

DCR0006 Consultation Responses

This Consultation was issued on:

- **19 September 2025**, with responses invited by **17 October 2025**.

Consultation Respondents

Respondent	Role(s) Represented
Scottish Power Energy Networks (SPEN)	LDSO
ESG Global Limited	DIP Connection Provider
IMServ Europe Ltd	Metering Services Smart, Metering Services Advanced, Smart Data Services, Advanced Data Service, Unmetered Supplies Data Service
RECCo	Code Administrator
UK Power Networks	Distributor, Registration Service, Unmetered Supplies Operator
OVO Energy Ltd	Supplier
AMT-Sybex Ltd (Trading as Flui Technologies)	Supplier
SP Electricity North West	Distributor
E.ON UK Energy Services Ltd	Metering Service Smart
National Grid Electricity Distribution	Distributor
Northern Powergrid	Distributor

Summary of Consultation Responses

Respondent	Agree?	Red-lined?	Impacted?	Cost?	Implementation?
Scottish Power Energy Networks (SPEN)	Yes	Yes	Low	None	Yes
ESG Global Limited	No	No	High	High/Med	No
IMServ Europe Ltd	Yes	Yes	Low	Low	Yes
RECCo	No	No	High	High	No
UKPN	No	-	-	-	-
OVO Energy Ltd	No	Yes	High/Med	High/Med	No
AMT-Sybex Ltd (Trading as Fluid Technologies)	Yes	Yes	Low	Low	Yes
SP Electricity North West	No	No	Low	Low	No
E.ON UK Energy Services Ltd	Yes	Yes	-	-	Yes
National Grid Electricity Distribution	No	No	High	Low	No
Northern Powergrid	No	No	Med	Med	No

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Question 1: Do you agree with the proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
4	7	0	0

Responses

Respondent	Response	Rationale
Scottish Power Energy Networks (SPEN)	Yes	N/A
ESG Global Limited	No	<p>Summary of Anomalies and Conflicts Identified</p> <p>We have identified several anomalies and conflicting details within the Change Request (CR) that we request are addressed prior to agreement and approval. Please find below our commentary and responses for consideration:</p> <ul style="list-style-type: none">• Date Conflicts: There appears to be inconsistencies between proposal dates and effective dates across referenced documents (e.g. DSD007 Glossary effective from 5 August 2025 vs. CR proposal dated 12 August 2025), and between recommended and listed implementation dates (e.g. 22 October 2025 vs. 25 November 2025).• Incident Classification Overlap: The CR does not fully address the relationship between <i>Significant DIP Incidents</i> and <i>Industry-Wide Major Incidents</i>, with a clear framework for managing these incidents and what defines how incidents will be assessed and assigned, especially where they meet both definitions in part. This includes governance conflicts between DIP Manager authority and Central Service Provider-led resolution processes. We also highlight that this proposal conflicts with the requirements of

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		<p>the implemented <i>Incident Resolution Group (IRG)</i> without proposed actions for continuity of, or interaction with that Group detailed in the CR, or this group being explicitly referenced.</p> <ul style="list-style-type: none">• Operational and Resource Impacts: The CR introduces new obligations that will require changes to many participants’ business operating models yet lacks sufficient detail on the financial and resource implications. The Tier One classification of this CR appears to be based solely on the presence of new obligations, without a supporting cost model to validate the impact threshold for those participants.• Governance Clarity: It remains unclear how existing Programme Major Incident activities will interact with the CR’s proposed framework. The CR must include clarification relating to what incidents will continue under current governance or be reclassified as <i>Significant DIP Incidents</i>.<ul style="list-style-type: none">○ E.g. At what level does an incident classify as “Significant”? P1, P2 or P3 with additional caveats○ substantial disruption to the normal operations of one or more DIP Users (where such issue is generated through operations carried out via the DIP) – would typically be managed through a participants own Major Incident Process. Is this proposal therefore expecting to replace such processes?○ Would substantial disruption to a single Supplier, Agent or DNO require incident Management through this process?• Proportionate Requirement CR needs to include further detail to assure the response and actions required are proportionate to how
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		<p>other major programmes, e.g. Smart and Switching manage major incidents. Is a “Significant DIP Incident” process appropriate and proportionate.</p> <p>We recommend that these issues be addressed through a revised CR that provides:</p> <ul style="list-style-type: none"> • Clear and consistent timelines; • Example scenarios to support the rationale for a “Significant DIP Incident” • Defined governance structures for incident classification and resolution including recognition of and impacts to IRG; • A transparent cost model to support financial planning; • Clarification on the interaction with existing incident management processes. <p>Additional clarification regarding the “Substantial disruption to one or more DIP Users” – Noting incorrect setting of the impact level could potentially trigger “<i>Significant DIP Incident</i>” processes that would typically not require such actions to resolve.</p>
IMServ Europe Ltd	Yes	
RECCo	No	<p>We welcome proposals from DIP Manager to clearly define processes in the DIP Rules for managing Significant DIP Incidents. We agree that having a clearly defined process is essential to efficiently resolve issues. We support much of the redline drafting, however we have noted some specific concerns in our response.</p> <p>We do not agree that the proposals provide sufficient clarity on how decisions to resolve Significant DIP Incidents will be made by the DIP Manager where there is no industry consensus and we are concerned that, without agreed decision making criteria or an appeal mechanism, DIP Users may be required to implement proposals that do not operate in the best interests of consumers, DIP Users, the settlements arrangements or retail energy markets. We note that DIP Manager has specific responsibilities for the operation of the DIP Service, so any decision must be</p>

	<p>objectively clear that it does not unduly favour that service or the operation of the DIP Manager.</p> <p>We do not consider that the solution provides sufficient clarity on how these new arrangements will operate in the context of the Elexon Service Management arrangements that have been implemented to support MHHS, the MHHS Programme's IRG or any existing Service Management arrangements operated under the REC, specifically, the EES Service Desk, the REC Code Manager Service Desk and the Switching Operator arrangements run by DCC to resolve Switching Incidents. Having an agreed approach that determines roles and responsibilities between the different service management arrangements provided across the industry is vital to avoid confusion and delay issue resolution.</p> <p>We do not agree that <u>all</u> DIP Users should be required to attend Significant DIP Incident Management Meetings. This would be disproportionate for DIP Users that do not have a role in issue resolution or are not impacted by the Significant DIP Incident.</p> <p>We do not agree that the scope of a Significant DIP Incident should include disruption to the normal operations of the DIP Manager. Our view is that scope should be limited to impacts on DIP Users related to the effective operation of the DIP Service, including where issues with the operation of the DIP Manager impact the operation of the DIP Service. For example, we do not consider that the DIP Manager website not being available would require all DIP Users to attend a Significant DIP Management Meeting, unless it could be demonstrated that this was having a material impact on the operation of the DIP Service.</p> <p>We are concerned that DCR0006 seeks to place obligations on DIP Users to comply with Elexon's MHHS Service User Operations Manual. These arrangements are not mandated under the BSC and are not subject to change control under the DIP Rules. Elexon could therefore update the MHHS</p>
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		<p>Service User Operations Manual and amend DIP User requirements, without any control or right to appeal by DIP Users.</p> <p>We would welcome clarification in the DIP Rules on how incidents that are not categorised as 'significant' are to be resolved and any obligations required on parties to support that resolution. We note the statement on page 4 of the Initial Assessment Report that such arrangements are informal. However, we remain concerned that lower level incidents can still impact consumer experience in the market and lead to unnecessary costs and inefficiencies for DIP Users in trying to get these addressed without clear resolution pathways, obligations and timescales.</p> <p>Comments on the consultation process:</p> <ul style="list-style-type: none">• We recognise the importance of putting in place workable arrangements for the DIP and the time pressures for MMHS go-live. However, we recommend that DIP Manager considers the benefits of engaging with DIP Users to develop proposals ahead of publishing Initial Assessment Reports for consultation. This may avoid unnecessary re-working of proposals and delay.• We suggest that consultations on DIP changes should request views on the Applicable DIP Objectives and the DIP Manager's assessment against these objectives. This would support the requirement to assess DIP CRs against the Applicable DIP Objectives (DSD0004, para 2.8.2).• We welcome the provision of a 'Summary of Key Obligations Relevant to a Significant Incident' on Page 8 of the Initial Assessment Report. However, the format is difficult to engage with and we suggest that, if used in future reports, this is provided as a separate excel file annex.• In this assessment, DIP Manager has set out obligations in the REC that relate to DCC, LDSOs and EES. We
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		are not clear why this has been added and would welcome engagement with DIP Manager on REC matters where it considers that there are relevant to its DCR proposals.
UKPN	No	<p>This CR appears to be address a Major Incident management (at a high level) process. The issue will be identifying what is a qualifying incident and what won't be. It refers to Settlement impact specifically then our take would be that this is limited to the DUoS Billing applications, at specific times of the month, and processes only. MPRS is covered by the REC obligations is our assumption here.</p> <p>It would be fairly easy to see that if our DIP adaptor, SWIM-Soak became unavailable during that period then if it was preventing every party from receiving the relevant DIP messages then that would constitute a significant DIP issue, but would that threshold be breached if the UKPN Durabill or MPRS instance suffered a server failure (as an example).</p> <p>This CR seems only to reinforce what the agreed Major Incident (MI) process is and is already mandated, via the Issue Resolution Group (IRG), that being, every party notify Elexon of a major incident, who upon accepting it is an MI will take on the role of Incident Manager. Is the CR trying to codify the same into the relevant code so that it is a formal obligation on parties more than the IRG?</p>
OVO Energy Ltd	No	While we agree with the importance of ensuring clear roles and responsibilities in terms of responding to Significant DIP Incidents, we have some concerns with the proposals included in this CR. Please see our response to Question 3 for further detail.
AMT-Sybex Ltd (Trading as Flui Technologies)	Yes	We support the introduction of a defined framework for managing Significant DIP Incidents. This proposal improves clarity around the roles and responsibilities of the DIP Manager and DIP Users, including DIP Connection Providers, in managing and resolving incidents that impact DIP operations.

SP Electricity North West	No	<p>It is our understanding that the management of significant events 'referred to as industry-wide major incident management' is already covered under the MHHS Service Users Operations Manual. This Manual was extensively consulted upon and is consistent with the MHHS Service Management Strategy which sets out the high-level model that industry participants will operate to support the systems, process and services described within the MHHS Target Operating Model and MHHS Design artefacts. The DIP is one of several key central systems within scope of this Manual and Strategy. It would be inefficient and unnecessary to have a second (potentially inconsistent) process in place. It could also risk causing confusion and encourage inconsistencies in approach.</p> <p>We would recommend that the DIP Manager should review the Service Operations Manual and identify any specific gaps or issues with the MHHS Service Management Strategy and Service Users Operations Manual specific to the DIP Manager remit. The DIP Manager could address these gaps under a targeted change proposal and modify the text under DCR0006 accordingly. This should be in collaboration and consultation with key participants and/DIP users.</p>
E.ON UK Energy Services Ltd	Yes	The proposed solution will offer systematic support in the event of a major incident.
National Grid Electricity Distribution	No	<p>We believe that it is necessary to have clear and defined rules around the management of significant DIP incidents.</p> <p>Now that M8 has come and gone and we are now reliant on the DIP, without proper management of incidents this can lead to drawn out incident resolution, potentially causing delays and loss of access.</p> <p>Our concerns with the proposed solution are that firstly we will be increasing the obligations on DIP users at an already busy time. Furthermore, giving the DIP Manager emergency powers might cause some users to be concerned about lack of checks and balances or dispute</p>

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		<p>resolution mechanisms if they disagree with the Manager's decisions.</p> <p>There is also some concern around the ambiguity in definitions. For example, the term "Significant DIP Incident" is broadly defined and may be open to interpretation. In addition, the requirement for collaboration across multiple parties may be difficult to manage in real-time.</p>
Northern Powergrid	No	<p>We believe there may be duplication with the MHHS Service Management processes.</p> <p>We suggest that those existing process are reviewed and any gaps that are identified, are addressed</p>

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

Summary

Yes	No	Neutral/No Comment	Other
5	5	1	

Responses

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

Respondent	Response	Rationale
Scottish Power Energy Networks (SPEN)	Yes	N/A
ESG Global Limited	No	<p>As previously noted,— and with further detail provided below — we have identified several concerns with the documentation associated with this Change Request (CR) that we request are addressed prior to its agreement and approval.</p> <p>1. Impact Assessment Definitions and Methodology</p> <p>The CR requests that participants provide impact assessments; however, it does not specify the criteria or methodology by which these impacts should be defined or evaluated.</p> <p>For example, the terms <i>High</i>, <i>Medium</i>, and <i>Low</i> impact are used without clarification of their meaning or the basis for use in assessment. This raises concerns about consistency and comparability across organisations. A scenario where a <i>High</i> impact is assessed by a small supplier may be considered <i>Low</i> for a large supplier, illustrates the ambiguity.</p> <p>Without a standardised framework or guidance, it is unclear how these impact statements can be reliably used to support validation and inform the approval or rejection of the CR. Further</p>

		<p>analysis and clarification are required to ensure the responses are meaningful and actionable.</p> <p>2. Alignment with Latest Documentation Versions</p> <p>This CR references the document <i>DCR0006-E_MHHS_Service_User_Operations_Manual_v1.4</i> as part of its supporting pack. We assume based on this version being distributed with this CR, has been used as the basis upon which this CR has been developed.</p> <p>However, upon review of the Collaboration Base, we note that more recent versions have been published—specifically, version 1.6 (uploaded 14/07/2025) and version 2.0 (uploaded 05/09/2025). To ensure alignment with current operational guidance and avoid discrepancies, the CR must be updated to reflect and reference the latest available version, v2.0. The risk associated with approval based on referencing outdated documentation undermines the validity and relevance of the proposed changes.</p> <p>3. Duplication of Existing Governance Structures</p> <p>The CR appears to replicate the function of the existing <i>Issue Resolution Group (IRG)</i>. This is an already established governance and management forum for the management of significant incidents, in effect until milestone M15.</p> <p>The duplication raised through this CR raises concerns regarding governance efficiency and resource utilisation. We request further clarity on the DIP Manager’s proposal for the ongoing management and coordination of Incident management across all the three groups detailed in the CR.</p> <p>Specifically, we seek assurance that the scope and responsibilities of the proposed structure will not conflict with or duplicate those of the IRG, and that participant resources and time will be</p>
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		managed effectively. Clear delineation of roles and governance processes is <i>essential</i> to avoid operational inefficiencies and ensure coherent programme delivery.
IMServ Europe Ltd	Yes	However we propose clarification would be beneficial regarding the naming convention of the proposed meeting under DSD002 Annex 5, 2.4d - e.g. is this the same as the recently established Issues Resolution Group?
RECCo	No	<p>We have concerns that the solution does not provide clarity for DIP Users on their obligations and responsibilities as it is not clear how these arrangements fit together with the Elexon Service Management arrangements and the Service Management Arrangements available under the REC.</p> <p>We also have concerns with the solution itself that we believe should be addressed before DCR0006 is approved.</p>
UKPN	N/A	
OVO Energy Ltd	Yes	While we agree that the proposed legal text delivers upon the intent of the CR, we have some concerns relating to the scale of impact that this CR is likely to have on DIP Users. Please see our response to Question 3 for further detail.
AMT-Sybex Ltd (Trading as Flui Technologies)	Yes	<p>The draft redlining in DSD002 Annex 5 and DSD007 provides the necessary structure and definitions to operationalise the proposed process. The new Annex clearly sets out how Significant DIP Incidents should be identified, escalated, and managed, and clarifies the obligations of all affected parties.</p> <p>Minor editorial observation for the terminology as “Significant DIP Incident” and “Major DIP Incident” should be reviewed for consistency to avoid ambiguity in future implementation and communications.</p>
SP Electricity North West	No	See Q1
E.ON UK Energy Services Ltd	Yes	The proposed solution clearly outlines the expected response from the DIP Manager and DIP users in the event of a major incident.

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National Grid Electricity Distribution	No	<p>Whilst we agree that having clear and defined rules around the management of significant DIP incidents is a good thing, the solution isn't clear enough.</p> <p>As discussed in Q1 there is some concern around the ambiguity in definitions. For example, the term "Significant DIP Incident" is broadly defined and may be open to interpretation. This ambiguity could lead to disputes and cause delays, not what is required with incidents.</p> <p>There is also a lack of integration with existing industry protocols. Whilst it references MHHS and REC provisions, this solution may not fully align with other incident management frameworks. This could lead to confusion or duplication of effort across industry bodies.</p>
Northern Powergrid	No	See comments in Q1

Question 3: Will this DIP CR impact your organisation?

Summary

High	Medium	Low	None
3	2	4	2

Responses

Respondent	Response	Rationale
Scottish Power Energy Networks (SPEN)	Low	N/A
ESG Global Limited	High	<p>Concerns Regarding Annex 5 – Introduction of New Obligations for DIP User</p> <p>Annex 5 of the Change Request (CR) introduces several new mandatory obligations for all DIP Users, requiring them to become active participants in the event of a significant DIP Incident.</p> <p>These obligations may necessitate changes to participants' operational models —potentially substantial in some cases.</p> <p>However, the CR does not appear to acknowledge or define how participants operating in conjunction with 3rd party DIP Connection Providers (DCPs), or where they engage third-party Systems, or Service Providers, many of whom undertake operational transactions on behalf of said market participants, will be represented within this framework.</p> <p>We request clarification on the following points:</p> <ul style="list-style-type: none">• Meeting Logistics and Participation<ul style="list-style-type: none">○ What are the expected timings for meetings?<ul style="list-style-type: none">- Can they be convened outside of standard business hours?

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- What is the minimum notice period for convening a meeting?
- What constitutes an accepted minimum required attendee list?
- How will the DIP Manager notify attendees and progress the meeting sessions?
- How will the DIP Manager ensure that appropriate attendees have been correctly contacted e.g. emails not missed or designated attendees unavailable?
- Are *all* market participants expected to attend every meeting?
- How will the DIP Manager ensure quorum is achieved to enable effective decision-making and progress?

- **Delegation and Representation**

- The CR states that participants must use “reasonable endeavours” to ensure attendance by their contracted service providers. However, it does not clarify whether participants may formally delegate attendance to their DCPs, Systems, or Service Providers where appropriate relationships exist.
- In certain cases where third-party providers will have limited insight into the resolution of specific incidents, their attendance may not contribute meaningfully to meeting outcomes. Do they need to attend or can they delegate?
- Resolution activities may involve operational actions or system updates related to MHHS data processing.

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- The CR should clarify how such scenarios will be managed.
- **Non-Engagement and Enforcement**
 - If attendance at meetings is mandatory, what mechanisms does the DIP Manager propose for managing non-engagement or non-compliance by parties?
- **Action Completion and Emergency Powers**
 - The CR expects participants to complete assigned actions within a “reasonable timeframe,” with the DIP Manager empowered to define resolution timelines and, where necessary, exercise *emergency powers* to make final decisions.
 - Further detail is required on how conflicts between parties will be managed, or where proposed timelines cannot be achieved, with detail as to who will act as the final arbiter particularly where timelines or the resolution may be contested.
- **Consideration of Participant Business-as-Usual (BAU) Activities**
 - The DIP Manager may not have full visibility of participants’ in-flight BAU activities or contractual obligations, which could affect their ability to meet the defined timeframes.
 - The CR does not currently provide a mechanism for participants to raise exceptions or formally challenge timelines that may be unachievable due to existing commitments.

We recommend that the CR be revised to address these concerns and provide greater clarity on governance,

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		representation, and operational feasibility.
IMServ Europe Ltd	Low	
RECCo	High	<p>DCR0006 creates an obligation to attend DIP Significant Management Meetings and participate in incident resolution. The rules for when these meetings can be called (e.g. are they 24/7) and the notice period provided for meetings has not been provided. This means that the impacts cannot be fully assessed.</p> <p>The right for DIP Manager to impose a solution that DIP Users do not consider to be the most efficient way to resolve a Significant DIP Incident also impacts RECCo in its role as a DIP User (EES).</p>
UKPN	Unknown	
OVO Energy Ltd	High/Medium	<p>We note the determination of the DIP Manager that this CR should be treated as a Tier One CR, citing the imposition of new obligations on DIP Users when responding to a Significant DIP Incident. Further we note the outlook that no new system requirements will be placed on DIP Users. We have concerns that the impacts on DIP Users have not been fully considered through this CR. The CR Assessment Report states that the proposed changes will be material in nature due to the impact on DIP Users, however no assessment of the scale of this impact, nor the possible costs that will be incurred by DIP Users as a result of the implementation of DCR0006, has been included. For example, the imposition of new obligations in response to Significant DIP Incidents may lead to additional costs in relation to the execution of actions to resolve incidents. This could be exacerbated if corrective actions are required outside of normal business hours. In such circumstances, DIP Users will need to ensure that sufficiently expertised resources are available outside of normal business hours, which would incur additional cost. Furthermore, the CR will also impact us in so far as we may need to renegotiate existing contractual arrangements with third party service providers to ensure that they are capable of committing resource to the resolution of Significant</p>

		DIP Incidents. This may increase contractual costs, which again does not appear to have been considered as part of this CR. We would welcome greater consideration of the operational and resource impacts that this CR is likely to have on DIP Users.
AMT-Sybex Ltd (Trading as Flui Technologies)	Low	As a DCP, we anticipate limited operational impact. The change introduces no technical or system modifications but does require procedural adjustments and alignment of internal incident management processes. Impacts will include participation in incident coordination meetings when relevant, and allocation of technical and operational resources during Significant DIP Incidents (alongside the creation of internal documentation updates and escalation pathways).
SP Electricity North West	Low	See Q1
E.ON UK Energy Services Ltd	None	DCR006 would not have an impact, as the same level of activity is already expected in the event of a major incident.
National Grid Electricity Distribution	High	NGED will be impacted by this change request in the following ways: <ul style="list-style-type: none"> • New obligations, we will be required to participate in incident management meetings when a Significant DIP Incident occurs. We would then have to allocate appropriate resources to support incident resolution, including technical and operational staff. • Compliance and accountability. The DIP Manager will have the authority to assign actions to DNOs during incidents. And DNOs must comply with these directions, which may require changes to internal processes or escalation processes.
Northern Powergrid	Medium	We are unclear of the impacts of the change, but this may have an impact on LDSO activity, including duplication of effort.

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

Summary

High	Medium	Low	None
1	2	4	3

Responses

Respondent	Response	Rationale
Scottish Power Energy Networks (SPEN)	None	N/A
ESG Global Limited	High/Medium	<p>Operational and Resourcing Implications of Additional Meeting Obligations</p> <p>The Change Request (CR) proposes that participants be required to attend additional meetings as directed by the DIP Manager and to implement agreed resolutions within defined timeframes.</p> <p>These activities will necessitate the deployment of specialised resources with appropriate skills and operational expertise. In addition to attending meetings, these resources will be expected to support pre-meeting activities—such as incident analysis and review as well as post-meeting tasks including resolution review, analysis, feedback, and defining the resolution of the recommended resolutions to the relevant teams.</p> <p>These obligations represent unplanned activities that, due to their nature, will likely require the reallocation of skilled personnel, currently engaged in other critical programmes. This diversion of resource focus may adversely affect the delivery of other core energy sector initiatives.</p> <p>Resourcing and Cost Considerations</p> <p>To meet the requirements of this CR, participants will need to</p>

		<p>ensure the availability of suitably qualified and experienced personnel. Given the assumption that meetings may be convened at short notice, outside of standard working hours or during periods of planned absence, it is anticipated that each party will need access to a minimum of two appropriately skilled resources to ensure continuity and coverage.</p> <p>This will introduce additional costs, particularly in securing and maintaining the availability of specialised personnel. The CR should acknowledge and account for these financial and operational impacts.</p> <p>Balancing Sector-Wide Obligations</p> <p>The CR does not provide sufficient detail on how the DIP Manager will balance the need to respond to Significant DIP Incidents whilst balancing the obligations with participants' own ongoing obligations to other energy sector programmes.</p> <p>For example, incidents may arise during planned Industry operational change, system updates such as quarterly REC releases or during other future Industry programmes of work.</p> <p>It is unclear how conflicting priorities will be managed and who will act as the final decision-maker in such circumstances.</p> <p>Governance and Duplication Risks</p> <p>If the Issue Resolution Group (IRG) remains operational in parallel with the obligations introduced by this CR, there is a risk of duplication in governance and associated costs. Further clarity is required on how these structures will interact and be managed to avoid inefficiencies and ensure value for participants.</p>
IMServ Europe Ltd	Low	
RECCo	High	DCR0006 will require a cost for attendance at any DIP Significant Management Meetings. As noted above, the rules for when these meetings can be called (e.g. are they 24/7) and the notice

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		<p>period provided for meetings has not been provided. This means that the costs cannot be fully assessed.</p> <p>The right for DIP Manager to impose a solution that DIP Users do not consider to be the most efficient way to resolve a Significant DIP Incident also creates a cost risk for RECCo in its role as a DIP User (EES).</p>
UKPN	Unknown	Unknown because we are unclear what the expectation is from this CR and how far reaching it may extend.
OVO Energy Ltd	High/Medium	Please see our response to Question 3
AMT-Sybex Ltd (Trading as Fluid Technologies)	Low	Minimal costs will be incurred and they will be administrative in nature. These relate to updating internal operational documentation, training support staff on the new DIP incident procedures, and potential participation in future post-incident reviews. All activities are expected to be one-off and manageable within existing operational budgets.
SP Electricity North West	Low	See Q1
E.ON UK Energy Services Ltd	None	No cost
National Grid Electricity Distribution	Low	<p>Whilst the change is not expected to cause direct system costs, we are unable to say for sure if this would create further costs down the line.</p> <p>Indirect costs could come from being required to attend extra meetings or internal costs for process changes etc.</p>
Northern Powergrid	Medium	Depending on party requirements being clarified, this could have an impact on resources and therefore costs associated.

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

Summary

Yes	No	Neutral/No Comment	Other
3	7	1	0

Responses

Respondent	Response	Rationale
Scottish Power Energy Networks (SPEN)	Yes	N/A
ESG Global Limited	No	<p>Cost Implications and Implementation Timeline Concerns</p> <p>1. Cost Considerations</p> <p>The CR asserts that the proposed changes are limited to documentation updates and do not introduce new system requirements for either DIP Users or the DIP Manager. It is therefore assumed that there will be no system-related impacts or associated costs for participants, and that the DIP Manager's implementation costs will be nominal (estimated at less than £3,000).</p> <p>We respectfully disagree with this assessment. The CR itself acknowledges that the documentation changes <i>introduce new obligations</i> for all DIP Users. These obligations will result in operational impacts and associated costs for participants, driven by the need to comply with directions issued by the DIP Manager.</p> <p>Additional costs will be incurred through:</p> <ul style="list-style-type: none">• Execution of resolution actions;• Potential revenue loss due to prioritisation conflicts

with existing contractual obligations;

- Support requirements outside of standard business hours, including evenings, weekends, and bank holidays.

While these may not be direct implementation costs, they are *consequential costs* and must be considered as part of the overall financial impact of the CR. Furthermore, the assumption that participants will have a minimum of two suitably qualified and available resources at short notice is unrealistic without prior planning and budgetary allocation.

2. Implementation Timeline

The CR outlines a response deadline of *17 October 2025*, with implementation aligned to milestone M11 on *22 October 2025*.

However, this timeline is inconsistent with the *DCR0006-Assessment Report* final assessment date of *4 November 2025* and the formal publication of the decision on *12 November 2025*.

This implies that implementation is expected prior to formal approval, which is procedurally and operationally problematic.

Additionally, other date conflicts have been identified within the CR documentation. The current timeline does not provide participants with sufficient time post-approval to undertake necessary preparatory actions, such as:

- Recruitment or reallocation of resources;
- Finalisation of contractual amendments;
- Internal planning and mobilisation to support the new obligations.

We recommend that a post-approval implementation window be introduced to allow participants to enact the required changes in a

		<p>structured and commercially viable manner.</p> <p>3. Resource Availability</p> <p>The CR assumes that participant resources will be available from <i>22 October 2025</i>.</p> <p>However, until the CR is formally approved with all obligations confirmed, participants cannot reasonably commit to resource mobilisation. It is unlikely that organisations will accept the commercial risk of initiating recruitment or incurring budgetary expenditure prior to formal approval.</p> <p>4. Operational Expectations and Scheduling</p> <p>The CR states that, in the event of a significant incident, DIP Users must <i>operate in accordance with Elexon's service management guidance</i>, including defined processes, timeframes, and KPIs. However, it does not specify the expected scheduling of meetings and resolution activities—e.g., whether these may occur outside of normal business hours, over weekends, or on bank holidays. Given that many participants operate within <i>standard business hours</i>, any deviation from this norm must be clearly defined to enable appropriate planning and financial impact assessment. The CR should explicitly outline these expectations to ensure transparency and operational readiness.</p>
IMServ Europe Ltd	None	
RECCo	No	<p>The DIP Manager recommends an implementation date of 22 Oct on page 3 of the Initial Assessment Report. However, on page 16 on the Initial Assessment Report, the DIP Manager recommends an implementation date of 25 November 2025. We assume that the latter is the intended implementation date. We note that DCR0005 also set out inconsistent dates within that Initial Assessment Report and ask that the DIP</p>

		<p>Manager addresses this issue in future DCR documentation.</p> <p>The Decision Date (11 November 2025) on page 16 of the Initial Assessment Report is less than 10WD after the Final Assessment is due to be published 04 November 2025). We do not believe that this is permitted under DSD004 para 2.7.3 unless the Authority determines the decision within that timeframe (which is not proposed in the Initial Assessment Report). We suggest that DIP Manager reviews the implementation approach to ensure that the dates are consistent with the DIP Rules.</p>
UKPN	No	Lack of clarity which needs addressing
OVO Energy Ltd	No	The CR Assessment Report states both the 22nd October 2025 (M11) and 25th November 2025 as the proposed implementation date. Clarity is needed as to which date is the correct one.
AMT-Sybex Ltd (Trading as Flui Technologies)	Yes	The proposed timeline and approach are proportionate and appropriate. Implementing the change by 25 th November allows sufficient time for industry consultation and procedural readiness.
SP Electricity North West	No	As previously noted, a significant event solution is already in place for MHHS which should cover the DIP central system and this proposal as currently drafted could create confusion and inconsistencies in approach.
E.ON UK Energy Services Ltd	Yes	Agree with the approach.
National Grid Electricity Distribution	No	<p>The implementation date of 25th November feels too soon given our concerns, and the potential for other DNO's to have theirs.</p> <p>Understanding the desire for something to be put in place as we are all now reliant on the DIP, we believe further thought should be given to this CR, including reaching out to parties affected by this so that this could be discussed initially.</p>
Northern Powergrid	No	Clarification is required on the implementation timescale and impact to parties.

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

Summary

Yes	No

Responses

Respondent	Response	Comments
Imserv	DSD002 Annex 5, 2.4d	we propose clarification would be beneficial regarding the naming convention of the proposed meeting under DSD002 Annex 5, 2.4d - e.g. is this the same as the recently established Issues Resolution Group?
ESG Global Limited	General	<p>Clarification Required on Incident Definitions and Operational Alignment</p> <p>This Change Request (CR) addresses the management of <i>Significant DIP Incidents</i> but does not acknowledge or incorporate the additional definition and actions of how participants will manage <i>Industry-Wide Major Incidents</i>, which also considers the origin of the disruptive event.</p> <p>To ensure clarity and consistency in incident management, the CR should either:</p> <ul style="list-style-type: none">• Align with existing definitions and frameworks, or• Clearly differentiate between the two classifications and outline the respective operational and support requirements.<ul style="list-style-type: none">○ This also needs to account for and recognise the previously referenced IRG governance process <p>Specifically:</p> <ul style="list-style-type: none">• An <i>Industry-Wide Major Incident</i>, as defined under MHHS governance, refers to an event that <i>occurs within a Central Service</i> and may affect market participants, requiring coordinated corrective actions.• A <i>Significant DIP Incident</i> is defined more broadly and <i>is not limited to incidents originating within a Central System</i>, typically will affecting market participants equally, requiring coordinated corrective actions.• Detail interaction with, and expectations for, the <i>IRG</i> governance framework.

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		<p>This broader scope implies that an <i>Industry-Wide Major Incident</i> is effectively a subset of a <i>Significant DIP Incident</i>. As such, both should be managed under a consistent and coherent operational model to avoid duplication, confusion, or misalignment in response protocols.</p> <p>We recommend that the CR be revised to:</p> <ul style="list-style-type: none"> • Explicitly define all incident types; • Clarify the relationship between them; • Detail the governance and operational processes applicable to each; • Ensure alignment with existing MHHS and industry-wide incident management frameworks. <p>Interaction with Existing Programme Major Incident Activities</p> <p>We seek clarification on how this CR will interact with other existing Programme Major Incident (MI) activities that may also meet the criteria for classification as a Significant DIP Incident. Specifically, it is unclear whether such incidents will continue to be managed under their current governance structures—potentially resulting in duplication of effort—or whether, upon identification as DIP-affecting, they will be reclassified and managed as Significant DIP Incident Events under the framework proposed by this CR.</p> <p>To ensure operational clarity and avoid governance overlap, the CR must provide detailed guidance on:</p> <p>The criteria and process by which existing MI activities will be assessed for reclassification;</p> <p>The governance transition mechanism, if applicable;</p> <p>How duplication of effort will be mitigated across parallel incident management structures.</p> <p>This clarity is essential to ensure consistent incident handling and efficient use of participant resources</p>
ESG Global Limited	General	<p>Governance of Industry-Wide Major Incidents</p> <p>If the definitions of <i>Significant DIP Incident</i> and <i>Industry-Wide Major Incident</i> are to remain distinct, the programme must provide a clear and comprehensive proposal for how <i>Industry-Wide Major Incidents</i> will be managed.</p> <p>This is essential to ensure consistency in incident response and to avoid ambiguity or duplication across governance structures.</p> <p>We recommend that this CR be expanded to include an overarching framework that:</p>

		<ul style="list-style-type: none"> • Defines the operational boundaries and responsibilities for each incident type; • Details how coordination will be achieved across both classifications; • Ensures that all incident types are managed under a coherent and integrated governance model. <p>This will support effective incident resolution, minimise duplication of effort, and provide clarity for all market participants.</p>
ESG Global Limited	DSD007 DIP Glossary vs DIP CR Proposal Form	<p>Conflict Between Proposal and Effective Dates</p> <p>We have identified a discrepancy between the formal proposal date and the effective date of the associated documentation. Specifically:</p> <ul style="list-style-type: none"> • The <i>DSD007 DIP Glossary</i> is listed as Version 3.0, with an effective date of 5 August 2025. • The <i>DIP Change Request Proposal Form (DCR0006)</i>, which introduces new definitions into DSD007, is dated 12 August 2025. <p>This sequencing suggests that the effective date of the glossary precedes the formal proposal of the changes it contains. Such a conflict raises concerns regarding governance transparency and version control. We recommend that the CR be updated to clarify the rationale behind this timeline and ensure alignment between proposal, approval, and effective dates to maintain procedural integrity.</p>

DSD007 – Glossary

Respondent	Location	Comment
RECCo	Section 2	Add new term 'Additional Significant DIP Incident Management Meeting'. This term has been used in new DSD002 Annex 5 but not included in the Glossary.
RECCo	Section 2	<p>Comments on definition of Significant DIP Incident:</p> <p>a) Typo in first sentence. It should be 'An Incident' rather than 'Anincident'</p> <ul style="list-style-type: none">We do not agree that the scope of a Significant DIP Incident should include disruption to the normal operations of the DIP Manager. Our view is that this should be limited to impacts on DIP Users related to the effective operation of the DIP Service, including where issues with the operation of the DIP Manager impact the operation of the DIP Service. For example, we do not consider that the DIP Manager website not being available would require all DIP Users to attend a Significant DIP Management Meeting, unless this was having a material impact on the operation of the DIP Service.

DSD0005, Annex 5

Respondent	Location	Comment
RECCo	Para 1.3	We do not believe that this sentence is necessary and is not included in other DSDs or their annexes. The glossary in DSD007 is applicable without this needing to be stated. If the DIP Manager considers that this sentence is necessary, it should be added to other DSDs and their annexes.
	Para 3.2 a)	We are concerned that DCR0006 seeks to place obligations on DIP Users to comply with Elexon's MHHS Service User Operations Manual. These

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		arrangements are not mandated under the BSC and are not subject to change control under the DIP Rules. We are therefore concerned that DIP Users are required to comply with arrangements over which they do not have direct control.
	Para 3.2 a)	<p>This sub-para requires DIP Users to operate within the timeframes set out in Elexon's service management guidance and within the KPIs defined in the Incident Prioritisation Matrix.</p> <p>Please clarify through an update to the DSD002 Annex 5 drafting:</p> <ol style="list-style-type: none"> 1) What Elexon service management guidance is being referred to here, 2) What timescales in the Elexon service management guidance are being referred as we are unable to identify any such timescales, and 3) The location of the Incident Prioritisation Matrix and any SLAs contained within it as we are unable to locate these.
	Para 3.2 b)	<p>We would normally expect DIP Users to be responsible for management of any contracted service provider without this needing to be an obligation in a Code.</p> <p>Notwithstanding the above, we suggest that a DIP User should only be required to notify its Contracted Service Provider(s) where this is relevant to the Significant DIP Incident. Otherwise, this creates a needless requirement to inform parties that are not impacted.</p>
	Para 3.2 d)	We do not agree that 'best endeavours' is the appropriate legal requirement in this instance. This is an onerous obligation which we do not believe is intended. We suggest that 'all reasonable steps', 'reasonable endeavours' or 'all reasonable endeavours' would be more proportionate.
	Para 3.2 g)	We would normally expect DIP Users to be responsible for actions attributed to their contracted service provider without this needing to be an obligation in a Code. We suggest that the action should be allocated to the DIP User and it is for

		them to manage this action as appropriate. Where an action is not completed, this is then the responsibility of the DIP User, rather than Contracted Service Providers, who are not a party to the DIP Rules.
	Para 3.2 i)	We assume that the reference to a 'Major DIP Incident' should be amended to 'Significant DIP Incident'. The term Major DIP Incident is not defined or used elsewhere in the DIP Rules.
	Para 3.2 j)	<p>Please confirm who determines if it is an Industry Wide Major Incident or a Significant DIP Incident.</p> <p>There is a high degree of overlap between the two so there may be confusion as to which route is being used unless this is clearly and promptly communicated. The definition of an Industry Wide Major Incident is: 'An industry-wide Major Incident refers to an event within a Central Service that causes substantial disruption to the normal operations of both the affected Central Service and any interconnected Central Services or Market Participants.'</p> <p>Please also note that the first few Industry Wide Major Incident scenarios in Appendix A of the MHHS Service Users Operations Manual relate to DIP service issues so it would be helpful to understand what types of scenarios would be separately covered by a Significant DIP Incident.</p> <p>Typo: amend 'User' to 'Users' in MHHS Service User Operations Manual to match defined term in DSD007.</p>
	Para 3.2 j)	We are concerned that DCR0006 seeks to place obligations on DIP Users to comply with Elexon's MHHS Service User Operations Manual. These arrangements are not mandated under the BSC and are not subject to change control under the DIP Rules.
	Para 3.3	We are concerned that this paragraph seeks to place an obligation under the DIP Rules to comply with other industry codes or contracts. This is not necessary and creates double jeopardy

		in terms of compliance and enforcement action.
	Para 4.1	We suggest that this paragraph is framed as a 'reasonable endeavours' requirements rather than an absolute obligation to agree how to resolve the incident.
	Para 4.4	Amend the two references to 'Additional Incident Management Meeting' to 'Additional Significant DIP Incident Management Meeting' to match the use of the term in para 4.2(b).
	Para 4.5	We note that arrangements between the DIP User and its Contracted Service Providers may be commercially confidential. We therefore suggest that all actions are attributed to the DIP User and are for them to manage accordingly.
	Para 4.6	What criteria will the DIP Manager use to determine its decision. Any decisions may require a DIP User to incur costs, use resource, reprioritise and defer other activities and therefore must be fully justified using objective criteria for 1) when the DIP Manager uses its powers to impose a requirement and 2) how it reaches a decision to impose requirements.