issues

Eligibility and treatment of exceptions

- 4.1. The group discussed whether some migrated MPANs remained eligible for the P432 arrangements and how related MPANs should be treated. It was recognised that distributors would not always be able to determine the relationship between MPANs and that affected MPANs may require pragmatic treatment, including temporary Band 1 allocation, reassignment using current data, or disconnection where a related MPAN was no longer required.

Development of agreed guidance

- 4.2. Members generally agreed that the current scale of the issues did not justify a DCP and that the subgroup should instead develop a consistent approach for distributors to follow. It was recognised that different exception types would require different treatments, including arrangements for related MPANs, domestic/non-domestic mismatches and whole current MPANs.

Whole current MPANs

- 4.3. The group agreed that MPANs recorded as whole current should not qualify for P432. Suppliers should be advised that such MPANs are ineligible and should correct any erroneous metering indicators before resubmitting them. Elaine noted that such issues should also form part of supplier and distributor data cleansing activities.

Communication Channels

- 4.4. Members discussed the importance of suppliers following the prescribed notification process. Where the required communication had not been received, distributors had generally reverted MPANs to their original position and required suppliers to resubmit using the appropriate route and template before processing could proceed.

5. Agreeing an Approach to P432 Exception Handling

Application of tariffs

- 5.1. The group discussed how distributors should determine the appropriate tariff where customer classifications had changed. Members considered that allocations should generally reflect the latest available information, although this could require additional assessment and may not always be supported by complete data.

Use of Band 1 as a default solution

- 5.2. The group considered whether Band 1 should be used as a pragmatic default where the correct allocation was unclear. The prevailing view was that, given the low volume of cases and limited duration of the transitional arrangements, Band 1 represented a proportionate interim solution. The group also agreed that any guidance should be broad enough to accommodate similar future scenarios.

Transitional periods start date

- 5.3. The group discussed when the 12-month transitional period should begin. Members noted that distributors generally interpret the period as commencing from the first full month following migration, which was considered consistent with existing charging arrangements.

Treatment of non-eligible MPANs

- 5.4. The group agreed that whole current MPANs should not benefit from the transitional arrangements and should instead be rejected until the relevant metering records had been corrected and resubmitted by the supplier.

Domestic/non-domestic precedence

- 5.5. The group discussed whether LLFCs or domestic/non-domestic indicators should take precedence where the two conflicted. The prevailing view was that the domestic/non-domestic marker should generally determine customer type, with LLFCs amended where required to align with the customer classification.

Supplier communication routes

- 5.6. The group reviewed previous concerns regarding submission routes and agreed that either SDEP or a dedicated mailbox could be used, provided the agreed information was submitted through a traceable process and reached the correct recipient.

Late supplier notifications and the three-month rule

- 5.7. The group discussed how late supplier notifications should be treated and considered whether transitional protection should apply where suppliers had failed to meet their notification obligations. Members reviewed the relevant DCUSA provisions and noted that suppliers are required to notify distributors within three months of initial migration. It was acknowledged that this requirement was introduced deliberately through DCP 458 and that accepting notifications beyond this period could create an open-ended obligation.
- 5.8. The group recognised the potential customer impacts but generally concluded that the three-month requirement should be applied as drafted and clearly reflected in future guidance. Members also agreed that it would be beneficial to understand why suppliers were not meeting the notification requirement in the first place.

6. Guidance Document

- 6.1. The group noted that the existing guidance may no longer reflect the latest DCUSA provisions following DCP 458 and may require updating. Members agreed that any review should also consider the inclusion of guidance covering exception scenarios, including related MPANs, whole current MPANs and other anomalies identified through the P432 process. It was proposed that an update be considered by the SIG before the subgroup reconvened to review any draft guidance.

7. Next Steps

- 7.1. Secretariat to review the DCP 414/458 Guidance and check that this is up to date. Should this need to be reviewed and updated, this will be raised at the SIG (after which any subsequent updates will be discussed with this subgroup.)

- 7.2. Secretariat to produce a draft of the agreed resolution steps for the issues discussed and circulate this to the subgroup for review.
- 7.3. The subgroup to review and provide feedback on the draft guidance related to exception handling.

8. Any Other Business

- 8.1. No other business was raised.

9. Next Meeting

- 9.1. It was agreed to review the actions via email and arrange a meeting, via poll, only if necessary.

New and Open Actions

Action Ref.	Action	Owner	Update
01/01	Produce a draft of the agreed resolution steps for the issues discussed and circulate this to the subgroup for review.	Secretariat	New Action
01/02	Review the DCP 414/458 Guidance and check that this is up to date. Should this need to be reviewed and updated, this will be raised at the SIG. Any subsequent updates will be discussed with the subgroup.	Secretariat	New Action
01/03	Review and provide feedback on the draft guidance related to exception handling.	Subgroup Members	New Action – dependant on actions 01/01 and 01/02 being completed

Closed Actions

Action Ref.			Update