DCUSA Change Proposal (DCP)	At what stage is this document in the process?
DCP 489: **DCUSA Accession Requirements for REP-900 and REP-901 Capability** **Date Raised:** 30 October 2026 **Proposer Name:** Peter Waymont **Company Name:** Eastern Power Networks **Party Category:** DNO	**01 – Change Proposal** **02 – Consultation** **03 – Change Report** **04 – Change Declaration**

Purpose of Change Proposal:

To ensure that new Distributors cannot issue MPANs unless they can create and send the REP-900 and REP-901 and that new Suppliers cannot register new MPANs unless they can receive and process the REP-900 and REP-901

Impacted Parties:

☒ Suppliers | ☒ DNOs | ☒ IDNOs | ☐ CVA Registrants | ☐ OTSO Party

☐ Gas Suppliers | ☐SIP Parties

Impacted Clauses:

Section/Schedule	Clause/Paragraph
Section 1A	4

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Indicative Timeline

The Secretariat recommends the following timetable:	
Initial Assessment Report	18 November 2026
Consultation Issued to Industry Participants	January/ February 2027
Change Report Approved by Panel	21 April 2027
Change Report issued for Voting	22 April 2027
Party Voting Closes	13 May 2027
Change Declaration Issued to Parties	18 May 2027

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1 Summary

What?

1.1 The accession process needs to ensure that new Distributors cannot issue MPANs unless they can create and send the REP-900 and REP-901 messages, and that new Suppliers cannot register new MPANs unless they can receive and process the REP-900 and REP-901 messages.

Why?

1.2 MHHS introduced a requirement for Distributors to issue certain DCUSA-owned market messages and for Suppliers to be able to receive and process them. These are crucial parts of the DUoS billing process. Indeed, the REP-900 is the electronic invoice.

1.3 As migration has progressed it has become apparent that neither of these are happening in all cases.

1.4 Apparently, migration qualification did not include these messages as they are DCUSA owned.

1.5 Accession to REC only considers DCUSA insofar as requiring new entrants to have acceded.

1.6 UKPN tried to engage with REC, to amend their accession process such that new Distributor or Supplier entrants would need to have undertaken DCUSA testing of these messages (to be defined) prior to qualifying under the REC.

1.7 REC confirmed that they would not change their processes as REC requires new entrants to have acceded to relevant codes and after that it is a matter for DCUSA.

1.8 REC also pointed out that Distributors can block registrations under DCUSA. (But note that this is only for breach).

How?

1.9 Amend the accession clause to add testing of DCUSA-owned messages or demonstration of processes or instead a warranty that they can.

Who?

1.10 Distributors and Suppliers

2 Governance

Proposers view on criteria for a CP to be considered Urgent

2.1 Does the Change Proposal relate to a current or imminent issue that if not urgently addressed may cause:

(Select all that apply)

- ☐ significant adverse commercial impact upon the Parties (or a class of Party), electricity consumers and/or any other person?
- ☐ significant adverse impact on the safety and security of the Distribution Network?
- ☐ one or more Parties to be in breach of the Relevant Instruments or other law?
- ☒ None of the Above

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Proposers view on criteria for a CP to be considered a Part 1 Matter

2.2 Do you believe this Change Proposal: *(Select all that apply)

- ☐ is likely to have a significant impact on the interests of electricity consumers?
- ☐ is likely to have a significant impact on competition in one or more of: the generation of electricity; the distribution of electricity; the supply of electricity; and any commercial activities connected with the generation, distribution or supply of electricity?
- ☐ is likely to discriminate in its effects between one Party (or class of Parties) and another Party (or class of Parties)?
- ☐ is directly related to the safety or security of the Distribution Network?
- ☒ amends the governance or the change control arrangements applying to this Agreement?
- ☐ None of the Above

Proposers view on criteria for a CP to be progressed to a Working Group or straight to the Change Report phase

2.3 Working Group

Suggested progression route for this CP

2.4 Based on the answers provided above I/we believe that this Change Proposal should:

- Be treated as a Part 1 Matter;
- Be treated as a non-urgent Change; and
- Proceed to the Definition phase via a Working Group for furter development

Proposer's view on prioritisation

Prioritisation Criteria	High Impact
Strategic Direction Statement Alignment: *The CP strongly supports key government energy policy actions that require immediate progress and aligns with SDS priorities under the Act Now category.*	**No** *[please provide justification for selected item]*
Complexity: *The CP is highly complex, with a fast-approaching deadline, significant implementation challenges, and a requirement for extensive stakeholder engagement.*	**No** *[please provide justification for selected item]*
Importance: *The CP addresses a high-risk or critical issue, making timely action important for stakeholders as it is anticipated to deliver substantial benefits and value.*	**Yes** This is to give visibility to new entrants of the requirements around these messages and to ensure they can use them.

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Priority Category: *(To be considered High priority all 3 Criteria must be High Impact.)*	**Standard**

3 Reasons for raising the Change Proposal

3.1 My starting point was that Distributors should not be able to create MPANs and Suppliers should not be able to register MPANs unless they have proven that they can interact with the market, other parties and registration systems.

3.2 I figured that any control should be right at the front and should be on registration processes.

3.3 I don't really know how REC works. I read the REC's Entry Assessment Information Pack, which references internal and external testing and presumed that new entrants acceded to REC and other industry codes and then underwent some sort of qualification process that involved testing, prior to fully qualifying and registering customers.

3.4 I had presumed that in order to register customers, Suppliers would need to demonstrate they can send and receive BSC Flows etc. I had hoped to add something similar into REC for these DCUSA owned flows.

3.5 That way the control wouldn't impede accession to the codes, which would be a license requirement.

3.6 I focussed on the creation and use of MPANs as this is the first step towards using the networks, that leads ultimately to DUoS billing.

3.7 I raised a REC issue to try to stimulate a debate on this and see if there was a potential solution. REC did not progress my issue as not being a REC matter.

3.8 I had previously enquired with BSC regarding MHHS qualification, when it became obvious that Suppliers could qualify without being able to process the REP-900 and had been advised this was a DCUSA matter.

3.9 Hence, I have raised this DCP to solve the issue as a DCUSA matter.

3.10 As REC (and possibly other codes) merely require accession to DCUSA, the control has to be prior to that in the process. See REC Schedule 9, clause 2.3 (b) and Schedule 24, text between 4.10.4 and 4.10.5.

3.11 Hence this DCP considers the accession process and requires new entrants to demonstrate capability with these REP messages before allowing them to accede to DCUSA. I can't see any other way round this if other codes take accession as sufficient to proceed to allowing registrations and hence using the distribution system.

3.12 Note there may be an interaction here with the DIP and DIP testing and I don't know how that could work for DCUSA owned messages.

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3.13 Also note that REC creates a Supplier/Distributor relationship based on accession to DCUSA. There would have to be a breach of DCUSA for that relationship to be ended and registrations suspended. REC does not appear to work on the basis that the default is that there is no relationship until the Distributor is satisfied the Supplier won't be in breach etc. The Distributor appears to have no choice.

3.14 Hence this change seeks to add controls into DCUSA prior to accession.

4 Solution and Legal Text

Solution Overview

4.1 To add requirements into the accession process around assurance of the ability to engage with these DCUSA owned market messages.

Legal Text Amendments

4.2 I have provided some draft legal text which I believe will achieve the solution specified above and this is set out below for ease of reference:.

> Add new Clause 4.4B, which may be like one of these -
>
> 4.4B the Applicant shall complete Qualification Testing *[to be defined]* in accordance with Schedule 34 [*to be drafted*].
>
> 4.4B the Application From will include the Applicant's warranty that, if they wish to be admitted as a DNO Party or IDNO Party, they can create and send the REP-900 and REP-901 messages, or that if they wish to be admitted as a Supplier Party they can receive and process the REP-900 and REP-901 messages.
>
> 4.4B the Application From will include evidence to show that the Applicant, if they wish to be admitted as a DNO Party or IDNO Party, can create and send the REP-900 and REP-901 messages, or that if they wish to be admitted as a Supplier Party they can receive and process the REP-900 and REP-901 messages.

Legal Text Commentary

4.3 There are a number of options which the working group should consider.

Addition/Amendment to DCUSA Owned Market Message (Data Flow) or Data Item

4.4 N/A

Market Message (Data Flow) / Data Item Commentary

4.5 N/A

5 Relevant Objectives

5.1 My view as to which of the DCUSA Objectives would be better facilitated by the implementation of this Change Proposal is set out below.

DCUSA General Objectives

5.2 Objective 1 because invoices need to be paid for the Distributor to be financially viable

5.3 Objective 2 because it ensures all Suppliers are operating to the same level playing field

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5.4 Objective 3 because invoices need to be paid for the Distributor to be financially viable

5.5 Objective 4 because it creates compliance controls in the accession application process

6 Impacts & Other Considerations

Impacts on any Significant Code Review (SCR) or other significant industry change projects

6.1 I do not believe that this CP impacts upon any current SCR or other significant industry change projects

Impacts on Other Codes

6.2 I have considered whether any other industry codes might be impacted as a result of this Change Proposal, and my/our initial view is set out below.

Grid Code…… ☐ SEC… ☐ CUSC… ☐ None…… ☒

Distribution Code… ☐ REC…. ☐ BSC…… ☐

6.3 The other codes don't believe they are involved. But there may be a DIP implication.

Impacts on DCUSA Owned Data Flows

6.4 I do not believe that this change will require any amendments to DCUSA owned Data Flows (Market Messages) or the applicable Scenario Variants or any Data Items .

Consumer Impacts

6.5 I do not believe that this change will impact consumers.

Environmental Impacts

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

7 Implementation

Lead Time for Implementation

7.1 No lead time

Proposed Implementation Date

7.2 Next release after approval.

8 Recommendations

The Code Administrator will provide a summary of any recommendations/determinations provided by the Panel in considering the initial Change Proposal. This will form part of a Final Change Report.

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