

DCMDG Subgroup 06 Meeting 01

20 July 2026 – Web-conference

Attendee	Company
Working Group Members	
Cass Bothwell	SPEN
Chris Ong	UKPN
Dave Wornell	NGED
Erik Baguzis	Indigo Networks
Georgia Preece	NPg
James Jones	SSEN
Lorna Murray	SPEN
Ryan Farrell	NPg
Code Administrator	
Richard Colwill (Chair)	ElectraLink
Craig Booth (Technical Secretariat)	ElectraLink
Apologies	
Suen Adedapo	NGED

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 issues raised at the DCMDG.

3. Overview of the Issues

- 3.1. The Subgroup discussed issues associated with the September 2026 Annual Allocation Review (AAR), specifically where Schedule 32 requires charging band reallocations to be backdated, but MHHS migration restrictions may prevent DNOs and IDNOs from implementing backdating as prescribed. Concerns were raised that Market-wide Half-Hourly migrated MPANs cannot be backdated beyond their migration date, which may prevent compliance with the current DCUSA requirements. Group members agreed that while a longer-term solution is likely to require a Change Proposal, there is insufficient time for such a change to be implemented before the September 2026 AAR and therefore a derogation is likely to be required for this year's process.
- 3.2. The Subgroup also considered whether the 2026 AAR should assess allocations spanning both ET2 and ET3 periods. Members reviewed the Schedule 32 drafting and discussed the reference to a site's "current charging band". The prevailing view was that the AAR should only consider current ET3 allocations rather than revisiting ET2 allocations. Members noted that ET3 charging bands are effectively new allocations from 1 April 2026, even where a site remains within the same numbered charging band. It was recognised that applying the review only to current ET3 allocations would significantly simplify implementation and provide a more legally defensible interpretation of the DCUSA drafting.
- 3.3. The Subgroup acknowledged that this interpretation does not fully resolve the issue of MHHS-migrated sites where backdating to 1 April 2026 may still be impossible. However, limiting the review to ET3 allocations substantially reduces the scale of the issue, leaving only those sites that migrated after 1 April 2026 requiring an alternative approach.
- 3.4. Future-year risks were also discussed. Members noted that annual allocation reviews may continue to be affected by MHHS migration and settlement-related backdating restrictions beyond 2026. The Subgroup therefore considered that a future Change Proposal will likely be required to future-proof the Schedule 32 drafting and ensure the AAR process remains operable as MHHS and settlement arrangements evolve.

4. Agreed Way Forward

ET2 & ET3 Periods

- 4.1. The Subgroup agreed that, for the purposes of the 2026 AAR, Schedule 32 should be interpreted as applying only to current ET3 charging band allocations. Members concluded that the drafting does not support undertaking separate ET2 and ET3 allocation reviews and that reallocations should therefore only be considered in the context of ET3 allocations effective from 1 April 2026 onwards.

MHHS Migration Restrictions Derogation

- 4.2. The Subgroup further agreed that a derogation request should be progressed to address circumstances where DNOs and IDNOs are unable to backdate charging band changes to 1 April 2026 because MHHS migration restrictions prevent changes being applied before the migration date. The derogation will seek approval for parties to backdate changes as far as system and registration rules allow where full compliance with the Schedule 32 requirements is not possible.
- 4.3. Members agreed that the derogation should be drafted broadly enough to address backdating restrictions generally rather than focusing solely on MHHS migration scenarios. This would help ensure that any other registration or system limitations preventing implementation of the AAR requirements are also captured.
- 4.4. The Subgroup agreed that the rationale and interpretation underpinning the ET3-only approach (as per paragraph 4.1 above) should be reflected within the derogation documentation, helping to communicate the agreed industry position to DNOs, IDNOs, other DCUSA Parties and the DCUSA Panel
- 4.5. Members also agreed that a future Change Proposal will likely be required to address the underlying issue permanently and future-proof the Schedule 32 backdating requirements. Whilst this can be raised for discussion at the DCMDG, it will ultimately need to be raised by a DCUSA Party.

Action 01/01	Chris Ong to prepare an initial draft derogation request based on previous derogations and circulate to the Subgroup for review.
Action 01/02	Chris Ong to circulate the draft derogation to Subgroup members, including IDNO representatives (it was suggested engaging with Donne Jamieson, IDNO Panel member), for comment and agreement.
Action 01/03	Subgroup members to review and finalise the derogation with the aim of issuing it to industry ahead of the August DCUSA Panel timetable. (The deadline for issue is 27 August 2026.)

5. Any Other Business

MHHS Data Flows (IF040)

- 5.1. The Subgroup discussed the IF040 data flow, which replaces the P222 data currently used for certain non-half-hourly allocation activities following MHHS implementation. Members noted that this data flow is referenced within Schedule 32 and is expected to be required for future allocation and reallocation activities. Several participants indicated that they did not yet have visibility of the data flow or know how it would be accessed in practice. DNOs and IDNOs were encouraged to

establish whether their organisations already receive the IF040 data and, if not, begin arrangements to obtain access.

Measurement Class G Data

- 5.2. The Subgroup highlighted the continued requirement for Measurement Class G data to support the allocation review process. Members noted that this information would be required in the near future and sought assurance that the annual provision process remained on track.
- 5.3. The Chair was asked whether ElectraLink had this in hand and to confirm delivery timelines. It was noted that the data would be required during August and that early provision would assist parties in preparing for the AAR process. The Chair agreed to discuss the matter internally and provide an update.

Action 01/04	Chair to reach out internally to check on the timescales for providing the measurement class G data.
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DCP 466 Update

- 5.4. An update was provided on DCP 466, with the current Ofgem target decision date understood to be 14 September 2026. Members noted that, even if approved, the implementation timetable means the proposal would not resolve the immediate issues affecting the September 2026 AAR.

6. Next Meeting

- 6.1. No further meetings are currently scheduled.

New and Open Actions

Action Ref.	Action	Owner	Update
01/01	Prepare an initial draft derogation request based on previous derogations and circulate to the Subgroup for review.	Chris Ong	New Action
01/02	Circulate the draft derogation to Subgroup members, including IDNO representatives (it was suggested engaging with Donne Jamieson, IDNO Panel member), for comment and agreement.	Chris Ong	New Action
01/03	Review and finalise the derogation with the aim of issuing it to industry ahead of the August DCUSA Panel timetable. (The deadline for issue is 27 August 2026.)	All Members	New Action
01/04	Reach out internally to check on the timescales for providing the measurement class G data.	Chair	New Action

Closed Actions

Action Ref.			Update