

DCP 424 Working Group Meeting 13

20 August 2026 at 13:00

Attendee	Company
Working Group Members	
Laura Quinn (LQ)	SPEN
Mary Gillie [MG]	Energy Local
Swapan Bahrani (SB)	Brook Green Energy
Andrew Malley (AM)	Ofgem
Kara Burke (KB)	NPg
Hazel Patterson (HP)	SPEN
Peter Waymont (PW)	UKPN
Nik Wills [NW]	Stark
Chris Day (CD)	Elexon
John Lucas [JL]	Elexon
Virginia Patey [VP]	St Clements
Code Administrator	
Andy Green [AG]	Chair
Apologies	
Chris Ong (CO)	UKPN
John Grrene (GE)	SSE Retail
Edda Dirks (ED)	SSEG
Lee Greenwood (LG)	BG
Ed Grimsey [EG]	BU-UK
Felix Leong (FL)	Ofgem

1. Administration

Recording

- 1.1 The Chair confirmed that the meeting was recorded to support the production of accurate minutes. The recording will be deleted once the minutes are approved.

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.

Minutes & Actions Plus Apologies

- 1.3 No feedback was provided on the minutes from the previous meeting. Updates on the actions are included in the appendix.

2. Purpose of the Meeting

- 2.1 The Chair set out that the purpose of the meeting was to review the review the below issues and agree on next steps,

- Ensuring pseudo MPANs can be clearly identified.
- Avoiding double counting and duplicate charging for mixed sites.
- Clarifying treatment of IDNO-connected complex sites.
- Ensuring MHHS and REC data flows support the intended solution.
- Maintaining cross-code alignment between DCUSA, REC and BSC changes

3. Ofgem update on timelines and decision-making processes

- 3.1 AM started the meeting by providing an update on the process Ofgem were seeking to take when deciding on all the related code mods for complex sites.
- 3.2 AM explained that Ofgem had originally expected to undertake a consultation on P441 because of its complexity and its links to other industry changes. However, Ofgem now believed it could proceed straight to a decision without an additional consultation, subject to no new issues emerging.
- 3.3 AM advised that Ofgem does not expect the final report for DCP 424 to reach them early enough for Ofgem to make a decision on P441 and REC proposal R0268 within their current modification timelines.
- 3.4 To prevent the linked modifications timing out before DCP 424 is ready, Ofgem intends to send P441 and R0268 back so that their decision and implementation dates can be updated. This is intended purely as an administrative alignment exercise rather than reopening the substance of the proposal.

4. Mixed-site migration arrangements

- 4.1 MG provided an update on the treatment of mixed sites under MHHS arrangements. She explained that many existing Complex Sites already comprise a mixture of smart and advanced metering and, whilst this presents challenges for MHHS processes, the issue is not unique to DCP 424 and is more appropriately considered as part of wider MHHS implementation arrangements.
- 4.2 MG continued to state that the key consideration was understanding how Complex Sites will operate within MHHS and how data from smart and advanced meters will be brought together to support the

Complex Site calculation. The Working Group agreed that this is primarily an MHHS design issue rather than a DCUSA charging issue and that it should not prevent the progression of DCP 424.

- 4.3 CD confirmed that Complex Sites containing advanced meters can already operate within MHHS arrangements and that the current industry issue relates specifically to fully smart Complex Sites. The Group concluded that the mixed-site issue does not create a material concern for DCP 424, although developments from the wider MHHS Complex Sites work should continue to be monitored.

5. Ensuring pseudo MPANs can be clearly identified

- 5.1 The Working Group reviewed the issue regarding the identification and treatment of pseudo MPANs used as part of the DCP 424 solution.
- 5.2 Working Group members discussed concerns that, under MHHS arrangements, there is currently no clear industry-wide mechanism for distinguishing pseudo MPANs created for Complex Site charging purposes from other pseudo MPAN arrangements. This raised questions regarding message routing, settlement treatment, DUoS billing and the ability of industry participants to consistently identify the relevant MPANs
- 5.3 VP outlined concerns regarding the operation of IF-021 flows and REP-002 reporting processes, noting that systems may require a method of identifying whether data relates to settlement activities or Complex Site DUoS charging arrangements.
- 5.4 The Working Group discussed whether an identifier, event code, LLFC arrangement or similar mechanism may be required to ensure that the correct information is routed to the appropriate parties and treated correctly within industry systems.
- 5.5 It was noted that the existing solution developed under BSCP550 historically relied on standard metering identifiers which are no longer available in the same form under MHHS. As a result, the Group recognised that a replacement mechanism may be required to provide the visibility needed by Suppliers, Distributors, settlement systems and service providers.
- 5.6 JL and CD advised that the issue appeared to extend beyond the scope of DCUSA and would require consideration within REC, BSC and MHHS arrangements. Several members highlighted that the immediate priority should be to develop a pragmatic minimum viable solution that supports DCP 424 without delaying the wider programme of linked industry changes.
- 5.7 The Working Group considered several potential approaches, including the use of LLFCs, DUoS tariff identifiers and event codes within IF-021 messaging. Whilst no preferred solution was agreed, there was broad consensus that some form of industry-recognised identifier would be required to ensure correct treatment of pseudo MPANs throughout the end-to-end process
- 5.8 The Working Group concluded that further cross-code analysis is required before a final solution can be developed. Christopher Day agreed to work with relevant stakeholders to assess the changes that may be required, whilst the Working Group noted that any solution would need to support settlement, billing and reporting processes in a consistent manner across industry systems.

6. Clarifying treatment of IDNO-connected complex sites.

- 6.1 The Working Group considered concerns raised regarding the operation of DCP 424 within IDNO environments.
- 6.2 VP outlined a number of questions relating to how Complex Site arrangements would interact with existing IDNO billing processes, REP-002 reporting and the flow of information between DNOs and IDNOs. In particular, members explored whether the proposed pseudo MPAN arrangements could create challenges when determining what information should be included within downstream billing and reporting processes.
- 6.3 CD confirmed that, from a settlement perspective, there is no material distinction between DNO and IDNO networks that would prevent a Complex Site from operating under the proposed arrangements. The Working Group therefore agreed that DCP 424 should be capable of supporting Complex Sites located within IDNO networks without requiring fundamental changes to the charging methodology.
- 6.4 The Working Group reviewed how IDNO billing systems would identify and treat the relevant pseudo MPANs. Considerations as to whether additional identifiers, LLFC arrangements or tariff-related markers could be required to ensure that the correct charges are applied and that pseudo MPANs created for Complex Site purposes are distinguished from other arrangements. Several Working Group members noted that a consistent industry-wide approach would simplify both DNO and IDNO billing processes.
- 6.5 The Working Group also discussed the impact on REP-002 reporting and the information exchanged between DNOs and IDNOs. Whilst no immediate issues were identified with the overall charging approach, members agreed that the interaction between pseudo MPAN identification, reporting outputs and downstream billing processes should be assessed further as part of the wider cross-code review of the solution.
- 6.6 The Working Group concluded that no fundamental barrier had been identified to implementing DCP 424 within IDNO networks. However, further analysis is required to ensure that any identification mechanism adopted for pseudo MPANs can also support IDNO billing and reporting processes in a clear and consistent manner.

7. Legal Text Review

- 7.1 The Working Group reviewed whether the legal text drafting clearly reflected the intended charging arrangements, the use of pseudo MPANs and the treatment of Complex Sites under MHHS. Attention was given to consistency of terminology, the description of applicable data interfaces and the relationship between the legal drafting and the operational solution.
- 7.2 The Working Group did not identify a need to change the legal text but at this time but agreed that the text could not yet be finalised as it would need to be refined once the outstanding operational, pseudo MPAN and cross-code issues had been resolved.
- 7.3 The Chair summarised that the Working Group continued to support the objective of ensuring that DUoS charging remained workable for Complex Sites under MHHS. However, clarity was still required on several areas before conclusions and final decisions could be made.
- 7.4 Working Group: agreed the following next steps:

- Continue work on pseudo MPAN identification, mapping and the level of market visibility required.
- Seek further clarification on mixed-site migration arrangements and maintain engagement with Elexon.
- Continue engagement with REC and BSC representatives on cross-code dependencies and implementation alignment.
- Review the operational, IDNO billing and DIP flow impacts, including the ability of existing systems to receive and process the relevant information.
- Update the draft legal text once the outstanding policy and operational points have been concluded.

7.5 The Chair agreed to set up a meeting with stakeholders from the relevant codes and then report back to the Working Group once the above areas had clearer conclusions.

7.6 MG advised she was away for the next three weeks and the Chair advised he was away for the next week also so the next Working Group will be agreed via poll once the cross-code conversations had concluded.

8. Next Steps and Next Meeting Date

8.1 The next meeting will be agreed via poll.

9. Any Other Business

9.1 No other business was raised.

New and Open Actions

Action Ref.	Action	Owner	Update
13/01	The Chair to set up a cross-code call to discuss the outstanding issues	Chair	New action.
13/02	The Chair to issue a poll to report back to the WG on the outcome of the cross code meeting.	Chair	New action.

Closed Actions

Action Ref.			Update
01/08	Working Group members to review paragraph 1.5	All	Closed

05/01	The Chair to update the Legal text and share with the Working Group	Chair	Closed
05/02	The Chair to create a second consultation document and legal text and share with the Working Group.	Chair	Closed
02/08	The Chair update the consultation document with the new REC change ID as well as contacting the REC to find out their timelines for the consultation to be issued.	Chair	Closed
03/08	Working Group to check the table in paragraph 4.11 to ensure all the pros and cons have been captured accurately.	All	Closed
04/08	Chair to update the consultation and issue to the Working Group for review.	Chair	Closed
01/01	Chair to draft a consultation and issue to the Working Group for review.	Chair	Closed
02/01	Chair to issue the consultation to DCMDG and SIG members, in addition to the usual recipients.	Chair	Closed
03/01	Secretariat to raise awareness of the DCP 458 consultation at the next DCMDG meeting.	Secretariat	Closed

DCUSA