



Making a positive difference
for energy consumers

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Date: 27 August 2026

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BY EMAIL TO: PanelSecretary@elexon.co.uk and bsc.change@elexon.co.uk

Dear Sara,

Authority decision and direction to send back Balancing and Settlement Code modification proposal P441 'Creation of Complex Site Classes'

On 19 March 2026, the Final Modification Report (FMR) for Balancing and Settlement Code (BSC) modification proposal P441 was submitted to the Authority¹ for decision. We have decided that we are unable to form an opinion on P441 based on the FMR as submitted to us and are therefore sending the proposal back for further work. The scope of this further work is limited to the alignment of the decision and implementation timetables with Retail Energy Code (REC) modification R0268, and Distribution Connection and Use of System Agreement (DCUSA) modification DCP424.

Background

P441² was raised under the BSC following recommendations arising from BSC Issue 88³, which considered the treatment of Complex Sites⁴ and proposed the introduction of defined Complex Site Classes (1–6):

¹ References to the "Authority", "Ofgem", "we" and "our" are used interchangeably in this document. The Authority refers to GEMA, the Gas and Electricity Markets Authority. The Office of Gas and Electricity Markets (Ofgem) supports GEMA in its day-to-day work. This decision is made by or on behalf of GEMA.

² [P441 Creation of Complex Site Classes - Elexon BSC](#)

³ [Issue 88 - Elexon BSC](#)

⁴ A Complex Site is a site at which multiple Meters must be "differenced" from each other and so the Meter Technical Details (MTDs) are too intricate to be accurately described in the MTD flow. In the context of the Retail Energy Code (REC), it means any site that requires a 'Complex Site Supplementary Information Form' to be sent by the Meter Operator Agent to enable Supplier Agents to interpret the MTDs and calculate consumption data for Settlement purposes.

- Class 1 - Licence Exempt Distribution Networks
- Class 2 - Licence Exempt Distribution Networks with embedded generation
- Class 3 - Feed through sites and network flows impacting Settlement Meters
- Class 4 - Feed through sites and network flows impacting Settlement Meters with embedded generation
- Class 5 - Netting of Imports from Export across multiple Boundary Points over the Total System
- Class 6 - Non – Standard Complex Sites

By introducing defined and standardised Complex Site Classes, P441 seeks to provide clarity regarding the circumstances in which Import and Export volumes may be netted for settlement purposes across multiple Metering Systems. Classes 1 to 4 reflect the majority of Complex Site arrangements currently in place, but introduce clearer and more consistent eligibility criteria. Class 5 Complex Sites are also in operation under a supply licence exemption (the Class A small supplier exemption); however, the absence of clearly defined rules has led to uncertainty regarding their treatment under the BSC. Class 6 represents a new category intended to capture potential arrangements that do not fall within the defined criteria of the other Classes.

During development of the proposal, it was identified that consequential changes would also be required to the REC and the DCUSA to ensure a consistent cross-code framework. R0268⁵ and DCP424⁶ have been developed to enable the implementation of P441. Together, these modifications seek to align the relevant industry codes with the new Complex Site framework proposed under the BSC.

Reasons for our decision

We have considered the FMR and note that R0268 and DCP424 form part of a wider cross-code package sitting alongside P441. Since the submission of the FMR, we have been informed that the expected submission date for DCP424 has moved beyond the current recommended P441 decision date of 5 October 2026. As a result, the implementation and decision timetable for P441 may no longer align with the associated modifications that are intended to operate alongside it.

We consider it important that the Authority has the opportunity to assess the entire cross-code solution before making decisions on the individual but related modifications. We therefore consider that the current timetable set out in the FMR should be revised accordingly.

⁵ [Consequential Cross-Code Change for BSC P441 - Complex Site Classes Creation - REC Portal](#)

⁶ [Use of System charging for Complex Sites - DCUSA](#)

For these reasons, we have decided to send the FMR back to the BSC Panel so that the recommended decision and implementation dates can be reviewed and, where appropriate, revised to reflect the latest timelines for DCP424 and R0268.

Direction under section F2.7A of the BSC

We therefore direct that additional steps are undertaken:

- The BSC Panel shall, in liaison with RECCo and ElectraLink, seek to revise the recommended decision and implementation dates for P441 to align with the corresponding REC and DCUSA modification processes for R0268 and DCP424 respectively.

Under section F paragraph 2.7A. of the BSC, the BSC Panel shall re-submit the revised FMR to us for decision as soon as reasonably practicable.

The reasons for this decision are made under section 49A of the Electricity Act 1989.

Andrew Malley
Head of Distribution Charging

Signed on behalf of the Authority and authorised for that purpose