DCP 476

'Treatment of Multi MPAN Sites'

COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

Company	Confidential/ Anonymous	1. Do you understand the intent of DCP 476?	Working Group Comments
ENC [IDNO]	Non-Confidential	Yes.	Noted.
NPg [DNO]	Non-Confidential	Yes, we understand the intent of this CP.	Noted.
SP ENW [DNO]	Non-Confidential	Yes.	Noted.
SPEN [DNO]	Non-Confidential	Yes.	Noted.
SSE Energy Customer Services [DG & Supplier]	Non-Confidential	In terms of the scope of this proposal, it is our understanding that the term 'site' is used in the consultation to refer to 'Final Demand Sites', as defined in Schedule 32 of the DCUSA. Such sites are 'Single Site(s)' which are defined as pertaining to a single connection agreement. We also understand that the proposal is only aimed at multi-MPAN sites which are registered with different suppliers. Whilst we understand the intent of the proposal in theory, we would like to better understand what types/configurations of 'Single Site(s)/Final Demand Sites' there are that have multiple MPANs and multiple suppliers, and how many of these there are (roughly). This	Members noted the suggestion to include multi-MPAN sites with a single Supplier; however, it was noted that this may be out of scope of this CP. **Action:** The Secretariat agreed to take an action to reach out to SSE Energy Customer Services to seek further clarification and examples of the suggested single Supplier issue.

		will, in our view, better help stakeholders and the Working Group assess the impact of the proposal. **Could the proposer/Working Group please provide some examples?**	
SSEN [DNO]	Non-Confidential	Yes.	Noted.
UKPN [DNO]	Non-Confidential	Yes.	Noted.
NGED	Non-Confidential	Yes	Noted.
Working Group Conclusions: The Working Group noted that respondents generally understood the intent of the proposal and recognised that DCP 476 seeks to address inconsistent treatment of multi-MPAN sites where MPANs are registered to different Suppliers. However, some respondents requested further clarification regarding the types and volume of affected sites.			

Company	Confidential/ Anonymous	2. Do you support the principles of DCP 476?	Working Group Comments
ENC [IDNO]	Non-Confidential	Yes, we support the principle that the treatment of multi MPANs sites which are with different suppliers should be clearly defined within DCUSA, and that these should be treated based on capacity per MPAN with both MPANs receiving a fixed and capacity charge.	Noted.

NPg [DNO]	Non-Confidential	Yes, we support the principles of the DCP. There is a clear issue here with no perfect solution under the currently available processes.	Noted.
SP ENW [DNO]	Non-Confidential	Yes, a consistent approach would be beneficial to all parties.	Noted.
SPEN [DNO]	Non-Confidential	Yes.	Noted.
SSE Energy Customer Services [DG & Supplier]	Non-Confidential	We agree that there is an issue to be addressed but we think the scope of the proposal should be widened to include multi-MPAN sites with a single supplier, as we believe that these sites also suffer from the same issue of different DUoS charge allocation practices between DNOs.	Members reiterated that including the single Supplier issue may be out of scope of this change as it could move the proposal beyond the original issue that this CP was raised to address; however, members agreed to review the outcome of the agreed action for further clarity around this.
SSEN [DNO]	Non-Confidential	Yes.	Noted.
UKPN [DNO]	Non-Confidential	Yes.	Noted.
NGED	Non-Confidential	Yes to provide consistency across all DNO's when billing DUOS charges for mis-aligned multi-mpans.	Noted.
Working Group Conclusions:			

The Working Group noted broad support for the principles of the proposal and agreement that an industry solution is required. However, some respondents questioned whether the scope should be widened to include single-supplier multi-MPAN sites.

The Working Group concluded that there was sufficient support to continue developing the proposal. The immediate focus should remain on multi-MPAN sites registered to different Suppliers, while the concerns relating to single-Supplier arrangements should be recorded and considered separately.

Company	Confidential/ Anonymous	3. Do you have experience of the issue described in this consultation? Please provide details.	Working Group Comments
ENC [IDNO]	Non-Confidential	We have not experienced this issue.	Noted.
NPg [DNO]	Non-Confidential	Yes, we have experienced this. It has been an issue for a long time when a single site with multiple MPANs chooses to have two (or more) different suppliers for one or more of the subsidiary MPANs. The revenue impact was made worse by the TCR when the proportion of revenues recovered through fixed charges increased, as the site will pick up multiple fixed charge instead of a single fixed charge. MHHS is also affected by a very similar issue, where a Single Site that consists of multiple MPANs (lead and subsidiaries) where all of the MPANs are not migrated at the same time, resulting in the site being split between the old and new billing systems. In this scenario the site will pick up two fixed charges, and there are questions about how to apply or split the MIC.	The Working Group noted that similar outcomes may arise during MHHS migration where the MPANs associated with one site do not migrate at the same time. This can result in MPANs associated with the same site being processed through different billing arrangements, even where the Supplier has not changed.

SP ENW [DNO]	Non-Confidential	Yes.	Noted.
SPEN [DNO]	Non-Confidential	SP Energy Networks generally seeks to avoid multi-MPAN site arrangements where possible, as our current billing processes require manual intervention to ensure charges are applied correctly across such sites. We are aware of a small number of site-specific billed customers that have more than one MPAN associated with the same physical site. Most identified cases are understood to be supplied through a single Supplier, although this is not routinely reported. We are aware of a limited number of EHV sites with MPANs across different suppliers. SPEN has implemented specific operational billing arrangements to manage the small number of known cases. However, the identification of affected sites remains challenging and current billing systems do not fully support automated treatment where MPANs associated with the same site are registered to different Suppliers. For these reasons, we recognise the issue identified by DCP 476 and support the development of a common industry approach.	Noted.

SSE Energy Customer Services [DG & Supplier]	Non-Confidential	We have recently become aware that the issue described, i.e. differences in how DNOs allocate DUoS charges, also arises at multi-MPAN sites with a single supplier, including EHV sites. At HV/LV sites with a single supplier, we understand that the fixed and capacity charges are to be applied to the lead MPAN but it doesn't seem to be a clear process to determine the lead MPAN. As such, we would like to see the scope of the proposal widened to include single supplier/multi-MPAN sites.	The group discussed the term lead MPAN (following a respondent's feedback) and stated that this is widely used in billing systems and connection agreements but are being replaced in the market-wide half-hourly environment by site IDs. The group agreed that terminology and educational guidance may need to be clarified, although changing the underlying registration process is likely outside the scope of this Working Group.
SSEN [DNO]	Non-Confidential	Yes. We've got a number of complex sites across all different distribution voltages in both our licensed areas.	Noted.
UKPN [DNO]	Non-Confidential	We have a number of sites which have more than one MPAN and have different Suppliers registered to them. There is also a MHHS migration issue, even if MPANs are with the same supplier, they may migrate one MPAN but not the other(s). This also causes a split.	Members agreed to consider whether delayed Supplier registration is a separate issue or whether this solution should also cater for this circumstances.
NGED	Non-Confidential	Yes, there is nothing anywhere to signify that a site has more than 1 MPAN so they can and do get split if the customer chooses to change supplier and the supplier does not register all of the MPANs.	Members agreed to consider whether MHHS migration is a separate issue or

		The onus seems to be on the customer to make it known to the supplier.	whether this solution should also cater for this circumstances.
Working Group Conclusions: Responses provided substantial evidence that the issue exists across multiple DNOs and Suppliers. Respondents highlighted operational challenges, customer impacts, billing inconsistencies and similar issues arising through MHHS migration activities. The Working Group agreed that the consultation responses provide sufficient evidence that the issue requires resolution.			

Company	Confidential/ Anonymous	4. What is your organisation's current approach when a site-specific billed site has multiple MPANs registered with different Suppliers?	Working Group Comments
ENC [IDNO]	Non-Confidential	We have not experienced this issue.	Noted.
NPg [DNO]	Non-Confidential	The current approach is to split the site into two sites (or more), and split the MIC equally across the MPANs. The MIC of the lead is reduced, with that reduction reflected by the MIC applied to the former subsidiary. The subsidiary MPAN(s) that has moved to a different supplier becomes a lead MPAN and is billed as if it is a separate site.	Noted.

		As an example: One site with two MPANS and 100kVA would become two sites with one MPAN and 50kva each. At this point, the DCUSA does not specify what we should do with existing allocations. Pragmatically they could be treated as two new sites and re-allocated based on the new MIC. But it could also be argued that the existing site should remain on the existing allocation unless the MIC reduced by more than 50%. It may be that no thought is given to the allocation as it is not covered in the DCUSA and both sites remain on the existing LLFC/band and pay double the fixed charge.	
SP ENW [DNO]	Non-Confidential	Currently our default position is that the MIC is split equally between all MPANS (although we do have a facility to override this) and the MPANS are billed individually to each different supplier. However the bill is based on the existing LLF/tariff that was applicable for the combined site.	Noted.
SPEN [DNO]	Non-Confidential	For the EHV sites that we have identified, since pricing is bespoke to each site through the EDCM, we calculate prices on a total site basis and split the Fixed Charge and capacity across the MPANs.	Noted.
SSE Energy Customer Services [DG & Supplier]	Non-Confidential	We may submit this information later.	Noted.

SSEN [DNO]	Non-Confidential	The MPANs will be billed individually. Each MPAN will receive the fixed charge based on the assigned tariffs, the capacity split will be site dependent (i.e, evenly split or apportion).	Noted.
UKPN [DNO]	Non-Confidential	We will have a single connection agreement in place with the customer and charge each site a separate fixed charge as well as the capacity (which is either agreed with the Customer or split evenly across all MPANs on that site). This splitting undermines our normal approach of grouping MPANs pursuant to paragraph 138 of Schedule 16. The banding is then assigned based upon the capacity allocated to each MPAN, and not on the capacity for the whole site, although this goes against the definition of 'Single Site' used in DCUSA Schedule 32, and is why we have raised this change proposal to seek clarity and ensure consistency. There is often the complication arising from the second MPAN changing to the new supplier at a later date.	Noted.
NGED	Non-Confidential	To split them apart and alert all of the suppliers involved via email that we will be billing each of them for the whole of the capacity unless they take remedial action. We don't split the capacity equally between them. This has always been our approach.	The proposer noted that this is the preferred alternative option and queried the outcome of this approach
Working Group Conclusions:			

The Working Group observed considerable variation in current industry practice. Existing approaches differ with respect to capacity allocation, residual band assignment, treatment of fixed charges and communication with Suppliers. The consultation responses reinforced the view that DCUSA currently lacks sufficient clarity regarding the treatment of these arrangements.

Company	Confidential/ Anonymous	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.	Working Group Comments
ENC [IDNO]	Non-Confidential	We believe a possible reason for customers choosing to have multiple MPANs with different suppliers is for commercial purposes, it may be the cheapest way to supply the site at the time of energisation. The customer may be advised that this is the most commercially viable approach. It may also be more beneficial if different parts of a site are on different supplier arrangements – such as new customer benefits offered by various suppliers compared to existing customers.	Noted.
NPg [DNO]	Non-Confidential	Presumably this may happen historically if the site was being leased out to different customers who each want their own bill. It also happens when a customer moves supplier but the supplier doesn't immediately move both MPANs, perhaps due to lack of clarity about the lead/subsidiary MPAN relationship, so the Subsidiary can sometimes be left behind.	The group noted that splitting a site can sometimes move capacity into lower bands and reduce DUoS or transmission charges, while in other cases it can create multiple higher-band fixed charges. This creates a risk of deliberate or unintended gaming

		It can now also happen due to MHHS migrations, albeit this is a slightly different issue where both MPANs can still have the same supplier but are billed in different systems (legacy and apex) as single sites. It may make commercial sense under the current charging structures for the customer to break a single site apart and have two band 2 sites instead of one band 4 site. For example in ET3, a single HV site with 2100kVA would be allocated to band 4. Two single sites with 1050kVA would be allocated to band 2. It would (usually) be cheaper to have two band 2 sites than one band 4 site for both DUoS, and certainly cheaper for TNUoS. However, some circumstances it can be cheaper to adopt the single site approach. It depends on the MIC at the site and the thresholds.	and needs to be considered when designing the final solution.
SP ENW [DNO]	Non-Confidential	In our experience this is often a mistake on behalf of the customer or a lack of understanding of how multi MPAN sites work from a charging perspective.	Noted.
SPEN [DNO]	Non-Confidential	We do not have any understanding of the motivation for this.	Noted.
SSE Energy Customer Services [DG & Supplier]	Non-Confidential	We do not currently have information on why customers appoint multiple suppliers across different MPANs at a single site. However, this may be due to operational, legacy, or metering arrangements.	Noted.

SSEN [DNO]	Non-Confidential	Yes, we would imagine primarily due to commercial consideration where suppliers offer different rates of import & export and this would be perhaps driven by some of the below reasons: • **Different physical feeders:** A large site may have multiple feeders for additional capacity or operational reasons. Each feeder can have its own supplier/MPAN. • **Different supply arrangements:** The customer may purchase electricity separately for different parts of the site, allowing different suppliers/contracts to be appointed. • **Independent operational areas:** A site may contain separate buildings or businesses, each with its own electrical supply and contractual arrangements. • **Existing historical arrangements:** MPANs may have been registered at different times and subsequently retained even though they are now considered one overall site. (i.e a PV farm could be energised before the additional Battery Storage connects so MPANs/suppliers could be registered at different times). • **Security of supply:** Critical sites may deliberately have multiple independent supplies/feeders so that an issue with one feeder does not affect the whole site.	Noted.

UKPN [DNO]	Non-Confidential	In discussions with a couple of Customers they have stated that an Energy Broker had advised them to take this approach to save costs. Also we have had requests to enter into separate connection agreements for different MPANs on the same site regardless of the supplier. We do also have an example where a site has a number of MPANs, one of which is de-energised and when they changed Supplier they didn't feel the need to move that MPAN, which although less than ideal it doesn't cause them additional costs until the point in time that that MPAN is energised, for the DNO this causes issues in ensuring the sites capacity is all allocated across all the sites MPANs. This also gives rise to consideration over how capacity that is designed across a number of MPANs should be split if any are de-energised (and what happens of they are re-energised). Noting that the physical capacity may not always be a linear fraction.	Noted.
NGED	Non-Confidential	Multi MPAN sites exist as they were/are generally set up to ensure resilience of supply by having a 'back up' MPAN and the ASC is split across those aggregated MPANs. The MPANs shouldn't be split in the way that we are seeing it. The customer should approach the DNO and ask for the supplies to be de-aggregated so that they can be split and billed separately in their own right. Some brokers are advising customers to split the supplies as there is inconsistency across DNOs with how these sites are billed once they have been split (by a supplier not taking over all MPANs from a multi MPAN	the Working Group recognised the appeal of preventing these arrangements from occurring in the first place; however, members noted that there may be wider regulatory or licence obligations which allow customers to choose their supplier for each MPAN.

		site) and some instances financial benefit to the customer to do this. I suppose the question we should be asking is why there is no process in place to stop this from happening – rather than setting up a complicated billing process to facilitate this happening. Some customers are not always aware of the Connection Agreement when they take over a premise. It's not on their radar.	The Working Group agreed that this should be checked, as it may limit the ability to prevent these arrangements through DCUSA.
Working Group Conclusions: The Working Group concluded that there are a range of reasons why multi-supplier arrangements occur, including commercial decisions, broker advice, historic site arrangements, resilience requirements, phased developments and operational factors. Responses also suggested that some arrangements arise accidentally or through incomplete supplier transfers. The Working Group discussed whether certain charging outcomes could inadvertently incentivise customers to split sites across Suppliers. Further consideration should be given to ensuring any proposed solution limits gaming opportunities and maintains cost reflectivity.			

Company	Confidential/ Anonymous	6. Having considered the potential solution approaches and worked examples above, do you prefer Option A or Option B?	Working Group Comments
ENC [IDNO]	Non-Confidential	We prefer option A as evenly proportioning the capacity between the MPANs is the simplest and most pragmatic solution. Allocating capacity equally across MPANs provides a straightforward methodology that is easy for parties to understand and implement. It avoids the additional complexity associated with determining and	**Option A** Noted.

		maintaining capacity allocations based on demand or a customer's opinion. Option B would require an ongoing assessment of how capacity should be apportioned, potentially resulting in increased administrative burden and differing interpretations across industry. The actual capacity per MPAN may be difficult to identify, especially if this is down to the customer to determine.	
NPg [DNO]	Non-Confidential	There are a few different reasons why this may happen and it may not be appropriate to reallocate them in every instance. For the short term, issues caused by a supplier delay in registration or by MHHS migrations, it would be more sensible to have a process that did not bill the fixed or capacity charge for one of two MPANs. This would allow the full MIC to be billed, a single fixed charge to be applied to only one site, but the volumes would be billed correctly across both MPANs. However, this is not an easy fix and would require either system changes or publication of additional tariffs that mirrored the main tariff but excluded the fixed, capacity, excess, and reactive elements. Please note, additional tariffs is not an option I would recommend pursuing. <u>Of the option on the table:</u>	**Option A** Noted.

		A: Option A is very close to the current process we flow as it is both efficient and pragmatic and allows for the volumes to be billed correctly without delay. A potential issue with solution A is that if a site has a capacity that is high enough (more than double the upper threshold of band 3) then splitting the site will still mean it gets two band 4 fixed charges. Solution B could mitigate this to some degree with one site potentially being a lower band. B: This issue generally only discovered when the registration of the subsidiary MPAN takes place and get an error in Durabill. The MIC is split equally in order to bill the site that month; Option B involves contacting the customer prior to being able to bill is not pragmatic and could delay billing by several months. However the benefit would mean that MIC could set more appropriately for the demand of each site, and the allocation each would be more reflective of their usage. Both options have flaws, but on balance we prefer option A over option B. There may be a little more to consider depending on the reason for the split, and the working group could consider pursuing an option that avoided more than one fixed charge in some circumstances where it is unfair to charge it.	

SP ENW [DNO]	Non-Confidential	We prefer Option B, although believe the solution is not yet fully formed and that workgroup should consider the points noted in Q12.	**Option B** Noted.
SPEN [DNO]	Non-Confidential	We prefer option B, splitting the capacity across MPANs by usage. This seems fairer and more akin to how the MPANs would be treated if they were each a separate site. Although not obvious in the worked examples, there are some bands where the upper threshold is more than double the lower threshold, for example EHV2. In this case it's possible that a site with two MPANs could potentially end up paying double the fixed charge. This could be discussed further in the working group to identify a potential solution, however we believe that as well as a system or process solution, there is a continuing need for education and guidance around nuances like this, to avoid customers unwittingly experiencing unintended consequences when splitting their MPANs across suppliers.	**Option B** Noted.
SSE Energy Customer Services [DG & Supplier]	Non-Confidential	1. We think that the proportionate approach of Option B is the more logical solution in comparison to Option A, given that it reflects a site's configuration more accurately. However, we'd like to understand how the capacity allocation to each MPAN would work in practice, in order to be confident that the solution is feasible. 2. We also have a concern: we have considered the four examples provided in the consultation, and we noted that for three of these,	**Option B** Noted.

under both Options A and B, the total fixed charges for each site differ (up or down) when compared to the fixed charges for the Baseline – see tables below. (For the fourth example, the fixed charges are zero in all cases. The total capacity charges are the same in each example, for each option.)

As such, Options A and B might be considered unfair compared to the 'Baseline', and both can create an incentive for operators of a single site to switch their various MPANs to different suppliers where this would lower the site's total fixed costs (and vice versa). We think that the Working Group should consider whether this could create unintended consequences.

Scenario 1	banding	EPN - LV HH	LPN - LV HH
Total Baseline fixed charges	band 4	£ 243.31	£ 8.58
Total Option A fixed charges	3 x band 2	£ 362.34	£ 25.74
Total Option B fixed charges	1 x band 2 + 2 x band 1	£ 330.08	£ 25.74

Scenario 2	banding	EPN - HV HH	LPN - HV HH
Total Baseline fixed charges	band 4	£ 3,122.68	£ -
Total Option A fixed charges	2 x band 3	£ 2,980.08	£ -
Total Option B fixed charges	1 x band 3 + 1 x band 2	£ 2,605.01	£ -

		(We have also compared the total fixed and capacity charges of the Baseline vs the two options for each example site. We note that the total capacity charges are the same in each case, and as such, they don't create any differences.)	
SSEN [DNO]	Non-Confidential	A flexible use of option A& B is probably more preferable i.e. where the CA does not stipulate a breakdown of capacity across each mpan, Option A should be applied. Where there is a breakdown of capacity available per the CA, Option B should be applied. However, we are not quite clear on what **"Maximum Capacity utilised"** means here and how it is determined, for example: • Is it the agreed Maximum Capacity (i.e, the capacity each MPAN specified in the Connection Agreement or assigned by customer in advance) • Or Is it the highest measured demand over a defined period (i.e, maximum demand?!). And what if an MPAN has little or no historical consumption?	**Option A + B** Noted.
UKPN [DNO]	Non-Confidential	Although the worked examples illustrate the primary problem they do not consider de-energised MPANs nor any subsequent CoS of MPANs such that they all have the same supplier again.	**Option A** The Working Group noted that retaining banding based on the whole-site capacity in the connection agreement, regardless of how capacity

		Of these, we prefer option A as it ensures that all the capacity is allocated as we believe that there are gaming opportunities with Option B. The total site capacity across all MPANs would still need to equal the value which the Connection Agreement states. We also believe that the banding should be on the capacity of the whole site rather than on a proportion of the capacity allocated to the individual MPANs, as it would align to the DCUSA legal text which refers to a 'Single Site'.	is allocated between MPANs. This would align banding with the DCUSA definition of a single site and reduce the opportunity for capacity splitting to alter the band.
NGED	Non-Confidential	A	**Option A** Noted.
Working Group Conclusions: The Working Group noted that consultation responses were divided between the two options, with support expressed for both approaches. Option A was generally viewed as simpler and easier to administer, whilst Option B was considered potentially more cost reflective. The Working Group agreed that further solution development is required. In particular, consideration should be given to hybrid approaches, treatment of residual charging bands, avoidance of unintended charging outcomes, customer fairness, and maintaining alignment with connection agreement arrangements			

Company	Confidential/ Anonymous	7. Have you identified any alternative solutions?	Working Group Comments
ENC [IDNO]	Non-Confidential	Not at this time.	Noted.

NPg [DNO]	Non-Confidential	No.	Noted.
SP ENW [DNO]	Non-Confidential	We believe the solution needs to be tweaked to avoid a site suffering double the Baseline Fixed charge. (see our response to Q12). Perhaps the default is the simpler option A but customer can elect option B (e.g. for a site with a security building and a processing facility, the latter with five times the capacity).	Noted.
SPEN [DNO]	Non-Confidential	No alternative solution has been identified at this stage. Any preferred solution should minimise billing complexity and avoid the duplication of fixed charges for the sites in question. We believe that generally there is a continuing need for education and guidance to avoid customers unwittingly experiencing unintended consequences when splitting their MPANs across suppliers.	Noted.
SSE Energy Customer Services [DG & Supplier]	Non-Confidential	We think that an alternative solution is required to ensure that a site's total fixed charges don't depend on the MPAN and capacity configurations as this could create unintended consequences (as we set out under q.6 above).	Noted.
SSEN [DNO]	Non-Confidential	Yes. As mentioned above (Q6), a hybrid solution would be more preferable.	Noted.

UKPN [DNO]	Non-Confidential	Keep the banding per the connection agreement, for all MPANs, regardless of the capacity split. This will band as per the connection agreement (and as per DCUSA). The customer can ensure the MPANs move supplier together or amend the connection agreement.	Noted.
NGED	Non-Confidential	Possibly having dedicated LLFC/DTI's that denotes a multi-mpan site? Different ones for LV/LVSub & HV?	Noted.
Working Group Conclusions: The Working Group concluded that responses to Question 7 demonstrated a clear need for a consistent approach to the treatment of split multi-MPAN sites. The group agreed that any solution should provide clarity on both capacity allocation and residual/fixed charge treatment, while recognising the need to remain aligned with the customer's connection agreement. Members agreed that further consideration should be given to whether different scenarios require different treatment, particularly where a split arises unintentionally or temporarily. The group noted that the next stage should focus on refining the potential solution options and ensuring that any proposed approach avoids creating opportunities for gaming or inconsistent customer outcomes.			

Company	Confidential/ Anonymous	8. Do you believe that DCP 476 interacts with DCP 328? If so, please explain how.	Working Group Comments
ENC [IDNO]	Non-Confidential	We recognise that DCP 328 considered similar charging principles where multiple suppliers are present across a site. While DCP 328 related specifically to private networks and DCP 476 is focused on	No

		multi MPAN site specific billed customers, both proposals address the treatment of fixed and capacity charges where supply arrangements are split across suppliers. We therefore consider DCP 328 to be relevant background, but do not believe it should directly determine the outcome of DCP 476 given the differing scope of the two proposals.	
NPg [DNO]	Non-Confidential	No – DCP 328 related to competition in supply on private networks and involved difference metering and shared metering. The sites considered here with subsidiary MPANs on the same Connection Agreement generally do not have a metering dispensation in place so are much simpler.	no
SP ENW [DNO]	Non-Confidential	No comment.	Noted.
SPEN [DNO]	Non-Confidential	We recognise an interaction in terms of charging principles, but not a direct dependency between the proposals.	No
SSE Energy Customer Services [DG & Supplier]	Non-Confidential	We consider that the issue DCP476 seeks to address is very similar to the one DCP328 sought to tackle ('UoS charges for private networks with competition in supply'). We think that it can be argued that DCP476 would implicitly apply to at least some private networks (PNs), namely those which meet the description of the DCP476 target group, i.e. a single PN that is a single site with multiple MPANs and more than one supplier.	

		As such, we think it is important that it is made clear whether PNs are in scope of this CP or not.	
SSEN [DNO]	Non-Confidential	Yes, we believe there is a connection between DCP476 and DCP328. Both DCPs would have to address the same key question of how to avoid double-charging or creating a different charging outcome solely because the MPANs have different Suppliers?	
UKPN [DNO]	Non-Confidential	No It is not clear from the consultation document what "related issues" the working group had in mind when asking about this?	
NGED	Non-Confidential	Unaware	Noted.
Working Group Conclusions:			

Company	Confidential/ Anonymous	9. Should private networks be considered within the scope of this proposal? Please provide further detail as to why/why not.	Working Group Comments
ENC [IDNO]	Non-Confidential	We do not consider private networks should be included within the scope of DCP 476. DCP 476 is intended to provide clarity on the treatment of site-specific billed sites with multiple MPANs registered to different	

		Suppliers. Expanding the proposal to include private networks would introduce additional complexity and could delay the development and implementation of a solution for the core issue currently under consideration. We note that similar issues relating to charging arrangements where multiple suppliers are present on private networks were previously considered under DCP 328. That proposal specifically examined private network arrangements and was ultimately rejected by Ofgem. While DCP 328 provides useful background and highlights some related charging principles, private networks raise distinct issues and therefore should be considered separately from DCP 476.	
NPg [DNO]	Non-Confidential	We do not believe the same issue affects private networks so they are out of scope. A private network issue would be in regard to metering dispensations where as this is regarding regular settlements.	
SP ENW [DNO]	Non-Confidential	We believe there shouldn't be a blanket inclusion for Private Networks as it's unlikely that the solution would be applicable to all Private Networks due to the breadth of different arrangements for some of which this might be appropriate. However it's our view that, in the interests of competition, Private Networks should be able to take advantage of the arrangements	

		where the circumstances are applicable (for example where there are no unregistered mpans). For this reason we recommend the workgroup further considers how best to allow Private Networks to be included.	
SPEN [DNO]	Non-Confidential	We believe that private networks should not be included within the scope of this proposal to avoid adding additional complexity. Whilst there are similarities in charging treatment where multiple Suppliers are involved, private networks raise additional issues that are distinct from the specific multi-MPAN site arrangements being considered under DCP 476.	
SSE Energy Customer Services [DG & Supplier]	Non-Confidential	We have no firm views on whether PNs should be considered within the scope of this CP or not. However, as per our q.8 response, we think that it can be argued that DCP476 would implicitly apply to at least some private networks (PNs), namely those which meet the description of the DCP476 target group, i.e. a PN that is a single site with multiple MPANs and more than one supplier. As such, we think it is essential that the proposal is very clear on whether PNs are in scope of this CP or not, and that the (yet to be drafted) legal text is unequivocal on this.	
SSEN [DNO]	Non-Confidential	No, as this would make the scope of this CP too broad. Private network is a very complex topic and involves a few different aspects that would need to be considered separately.	

UKPN [DNO]	Non-Confidential	This change was not raised with Private Networks in mind, and currently DCUSA is silent on Private Networks so any change in relation to this DCP should exclude them. We do not believe that any specific wording in the legal text needs to be included in relation to Private Networks as part of this change, as has been the approach with other changes since DCP328 was rejected.	
NGED	Non-Confidential	Unsure	
Working Group Conclusions:			

Company	Confidential/ Anonymous	10. Would implementation of any of the proposed approaches require system changes?	Working Group Comments
ENC [IDNO]	Non-Confidential	System changes may be required to automatically calculate the capacity based on the number of MPANs and allocate the appropriate charge.	
NPg [DNO]	Non-Confidential	No.	
SP ENW [DNO]	Non-Confidential	Yes, as this process is currently automated in our billing system so relies on all MPANS remaining on the same LLF/tariff in order to bill.	

		If MPANS were to be allocated different bandings then that would need a change to the billing system.	
SPEN [DNO]	Non-Confidential	System and/or process changes may be required to identify sites where multiple MPANs associated with a single site are registered to different Suppliers, maintain the allocation of charges and capacity across those MPANs, and ensure that billing arrangements operate correctly. In particular, the identification of affected sites and the ability to bill multi-MPAN sites where different Suppliers are involved remain challenges.	
SSE Energy Customer Services [DG & Supplier]	Non-Confidential	We expect the proposed approaches to require supplier system changes, particularly where existing pricing and billing systems need to identify and allocate charges at the MPAN level. The scope of these changes will depend on the final solution, the allocation methodology adopted and whether changes would be required to any such sites already being supplied by a supplier (which may necessitate correction to existing contracts and pricing, as well as potential complexities based on the nature and product that the customer has signed up for.If a supplier does not already supply such sites, the complexity and cost of system changes would be somewhat minimised. As a result, it is difficult for us to assess the implementation costs at this stage. Costs are likely to arise from system enhancements,	

		testing activities, and process changes. However, we are not currently able to provide a robust estimate.	
SSEN [DNO]	Non-Confidential	Our billing system vendor would need to understand the potential solution before assessing whether any system changes would be required.	
UKPN [DNO]	Non-Confidential	No.	
NGED	Non-Confidential	Our legacy billing system would have to be manually updated by users but as MPANs transition into MHHS then it could be automated so yes probably would require a system change. Have not come across any yet in MHHS so not sure how our billing system handles them currently.	
Working Group Conclusions:			

Company	Confidential/ Anonymous	11. Would the system changes identified above result in any material implementation costs? If so, can you share what those costs are?	Working Group Comments
ENC [IDNO]	Non-Confidential	We do not have an estimate on the costs potentially involved in system changes.	

NPg [DNO]	Non-Confidential	N/A.	
SP ENW [DNO]	Non-Confidential	Unable to provide costs at this time.	
SPEN [DNO]	Non-Confidential	Potentially, however SP Energy networks is unable to quantify these costs, as full implementation requirements are not fully defined.	
SSE Energy Customer Services [DG & Supplier]	Non-Confidential	See our response to q.10.	
SSEN [DNO]	Non-Confidential	Please see above.	
UKPN [DNO]	Non-Confidential	N/A.	
NGED	Non-Confidential	Unsure	
Working Group Conclusions:			

Company	Confidential/ Anonymous	12. Do you have any other questions?	Working Group Comments

ENC [IDNO]	Non-Confidential	Overall we are supportive of the approach to treat multi-MPAN sites with different suppliers based on the site capacity evenly split between MPANs. We have a few clarification points below regarding the process for consideration: If a customer was previously on a lead and related MPAN, but moved the related MPAN to a different supplier, we would have to 'unrelate' the MPAN, so that a new capacity and LLFC are applied and therefore the capacity and fixed charges are billed correctly. A consideration is that the customer, not the supplier, is the one that chooses if the MPANs are to be related and this customer could change at a later date. In the event of a change in supplier, we would like to understand how a change would be communicated to us, as this would be a change in contract with the customer and us.	
NPg [DNO]	Non-Confidential	If the sites were to merge again in the future, would they revert to their previous allocation, or be treated as a new site with a refresh allocation, or is no action taken, potentially resulting in them being combined on a lower charge band than the MIC suggests.	
SP ENW [DNO]	Non-Confidential	The examples only consider scenarios where the mpans drop to lower bands than the Baseline. There is an existing code defect which is not considered in the scenarios, namely that for some	

		bands, if a site is at the top and site capacity is divided equally across two mpans, then the site could end up with two mpans in the Baseline band and therefore double the Baseline Fixed charge. This doesn't seem consistent with the original intent of Ofgem's TCR or what this change is looking to achieve and so this seems like a missed opportunity to resolve that defect as part of this mod. This effect could occur in LV, HV or indeed EHV. We also believe the solution should allow for Private Networks to take advantage of the arrangements where appropriate. Lastly it might be worthwhile for workgroup to consider whether sites should be allowed the discretion to choose option A or B. For example could there be data issues that result in an unfair outcome for a supplier under option B? For these reasons we believe the workgroup should reconsider the proposed solutions to best ensure a fair outcome.	
SPEN [DNO]	Non-Confidential	No.	
SSE Energy Customer Services [DG & Supplier]	Non-Confidential	As we stated under q.1 above, we would like to better understand what types of sites there are that have multiple MPANs and multiple suppliers. This will help stakeholders and the Working Group when seeking to assess the impact of the proposal. Could the Working Group / proposer please provide some examples?	

		We note that a second consultation is required, and that this will provide draft legal text. We look forward to considering the further detail / information we are seeking, via this response, at that time.	
SSEN [DNO]	Non-Confidential	-Depending on which solution options, DNO may need to consider one tariff or multiple tariffs should be applied for a single connection agreement (with multiple MPANs & suppliers). - Does DCP 476 relate to DCP 424 "Use of System charging for complex sites"?	
UKPN [DNO]	Non-Confidential	No not at this time.	
NGED	Non-Confidential	No	
Working Group Conclusions:			