DCP 424 Working Group Meeting 15

29 October 2026 at 10:00

Attendee	Company
Working Group Members	
Mary Gillie [MG]	Energy Local
Andrew Malley (AM)	Ofgem
Peter Waymont (PW)	UKPN
Chris Day (CD)	Elexon
Ed Grimes [EG]	BU-UK
John Lucas [JL]	Elexon
Felix Leong (FL)	Ofgem
Lili Zou [LZ]	SSE
Georgia Preece [GP]	NPg
Code Administrator	
Andy Green [AG]	Chair
Apologies	
Chris Ong (CO)	UKPN
John Grrene (GE)	SSE Retail
Edda Dirks (ED)	SSEG
Lee Greenwood (LG)	BG
Kara Burke [KB]	NPg

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.

Purpose of the Meeting

1.3 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.
- Ensuring MHHS and REC data flows support the intended solution.

2. Pseudo MPAN identification solution

2.1 The Chair welcomed attendees and explained that, due to the short turnaround from the previous Working Group, no formal agenda had been issued.

2.2 Updated draft legal text and the developing BSC guidance had been circulated, and the Chair had also started preparing a "How?" section for the Change Report to provide a clearer explanation of how the solution would operate in practice.

2.3 The Chair advised that he and CD had met with a DNO billing-system provider to talk through the proposed solution. The initial discussion had been broadly positive and had helped clarify the information that billing systems would need to receive and identify. However, the provider had indicated that six months was likely to be the minimum implementation lead time, particularly given other changes already competing for development capacity.

2.4 PW and EG had not yet been able to obtain wider feedback from their respective billing teams/providers. The Working Group agreed that broader engagement with DNO and IDNO billing-system providers was therefore required before the solution could be considered fully closed.

2.5 PW questioned why Pseudo Secondary MPANs were required for individual metering arrangements where an existing MPAN already existed. He suggested that an alternative could be for the original metering information to continue through the normal DUoS processes, with the netting undertaken solely for Settlement. This could potentially avoid some of the additional pseudo-MPAN arrangements.

2.6 The Chair explained that his understanding was that P441 had been developed on the basis that the primary MPAN performs the Settlement function, with the Pseudo Secondary MPAN providing the separate route through which gross information can be supplied to the Distributor outside the netted Settlement treatment. The current DCP 424 solution had also been designed to remain consistent with the legacy solution developed by earlier Working Groups.

2.7 JL added that P441 had not been developed from a blank sheet of paper. Its purpose was to formalise and provide appropriate controls around processes already being used by market participants. It had therefore not sought to redesign the arrangements so that netting was instead undertaken centrally within Settlement. PW acknowledged this explanation, while noting the

distinction between a solution being implementable and necessarily being the optimal long-term solution.

2.8 AM advised that the key consideration for Ofgem was whether the P441, DCP 424 and related REC arrangements formed an implementable package. Ofgem needed sufficient confidence that, if a positive decision were taken, the package could operate without requiring another send-back. This did not prevent future improvements where a better solution became available.

2.9 The Chair agreed that the alternative raised by PW should be acknowledged in the Change Report, together with an explanation of why it had not been progressed. The Working Group's focus would remain on demonstrating that the current solution was workable and implementable.

2.10 The Chair provided feedback from the initial billing-system-provider discussion. This had identified a need to distinguish not only the Pseudo Secondary MPANs carrying gross DUoS data, but also the primary Complex Site MPAN carrying the net Settlement position.

2.11 A further question concerned the routing of IF-021 messages for Connection Type W MPANs. It was s stressed that DNOs should not begin receiving IF-021s for the entire Connection Type W population simply to accommodate the relatively small number required for Complex Sites.

2.12 The Chair confirmed that this was not the intention. CD had taken an action to check the DIP routing and validation arrangements to make sure the new Complex Site scenario variants could reach the LDSO without opening the route to all Connection Type W IF-021s.

2.13 PW also stressed that the solution needed to work consistently across different billing-system providers rather than solving the issue for one DNO system but creating a different requirement for IDNOs or another provider.

2.14 EG agreed to engage through the IDNO arrangements to identify the appropriate IDNO billing-system representatives. The Working Group agreed that the better approach would be to bring DNOs, IDNOs and the relevant billing-system providers together to agree a common process.

2.15 The Working Group reviewed amendments made to the draft DCUSA legal text following the previous meeting.

2.16 The revised drafting sought to clarify that aggregated and site-specific DUoS require different treatment. For metering associated with an aggregated DUoS Tariff ID, gross volumes would be submitted on one Pseudo Secondary MPAN per relevant measurement quantity. Where metering is subject to a site-specific DUoS Tariff ID, an exclusive Pseudo Secondary MPAN would be required.

2.17 It was questioned whether the site-specific wording was sufficiently clear, particularly whether multiple non-whole-current meters were being combined into a single pseudo MPAN or whether each remained separately identifiable.

2.18 MG considered that whole-current/Class F and G-type arrangements could be aggregated in a similar manner to current charging, whereas arrangements requiring site-specific capacity or demand charges would need to remain individually identifiable. It was agreed that individual treatment was necessary where capacity and demand charges applied.

2.19 CD joined the discussion and presented further changes he had made to the proposed BSC scenario variants following the billing-provider discussion.

2.20 He explained that the revised approach would distinguish more clearly between the primary Complex Site MPAN, carrying the net position used for Settlement; an aggregated Pseudo Secondary MPAN containing the gross whole-current volumes associated with the Complex Site; and individual Pseudo Secondary MPANs for non-whole-current metering, where the gross values need to remain separately identifiable for site-specific charging.

2.21 It was illustrated that where, for example, two whole-current meters each recorded 20 units, their gross values could be added together and 40 units reported against the relevant aggregated Pseudo Secondary MPAN. By contrast, a CT meter requiring site-specific treatment would have its own Pseudo Secondary MPAN carrying its gross active power information. Relevant reactive information would also need to be accommodated.

2.22 It was confirmed the intended principle as one Pseudo Secondary MPAN for the aggregate of the relevant whole-current meters, and one Pseudo Secondary MPAN for each non-whole-current meter requiring individual treatment.

2.23 Some technical elements remained to be checked with the DIP team, including the use of correlation IDs and whether a separate reactive scenario variant was required for the primary Complex Site MPAN. CD agreed to validate these points and circulate the developing scenario-variant material.

2.24 It was asked how a billing system would know that an existing MPAN and a Pseudo Secondary MPAN related to the same Complex Site. This was particularly important to ensure that the Pseudo Secondary MPAN did not attract additional fixed or capacity charges when those charges were already being applied to the underlying physical arrangement.

2.25 CD explained that this was not a new requirement created by DCP 424. Under the existing BSC arrangements the LDSO creates Pseudo Secondary MPANs and is already required to maintain an inventory identifying the relationship between the primary and associated Pseudo Secondary MPANs.

2.26 However, the Working Group agreed that there remained a practical question over how that relationship is represented and maintained within billing systems. The Chair considered that this should be specifically tested with the billing providers.

2.27 CD explained that the new IF-021 scenario variants should nevertheless make the solution more robust. Receipt of the Complex Site event code against the primary MPAN would tell the Distributor that the data represented the net Settlement result and that one or more Pseudo Secondary MPANs carrying the relevant gross volumes should also be expected. This would help mitigate the previous concerns around double counting.

2.28 The Working Group discussed some continuing confusion caused by references to “primary”, “secondary”, “pseudo” and existing MPANs.

2.29 MG suggested that the guidance needed to make it particularly clear what was meant by the primary Settlement MPAN and the MPANs associated with the underlying metering.

2.30 It was agreed and confirmed that the intended guidance would include worked examples illustrating the relationships between the primary MPAN, the individual metering and Pseudo Secondary MPANs.

2.31 The Chair noted that further supporting diagrams were also expected from a billing system provider following the billing-provider discussion. These had been helpful in demonstrating how the data and billing arrangements fitted together and would be circulated to the Working Group once available.

2.32 Fl asked how DUoS charges would apply where licensed and exempt Suppliers were operating within a Complex Site.

2.33 PW explained that the Distributor's relationship was with the licensed Supplier registered to the relevant MPAN. The Distributor would therefore charge the registered licensed Supplier rather than an exempt Supplier operating behind that arrangement.

2.34 MG agreed, noting that this was consistent with normal DUoS arrangements. How the licensed Supplier subsequently recovered or allocated those costs between its customers was a matter for the Supplier.

3. Next Steps and Next Meeting Date

3.1 The Working Group agreed that the priority was now to validate the proposed process with the wider billing-system-provider community.

3.2 EG agreed to contact the IDNO community to identify the appropriate billing-system representatives. Once those contacts had been identified, the Chair would issue a poll and arrange a joint session involving relevant DNOs, IDNOs and billing-system providers.

3.3 The Chair would also circulate the developing "How?" section for the Change Report, CDs updated scenario-variant material and the billing-system diagram once available. These materials would provide the starting point for the billing-provider discussion.

3.4 Following that session, the Working Group would return to the DCUSA legal text to ensure that the distinction between the primary MPAN, Pseudo Secondary MPANs, aggregated charging and site-specific charging was sufficiently clear.

3.5 The Chair agreed to set up another Working Group meeting once the billing system providers had confirmed their availability.

4. Any Other Business

4.1 No other business was raised.

New and Open Actions

Action Ref.	Action	Owner	Update

15/01	Validate the revised IF-021 scenario variants, including the correlation ID and reactive-data requirements, with the DIP team.	Christopher Day	**New action**
15/02	Circulate the revised BSC scenario-variant material to the Working Group.	Christopher Day / Chair	**New action**
15/03	Chase and circulate the billing-system process diagram developed by the DNO system provider.	Chair	**New action**
15/04	Contact the IDNO community and identify the appropriate billing-system-provider representatives.	Ed Grimsey	**New action**
15/05	Arrange a joint session with DNOs, IDNOs and relevant billing-system providers once representatives have been identified.	Chair	**New action**
15/06	Circulate the draft DCP 424 “How?” section to assist the billing-system-provider discussion.	Chair	**New action**
15/07	Clearly explain in the Change Report the alternative solution raised by Peter Waymont and why the Working Group has not pursued it.	Chair	**New action**
15/08	Following billing-provider engagement, revisit the legal text to clarify the primary/pseudo MPAN relationship and aggregated versus site-specific treatment.	Working Group / Chair	**New action**

Closed Actions

Action Ref.			Update
14/01	Share the BSCP guidance document with the DCUSA WG	AG	**Closed.**
14/02	Update the legal text to clearly reference the data being provided against the relevant pseudo MPAN	AG/CD	**Closed.**
13/01	The Chair to set up a cross-code call to discuss the outstanding issues	Chair	**Closed.**
13/02	The Chair to issue a poll to report back to the WG on the outcome of the cross code meeting.	Chair	**Closed.**
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**