

DCP 454 Working Group Meeting 01

4 June 2025 at 13:00 - Web-Conference

| Attendee | Company |
|------------------------------|--------------------|
| Working Group Members | |
| Andrew Nosworthy | Osprey |
| Chris Berry | SEFirst |
| Dan Simpson | ChargeUK |
| Donna Jamieson | IDCSL |
| Ed Grimsey | BUUK |
| Edda Dirks | SSE Generation |
| Itunu Akin-Olawale | ENWL |
| James Jones | SSEN |
| John Harmer | WatersWye |
| Karl Maryon | Drax |
| Kavya Kavya | Brook Green Supply |
| Louise Robinson | ESPUG |
| Monique Pereira | Indigo |
| Nik Wills | Stark |
| Simon Vicary | EDF |
| Suen Adepapo | NGED |
| Tony Collings | Ecotricity |
| Observers | |
| Tamara Satmarean | OZEV |
| Thomas Holderness | Ofgem |
| Code Administrator | |
| Richard Colwill | Chair |
| Craig Booth | Secretariat |
| Apologies | |
| Ryan Farrell | NPg |
| Victoria Burkett | SSE |
| Robbie Lees | IDCSL |

1. Administration

Recording

- 1.1 The Chair asked members if they were comfortable for this Working Group to be recorded. No members objected to this request. The purpose of this recording is purely to aid the Technical Secretariat in producing an accurate report of the meeting. The recording will be deleted once these minutes have been approved.

Competition Law Guidance and Terms of Reference

- 1.2 The Working Group reviewed the “Competition Law Guidance” and “Terms of Reference”. All Working Group members agreed to be bound by the Competition Law Guidance for the duration of the meeting.

2. Purpose of the Meeting

- 2.1 The Chair set out that the purpose of the meeting was to discuss the new CP that has been raised and agree the next steps.

3. Approach

- 3.1 The Chair explained that the DCP 420 Working Group had developed five potential solutions which were consulted on, without legal text, such as being re-banded, being made exempt from residual charges, being charged residual charges on the unit rates, etc.
- 3.2 The Chair explained that feedback on the unit rate option (option 4) showed that this was favoured by energy industry colleagues but that it would not provide the relief in time for EV CPOs.
- 3.3 The Chair further explained that option 4 from DCP 420, which was preferred by the bulk of the Working Group and the majority of energy industry colleagues who responded to the consultation, had been descoped from DCP 420 in favour of solutions that can be implemented sooner, and that option 4 would be developed under a separate CP that would work in parallel with DCP 420.
- 3.4 The Chair also noted that this is the first CP raised by the Secretariat using new abilities granted in 2024, following discussion and approval at the DCMDG. The Chair noted that in this instance, he would provide the necessary overview of the CP.
- 3.5 The Chair noted that DCP 454 may be placed temporarily on hold at certain points whilst the DCP 420 Working Group progresses actions that will be necessary for both CPs to be progressed, such as the RFI that is to be issued.
- 3.6 The Chair explained that the DCP 420 Working Group has been developing a Request for Information (“RFI”) that will be issued to EV CPOs, requesting MPAN data for EV charging sites, which will be aggregated and anonymised by the DCUSA Secretariat. The Chair further explained that a RFI will then be issued to DNOs and IDNOs to request band, consumption and half-hourly data, which the Working Group will use to perform the impact assessment. The Chair noted that the purpose of the impact assessment is to understand the impact on other customers.
- 3.7 The Chair noted that at a recent meeting it was questioned whether DCP 454 had been raised too early. The Chair explained that the intent was to progress the two CPs alongside each other, which

may or may not include joint meetings between the two Working Groups, and that the timetables for each CP would be updated by each Working Group to reflect the progress that each can reasonably make.

- 3.8 The Chair also noted that, if appropriate, there is the potential to engage with DCUSA's legal advisors sooner in the process, as the legal text is likely to be complex and it may be necessary to have early sight of the potential impacts of the proposed amendments to the legal text.

4. Overview of DCP 454

- 4.1 The Chair walked the Working Group through the CP form and gave an overview of the CP.
- 4.2 The Chair noted that whilst the solution being developed under DCP 454 is considered to be the "enduring" solution, the intent was still that this should be temporary and therefore subject to removal, either at a fixed date or when the economic conditions are sufficient to support these sites.
- 4.3 A Working Group member noted that under paragraph 1.2, it was presumed that the DCP 454 solution would replace the DCP 420 developed solutions, and that Ofgem, as the Authority, may determine that one of the DCP 420 solutions is suitable for use as the enduring solution. It was suggested that a discussion should be had at some future stage as to whether the Working Group would wish to make a recommendation to Ofgem.
- 4.4 A Working Group member noted that paragraph 1.4 was light on detail and did not sufficiently explain how the charges would be calculated, and that some further work would be needed on this.
- 4.5 A Working Group member noted that paragraph 1.5 referenced the need for a sunset clause which is not a typical approach to include a sunset clause and queried how this would be assessed against the DCUSA Charging Objectives.
- 4.6 The Chair explained that the assessment of the objectives had been copied from DCP 420, using the Proposer's view of those objectives as the basis for this CP. The Chair noted that there are likely to be varied views within the Working Group and resulting from the consultation, and that if no consensus can be reached, Working Group views would be documented factually within the Change Report.
- 4.7 The Ofgem representative suggested that the Chair talk through the governance related to the new process for raising CPs to better understand how the CPs are raised, how the objectives are assessed and how CPs are withdrawn.
- 4.8 The Chair walked the Working Group through the process and noted that, in the future, it is likely the assessment of the objectives would be discussed at either the SIG or the DCMDG during the process of gaining approval for the raising of CPs, but that in this instance it was deemed appropriate to utilise the DCP 420 Proposer's assessment of the objectives as a baseline.
- 4.9 The Chair acknowledged that a CP can be withdrawn by a Proposer, which would then be offered out to industry colleagues to give the opportunity to them to sponsor the CP. The Chair explained that where it may be necessary for a Secretariat raised CP be withdrawn, it would likely be taken back to the appropriate forum for discussion and to determine whether it should be withdrawn.

- 4.10 The Chair noted that, once in the Working Group phase of the change process, it was his view that the development of the CP be Working Group led.
- 4.11 A Working Group member noted that the Secretariat is, in its dual role in this CP, is acting as the entity that will process the RFI data and, as Proposer, would have sight of this, which is not usually the case. It was queried whether this is an issue that would need to be raised at the SIG or at Panel. Another Working Group member noted that he viewed the Secretariat as having an impartial position in the change process in this instance and that it differed to a DCUSA Party Proposer having the same access to the data.
- 4.12 The Chair explained that, in his view, once the CP is in the change process, the Chair and Technical Secretary roles should be the same as for every Working Group, with the outcomes being that the Working Group leads on the development of the options and solutions, taking into account feedback gained through consultations and RFIs, and from within the Working Group.
- 4.13 The Chair explained that a CUSC modification would potentially be required and that the DCUSA Secretariat was not able to raise this. The Chair explained that he would investigate means to have a cross-code change raised.
- 4.14 A Working Group member noted that there is ongoing work by Ofgem in the space of cost allocation and cost recovery and questioned whether it was appropriate for a CP and a CUSC modification to be raised at this time when that work is ongoing. The Ofgem representative noted that the responsible teams for transmission and distribution work closely and that there is little risk of communication breakdown and policy divergence.
- 4.15 The Chair noted that the CP is not confidential, but that it is utilising confidential data, which will not be made public or published on the DCUSA website.

5. Legal Text

- 5.1 The Chair explained that the Secretariat had drafted an early version of the legal text and based this on the approach taken for unmetered supplies, and that it would be beneficial for Working Group members with more in-depth knowledge of the charging arrangements to review this and provide feedback.
- 5.2 The Chair walked the Working Group through the legal text.
- 5.3 In relation to paragraph 92E of the draft legal text, the Working Group discussed what was meant with regards to Related MPAN as this had been discussed in the DCP 420 Working Group. The Secretariat clarified that in this instance the inclusion of related MPANs was for the purpose of calculating the total consumption of all Final Demand Sites and unmetered supplies, to allow the residual surplus or shortfall to be calculated, noting that some sites would have a related MPAN.

6. Further Working Group Discussion

- 6.1 A Working Group member has asked whether any thought has been given to projected EV CPO site volumes in the event that the CP is approved (i.e., if the relief is provided, would EV CPOs look to increase the number of EV charging sites). The Chair explained that this had not yet been considered and that it could be something the Working Group considers moving forward. The member noted

that some customers are not investing at this time due to the high charges, but that this may increase if the CP is approved and therefore more consumption will be used for charging EVs (e.g., due to both the increased use of existing sites and the investment in new sites).

- 6.2 The Ofgem representative noted that the legal text covers what would be required in the scope of the DCUSA, but that this will ultimately impact how customers' bills would be calculated and that there may be some impacts on settlement, the BSC, other DNO processes, etc., and that DNO input on this would be welcome.

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| Action 01/01 | DNO member colleagues to provide feedback on concerns raised above, if possible. |
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7. Agree Next Steps

- 7.1 The Chair noted that the Work Plan would need to be updated, and it would make sense to do this when the consultation date becomes known.
- 7.2 The Chair stated that the draft legal text, along with some of the questions and considerations raised in today's Working Group meeting, would be sent to Working Group members for them to review and provide feedback.

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| Action 01/02 | Secretariat to issue the draft legal text. |
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- 7.3 The next meeting will be held on Tuesday 24 June, from 10:00 to 13:00.
- 7.4 The next agenda items will be to:
- 7.4.1 discuss feedback on the legal text;
 - 7.4.2 update on RFI activity; and
 - 7.4.3 agree next steps.

8. Any Other Business

- 8.1 No other business was raised.

New and Open Actions

| Action Ref. | Action | Owner | Update |
|-------------|---|----------------|------------|
| 01/01 | DNO member colleagues to provide feedback on concerns raised above, if possible | DNO Colleagues | New Action |
| 01/02 | Secretariat to issue the draft legal text. | Secretariat | New Action |

Future Topics For Discussion

| Minutes Ref. | Topic | Raised By | Status |
|--------------|---|----------------------|--------|
| 01/Para 6.1 | Does the DCP 420/454 Working Groups need to do any work to project the volumes of EV CPO charging sites increasing based on DCP 420/this CP being approved. | Chris Berry, SEFirst | Open |

Closed Actions

| Action Ref. | Action | Owner | Update |
|-------------|--------|-------|--------|
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