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## DIP CR Consultation Responses

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### DCR0001 ‘Addition of missing Non-Functional Requirements (NFRs) to the DIP Rules to reflect Market-wide Half Hourly Settlement (MHHS) design’

This DIP Change Request (CR) Consultation was issued on 25 November 2024, with responses invited by 20 December 2024.

#### Consultation Respondents

Respondent	Role(s) Represented
RECCo	Code Body / Code Administrator
National Grid Electricity Distribution	Distributor
Scottish and Southern Electricity Networks	Distributor
Scottish Power Energy Networks	Distributor
Electricity North West Limited	Distributor, Registration Service
National Energy System Operator	Other

# Summary of Consultation Responses

Respondent	Agree?	Redlini ng?	Impact ed?	Costs?	Implem entatio n?
RECCo	✗	✗	✓	✗	✗
National Grid Electricity Distribution	✓	✗	✗	✗	✓
Scottish and Southern Electricity Networks	✓	✗	-	-	✓
Scottish Power Energy Networks	✗	✗	✗	✗	✗
Electricity North West Limited	✗	✗	✓	✓	✗
National Energy System Operator	-	-	✗	✗	-

## Question 1: Do you agree with the proposed solution?

### Summary

Yes	No	Neutral/No Comment	Other
2	3	1	0

### Responses

Respondent	Response	Rationale
RECCo	No	<p>We support the intent of the proposal to add MHHS Design requirements that were not captured in the DIP Rules that went live on 01 Oct 2024. However we have comments on the proposed drafting, as set out in detail below, that we consider should be addressed before DCR0001 is approved.</p> <p>In addition, we note that MHHS Programme CR054 requires further changes to the proposed solution in DCR0001. It would be preferable for DCRs to cover the latest MHHS Design position in the DIP Rules rather than seeking to agree changes that will need to be further changed ahead of the DIP being used in live operation. Where this is not possible, it would be helpful to reference what is out of scope of this proposals and expected to be covered in a later DCR.</p>
National Grid Electricity Distribution	Yes	We agree with the proposed solution subject to the comments we have noted below in respect of the red-lining.
Scottish and Southern Electricity Networks	Yes	As there were missing NFRs it appears sensible to get them added with this CP
Scottish Power Energy Networks	No	<p>We do not support the proposed solution as currently written, as this is referencing old data volumes in the section, and makes no reference to the DNO Coefficients, this would mean the inclusion as it is currently written is inaccurate.</p> <p>We support the intent of the proposal.</p>
Electricity North West Limited	No	The proposed solution does not reflect the MHHS Programme approved change CR054 'Changes to Non-Functional requirements for LDSOs'

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		<p>solution. CR054 was raised by LDSOs to ensure the NFR errors were corrected and fit for purpose for LDSOs. This has a material impact on the accuracy of the solution. Full details are attached in Question 2.</p>
National Energy System Operator	N/A	<p>NESO is not a DIP user and is agnostic on this proposal</p>

Question 2: Do you agree that the draft redlining delivers the proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
0	5	1	0

Responses

A summary of the specific responses on the draft redlining can be found at the end of this document.

Respondent	Response	Rationale
RECCo	No	We support the intent of the proposal to add MHHS Design requirements that were not captured in the DIP Rules that went live on 01 Oct 2024. However we have comments on the proposed drafting, as set out in detail below, that we consider should be addressed before DCR0001 is approved.
National Grid Electricity Distribution	No	E2E1005 and 9.8.2 in DCR0001-B_DSD002 – the figures quoted in respect of peak volumes for message throughput are the old figures. As per MHHS-E2E002 Requirement v3.5 the figures should be “All Services (unless explicitly referenced below) shall have capacity to process the following volumes of messages: - peak daily volume of 1,143,000 * portfolio coefficient - peak hourly volume of 1,143,000* portfolio coefficient ” We would also raise a query in respect of 9.8.3 in DCR0001-B_DSD002. “For the purposes of this paragraph, PC shall be the same as the DIP User’s Supplier’s Funding Share (FSS) calculated in accordance with DSD0055 “DIP Funding and Budget”” Does this describe our portfolio coefficient in terms of us as a DNO as it appears to be only to do with Suppliers?
Scottish and Southern Electricity Networks	No	The proposal does not consider MHHS CR054 which approves the NFR changes for LDSOs

Scottish Power Energy Networks	No	We are of the view that there are updates required to uplift the information and extend to include Coefficients applying to LDSO, we believe that this section should include all volumes agreed via the MHHS Programme to ensure accuracy.
Electricity North West Limited	No	<p>CR054 introduced changes to the original NFR requirements for E2E1004, E2E1005 as follows:</p> <p>Amend the L4 performance and volumetric NFRs for the UMSO role / service for requirements: E2E1004, E2E1005, E2E1007, E2E1009 &amp; E2E1011.</p> <p>Remove PUB-013, PUB-014, PUB-021, REP002, REP002A, REP900 &amp; REP901 used in DUoS billing by LDSOs from the scope of NFR requirements: E2E1004, E2E1005, E2E1007, E2E1009 &amp; E2E1011</p> <p>Update NFR E2E1004 to expressly state each participant's individual MPAN portfolio coefficient needs to be applied.</p> <p>Update NFR E2E1005 to remove the Gas quotient from the volumetrics</p> <p>The current drafting of DCR001 incorrectly refers to old volumes pre CR054 approval and should be corrected.</p> <p>There is also an issue contained in DCR0001 relating to the Portfolio Coefficients which will apply to LDSOs with respect to budgets and charging.</p> <p>"For the purposes of this paragraph, PC shall be the same as the DIP User's Supplier's Funding Share (FSS) calculated in accordance with DSD0055 "DIP Funding and Budget""</p> <p>This should also be amended in the revised drafting.</p>
National Energy System Operator	N/A	NESO is not a DIP user and is agnostic on this proposal

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### Question 3: Will this DIP CR impact your organisation?

#### Summary

High	Medium	Low	None
0	1	1	3

#### Responses

Respondent	Response	Rationale
RECCo	Low	<p>DCR0001, if implemented as currently drafted with the issues noted below, could lead to DIP User confusion on how they meet their DIP User requirements and this could impact the operation of REC Business Processes that rely on the use of the DIP.</p> <p>As a very minor point to note, the commentary within Question 3 should be updated to add the references to the CR number. It currently refers to CRXXXX.</p>
National Grid Electricity Distribution	None	-
Scottish and Southern Electricity Networks	-	SSEN is unable to quantify the impacts if the CP is not amended to take into account CR054
Scottish Power Energy Networks	None	We have not identified any impact on our business and are of the view that this only affects the DIP Manager
Electricity North West Limited	Medium	If this CR is accepted, LDSOs will be required to demonstrate to the DIP Manager against incorrect parameters and metrics, against thresholds that can never be met at unnecessary costs. LDSOs have also currently undergoing testing against the correct parameters and metrics.
National Energy System Operator	None	-

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## Question 4: Will your organisation incur any costs in implementing this DIP CR?

### Summary

High	Medium	Low	None
0	1	0	4

### Responses

Respondent	Response	Rationale
RECCo	None	N/A
National Grid Electricity Distribution	None	-
Scottish and Southern Electricity Networks	-	Please see response to Q3 this applies to costs also
Scottish Power Energy Networks	None	We have not identified any costs associated with this proposal
Electricity North West Limited	Medium	If this CR is accepted there would be unnecessary LDSO cost to support testing of incorrect NFRs and it could impact the Plan as LDSOs would be unable to demonstrate successful completion of testing for entry gate check in.
National Energy System Operator	None	-



Question 5: Do you agree with the proposed implementation approach for this DIP CR?

Summary

Yes	No	Neutral/No Comment	Other
2	3	0	1

Responses

Respondent	Response	Rationale
RECCo	No	<p>DCAB should be established and provided with an update on the progression of this DCR ahead of DIP Manager making a determination on DCR001.</p> <p>DCAB has an important role in holding DIP Manager to account for the decisions that it takes by providing the appeal adjudicator role. We understand that both the decision to assign DCR0001 as a Tier 2 Change Request and any decision to approve/reject DCR0001 are appealable to DCAB.</p>
National Grid Electricity Distribution	Yes	-
Scottish and Southern Electricity Networks	Yes	As this is primarily a governance change SSEN has no issues with the implementation approach
Scottish Power Energy Networks	No	We are not supportive of this implementation approach as the key information in the change contains incorrect data
Electricity North West Limited	No	The DCR should be withdrawn due to an admin error and redrafted based upon the requirements agreed under CR054. Once the DCR had been redrafted/resubmitted (urgently if required by the DIP manager) it could be considered to reflect the existing approved design.
National Energy System Operator	N/A	NESO is not a DIP user and is agnostic on this proposal

## Question 6: Do you have any further comments on this DIP CR?

### Summary

Yes	No
3	3

### Responses

Respondent	Response	Comments
RECCo	Yes	<p>The online version of the legal text does not show the changes as redline. The redline changes can be seen when the document is downloaded. However, it would be useful to be able to see this on the online version.</p> <p>It is important that all relevant industry parties, including those that will be DIP Users, are informed of proposals to change the DIP Rules. At this early stage in its development we recommend that multiple channels are used to inform parties of DCR consultations so that they have an opportunity to respond. This is particularly important while the DIP Manager is building its contact lists. RECCo has publicised DCR0001 in its weekly bulletin and recommends that other channels are also used, such as MHHS Programme's weekly Clock and Elexon's weekly Newscast.</p> <p>Other than the above, we found the documentation clear and easy to follow.</p>
National Grid Electricity Distribution	No	-
Scottish and Southern Electricity Networks	No	Not at this time
Scottish Power Energy Networks	Yes	While we are supportive of the intent of this proposal, we cannot support as it currently stands as the underlying test relating to the daily volumes references historical information and does not reflect the current position.
Electricity North West Limited	Yes	The consultation was not sent through to the appropriate parties (BSC Contract Managers, MHHS Contacts) and a number of the DNO parties (who

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		<p>are directly impacted) were made aware of this consultation through a third party. We request all future DIP DCRs communication are sent to directly to BSC contract managers and MHHS leads (until such time as MHHS goes live).</p> <p>There are inconsistencies between the consultation deadlines between Newscast (20th December) and the actual consultation document (12th December). We have used the newscast deadline for planning and submitting our response.</p>
National Energy System Operator	No	-

## DSD002 Annex 2

Respondent	Location	Comment
RECCo	Para 8.13.1	<p>Reflects MHHS Design E2E0402. Additional wording included in DSD002 Annex 2 which was not in the design: 'If required, the DIP Manager will inform other DIP Users of such outage, particularly if an outage means that DIP Users may not be able to deliver messages within the time frames required elsewhere'.</p> <p>We are not clear how the 'if required' caveat would be applied. In particular, who would make this decision. We suggest that criteria should be developed and agreed with DIP Users and/or DCAB.</p> <p>To establish the criteria, we consider that further assessment is required to understand the impacts and the circumstances when DIP Manager should be required to provide information to DIP Users. This should consider the requirements under existing Codes for the provision on information when a Market Participant's system has an outage to avoid unnecessary duplication and to ensure that the ownership of messaging is clear to parties.</p>
RECCo	Para 8.13.2	<p>Reflects MHHS Design E2E1010. Requirement to not plan outages within 'secured active processing window'. The term 'secured active processing window' has not been added as a defined term and therefore it is not clear what this refers to. A definition is required so that DIP Users can understand and meet their requirements.</p> <p>The inclusion of 'Where applicable' at the start of this clause has not been clarified. Further information should be provided on when this requirement is applicable or the reference to 'where applicable' removed.</p>
RECCo	Para 9.7	<p>Reflects MHHS Design E2E0210 which states that user systems shall be idempotent and have a mechanism for handling duplicate messages. No comments.</p>

RECCo	Para 9.8.1	<p>Reflects MHHS Design E2E1004, however it does not include the specific exclusions described in the MHHS Design. E2E1004 Column K excludes various IF and PUB messages and also requires a Profile Co-efficient to be applied.</p> <p>We suggest that this paragraph is reviewed and updated as required to reflect the exclusions in E2E1004 and the application of the Profile Co-efficient.</p>
RECCo	Para 9.8.2	<p>Intended to reflect MHHS Design E2E1005, however it does not reflect the latest values as per approved MHHS Programme CR054 'Change to Non-Functional Requirements for LDSOs' (CR054). We note from discussions at the November CCAG that DIP Manager intends to raise a further DIP CR to implement CR054 at a later date. However, we query the value in making a change to the DIP Rules through DCR0001 to implement drafting that does not match the latest version of the MHHS Design.</p>
RECCo	Para 9.8.3	<p>States that the Profile Coefficient shall be the same as the DIP User's Supplier's Funding Share. This does not work for DIP Users that are not Suppliers. The definition of Profile Coefficient in the MHHS Design is: 'the size of the services MPAN portfolio / total number of MPANS, i.e. the percentage of the total number of MPANS'. See cell K49 MHHS-E2E002 Requirements v3.5.xlsx. We suggest that this paragraph is reviewed and a definition of Profile Coefficient used that is applicable to all relevant DIP Users.</p>
Electricity North West Limited		<p>Amend the L4 performance and volumetric NFRs for the UMSO role / service for requirements: E2E1004, E2E1005, E2E1007, E2E1009 &amp; E2E1011.</p> <p>Remove PUB-013, PUB-014, PUB-021, REP002, REP002A, REP900 &amp; REP901 used in DUoS billing by LDSOs from the scope of NFR requirements: E2E1004, E2E1005, E2E1007, E2E1009 &amp; E2E1011</p> <p>Update NFR E2E1004 to expressly state each participant's individual MPAN portfolio coefficient needs to be applied.</p> <p>Update NFR E2E1005 to remove the Gas quotient from the volumetric</p>