

Duplicate MPANs sub-group

Meeting 1

CMAG Secretariat

23 February 2026



Health & Safety

In case of an emergency

An alarm will sound to alert you. The alarm is tested for fifteen seconds every Wednesday at 9.20am.

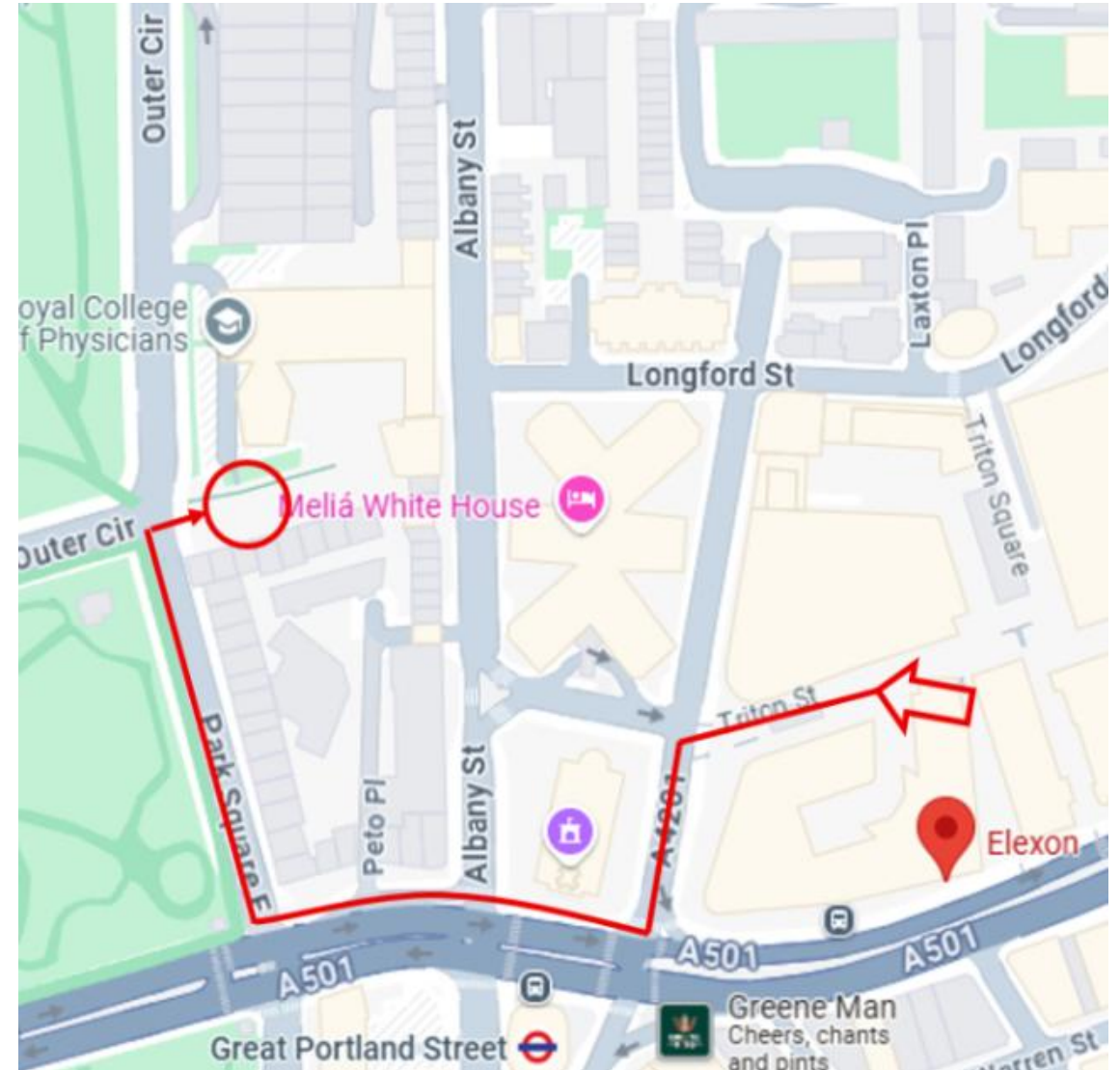
Evacuating 350 Euston Road

- If you discover a fire, operate one of
- the fire alarms next to the four emergency exits.
- Please do not tackle a fire yourself.
- If you heard the alarm, please leave the building immediately.
- Evacuate by the nearest signposted fire exit and walk to assembly point.
- Please remain with a member of Elexon staff and await further instruction from a fire warden.
- For visitors unable to use stairs, a fire warden will guide you to a refuge point and let the fire brigade know where you are.

When evacuating please remember

- Do not use the lifts.
- Do not re-enter the building until
- the all clear has been given by the fire warden or ground floor security.

Our team on reception is here to help you, if you have any questions, please do ask them.



Meeting Agenda

Agenda Item	paper	Lead
Welcome and Apologies		Matthew Woolliscroft (Chair)
Review of sub-group Terms of Reference (ToRs)	01/01	Jenny McGowan
Background to issue		Matthew Woolliscroft
Understanding the 'first come, first served' (FCFS) approach to be used in the upcoming Delivery Year		Ellen McGrath
Identifying conflicts earlier in the process		Matthew Woolliscroft
Rules changes to improve upon the FCFS approach and create an enduring solution		Matthew Woolliscroft
Exploration of approaches used in other markets		Jenny McGowan
Wrap up and next steps		Matthew Woolliscroft
Any other business (A.O.B.)		All

Break Type	Approx Time
Comfort Break	11:30 – 11:40
Lunch	12:45 – 13:30
Comfort Break	14:30 – 14:40

Review of Terms of Reference (ToRs)

Purpose and scope (1 of 2)

The sub-group will:

- Develop a full understanding of the issue and explore the impacts of the current process used by the Settlement Body
- Consider what changes are needed to strengthen and clarify the difference metering and ‘first come, first served approach
- Explore alternative approaches that could be adopted including:
 - Early identification of conflicts
 - Aligning to approaches used in other markets
 - The case for demonstrating independence
 - Changes needed to implement an alternative solution
 - Assessing an alternative solution against the current process
- Produce a report for CMAG discussion – including change proposal for a preferred solution

Purpose and scope (2 of 2)

Any sub-group proposal will be for a longer-term solution rather than making changes for the upcoming Delivery Year

The CMAG change process is CM Rules based. We don't want to preclude all discussion of Regulations changes that may facilitate a better solution, however CMAG will not be able to consider a proposal that is not consistent with the current Regulations and policy intent.

Sub-group members must act as independent experts rather than representing the interests of their employers. The final report will represent a range of views expressed by members

Background

Background

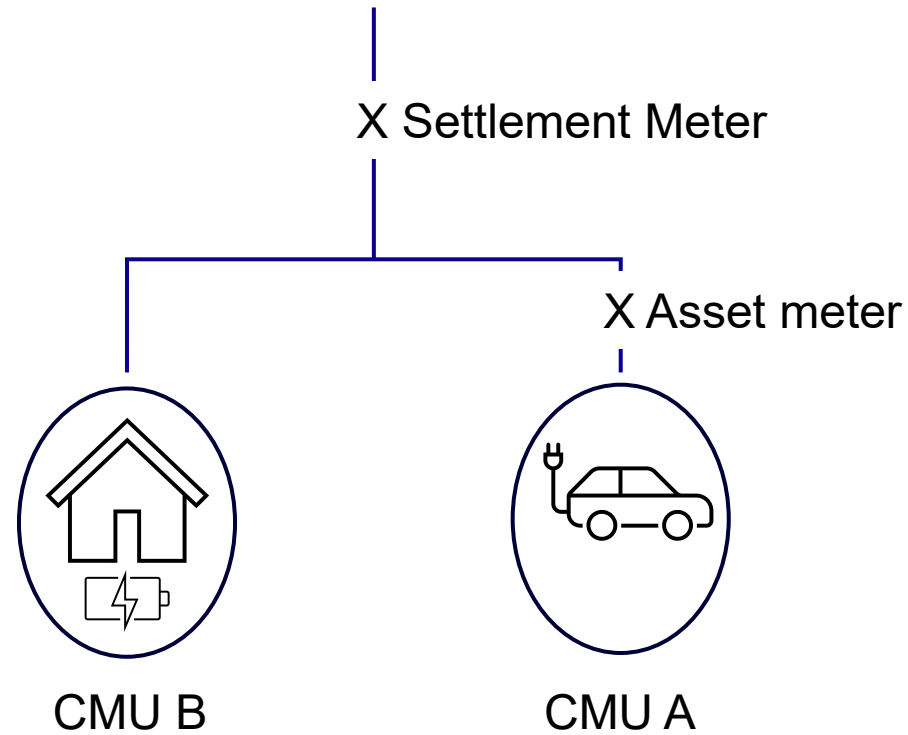
Unproven DSR CMUs are not required to provide details of specific assets being used as part of Prequalification

A CP with a DSR CMU must provide the Settlement Body details of the meters associated with the assets being used to provide the capacity

In some instances, CPs have tried to register either the same, or co-located assets which can pose challenges for the Settlement Body

Conflicts can't be identified until CPs submit Metering Configurations

Co-located assets with asset metering

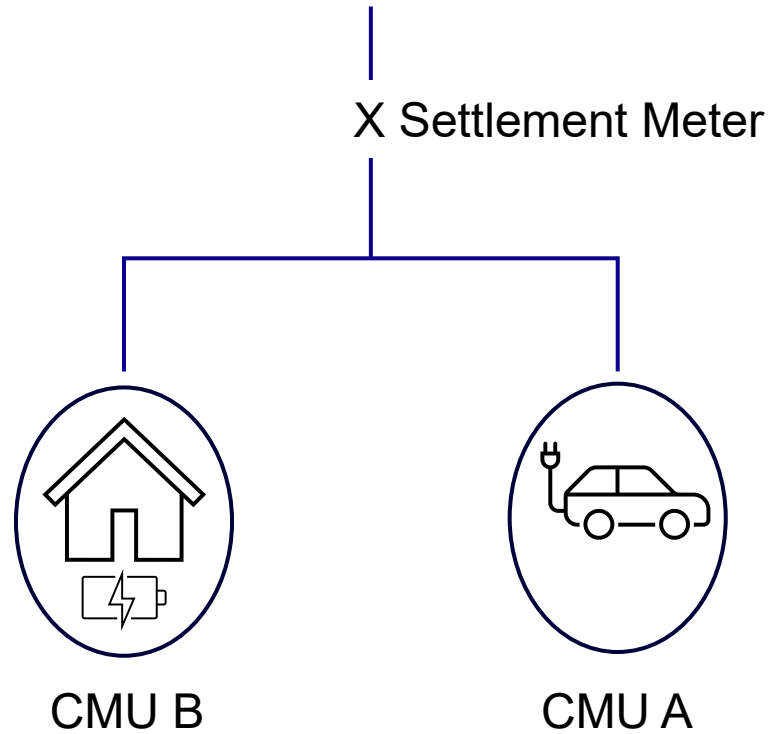


Difference Metering Solution

CMU A – Asset Meter

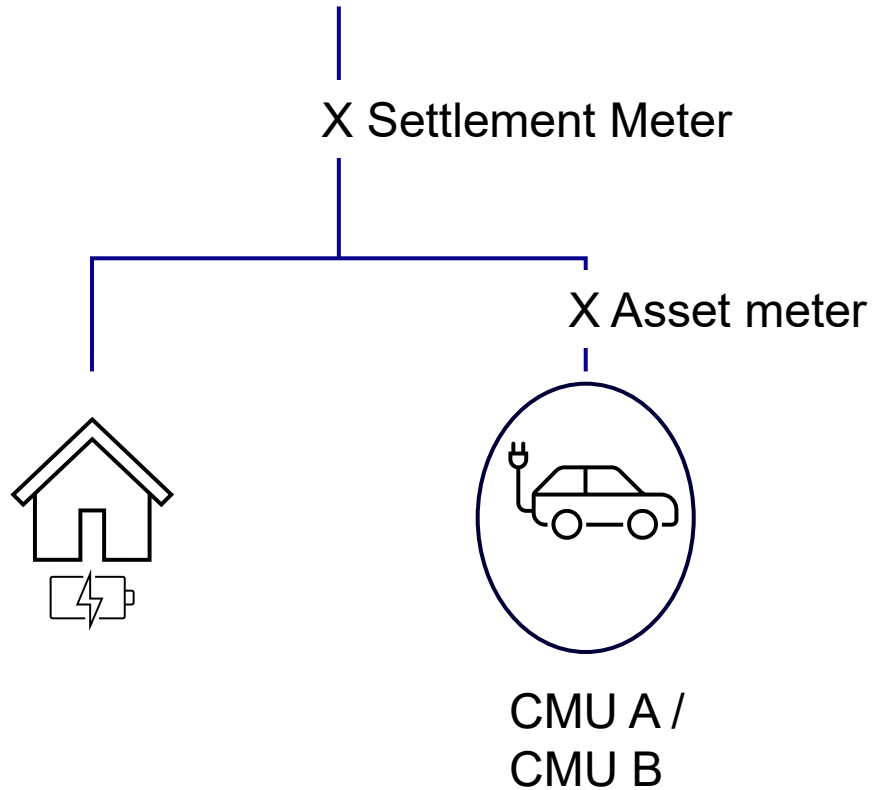
CMU B – Settlement Meter – Asset Meter

Co-located assets without asset metering



Although intended CMUs contain different assets, there is no way to identify what share of the Settlement Metering volumes should be attributed to which asset. 'First come, first served' approach used.

Co-located assets without asset metering



Multiple parties claiming the same asset would result in double counting. 'First come, first served' approach used.

Potential root causes

Capacity Providers' customers have potentially entered into more than one contractual agreement and the Capacity Providers may be unaware of this

Unproven DSR CMUs are not mandated to submit their Metering Configuration information until late in the pre-Delivery Year setup period

No database accessible to Capacity Providers or Delivery Partners contains information on domestic DSR assets, metering information, and contractual ownership

No information is available to the Settlement Body that would allow it to determine if assets are co-located rather than duplicated prior to the Capacity Providers submitting their metering configurations

Understanding the 'first come, first served' approach to be used in the upcoming Delivery Year

ESC update on Duplicate MPANS



First Come First Served 2025/26



Practical Application:

- 1) Capacity Provider (CP1) to first submit an asset in their Metering Configuration – Approved CMU portfolio
- 2) Second Capacity Provider (CP2) submits the same asset or MPAN – EMRS cannot approve and Capacity Provider notified
- 3) CP2 disputes the EMRS decision. ESC contacts CP2 to flag disputed Asset/MPAN and request they work with CP1 to review the disputed MPANs and come to an appropriate resolution

2025/26 – dispute outcomes:

Agreement and
resolution between
Capacity Providers

Two assets identified
as separately
metered

Capacity Providers
confirm both have
contractual control

FCFS

Existing risks in this process:

- CP2 not aware clashing components in CMU portfolio until EMRS validation / ESC notification
- Heavily incentivises early set up – creation of administrative bottleneck
- Settlement Body cannot verify CP contractual DSR control over the performance and/or customer.
No SB remit to determine legitimacy of any claimed contractual DSR control

Delivery Year 2026/27 FCFS Process



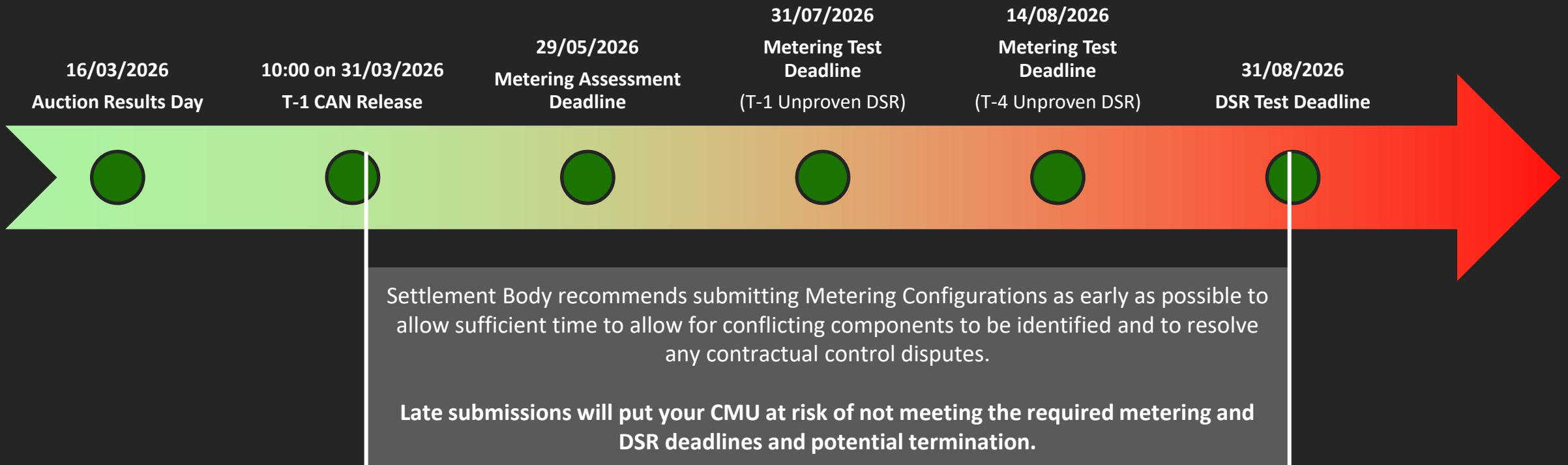
Guidance published February 2026

- Settlement Body will continue to implement **First Come First Served** for domestic DSR Metering Configurations.
- Settlement Body will accept formal submission of Metering Configurations following CAN release - no draft or batch submissions will be accepted.
- Metering Configuration submissions will be processed in the order in which they are received following CAN release, with the earlier submission having claim to any duplicated asset.
Appropriate method to confirm order of submission will be defined in guidance (e.g. time stamp on emails)
- CPs will be notified if they submit an asset that has already been claimed, including the CP that has claimed the asset.
- It is outside ESC's remit to make decisions on commercial or contractual agreements.
Operation of FCFS will be continued assuming all information submitted is true and correct, as per Rule 3.12.
- No amendments will be made to remove components from a Metering Configuration unless the CP who submitted first instructs the Settlement Body.
- Where there are genuine co-located assets, the **difference metering solution** will continue to be offered.
CPs to identify which assets are co-located and then submit confirmation that their assets are co-located. Onboarding onto the HES will commence following this confirmation. Assurance and control details will be outlined in guidance.
 - Reliance on both CPs to agree to solution – if there is no agreement than FCFS will be used.

Pre-DY 2026/27 milestones



An overview of the key dates for DSR CMUs in the setup for DY26/27 is below.



Recommendation to Capacity Providers



Ensure early setup to leave time for engagement with SB and CPs



Engage with DSR CPs where possible to understand clashing components



Utilise the public registers to identify clashing components



Conclusion

Issues not addressed by our solution:

- Settlement Body cannot determine what assets have been claimed by what Capacity Provider until they submit their Metering Configurations.
- Capacity Providers are not aware that another Capacity Provider has claimed the same asset or a co-located asset until the Settlement Body notifies the Capacity Providers as such.
- Settlement Body cannot check for co-located assets and only becomes aware that assets are co-located when the Capacity Providers are advised of the conflicts and then confirm the assets are co-located (and not duplicated).
- Settlement Body's checks for whether a Capacity Provider has conflicting assets consumes a large amount of operational resource.

Root causes of these issues not addressed by FCFS solution:

- Capacity Providers' customers have potentially entered into more than one contractual agreement and the Capacity Providers may be unaware of this.
- Unproven DSR CMUs are not mandated to submit their Metering Configuration information until late in the pre-Delivery Year setup period.
- No database is accessible to Capacity Providers or Delivery Partners contains information on domestic DSR assets, metering information, and contractual ownership.
- No information is available to the Settlement Body that would allow it to determine if assets are co-located rather than duplicated prior to the Capacity Providers advising the Settlement Body as such.



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Thank you.

Identifying conflicts earlier

Identifying conflicts

- Do CPs do any investigation when acquiring customers?
- What work is done to identify potential conflicts ahead of registration?
- Can the CMMR be used to help identify conflicts?
- Are there any other resources that can identify potential conflicts?

Identifying conflicts – early identification

- Would publication of ‘intended MPANs ahead of auctions influence bidding strategies?
- Would notifying ‘intended MPANs to delivery partners at prequal limit Capacity Providers ability to prequalify DSR CMUs?
- Would notifying ‘intended MPANs to delivery partners at prequal give Capacity Providers better confidence in their ability to deliver a Capacity Obligation?
- Rule 8.3.3(b) and 13.2.5 require MPANs to be submitted to the Settlement Body after auction results up to 4 months before start of a Delivery Year.

Rules changes to improve
upon the FCFS approach and
create an enduring solution

Current regulations

Current regulatory wording (1 of 3)

Regulation 5:

(3) The conditions in this paragraph are that—

- a) the DSR provider must, in relation to each demand side response CMU component—
 - i. be the DSR customer;
 - ii. own the DSR customer; or
 - iii. have contractual DSR control over the DSR customer;
- b) each demand side response CMU component must be connected to a half hourly meter that is capable of measuring the import or export of electricity to or from that demand side response CMU component...

(4) In paragraph 5(3) a), “contractual DSR control” means, in respect of any delivery year, having the right (whether by ownership or pursuant to contract notwithstanding that terms and conditions may apply to its exercise) exclusively to control all or part of the metered volume of any demand side response CMU component to provide demand side response when required to do so in that delivery year.

Current regulatory wording (2 of 3)

Regulation 2:

What is reasonable to expect

“demand side response CMU component” means—

- a) a DSR customer’s consumption of electricity as measured by a single half hourly meter; or
- b) a permitted on-site generating unit,

which forms part of the means by which a DSR provider commits to provide capacity as described in regulation 5(1);

Current regulatory wording (3 of 3)

CM Rule 8.3.3:

- f) A Capacity Provider or CMVR Registered Participant must:
 - i. Provide to the CM Settlement Body as soon as reasonably practicable and, in any event, within 10 Working Days ensure the accurate submission of the following information to the CM Settlement Body as applicable;
 - a. All relevant Meters, and Meter Point Administration Numbers, for all the relevant Meter(s),
 - b. BM Unit Identifiers (as defined in the Balancing and Settlement Code), if applicable; and
 - c. in the case of an Interconnector CMU, the relevant interconnector identifier(s) as specified for the purposes of the BSC in file CDCA- I041 of the Central Data Collection Agent (CDCA).
 - d. if any Meter Point Administration Number specified has already been registered to another CMU which is a Capacity Committed CMU in respect of one or more of the same Delivery Years, include a declaration explaining how the two CMUs relate and how metering will separately identify the output of each of them.

Difference metering

Using a difference metering solution – component definition

Regulation 2 definition:

- Does the definition of ‘single meter’ fully align with a difference metering solution being used for DSR components?
- Does the definition of a DSR CMU component still work without the work ‘single’?
- Can the definition be better worded to more clearly facilitate a difference metering solution?

As changes to the CM Regulations is outside the scope of the CMAG, and suggested changes can be recommended to DESNZ, but can not be progressed through the Rules change process.

Using a difference metering solution – component independence

Reg 4(3)(c) requires independence of Generating CMU components

subject to paragraph 4.5, each generating unit is capable of being controlled independently from any other generating unit not forming part of the generating CMU;

- Should the definition of DSR CMU components include a similar requirement to be able to be controlled independently?
- Would independence need to be demonstrated?
 - If so, what is a proportional requirement?

Forming a queue

Forming a queue

How should the Settlement Body determine the order in which to apply to improved FCFS approach?

- What timestamps are available for submissions?
- Does a submission need to be complete to join the queue?
 - How should errors in submissions be treated?
 - Is there a difference between simple typos and incomplete submissions? If so, where to draw the line?

Possible new rule

Expectations on CPs to avoid conflicts

- What is reasonable to expect a CP to do ahead of registration to avoid conflicts?
 - Is the CMMR a useful tool?
- Do CPs make clear to consumers that they can't sign up with multiple providers – could this be made clearer?
- Are there any other actions that can be taken to reduce the number of MPAN conflicts?

Suggested new Rule

A Capacity Provider or CMVR Registered Participant must use reasonable endeavours to ensure that a DSR CMU component that is submitted as part of a Metering Configuration Solution is not registered as part of a CMU for the same Delivery Year.

- (a) If the Settlement Body identifies that the DSR CMU component is already registered in another CMU, the Settlement Body will notify both Capacity Providers. The DSR CMU component will remain registered in the existing CMU unless the prevailing Capacity Provider instructs Settlement Body to remove the DSR CMU Component from the CMU.
- (b) For the avoidance of doubt, reasonable endeavours includes, but is not limited to:
 - (i) inspection of the CMMR; and
 - (ii) communicating to potential customers that the same DSR CMU component cannot be used to provide capacity by more than one CMU.

Suggested new Rule – placement and references

Where should a proposed new rule be inserted to achieve maximum effectiveness?

Suggestions:

- Insert new Rule in 8.3.3 ‘Metering’ after paragraph (f)(i)(dd)
- Insert new Rule in Rule 8.3.3A ‘Notifying DSR CMU Components’ after paragraph (aa)
- Update Rule 8.3.4 ‘Changing DSR CMU Components’ paragraph (f) to also be in accordance with the proposed new Rule
- Insert new Rule in 8.3.7 ‘Notifying change of address’ after paragraph (b)(i)

Approaches used in other markets

Demand Flexibility Service – NESO

Participation guidance:

‘...providers with the latest timestamp for the sign-up of a Unit Meter Point would be deemed to be the sole provider for that end consumer, and that the provider with an older sign-up timestamp would be obliged to de-register the meter from their service’

Under the Procurement Documentation, it is the responsibility of the Registered DFS Participant to ensure that their customers are only signed up to DFS once, as per clause 4.4 and 13.1.3 (d) of the Procurement Rules. Registered DFS Participants should clearly state this to their customers, and it should form part of the contractual agreement/terms and conditions with the end customer.

If a Unit Meter Point is found to be duplicated as part of the registration or Unit Meter Point submissions, NESO will look for the date and time that this meter was signed up by each participant. The meter will be allocated to the participant that has the latest time stamp

Demand Flexibility Service – NESO

Rationale for different approach:

DFS Participants can submit updates to their Unit Meter Points daily for an ad-hoc check, with a cut off time of 09:00 hours for the daily duplicate check

The DSF market is much more fluid allowing much closer to the time changes to registration data

The CM is an annual commitment to provide agreed capacity to the market for the duration of the coming Delivery Year

Open Networks – ENA

Common flexibility service Terms and Conditions 3.1.9:

use reasonable endeavours to ensure that a DER that is pre-qualified is not registered with another Provider to provide Flexibility Services to the Company. If the Company identifies that the DER is registered with more than one Provider, the Company will notify both Providers. The DER will remain registered with the existing Provider until sufficient evidence of the Provider to which the Asset is registered has been provided to the Company's satisfaction (acting reasonably).

Registration will remain with original provider until the new provider provides sufficient evidence that the registration is theirs.

Open Networks – ENA

Aligning with common flex Ts&Cs seems sensible

Guidance doesn't expand on what 'sufficient evidence' entails or how it would be possible for the market operator to assess this.

Flexible Power – National Grid DSO

Guidance:

‘Where there is duplication, we will reject the second registered asset. We encourage flex providers to use the decommissioning functionality in the Market Gateway when assets are no longer in their control to allow other flex providers to register them. On some occasions duplication may be valid, for example when the technology types are different and metering is at the asset level – we understand these types of nuances and check for them before deciding upon rejection.’

Local flexibility – UKPN

Participation Guidance 3.3:

‘Where requested, the provider shall be able to submit evidence to UK Power Networks’ satisfaction that proves they have the authority to act on behalf of the owner of the DER in respect of the service. For example, this will be required if the provider’s DER is contested by another provider. In this instance, the second provider will be notified that the MPAN has already been registered. They can provide evidence of informed consent from the end customer. and the incumbent provider can challenge this by providing their own evidence of consent.

Next steps

Next steps

Elexon will take today's discussions to round out an enduring FCFS approach as a rules change proposal which we will circulate for review

Elexon will circulate summary of this meeting for members to review

Invite suggestions of alternatives to the FCFS approach from members that can be discussed at the next meeting

AOB and meeting close



Thank You