DCUSA Consultation 2	At what stage is this document in the process?
# DCP 476: ## Treatment of multi MPAN sites **Date Raised:** 01/06/2026 **Proposer Name:** Chris Ong **Company Name:** Eastern Power Networks **Party Category:** DNO	01 – Change Proposal **02 – Consultation** 03 – Change Report 04 – Change Declaration

Purpose of Change Proposal

To determine how a site-specific billed site which has multiple MPANs but which are traded with different Suppliers should be treated.

	This document is the second 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. The Working Group recommends that this Change Proposal should proceed to a second Consultation. Parties are invited to consider the questions set in section 10 and submit comments using the form attached as Attachment 2 to dcusa@electralink.co.uk by 11 December 2026.
	**Impacted Parties** Suppliers/DNOs/IDNOs/CVA Registrants
	**Impacted Clauses** Schedules 16/17 /18 and 32

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Timetable

Activity	Date
Initial Assessment Report	17 June 2026
Consultation Issued to Industry Participants	21 August 2026
Consultation 2 Issued to Industry Participants	20 November 2026
Change Report Approved by Panel	17 February 2027
Change Report issued for Voting	18 February 2027
Party Voting Closes	11 March 2027
Change Declaration Issued to Parties/Authority	112 March 2027
Authority Decision	N/A

Any questions?

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1 Summary

1.1 This is the second consultation on DCP476. The first consultation was issued in August 2026, and the consultation responses are summarised in section 4. Section 5 sets out the conclusions from the first consultation, as well as the second consultation.

What?

1.2 As per the first consultation, the purpose of this proposal is to 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?

1.3 As per the first consultation, the issue is as follows: 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 DUoS and 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.

1.4 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.

1.5 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.

1.6 This would lead to questions as to what should then happen if the MPANs become re-aligned.

How?

1.7 The options proposed in the first consultation are recapped at the start of section 4. Whilst their capacity allocation approaches have been carried over, the notion of allocating individual

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residual bands to each MPAN has been dropped. The way the initial options have been reconfigured is explained in this section.

1.8 Following the first consultation, the Working Group would like to clarify that DCP 476 considers two related but distinct issues:

- how the overall site capacity and associated capacity charges should be allocated between MPANs/Suppliers, and
- how the site's fixed/residual charge should be recovered.

1.9 The proposed solutions in this second consultation are summarised and mapped to the first consultation's options as follows:

Capacity charges allocation

1.10 For capacity charging, the Working Group proposes that the total Maximum Import Capacity (MIC) for the whole site would remain unchanged but would be allocated across the MPANs forming the site.

1.11 As a default, the capacity would be split equally between the MPANs, rather than between Suppliers. Therefore, where a site had five MPANs and four were registered to one Supplier and one to another, the capacity would be allocated 80:20 between the two Suppliers. This is similar to Option A of the first consultation but without rebanding.

1.12 As part of this solution, the customer would also be granted the ability to agree an alternative proportional allocation of capacity between a site's MPANs with the DNO where appropriate. This is similar to Option B of the first consultation but without rebanding.

1.13 Under this second consultation, Options A and B have been merged in the context of capacity charge allocation, with Option A being the default, and Option B being integrated as a potential substitute.

1.14 These allocation options would not create additional site capacity or, in itself, constitute a change to the overall MIC agreed for the Single Site. This is consistent with the developing legal approach, which retains the underlying site MIC while providing a mechanism for allocating that capacity between MPANs or Supplier groupings.

Fixed/residual charges allocation

1.15 For fixed/residual charges, the Working Group has identified two solutions (one with two sub-options) for this second consultation, including worked examples.

Options 1a and 1b - Retain the existing site band and split the fixed/residual charge.

1.16 The Single Site would remain within its existing charging band, determined using the capacity of the overall site. The site's fixed/residual charge would then be divided between the relevant MPANs so that, collectively, the MPANs recover the charge applicable to the Single Site. The charge could be divided either equally across each supplier (option 1a), or proportionately by

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capacity, i.e. to reflect the aggregated share of capacity that each supplier supplies (option 1b). Together, these two variants of Option 1 broadly mirror the proposed approach for the capacity charges allocation.

Option 2 - Retain the existing site band and apply the full fixed/residual charge to each MPAN.

1.17 The Single Site would again retain its existing charging band, but each MPAN would attract the full fixed/residual charge associated with that band. This may be simpler operationally but could result in a higher aggregate charge for a site, once MPANs at the same site are registered to different Suppliers. Option 2 differs from the proposed approach for the capacity allocation. This option is new.

Summary of options relating to Fixed Charge allocation

1.18 Illustrative examples for the two options (one with two sub-options), using the following assumptions:

- The examples applies to a HV 'Final Demand/Single Site'.
- The site has three MPANs and two suppliers.
- The site is in residual band 4 (HV, at 2,000 kVA), with a full residual charge of £8,000 p.a..
- Site configuration:

	Capacity (kVA)	*supplier*
MPAN 1	400	Supplier A
MPAN 2	1,400	Supplier B
MPAN 3	200	Supplier B
Total site capacity	2,000	n/a

Fixed charge allocation

	Description of option	Fixed charges allocation	Total site charge	TCR considerations
1 a 1 b	Site fixed charge is split between suppliers equally or ---------- proportionately	Supplier A: £4,000 p.a. Supplier B: £4,000 p.a. or ---------- Supplier A: £1,600 p.a. Supplier B: £6,400 p.a.	£8,000 p.a.	Potentially aligns with the current TCR 'Single Site' definition.
2	Each supplier is charged the whole fixed charge for the site	Supplier A: £8,000 p.a. Supplier B: £8,000 p.a.	£16,000 p.a.	Might not align with current

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				TCR 'Single Site' definition.

1.19 This consultation seeks industry views on the solutions, considering customer impacts, system changes, TCR implications and any consequences for other industry codes.

Who?

1.20 DNOs, IDNOs, CVA Registrants and Suppliers would be impacted.

2 Governance

2.1 The governance information was set out in the first consultation.

Requested Next Steps

This Change Proposal should:

- Be treated as a Part 1 Matter;
- Be treated as a Standard Change; and
- Proceed to the Working Group phase.

2.2 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 set out in the first consultation, 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 and 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

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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.

3.7 The first consultation for this CP provided worked examples of some of the scenarios explained above and these can be found in the previous consultation document here.

4 Working Group Assessment and Consultation 1

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.

4.2 The first consultation for this CP was issued on 21 August 2026 for a period of 15 Working Days and there were 9 parties who responded to the consultation.

4.3 Consultation 1 considered two potential approaches (Option A and Option B) for allocating the overall site capacity between the MPANs forming the Single Site for both the purposes of capacity charging and fixed charging. Both approaches proposed that each MPAN is allocated its own residual band, with both the capacity charge and the fixed charge being applied accordingly, and as if each MPAN was a ‘single site’. In other words, the residual bands would be allocated on an MPAN basis rather than a ‘single site’ basis.

4.4 Option A – Equal allocation: The total site capacity would be divided equally between each of the MPANs forming the Single Site, and each MPAN would therefore be allocated the same residual band. For example, where a site has a MIC of 100 kVA and five MPANs, 20 kVA would be allocated to each MPAN. Where those MPANs are registered to different Suppliers, the capacity attributed to each Supplier would reflect the number of MPANs registered to that Supplier.

4.5 Option B – Proportional allocation: The total site capacity would instead be allocated between the MPANs on a proportional basis, reflecting the capacity attributable to each MPAN. Each MPAN might therefore be allocated a different band to that of the other MPANs. For example,

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where one MPAN was allocated 60% of the site's capacity and the remaining four MPANs were each allocated 10%, the site MIC would be divided on that basis.

Question 1: Do you understand the intent of DCP 476?

4.6 All confirmed that they understood the intent of DCP 476.

4.7 One respondent sought greater clarity on the types and approximate number of Single Sites containing multiple MPANs and multiple Suppliers, to better understand the scale and potential impact of the issue.

4.8 Overall, the responses demonstrated that the underlying issue and purpose of the Change Proposal were understood, although further practical examples and detail would assist industry consideration of the solution.

Question 2: Do you support the principles of DCP 476?

4.9 There was full support for the principle of establishing a clear and consistent approach within DCUSA. Respondents recognised that different treatment currently exists and considered that greater consistency would be beneficial.

4.10 One respondent suggested that the scope should be widened to include multi-MPAN sites where all MPANs are registered to a single Supplier, on the basis that inconsistencies in the allocation of DUoS charges can also arise in those circumstances.

Question 3: Do you have experience of the issue described in the consultation?

4.11 The majority of respondents had experience of the issue. Respondents identified examples across different voltage levels and noted that the issue can require manual intervention within existing billing processes.

4.12 A number of wider circumstances were also identified. These included MPANs moving to different Suppliers, MPANs migrating at different times under MHHS, and situations where a single Supplier had entered into separate supply contracts for individual MPANs.

4.13 Respondents highlighted that these situations can sometimes result in multiple fixed charges being applied or uncertainty over the appropriate allocation of MIC.

Question 4: What is your organisation's current approach where a site-specific billed site has multiple MPANs registered with different Suppliers?

4.14 Responses noted that there is no single consistent industry approach.

4.15 Some respondents currently split the site's MIC equally between the relevant MPANs, while others allow the allocation to be apportioned depending on the individual MPANs circumstances. Different approaches are also taken to fixed charges and charging bands.

4.16 It was also highlighted by one respondent that some arrangements treat the MPANs individually for billing purposes, whereas at EHV the site may continue to be priced collectively with the fixed charge and capacity subsequently divided between the MPANs. Other approaches assign bands according to the capacity allocated to each MPAN.

4.17 One response noted that their current approach was to treat any MPANs registered with different suppliers as a separate single site.

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Question 5: Why do customers appoint different Suppliers to MPANs forming part of the same site?

4.18 Respondents identified a range of reasons, including commercial decisions, different contractual arrangements for different parts of a site, separate physical feeders, independent operational areas, historic arrangements and security-of-supply considerations. Supplier changes and MHHS migration can also result in MPANs becoming separated unintentionally.

4.19 Some respondents also noted that customers may be advised to separate their MPANs for commercial reasons where the resulting charging arrangements could reduce costs. Conversely, other instances may arise simply because the customer does not understand the charging consequences of separating MPANs.

Question 6: Having considered the potential solution approaches, do you prefer Option A or Option B?

4.20 Responses were mixed, with no clear industry preference between the two original approaches.

4.21 Respondents supporting Option A, under which capacity would be split equally, considered it the simpler and more pragmatic approach. It was viewed as easier to administer and less dependent on obtaining and maintaining information about the appropriate capacity for individual MPANs.

4.22 Those supporting Option B, involving a proportional allocation, considered that it could better reflect the actual configuration or usage of a site. However, concerns were raised about how the appropriate allocation would be determined and maintained and whether this could delay billing.

4.23 Other respondents favoured a hybrid approach, e.g. using an equal split as the default but allowing a customer to apportion the capacity across the MPANs if they wish to do so.

4.24 Some respondents also raised concerns about the effect each of the options could have on residual bands and fixed charges. Respondents noted that dividing the capacity could move MPANs into different bands and could result in the total fixed charge being either higher or lower than that applicable to the original Single Site.

Question 7: Have you identified any alternative solutions?

4.25 Several respondents did not identify an alternative solution, although others suggested variations on the original approaches.

4.26 Suggestions included using Option A as the default with the ability for the customer to agree an alternative allocation of the capacity if they wanted, adopting a hybrid approach depending upon what is specified in the Connection Agreement, and retaining the charging band applicable to the overall site regardless of how capacity is subsequently allocated between MPANs.

4.27 Respondents also highlighted that any solution should seek to avoid inappropriate duplication of fixed charges.

Question 8: Does DCP 476 interact with DCP 328?

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4.28 The majority of respondents considered the issues sufficiently different because DCP 328 concerned private networks, including particular metering arrangements, whereas DCP 476 concerns MPANs associated with a Single Site and Connection Agreement.

4.29 Two respondents considered DCP 328 relevant because both changes involve the treatment of charges where more than one Supplier is associated with arrangements at a site.

Question 9: Should private networks be within scope?

4.30 The majority of respondents who expressed a firm view considered that private networks should not be brought within the scope of DCP 476, principally because this could significantly broaden the Change and introduce issues different from those the proposal was raised to address.

4.31 However, some respondents considered that there may be private network arrangements which meet the characteristics being considered under DCP 476 and suggested that the drafting should be sufficiently clear about whether such arrangements are included or excluded.

4.32 One respondent suggested that private networks should be able to use the arrangements where the relevant circumstances apply rather than being subject to a blanket exclusion.

Question 10: Would implementation require system changes?

4.33 Responses varied considerably depending upon existing systems and the solution ultimately adopted

4.34 Some respondents considered that no significant system changes would be required, whereas others identified potential changes to systems, tariff or LLFC allocation, MPAN-level charging information and processes used to identify affected sites and maintain capacity allocations.

4.35 Many responses noted that the scale of system change may depend heavily on whether MPANs forming part of the same site remain within the same charging band or are able to be allocated separate bands.

Question 11: Would those system changes result in material implementation costs?

4.36 Respondents were generally unable to provide firm implementation costs at this stage because the final solution had not been determined. Potential costs identified included system development, testing and process changes.

4.37 One Supplier also highlighted possible contractual impacts if implementation resulted in significant numbers of MPANs changing residual bands, particularly where existing fixed-price contracts might need to be reconsidered.

Question 12: Do you have any other questions or comments?

4.38 The responses raised several matters for further consideration. These included obtaining a better understanding of the number and types of affected sites; determining the treatment where MPANs subsequently return to the same Supplier; dealing with de-energised and subsequently re-energised MPANs; clarifying communication arrangements following a change of Supplier; considering the relationship with DCP 424; and avoiding circumstances where splitting capacity results in multiple MPANs retaining the original charging band and consequently duplicating the fixed charge.

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Overall Consultation 1 outcome

4.39 Overall, Consultation 1 demonstrated broad support for resolving the issues of both capacity charging and fixed charging and confirmed that different approaches are currently being applied across industry.

4.40 Consultation responses did not identify a clear preference between the two approaches. Some respondents preferred the simplicity of an equal allocation, while others considered that a proportional allocation could better reflect individual site arrangements. A number of respondents supported a hybrid approach, whereby an equal allocation would apply by default but an alternative proportional allocation could be agreed where appropriate.

4.41 Following consideration of these responses, the Working Group agreed that an equal allocation between MPANs should form the default approach, while allowing the customer and DNO to agree an alternative proportional allocation where appropriate.

Residual banding by MPAN

4.42 The Working Group reconsidered the originally proposed approach whereby the overall site MIC would first be allocated between the MPANs forming the Single Site and the resulting capacity allocations would then be used to determine a separate residual charging band for each MPAN, with each MPAN mapped to the relevant Supplier. This could therefore result in MPANs which form part of the same Single Site being assigned to individual residual bands.

4.43 Following further consideration, the Working Group agreed not to progress this approach as a solution within Consultation 2. Members considered that the capacity attributed to individual MPANs for charging purposes would not necessarily represent the physical capacity available to those MPANs under the underlying Connection Agreement. Using that allocation to determine residual banding could therefore create an artificial charging outcome and, in some circumstances, expose individual MPANs to inappropriate charging consequences.

4.44 The Working Group also considered that this approach would represent a more fundamental departure from the existing Single Site arrangements under the TCR, as residual banding would effectively move from a site-based assessment to an MPAN-based assessment. Members identified potential consequential changes to Schedule 32 and concerns that allowing sites to move between site-based and MPAN-based treatment could encourage customers to alter their arrangements purely to achieve a more favourable charging outcome.

4.45 On balance, the Working Group considered that separate MPAN banding introduced additional complexity and potential unintended consequences without providing sufficient benefit over the alternative approaches. It was therefore agreed that the option would be acknowledged within the consultation but would not be presented as a solution for industry consideration. Respondents will still be able to raise this, or any other alternative approach, through the wider consultation questions

Working Group Conclusions following Consultation 1

4.46 Following its review of the Consultation 1 responses, the Working Group concluded that there was sufficient evidence that the issue identified by DCP 476 exists in practice and that further clarification within the DCUSA is required. Respondents demonstrated that different approaches are currently being applied to the allocation of capacity, residual banding and fixed charges where MPANs forming part of the same site are registered to different Suppliers.

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4.47 The Working Group therefore agreed to develop the options further. In particular, subsequent discussions separated the solution as follows:

- With regard to **capacity charges**, a proposed approach for allocating the site's capacity across the MPANs, with an equal split by MPAN as the default and the ability to agree an alternative proportional allocation; and
- With regard to **fixed/residual charges**, two alternative approaches, on which the Working Group is seeking further industry views through Consultation 2
- However, it was decided that neither solution would apply the first consultation's proposed approach of banding each MPAN as if it were a 'single site'. Instead, a multi-MPAN site's residual band would remain unchanged under the options in this second consultation.

4.48 For further details, see the "How?" sub-section of section 1 of this consultation.

5 Working Group Conclusions and Consultation 2

Scope of DCP 476

5.1 Further to the Working Group's conclusions above of the first consultation, the Working Group agreed that the principal focus of DCP 476 should remain on Single Sites containing multiple MPANs registered to different Suppliers. While Consultation 1 identified potentially similar issues in other circumstances, the Group was conscious that widening the scope too far could prevent or delay resolution of the specific defect that DCP 476 was raised to address.

5.2 The Working Group nevertheless recognised that the solution needed to be sufficiently robust to deal with different ways in which a multi-Supplier arrangement could arise. This included circumstances where the arrangement was deliberate, as well as cases where MPANs became separated between Suppliers unintentionally or temporarily. The Working Group therefore considered that the mechanism should focus on the charging treatment once the relevant circumstances exist, rather than attempting to control the customer's choice of Supplier.

Private Networks and DCP 328

5.3 The Working Group considered in detail whether private networks should form part of DCP 476, particularly given the previous consideration of similar charging issues under DCP 328.

5.4 The Working Group's majority view was that DCP 476 should not seek to resolve the wider issue of competition in supply across private networks. Bringing private networks within scope could introduce a significantly wider and more complex set of arrangements and risk moving DCP 476 away from the specific issue it was raised to address. Consultation responses also recognised that DCP 328 dealt with different arrangements, including private network, shared and difference-metering scenarios.

5.5 However, the Working Group did not consider that private networks should be expressly or automatically excluded. It recognised that a private network could potentially satisfy the same characteristics as the sites being addressed by DCP 476. For example, the relevant arrangements could potentially comprise a Single Site under one Connection Agreement, contain multiple MPANs and have those MPANs registered to different Suppliers.

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5.6 The Working Group therefore considered that the preferred approach was not to design DCP 476 specifically around private networks, but equally not to prevent an arrangement from falling within the solution simply because it happened to involve a private network. The determining factor should instead be whether the site meets the relevant criteria established by DCP 476.

5.7 This meant that DCP 328 was considered useful historical context, rather than a direct dependency that should determine the DCP 476 solution.

Single-Supplier Multi-MPAN Sites

5.8 Consultation 1 identified that similar issues may arise where a site has multiple MPANs but those MPANs remain registered to the same Supplier.

5.9 The Working Group acknowledged the issue but considered that it may be different from the principal issue DCP 476 was intended to address.

5.10 The Working Group subsequently considered that the point related more closely to Supplier pricing arrangements than to the specific issue addressed by DCP 476. The Working Group retained its focus on multi-MPAN sites where MPANs are registered to different Suppliers.

Capacity Splitting and capacity charging

5.11 Consultation 1 demonstrated that there was no consistent industry approach to allocating the overall site MIC after MPANs became registered to different Suppliers. The Working Group therefore identified capacity allocation as one of the key areas requiring further development.

5.12 The Working Group subsequently considered how the splitting and charging of the capacity should work where more than two MPANs were involved. For example, where a site had five MPANs, four registered to one Supplier and one to another, the Working Group agreed that the capacity should follow the MPANs. The capacity and the associated charges would therefore be allocated 80:20, rather than being divided 50:50 simply because two Suppliers were present.

5.13 The Working Group ultimately agreed on a default equal split of the capacity across the number of MPANs, while retaining the ability for the customer and DNO to agree on an alternative proportional split where appropriate.

Q1: Do you agree that, for the purpose of capacity charging, the total site MIC should, as a default, be divided equally between the MPANs forming the Single Site, with the customer and DNO able to agree an alternative proportional capacity splitting? Please provide reasons and identify any unintended consequences.

Q2: Does your current MHHS system allow capacity and capacity charges to be split in the manner proposed?

Fixed and Residual Charging

5.14 The Working Group identified the treatment of the fixed/residual charge and charging band as a matter that remained unresolved after the first consultation.

5.15 Consultation 1 showed support for different approaches and highlighted points raised between simplicity, cost reflectivity, customer fairness and alignment with the underlying Connection

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Agreement. Neither of the original options therefore had sufficient consensus to progress unchanged.

5.16 Further Working Group consideration resulted in two approaches being developed:

- Option1 - retain the site's existing band but divide the fixed charge between the relevant MPANs; with two sub options, split the fixed charge between suppliers either equally (option 1a) or proportionally (option1b) ;or
- Option 2 - retain the site's existing band and apply the full fixed charge to each MPAN.

5.17 These options have been set out in more detail, and with worked examples, in Section 1 under the “How?” section.

5.18 The Working Group did not reach a majority preference between these two approaches. It therefore agreed that Consultation 2 should seek industry views on which solution parties preferred and why.

Q3: Which of the above fixed/residual charging solutions do you prefer and why?

Q4: Are there any unforeseen consequences associated with any of the solutions that the Working Group has not considered?

Q5: Are there any other solutions that the Working Group has not considered? If so, please provide details.

Customer Choice, Fairness and Potential Gaming

5.19 The Working Group recognised that there are legitimate reasons why MPANs forming part of a Single Site may be registered to different Suppliers. Consultation responses identified commercial decisions, broker advice, historic arrangements, resilience requirements, phased developments, operational factors and incomplete Supplier transfers.

5.20 The Working Group therefore considered that DCP 476 should not prevent or discourage a customer from exercising its ability to choose different Suppliers.

5.21 At the same time, the Working Group recognised that the eventual charging methodology should not inadvertently create an incentive for customers to restructure their Supplier or MPAN arrangements purely to achieve a more favourable DUoS charging outcome. Avoidance of gaming opportunities, inappropriate duplication of charges and inconsistent customer outcomes was therefore identified as an important consideration when assessing the available solutions.

Q6: Are any of the proposed solutions, or any alternatives you have identified open to gaming? Please elaborate on how they are open to gaming and what possible mitigations could be put in place to reduce gaming opportunities.

MHHS Migration and Temporary Supplier Splits

5.22 Consultation responses highlighted that the issue can also arise during MHHS migration, including where MPANs forming part of the same site migrate at different times.

5.23 The Working Group considered that further thought was required as to whether such circumstances represented a separate MHHS-specific issue or whether the DCP 476 solution

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should be capable of dealing with temporary or unintended Supplier splits in the same way as longer-term arrangements.

5.24 The Working Group's developing approach was therefore to ensure that the solution is sufficiently clear to operate where the relevant charging circumstances arise, without attempting to resolve wider MHHS registration matters through DCP 476.

System Capability and Implementation Costs

5.25 Consultation 1 showed that the implementation impact would depend materially on which charging solution was selected. The Working Group therefore identified system capability and implementation cost as an area that needed further evidence before making a final recommendation.

5.26 For the residual options, the Working Group agreed that DNOs and IDNOs should be asked to identify the system changes associated with each option, engaging their own providers where necessary.

Q7: What is the scale and nature of the any system changes (including for Durabill ,any IDNO billing systems and Supplier validation systems) required to implement each solution as set out in the how area of section 1?

TCR and the Definition of a Single Site

5.27 The relationship with the existing TCR arrangements was identified as an area requiring further consideration. The Working Group explored the way rules for residual banding and charging relate to the options. Schedule 32 of the DCUSA sets out that residual bands are applied to Final Demand customers at 'Single Site' level. The Schedule is silent on relevant sites that have more than one MPAN, resulting in a grey area which may need to be clarified.

5.28 It could be argued that Option 1a and 1b comply with the TCR provisions in that they recover the equivalent of the site's total residual charge. Option 2 would result in multiples of a site's residual charge being recovered.

5.29 The Working Group agreed that DCP 476 should acknowledge and properly consider the existing TCR arrangements rather than attempt to work around them. However, it did not consider the existing arrangements should automatically prevent an alternative solution if that solution could be demonstrated to deliver a better and defensible outcome for customers and Parties. Consultation 2 therefore seeks specifically on the consequences of each approach for the existing TCR provisions.

Q8: Do you foresee any changes to, or consequences for, the existing TCR provisions under any of the proposed solutions?

De-energisation and Re-energisation

5.30 The Working Group also identified a specific scenario requiring further consideration where one MPAN at a multi-MPAN site becomes de-energised and is subsequently re-energised.

5.31 This raised questions about whether capacity should be redistributed amongst the remaining energised MPANs, whether charging bands or fixed charges should change and what should happen if that MPAN subsequently returns. The original consultation material had already

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identified the potential difficulty of reallocating capacity where a de-energised MPAN was later brought back into use.

5.32 The Working Group agreed that Consultation 2 should therefore expose this scenario so respondents could consider how each proposed solution would operate in practice.

Q9: Where an MPAN forming part of a Multi-MPAN Site is de-energised, how do you consider the site's capacity allocation and fixed/residual charges should be treated? Where that MPAN is subsequently re-energised, how should the capacity allocation and fixed/residual charging arrangements be reinstated or reassessed? Please provide reasons for your response and identify any system or process impacts.

Q10: How should the capacity and fixed charge be distributed in the event of an MPAN being de-energised?

Q11: How should the site be treated when a de-energised MPAN is re energised?

Other Industry Codes and Transmission Charging

5.33 The Working Group recognised that the way in which MPANs are treated for DCP 476 could have consequential effects outside DCUSA. In particular, different treatment of MPANs could affect information used for transmission residual charging and potentially create different outcomes under other industry arrangements.

5.34 The Working Group agreed that DCP 476 should not attempt to resolve matters that properly sit under another industry code. However, consequential impacts should not be ignored. Consultation 2 should therefore provide respondents with an opportunity to identify wider cross-code implications so that these can be understood and, where necessary, addressed through the appropriate governance arrangements.

Q12: Are there any wider implications associated with any of the solutions across other industry codes? If so, please provide details?

Prospective Rather than Retrospective Application

5.35 The Working Group discussed whether implementation of DCP 476 should require existing historic charging arrangements to be revisited.

5.36 The general view was that the solution should operate on a forward-looking basis. The Group did not consider that historic DUoS charges should routinely be recalculated retrospectively as a consequence of implementing the Change.

5.37 This provides an important principle for the development of the implementation arrangements, although the precise implementation date and transitional treatment will depend upon the final solution.

Legal Text and Impacted Schedules/Sections within DCUSA

5.38 The Working Group agreed that legal text would ultimately be required but recognised that the appropriate drafting depended upon the final charging solution.

5.39 The original consultation had identified Schedules 16, 17 and 18, Paragraph 141 Note 7 and Schedule 32 as potentially relevant provisions.

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5.40 Following Consultation 1, the Group agreed that initial legal drafting should be designed to clarify both the agreed capacity approach and the fixed/residual charging solution. The Group also discussed whether dedicated provisions for multi-MPAN sites should sit in Schedule 32 or elsewhere within DCUSA, including potentially Schedule 16, 17 and 18. That question was left for further consideration once the initial drafting had been developed post the review of this consultation responses.

Supporting Guidance

5.41 The Working Group recognised that supporting guidance could help ensure consistent application of the eventual arrangements across DNOs, IDNOs and Suppliers. However, it considered that it would be premature to determine the precise content of any guidance before the preferred charging solution was established.

5.42 The need for guidance will therefore be revisited once Consultation 2 has established a clearer direction for the fixed/residual charging methodology.

6 Impacts & Other Considerations

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

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

Consumer Impacts

6.2 DUoS payers who are liable for the DUoS residual are also liable for the TNUoS residual, and both types of residual are applied under the same residual band. As such, the element of the DCP476 solution which covers the DUoS fixed/residual charge allocation may also affect the way the TNUoS residual is allocated at the relevant sites.

Does this Change Proposal Impact Other Codes?

6.3 Parties may feel that there may be some CUSC impacts as a result of this CP. It was agreed that any future CUSC changes would need to be raised outside the DCUSA with the CUSC if parties wished to raise them.

Environmental Impacts

6.4 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.

7 Relevant Objectives

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7.1 The Working Groups view as to which of the DCUSA Objectives would be better facilitated by the implementation of this Change Proposal is set out below.

	DCUSA Charging Objectives	Identified impact
☐	1. That compliance by each DNO Party with the Charging Methodologies facilitates the discharge by the DNO Party of the obligations imposed on it under the Act and by its Distribution Licence	None
☑	2. That compliance by each DNO Party with the Charging Methodologies facilitates competition in the generation and supply of electricity and will not restrict, distort, or prevent competition in the transmission or distribution of electricity or in participation in the operation of an Interconnector (as defined in the Distribution Licences)	Positive
☑	3. That compliance by each DNO Party with the Charging Methodologies results in charges which, so far as is reasonably practicable after taking account of implementation costs, reflect the costs incurred, or reasonably expected to be incurred, by the DNO Party in its Distribution Business	Positive
☑	4. That, so far as is consistent with Clauses 3.2.1 to 3.2.3, the Charging Methodologies, so far as is reasonably practicable, properly take account of developments in each DNO Party's Distribution Business	Positive
☐	5. That compliance by each DNO Party with the Charging Methodologies facilitates compliance with the EU Internal Market Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators; and	None
☐	6. That compliance with the Charging Methodologies promotes efficiency in its own implementation and administration.	None

7.2 A consistent treatment should reduce the risk that DUoS charging outcomes distort a customer's decision over whether to use different Suppliers for MPANs forming the same site. Consultation responses and the Working Groups own experience showed that customers may use multiple Suppliers for legitimate commercial and operational reasons, but also that current charging differences can create financial incentives or disincentives to split MPANs.

7.3 The proposer's view is that this CP achieves a fairer and more cost-reflective outcome.

7.4 DCP 476 addresses an issue becoming more apparent through changing Supplier arrangements, complex multi-MPAN configurations and MHHS migration creates a process that ensures a consistent approach across DNOs.

7.5 The Working Group will seek industry views via a third consultation on which objectives are better facilitated once the final solution is more developed.

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8 Legal Text

Text Commentary

8.1 The Working Group considers that amendments are likely to be required to Schedules 16, 17, 18 and 32 of the DCUSA to implement DCP 476. These amendments are expected to clarify how the overall site capacity and associated capacity charges are allocated where MPANs forming part of a Single Site are registered to different Suppliers, together with the treatment of the applicable fixed/residual charge.

8.2 The legal text will need to retain the overall MIC and Single Site principle, while providing for the agreed allocation of capacity between the relevant MPANs. Amendments to Schedule 32 are also likely to be required to clarify the treatment of residual banding and fixed charges once the preferred charging approach has been established.

8.3 The Working Group does not propose to develop final legal text at this stage. Detailed drafting will be undertaken following consideration of the responses to this consultation and agreement on the preferred capacity charging and fixed/residual charging solution. This will allow the legal text to reflect the final approach and any consequential changes identified through Consultation 2.

8.4 For the avoidance of doubt, the Working Group intends to issue a third consultation for DCP 476, and this third consultation will include draft legal text.

9 Implementation Date

9.1 The implementation date will be considered following review of the Consultation 2 responses and once the preferred solution and associated system changes have been identified.

9.2 The Working Group's current view is that the revised arrangements should apply prospectively and should not require historic DUoS charges to be recalculated.

9.3 For the avoidance of doubt, the Working Group intends to issue a third consultation for DCP 476, and this third consultation will include the proposed implementation date and a request for party views on this date

Q13: Do you have any other questions?

10 Consultation Questions

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

No.	Questions
1	Do you agree that, for the purpose of capacity charging, the total site MIC should, as a default, be divided equally between the MPANs forming the Single Site, with the

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	customer and DNO able to agree an alternative proportional capacity splitting? Please provide reasons and identify any unintended consequences.
2	Does your current MHHS system allow capacity and capacity charges to be split in the manner proposed?
3	Which of the above fixed/residual charging solutions do you prefer and why?
4	Are there any unforeseen consequences associated with any of the solutions that the Working Group has not considered?
5	Are there any other solutions that the Working Group has not considered? If so, please provide details.
6	Are any of the proposed solutions, or any alternatives you have identified open to gaming? Please elaborate on how they are open to gaming and what possible mitigations could be put in place to reduce gaming opportunities.
7	What is the scale and nature of the any system changes (including for Durabill ,any IDNO billing systems and Supplier validation systems) required to implement each solution as set out in the how area of section 1?
8	Do you foresee any changes to, or consequences for, the existing TCR provisions under any of the proposed solutions?
9	Where an MPAN forming part of a Multi-MPAN Site is de-energised, how do you consider the site's capacity allocation and fixed/residual charges should be treated? Where that MPAN is subsequently re-energised, how should the capacity allocation and fixed/residual charging arrangements be reinstated or reassessed? Please provide reasons for your response and identify any system or process impacts.
10	How should the capacity and fixed charge be distributed in the event of an MPAN being de-energised?
11	How should the site be treated when a de-energised MPAN is re energised?
12	Are there any wider implications associated with any of the solutions across other industry codes? If so, please provide details?
13	Do you have any other questions?

10.1 Responses should be submitted using Attachment 2 to dcusa@electralink.co.uk no later than Monday 11 December 2026

10.2 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.

11 Attachments

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- Attachment 1 - DCP 476 Consultation 2 Response Form
- Attachment 2 - DCP 476 Change Proposal Form
- Attachment 3 – DCP 476 Consultation 1 and Responses

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