

| DCUSA Consultation                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | At what stage is this document in the process?                                                                                |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|
| <h2>DCP 476:</h2> <h3>Treatment of multi MPAN sites</h3> <p><b>Date Raised:</b> 01/06/2026</p> <p><b>Proposer Name:</b> Chris Ong</p> <p><b>Company Name:</b> Eastern Power Networks</p> <p><b>Party Category:</b> DNO</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <div>01 – Change Proposal</div> <div>02 – Consultation</div> <div>03 – Change Report</div> <div>04 – Change Declaration</div> |
| <p><b>Purpose of Change Proposal</b></p> <p>To determine how a site-specific billed site which has multiple MPANs but which are traded with different Suppliers should be treated.</p>                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                               |
|                                                                                                                                         | <p>This document is a Consultation issued to DCUSA Parties and any other interested Parties in accordance with Clause 11.14 of the DCUSA seeking industry views on DCP 476.</p> <p>The Working Group recommends that this Change Proposal should proceed to Consultation.</p> <p>Parties are invited to consider the questions set in section 10 and submit comments using the form attached as Attachment 2 to <a href="mailto:dcusa@electralink.co.uk">dcusa@electralink.co.uk</a> by 14 September 2026.</p> |                                                                                                                               |
|                                                                                                                                         | <p><b>Impacted Parties</b></p> <p>Suppliers/DNOs/IDNOs/CVA Registrants</p>                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                               |
|                                                                                                                                         | <p><b>Impacted Clauses</b></p> <p>Schedules 16/17 and 18</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                               |

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| Timetable                                      |                                |  +44 1293 657939 |
| Activity                                       | Date                           |                                                                                                     |
| Initial Assessment Report                      | 17 June 2026                   |                                                                                                     |
| Consultation Issued to Industry Participants   | 21 August 2026                 |                                                                                                     |
| Change Report Approved by Panel                | 21 October 2026                |                                                                                                     |
| Change Report issued for Voting                | 22 October 2026                |                                                                                                     |
| Party Voting Closes                            | 12 November 2026               |                                                                                                     |
| Change Declaration Issued to Parties/Authority | 16 November 2026               |                                                                                                     |
| Authority Decision                             | TBC                            |                                                                                                     |



Any questions?

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## 1 Summary

### What?

- 1.1 Determine how a site-specific billed site with multiple MPANs, which are registered with different Suppliers should be treated for the allocation of the capacity and standing charges.

### Why?

- 1.2 Currently where a site has multiple MPANs it is often billed one fixed charge and one capacity charge to recognise the connection agreement is with the whole site. However, there are no controls in industry processes that cause the MPANs to remain aligned and they can be split over more than one Supplier. This causes more than one billing account to be required, and capacity to be split (often pro-rated?) over the billing accounts. This results in two or more standing charges being applied to the site for both Distribution Use of System (DUoS) and Transmission Network Use of System (TNUoS), increasing the costs ultimately to the Customer. It is important that this is fully considered in any proposed solution for this change, as using the whole site capacity for the banding of each MPAN could result in three higher bands being applied where the site has three MPAN each with different Suppliers, rather than three lower bands if the capacity was split, or a single higher band applied should all the MPANs be with the same Supplier.
- 1.3 Schedule 32 of DCUSA would appear to suggest that the site should be banded on the whole site's total capacity which leads to invoices quoting a (split) capacity that may not be aligned to the band the tariff is for.
- 1.4 However that may be unclear from an invoice validation perspective, and it could be preferable to change the band so that each billing account is billed based upon the capacity allocated to each MPAN.
- 1.5 This would lead to questions as to what should then happen if the MPANs become re-aligned.

### How?

- 1.6 To include a clear definition of how a site with multiple MPANs which are registered to different Suppliers are treated for the allocation of their standing and capacity charges and also how they are banded.

### Who?

- 1.7 DNOs, IDNOs, CVA Registrants and Suppliers would be impacted.

## 2 Governance

- 2.1 In line with the Proposer's response to the above items, this change proposal was originally raised as a Part 2 Matter. During the Panel meeting that was held in June 2026 however, the Panel considered whether it should be a Part 1 Matter as it relates to the Charging Methodologies which are usually subject to Ofgem approval.

### Panel Assessment – 17 June 2026

- 2.2 Since the proposal impacts the DCUSA Charging Methodologies and influences how charges are applied and billed to customers, the Panel considered it to be a Part 1 matter.

### Requested Next Steps

- 2.3 This Change Proposal should:
- Be treated as a Part 1 Matter;
  - Be treated as a Standard Change; and
  - Proceed to the Working Group phase.
- 2.4 This consultation is issued for a period of 15 working days. The Working Group will review the responses after this period.

## 3 Why Change?

- 3.1 As the existence of sites with multiple MPANs split across different Suppliers is largely invisible in DCUSA there is likely to be a variety of solutions in place across different DNOs / IDNOs. This change would look to put into place a clear definition of how the site is treated for the allocation of its total capacity (as detailed into the connection agreement) and also how and on what basis the billing accounts should be banded.
- 3.2 Where all MPANs at a multi-MPAN site are registered with the same Supplier, the site may be treated collectively for charging purposes. The Working Group discussed that complications can arise where MPANs relating to the same site are registered with different Suppliers. In that circumstance, more than one billing account may be required and the site capacity may need to be allocated across those accounts.
- 3.3 The Working Group noted that current treatment may not be consistent across organisations. Questions arise over how site capacity should be allocated between MPANs, how fixed and capacity charges should be applied, and whether the residual charging band should be determined using the total capacity of the single site or the capacity allocated to each individual MPAN.
- 3.4 The issue may produce different charging outcomes depending on the configuration of the site, the number of Suppliers involved, the allocation method and the applicable regional tariffs. The purpose of DCP 476 is not to transfer costs between defined groups. Its focus is to establish a clear and consistent principle for the treatment of the relevant sites.
- 3.5 The Working Group recognised that customers must remain able to choose and change Supplier. DCP 476 is not intended to require all MPANs at a site to be registered with the same Supplier. The consultation is concerned with the charging treatment that should apply when multiple Suppliers are present.
- 3.6 The Working Group considered that respondents would benefit from a small number of conceptual solution approaches and worked examples showing how fixed and capacity charges could differ under

each approach. The examples should concentrate on fixed and capacity elements, rather than unit charges, and should illustrate that outcomes may vary between distribution regions and site configurations.

### The Options

3.7 There are two related issues which DCP476 is looking to clarify.

The first is how to assign the residual banding:

(a) In the case of multi-MPAN sites with a single supplier, the practice is to base the banding on the capacity of the whole site<sup>1</sup> (. This is referred to as the '**Baseline**' scenario further below; or

(b) In the case of multi-MPAN sites with more than one supplier, it is proposed that a residual band should be assigned to each MPAN, based on a share of the site's total capacity<sup>2</sup>, for which two possible options are proposed:.

(a) to allocate an evenly split capacity share to each MPAN ('**Option A**' below) or

(b) to allocate a share based upon the Maximum Capacity utilised by each MPAN ('**Option B**' below).

3.8 To illustrate this, we have used two example Customers, across two different DNO networks, Eastern Power Networks (EPN) is broadly representative of most DNOs (although the revenue numbers and as a result the charges will differ), and London Power Networks (LPN) is a network which often has negative residual so has been chosen as an outlier.

3.9 The examples shown below only reflect the DUoS charge, and do not show the impact upon TNUoS residual charges, which especially for the larger, higher voltage customers can be far more significant than DUoS.

3.10 Although the capacity charge has been included in the examples, this charge will remain the same regardless of how the capacity is split or allocated between the MPANs on a site. In most cases it will only be the fixed charge which differs, although there have been circumstances in recent years (for example in the LPN region) where negative residual has led to a zero fixed charge being calculated, and the unit rates differing across different bands where under normal circumstances these would be the same charge (p/kwh). This is in order to recover the correct amount of residual revenue.

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<sup>1</sup> assuming it is a 'Final Demand Site' as defined in the DCUSA Schedule 32

<sup>2</sup> as per footnote 1

Furthermore, as units will vary depending upon when they are consumed they have been excluded from the examples. All charges are in £'s per year.

3.11 It is important to note that these are only example customers and the charges for a customer with different capacities or the volume of MPANs, connected to a different network or considered in a different charging year will not be the same as those shown below.

3.12 Scenario 1 is an LV HH Metered Customer who has a capacity of 300kVA and 3 MPANs, where there are three examples how the capacity could be split.

**Baseline** Where all MPANs on a single site are with the same Supplier only one fixed and capacity charge will apply.

**Option A** Each MPAN would be assigned LV HH Band 2 when the capacity is split evenly 100kVA x3.

**Option B** The capacity was split according to usage or based upon a view from the Customer the capacity could be split 150kVA for one MPAN and 75kVA for the other two, one would be in Band 2 and the other two MPANs would be in band 1.

| EPN 2026/27 Charges - LV HH Metered                              | Charging Band | Capacity (kVA) | Fixed (£) | Capacity (£) | Total (£) |
|------------------------------------------------------------------|---------------|----------------|-----------|--------------|-----------|
| Baseline                                                         | Band 4        | 300            | 243.31    | 8803.80      | 9047.11   |
|                                                                  |               |                |           |              |           |
| Option A - Capacity evenly split                                 | Band 2        | 100            | 120.78    | 2934.60      | 9166.14   |
|                                                                  | Band 2        | 100            | 120.78    | 2934.60      |           |
|                                                                  | Band 2        | 100            | 120.78    | 2934.60      |           |
|                                                                  |               |                |           |              |           |
| Option B - Capacity split based on information from the Customer | Band 2        | 150            | 120.78    | 4401.90      | 9133.87   |
|                                                                  | Band 1        | 75             | 104.65    | 2200.95      |           |
|                                                                  | Band 1        | 75             | 104.65    | 2200.95      |           |

| LPN 2026/27 Charges - LV HH Metered                              | Charging Band | Capacity (kVA) | Fixed (£) | Capacity (£) | Total (£) |
|------------------------------------------------------------------|---------------|----------------|-----------|--------------|-----------|
| Baseline                                                         | Band 4        | 300            | 8.58      | 7916.85      | 7925.43   |
|                                                                  |               |                |           |              |           |
| Option A - Capacity evenly split                                 | Band 2        | 100            | 8.58      | 2638.95      | 7942.58   |
|                                                                  | Band 2        | 100            | 8.58      | 2638.95      |           |
|                                                                  | Band 2        | 100            | 8.58      | 2638.95      |           |
|                                                                  |               |                |           |              |           |
| Option B - Capacity split based on information from the Customer | Band 2        | 150            | 8.58      | 3958.43      | 7942.58   |
|                                                                  | Band 1        | 75             | 8.58      | 1979.21      |           |
|                                                                  | Band 1        | 75             | 8.58      | 1979.21      |           |

3.13 Scenario 2 is an HV HH Metered Customer who has a capacity of 3000kVA and 2 MPANs, where there are three examples how the capacity could be split.

**Baseline** Where all MPANs on a single site are with the same Supplier only one fixed and capacity charge will apply.

**Option A** Each MPAN would be assigned HV HH Band 3 when the capacity is split evenly 1500kVA x2.

**Option B** The capacity was split according to usage or based upon a view from the Customer the capacity could be split 2000kVA for one MPAN and 1000kVA for the other MPAN, one would be in HV HH Band 3 and the other MPAN would be in HV HH Band 2.

| EPN 2026/27 Charges - HV HH Metered                              | Charging Band | Capacity (kVA) | Fixed (£) | Capacity (£) | Total (£) |
|------------------------------------------------------------------|---------------|----------------|-----------|--------------|-----------|
| Baseline                                                         | Band 4        | 3000           | 3122.68   | 58144.50     | 61267.18  |
|                                                                  |               |                |           |              |           |
| Option A - Capacity evenly split                                 | Band 3        | 1500           | 1490.04   | 29072.25     | 61124.58  |
|                                                                  | Band 3        | 1500           | 1490.04   | 29072.25     |           |
|                                                                  |               |                |           |              |           |
| Option B - Capacity split based on information from the Customer | Band 3        | 2000           | 1490.04   | 38763.00     | 60749.51  |
|                                                                  | Band 2        | 1000           | 1114.97   | 19381.50     |           |

| LPN 2026/27 Charges - HV HH Metered                              | Charging Band | Capacity (kVA) | Fixed (£) | Capacity (£) | Total (£) |
|------------------------------------------------------------------|---------------|----------------|-----------|--------------|-----------|
| Baseline                                                         | Band 4        | 3000           | 0.00      | 100630.50    | 100630.50 |
|                                                                  |               |                |           |              |           |
| Option A - Capacity evenly split                                 | Band 3        | 1500           | 0.00      | 50315.25     | 100630.50 |
|                                                                  | Band 3        | 1500           | 0.00      | 50315.25     |           |
|                                                                  |               |                |           |              |           |
| Option B - Capacity split based on information from the Customer | Band 3        | 2000           | 0.00      | 67087.00     | 100630.50 |
|                                                                  | Band 2        | 1000           | 0.00      | 33543.50     |           |

- 3.14 For the LV Tariffs in both regions and the HV tariff in EPN the charges regardless of how the site is split are broadly similar, whereas for the HV tariffs in LPN (due to the zero fixed charge in the charging year 2026/27) the charges are identical.

**Q1: Do you understand the intent of the Change Proposal?**

**Q2: Are you supportive of the principles of this Change Proposal?**

**Q3: Do you have experience of the issue described in this consultation? Please provide details.**

**Q4: What is your organisation's current approach when a site-specific billed site has multiple MPANs registered with different Suppliers?**

**Q5: Do you have any understanding as to why some customers choose to appoint multiple suppliers across different MPANs for a single site? If you do, please provide details.**

**Q6: Having considered the potential solution approaches and worked examples above, do you prefer Option A or Option B?**

**Q7: Have you identified any alternative solutions?**

## 4 Working Group Assessment

### 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.dcusa.co.uk](http://www.dcusa.co.uk).

#### Private Network considerations

- 4.2 The Working Group discussed whether private networks could fall within the concept of a 'Final Demand Site' and whether they should be included within, or expressly excluded from, the scope of DCP 476. The proposer was minded not to include private networks in the scope of this CP, and the majority of the Working Group agreed.
- 4.3 [DCP 328 'Use of system charging for private networks with competition in supply'](#) was identified as relevant historical context because it considered related issues involving private networks and ultimately did not progress.

**Q8: Do you believe that DCP 476 interacts with DCP 328? If so, please explain how.**

**Q9: Should private networks be considered within the scope of this proposal? Please provide further detail as to why/why not.**

- 4.4 The Working Group discussed that guidance may be useful alongside any DCUSA changes, particularly to support consistent application and industry understanding. However, the Group considered that the need and content of guidance should be revisited once a preferred solution is clearer.
- 4.5 The Working Group also agreed to ask about system changes at this stage. Early information on the nature, duration and approximate cost of changes may help the Group compare solution options and later determine an appropriate implementation approach.

**Q10: Would implementation of any of the proposed approaches require system changes?**

**Q11: Would the system changes identified above result in any material implementation costs? If so, can you share what those costs are?**

- 4.6 The Working Group intends to revisit the preferred solution, worked examples, draft legal text, DCUSA charging objectives, wider industry impacts, supporting guidance, implementation arrangements and any further system impact assessment once the initial responses have been assessed.

## 5 Impacts & Other Considerations

**Does this Change Proposal impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?**

- 5.1 We do not believe that this CP impacts upon any current SCR or other significant industry change projects.

### Consumer Impacts

- 5.2 There are no consumer impacts other than those that have already been mentioned in this CP.

**Does this Change Proposal Impact Other Codes?**

- 5.3 We do not believe that this change will impact other codes.

### Environmental Impacts

- 5.4 In accordance with DCUSA Clause 10.4.5A, we have assessed whether there would be a material impact on greenhouse gas emissions if this CP were implemented. We have not identified any material impact on greenhouse gas emissions from the implementation of this CP.

**Q12: Do you have any other questions?**

## 6 Consultation Questions

- 6.1 The Working Group is seeking industry views on the following consultation questions:

| No. | Questions                                                                                                                                                                |
|-----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1   | Do you understand the intent of DCP 476?                                                                                                                                 |
| 2   | Do you support the principles of DCP 476?                                                                                                                                |
| 3   | Do you have experience of the issue described in this consultation? Please provide details.                                                                              |
| 4   | What is your organisation's current approach when a site-specific billed site has multiple MPANs registered with different Suppliers?                                    |
| 5   | Do you have any understanding as to why some customers choose to appoint multiple suppliers across different MPANs for a single site? If you do, please provide details. |
| 6   | Having considered the potential solution approaches and worked examples above, do you prefer Option A or Option B?                                                       |
| 7   | Have you identified any alternative solutions?                                                                                                                           |
| 8   | Do you believe that DCP 476 interacts with DCP 328? If so, please explain how.                                                                                           |
| 9   | Should private networks be considered within the scope of this proposal? Please provide further detail as to why/why not.                                                |
| 10  | Would implementation of any of the proposed approaches require system changes?                                                                                           |
| 11  | Would the system changes identified above result in any material implementation costs? If so, can you share what those costs are?                                        |
| 12  | Do you have any other questions?                                                                                                                                         |

6.2 Responses should be submitted using Attachment 2 to [dcusa@electralink.co.uk](mailto:dcusa@electralink.co.uk) no later than 14 September 2026

6.3 Responses, or any part thereof, can be provided in confidence. Parties are asked to clearly indicate any parts of a response that are to be treated confidentially.

## 7 Attachments

- Attachment 1 - DCP 476 Consultation Response Form
- Attachment 2 - DCP 476 Change Proposal Form

