

DCUSA SIG Meeting 166 Minutes

28 March 2025 at 10:00am: Web Conference

Attendee	Company
Working Group Members	
Peter Waymont (PW)	UKPN
Victoria Burkett (VB)	SSE Energy
Ladie Adekanle (LA)	Scottish Power
Edda Dirks (ED)	SSEG
Ryan Farrell (RF)	NPg
Owen Black (OB)	SPEN
Niki Willis (NW)	Stark
Simon Vicray(SV)	EDF
Dave Wornell (DW)	NGED
Tim Ellingham (TM)	RWE
Kavya Kaya(KK)	Brook Green Energy
Code Administrator	
Richard Colwill [RC] (Chair and Technical Secretariat)	ElectraLink

1. Administration

- 1.1 SIG members reviewed the “Competition Law Guidance”. All members agreed to be bound by the Competition Law Guidance for the duration of the meeting.
- 1.2 The Chair advised the meeting would be recorded and asked the Standing Issues Group if there were any objections to this. It was explained that the recording would be deleted after the Draft Minutes are approved. There were no objections.

2. Review of Previous meetings actions

- 2.1 ED noted that there was a typo in paragraph 3.1. The text referred to DIF 79 rather than DIF 78.

ACTION 166/01: RC to update the minutes and post new version on website.

- 2.2 An update on open actions can be found in Appendix 1 of these minutes.
- 2.3 ED asked a question around the four new sub-groups and how they report back to the SIG. The Chair noted that every month a headline report is presented to the DCUSA Panel providing an update on all SIG matters. A high-level summary can also be provided verbally each time the SIG meets.
- 2.4 The Chair provided a quick update that at the next meeting he will share some guidance around the [DCP 417 ‘Ability for the DCUSA Secretariat to Raise Change Proposals’](#) process.

3. DCP 440 ‘Consuming “de-energised” sites’

- 3.1 PW raised a verbal issue regarding [DCP 440](#). His concern was regarding the length of time it had taken from the send back letter being presented to the Panel on 19 March and the date of the first meeting which will be late April. The Chair took an action to look into this and provided an update post meeting.

ACTION 166/02: RC to look into DCP 440 issue raised by PW.

4. Review of DIFs 80 ‘De-energised sites’

- 4.1 PW provided an overview of DIF 80 (see Attachment 1).
- 4.2 PW noted that [DCP 411 ‘Charging De-energised sites’](#), was raised in order to facilitate charging DUoS for de-energised sites. He stated that a working group was formed that consulted and accommodated the wishes of a number of parties, which resulted in the solution incorporating a long-winded process of customer engagement and prioritisation, and moving away from the original proposal, which was to charge all de-energised customers.
- 4.3 PW also referred to the Ofgem rejection letter (see Attachment 2), which provided their rationale for the decision. In their decision, Ofgem highlighted:
 - 1. DCP115 as a solution (p1, p7)
 - 2. The complexity of the engagement process (p4)
 - 3. Supplier difficulty in passing on charges, leading to distortions (p5)
 - 4. The solution encouraging more disconnections that are temporary in nature (p6)
 - 5. Unresponsive customers causing other customers to bear costs (p6)
 - 6. Cross-subsidy (p8)
- 4.4 PW noted that DCP115 gives a process that can lead to disconnection of de-energised customers if the company reasonably considers that it is not required to maintain the connection under the Electricity Act i.e. where it is not reasonable in all the circumstances to maintain the connection. PW noted that the reasonableness test is very difficult, and customers often cite planning permission on the site or

business plans for redevelopment etc. They have also seen customers being charged capacity charges by their supplier and saying it is unreasonable for the distributor to disconnect capacity that they are paying for (despite the distributor not receiving any revenue from these customers).

- 4.5 PW also noted that Ofgem's draft Strategic Direction Statement includes objectives which may be relevant, such as:

Objective 1: Ensure fair prices;

Objective 6: Expand electricity networks; and

Objective 9: Network performance and connections.

- 4.6 Fundamentally, this issue is around the approach to customers who sit on large capacities for free, causing other customers to bear higher use of system charges and potentially reinforcement costs, and if necessary, determining in what circumstances it may be considered not "reasonable to maintain in all the circumstances", under the Electricity Act.

- 4.7 Three potential solutions were presented as below:

- Continue with the cross-subsidy of de-energised sites by other connected users.
- Amend National Terms of Connection to set import/export capacity to zero after three (?) years of de-energisation or 36 months of de-energisation within the last 60 months (trying to avoid gaming). However, this feels much more draconian than making de-energised customers pay their fair share of network costs to retain the capacity.
- Re-raise original charge but with no leeway to result in anything other than charging DUoS to all de-energised customers.

- 4.8 After discussion, it was noted that this issue was mainly regarding CT metering.

- 4.9 VB noted that she believes there is an interaction with REC and the processes that sit in there. It may be that the processes in REC need to be stricter on how suppliers manage de-energisation status before it gets to the stage of passing charges on. It was noted that some of the processes that sat in the MRA were lost when transferred to REC and it may be worth a review of this.

ACTION 166/02: RC to reach out to REC to explore reviewing the de-energisation processes.

- 4.10 It was agreed to revisit this issue next month once the Chair had reached out to the REC.

- 4.11 ED asked whether it would be beneficial to raise this issue at DCMDG also and the Chair agreed to raise this at the next meeting.

ACTION 166/03: RC to create raise DIF 80 at DCMDG.

5. Any Other Business

- 5.1 There was no AOB raised.

6. Date of Next Meeting:

- 6.1 The next SIG meeting will take place on 25 April 2025 at 10:00am, via Microsoft Teams.

7. Attachments

- Attachment 1: DIF 80
- Attachment 2: DCP 440 Authority Decision Letter

APPENDIX 1

New and open actions

Action Ref.	Action	Owner	Update
164/02	Secretariat to set up a subgroup to discuss ECR changes with a new set of terms of reference.	Secretariat	To be progressed shortly.
165/02	AG to create a subgroup to continue to investigate the issue.	Secretariat	These have been set up. Action closed
165/03	AG to create a subgroup to continue to investigate the issue.	Secretariat	These have been set up. Action closed
165/04	SIG members who have experienced this issue to see who had installed the generators	Secretariat	Ongoing
165/05	AG to create a subgroup to continue to investigate the issue.	Secretariat	These have been set up. Action closed
165/06	AG to support KB with the REC to draw a high-level process map for the installation of generators.	Secretariat	Ongoing
165/07	MB to raise a DCUSA change proposal to resolve the issues raised in DIF 79.	Mark Bellman	Ongoing
165/08	MB to raise an issue for March's SIG meeting to discuss the use of RPI and CPIH	Mark Bellman	Ongoing
166/01	RC to update the minutes and post new version on website.	Secretariat	New Action
166/02	RC to reach out to REC to explore reviewing the de-energisation processes.	Secretariat	New Action
166/03	RC to create raise DIF 80 at DCMDG.	Secretariat	New Action

APPENDIX 2

Closed actions

Action Ref.	Action	Owner	Update
162/01	RC to request a housekeeping change is raised to change party to a lower-case p within the DCUSA legal text were the text lays out the process for who can raise an ECR change request.	Secretariat	Closed.
162/02	RT to liaise with the technical lead on the LTDS project to understand how a change could be implemented outside the project if that meant it could be delivered quicker than if it was done via the LTDS project.	Ryan Taylor	Closed.

162/03	RC to continue to liaise with RT offline post RT speaking with their technical LTDS project lead to discuss if and how the ECR changes could be dealt with and then bring these ideas to the SIG early in 2025.	Secretariat	Closed.
164/01	AG to update the November meeting minutes with what the LTDS acronym meant, insert a link to the LTDS guidance page and mark the actions captured within paragraphs 3.3 and 3.18-3.23 in a clearer fashion and add them to an action log and reissue.	Secretariat	Closed.
164/03	Secretariate to ensure that the panel receives regular updates on the ECR change requests	Secretariat	Closed
165/01	AG to update the January meeting minutes so that the actions correctly show as 164/2 and 164/3	Secretariat	Closed