

## DCP 458 Working Group Meeting 02

08 September 2025 at 10:00

Attendee	Company
<b>Working Group Members</b>	
Kara Burke [KB]	NPg
Chris Ong [CO]	UKPN
Clair Richards [CR]	NGED
Donna Jamieson [DJ]	IDCSL
Ed Grimsey [EG]	BUUK
Ephie Chalakateva [EC]	NGED
Philip Mark [PM]	SSEN
Peter Waymont [PW]	UKPN
Natalie Hay [NH]	BUUK
Lee Stone [LS]	EON
Hazel Paterson [HP]	SPEN
Tim Porter [TP]	SSEN
Blessing Ekpe [BE]	SSEN
<b>Code Administrator</b>	
Andy Green [AG]	Chair
Hannah Proffitt [HPr]	Secretariat

### 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.

## Minutes & Actions

- 1.3 No feedback was provided on the minutes from the previous meeting. Updates on the actions are included in the appendix.

## 2. Purpose of the Meeting

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- 2.1 The Chair set out that the purpose of the meeting was to review the consultation responses and to agree the solution to take forward.

## 3. Review Consultation Responses

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- 3.1 11 responses were received. A summary of responses and the Working Group discussions are as follows. The full responses are included as **Attachment 1**.

### Question 1 - Do you understand the intent of DCP 458?

- 3.2 All respondents stated they understood the intent of the DCP, with no additional comments.

### Question 2 - Are you supportive of the principles of DCP 458?

- 3.3 Eight respondents stated they were supportive of the principles of the DCP.
- 3.4 One respondent stated they were supportive of the principle but not the proposed solution.
- 3.5 Two respondents advised they were not supportive of the principles. Both responses outlined concerns surrounding the use of default capacity charges.
- 3.6 The Proposer noted that the intent is to establish a way of billing for capacity, not attempting to agree a capacity with the customer, therefore the fact that the connection agreement cannot be changed under retrospective capacity reductions is not relevant.
- 3.7 KB questioned whether, if you bill based on a default that is too high for the customer, they can be refunded. The Proposer noted that it is stated that they will be billing on 71kVA and that if they have not used 71kVA they can contact the DNO to agree a lower capacity.
- 3.8 LS noted that due to DCP 384, they will be unable to do this retrospectively and will be liable to pay the increased cost. LS noted that customers could also be liable for excess capacity charges if the default capacity was too low for their requirements.
- 3.9 EC noted that the proposal was that the Supplier will notify the customer of the upcoming change/migration, so this should prompt them to contact the DNO to discuss any changes that need to be made. EC noted that they felt 71kVA was an appropriate interim default.
- 3.10 LS noted that there is enough data to work out what the capacity should be based on the previous 12 months if the customer does not get in contact. LS noted that this should be used rather than a default.
- 3.11 The Proposer highlighted a possible situation where the customer has capacity for future purposes. One member agreed that this would need to be accounted for in the proposal/solution as if the

customer has capacity booked for future use, that should take precedent. LS highlighted their opinion that this is a different issue to the one originally being addressed by DCP 458.

- 3.12 Regarding the response stating that it is unclear how a DNO/IDNO is able to establish if an MPAN moving to HH is a transitioning CT customer or a BAU change without the supplier notifying them, LS agreed that they have had a small number of situations in which DNOs have questioned why sites have been put to half hourly and that these have been resolved.
- 3.13 One response outlined that a default capacity would mean that these MPANs are allocated to charging band 1, which impacts both the capacity charge and the fixed charge. The response stated it would be difficult to move these customers to the correct band once allocated, if the MIC that they actually require would put them in a higher charging band.
- 3.14 The Proposer noted that DCP 414 currently imposes band 1 onto everyone. The Proposer noted that LS had provided some amended legal text which adjusts this. The Chair agreed that this legal text would be discussed further in the meeting.
- 3.15 One response outlined that the issue of Suppliers not providing customer contact details to allow Distributors to meet their DCUSA obligations, should be addressed and intervention from the appropriate authority should be sought to ensure Suppliers comply with their obligations.
- 3.16 LS noted that they have not yet started their P432/DCP 414 activities and are therefore not in breach of any obligation. LS noted that this is not mandated to be completed for over a year.
- 3.17 One response suggested that, in the circumstance that the customer details have not been provided by the Supplier or the details are incorrect, the Distributors can apply the capacity as “reasonably assessed” based on the data collected during the 12 months following migration without contacting the customer. Opposed to using the default of 71kVA.

Question 3 - Is applying a default capacity, rather than trying to agree one with the customer appropriate?

- 3.18 Responses to this question were mixed. Eight respondents stated yes, with one stating it would only be appropriate if the capacity can easily be changed and the other stating it would only be appropriate if the customer cannot be contacted.
- 3.19 Three responses stated they felt it was not appropriate. The Working Group agreed that the reasons provided were addressed within the previous discussions.

Question 4 - Is the initial suggested default capacity of 71 kVA appropriate?

- 3.20 One respondent stated they had no comment. Seven respondents stated they felt the suggested default was appropriate. Three respondents felt it was not, as they did not support the use of a default.
- 3.21 The Working Group had no comment on the responses.

Question 5 - Have you used default capacities in other circumstances? If so, what were these circumstances and what defaults were applied?

- 3.22 Two respondents gave no comment, four said they had not used default capacities before, and five said they had as part of the solution for P272.
- 3.23 LS noted that the difference between P272 and DCP 414 is that data is available to base the capacity on, so a default is not needed.
- 3.24 KB highlighted that for P272, they did not use a default, they calculated for everything.

Question 6 - Are you aware of any potential consequences of applying a default capacity? If so, what are/were these consequences?

- 3.25 Two respondents stated no comment, two stated they are not aware of any potential consequences of applying a default capacity.
- 3.26 One response outlined that the capacity may not be appropriate for all customers and that changes will not be able to be made retrospectively. The Working Group noted that they had discussed this earlier in the meeting.
- 3.27 The response outlined that using a default of 71kVA will mean that these customers will also be allocated to the lowest charging band and will therefore not, in cases where their actual requirement is higher than the band 2 boundary, be paying their fair share of the DUoS residual charge, meaning that other customers are paying more. Reallocation to a higher band could be problematic and may require further changes to Schedule 32.
- 3.28 The Proposer asked if there are many customers who would fall into a higher band than band 1 given these customers do not have half hourly metering now. KB noted there are unlikely to be many, but that some might and that it would be difficult to get them out of band 1.
- 3.29 Another response noted that the agreed capacity level set will also influence DNO network infrastructure planning. Members noted that following earlier discussions, this point is not relevant as the change is more about build capacity than connection agreement.
- 3.30 Another respondent stated that where the site is exceeding the default capacity during the 12-month period, there is the risk the customer will exceed the default capacity once applied. The response noted that new Connections Agreements would have to be sent out to all affected customers which could result in an increase in complaints. The response questioned whether there would be a risk that a DNO may be in breach of Schedule 2B DCUSA, section 3 of the National Terms of Connection if there is a default capacity but no agreement between the network operator and the legal entity.
- 3.31 The Proposer noted that as previously discussed, this is relating to billing and not the national terms of connection. The Proposer added that there is a risk that the customer will exceed any previous 12-month demand and under the current arrangements, new connection agreements have to be sent out to all customers in any case.

Question 7 - What proportion of the customers that you are expecting to migrate as part of the DCP 414 obligation have you received contact details for?

- 3.32 Responses to this question were mixed. With two respondents stating all, one stating approximately 45%, two stating a limited amount, one stating 0.035% and one stating 0.15%.

3.33 One response outlined that they have a team that will be updating their data proactively. Two responses stated none, but with one noting that they are aware than many Suppliers are planning to send the details at a later stage but are aware of their obligations.

3.34 HP clarified that the SPEN response should state minority instead of majority.

Question 8 - For suppliers only - How do you intend to share with Distributors which customers you are migrating as part of the DCP 414 obligation?

3.35 One response stated that they would use SDEP and two stated they would use spreadsheets to share the information.

3.36 The Chair noted that the Drax Group response did not outline a method, and agreed to contact them to confirm.

02/01 – The Chair to contact Drax to clarify what method they are intending to use to share with Distributors which customers they are migrating as part of the DCP 414 obligation.

Question 9 - For suppliers only- Are there any barriers/challengers to suppliers in identifying which customers are to be migrated as part of the DCP 414 obligation i.e. no contact, access etc?

3.37 One response noted that no contact and access issues remain the major issues. Another response highlighted legacy meters requiring exchange, access, DNO works or customer details.

3.38 Another respondent highlighted that there are barriers however that these challenges exist more so post BSC mod P432 implementation after Milestone M14/October 2026, as P432 requires that site moves to HH (either via CoMC or MHHS migration) meet the Advanced meter licence definition.

3.39 Another response noted that there are always challenges with site works, particularly in relation to unmanned sites and rural locations, however many sites can be converted to HH remotely.

Question 10 - Is there an alternative process that has not been considered within this CP? If so, what is this process?

3.40 Two respondents provided no comment, and five stated they were not aware of an alternative process.

3.41 Four respondents suggested that customer's usage should be used to calculate their capacities rather than using the default. In cases where they have been unable to contact customers due to not having customer contact details provided or where the customer has not engaged with the process.

3.42 The Proposer clarified that where DNOs have not been provided with customer contact details, the customer does not fall under this and would migrate to measurement class E and get charged full capacity charges. The Proposer noted that their interpretation is that if they are not informed in advance of the migration, it is the Supplier's liability and they will need to resolve it with the customer. LS agreed.

Question 11 - Do you consider that the proposal better facilitates the DCUSA General Objectives? If so, please detail which of the General Objectives you believe are better facilitated and provide supporting reasons. If not, please provide supporting reasons.

- 3.43 Eight respondents stated that the proposal better facilitates General Objective 4.
- 3.44 One stated that none of the objectives are better facilitated as any benefits are outweighed by the impacts of recalculating capacities further down the line. The response stated that Charging Objective 3 is negatively impacted.
- 3.45 Two respondents stated that they do not consider this proposal better facilitates the DCUSA general objectives.
- 3.46 The Proposer highlighted that this is not a charging methodology change and therefore cannot be assessed against the charging objectives.

Question 12 - Are you aware of any wider industry developments that may impact upon or be impacted by this CP?

- 3.47 Nine respondents advised they were not aware of any wider industry developments that may impact upon or be impacted by this CP.
- 3.48 One respondent highlighted that they feel that SDEP is not an optimal solution as they have already encountered issues where it is used as a mail service for purposes for which it was not designed. The respondent stated they would like to see any customer contact information sent by email only, which can be password protected, with the password sent on a separate email to provide security.
- 3.49 Working Group members agreed. The Chair suggested that the communication method could be included in the legal text.
- 3.50 LS agreed to use the DCMDG to prompt everybody to share contact e-mail addresses. LS noted that a document could be put together through the SIG with all the relevant e-mail addresses included. The Chair agreed to add this to the agenda for the next SIG meeting.

02/02 – The Chair to add an item to the next SIG agenda regarding removing SDEP from the guidance document and leaving email only.

Question 13 - How are you impacted by the outcome of this CP?

- 3.51 The Working Group noted the various impacts outlined in the responses.
- 3.52 One respondent outlined that they have around 15,000 customers that should migrate by April 2026, and by setting the capacity to 71kVA they would need to raise 15,000 Connection Agreements with whatever customer details they have at the time.
- 3.53 The Proposer noted that this is a billing mechanism and that they do not necessarily need to send out 15,000 connection agreements. KB noted that in the licence condition 14 it states that they bill capacity based on the MIC or MEC, which is the agreed capacity. KB noted that they do not



understand how this is different. The Proposer noted that in the absence of a MIC or MEC they will be billing a default.

Question 14 - Do you agree with the Working Group's proposed implementation date? If not, please provide your rationale.

- 3.54 Nine respondents supported the proposed implementation date. Two respondents noted that they do not support the DCP.
- 3.55 One response highlighted that the change needs to be progressed on an accelerated timeline as the window for meeting the P432 obligation is just over 12 months away.
- 3.56 The Chair noted that the change is a Part 2 urgent matter and therefore the voting window can be reduced to accelerate the timeline.

Question 15 - Do you have any comments on the draft legal text?

- 3.57 Seven respondents provided no comments on the legal text.
- 3.58 One respondent noted that for the alternative solution the legal text would be simpler and could be achieved by amending 182. to add 'the DNO/IDNO is unable to contact the customer,'. LS agreed.
- 3.59 LS provided legal text for the alternative solution. The Working Group discussed and amended the legal text. This is provided as **Attachment 2**.
- 3.60 The respondents who had provided comments on the legal text agreed that the amended text accounted for their suggestions.

Question 16 - Do you have any other comments on DCP 458?

- 3.61 Nine respondents did not provide any additional comments.
- 3.62 One respondent stated that they feel the change should not be classed as a Part 2 matter and should be reviewed by Ofgem. The Chair noted that the decision on whether a change should be Part 1 or Part 2 is to be made by the Panel. The Proposer suggested that this should be reviewed by the Panel when the Change Report is submitted for consideration as they will then have all the information.
- 3.63 LS noted that if the change is progressed as a Part 1 matter, the timeline will then depend on how long it takes to receive the Ofgem decision. The Chair noted that an Ofgem representative attends the Panel and prior warning can be given to them that the Change Report is coming.
- 3.64 The Proposer noted that if it does become a Part 1 matter, the current rules apply until the Ofgem decision is made. So depending on the timing of the decision, the process could have started.
- 3.65 The Chair agreed to speak to the Panel Ofgem representative and warn them that the change may be updated to a Part 1 matter.

02/03 – The Chair to speak to the Panel Ofgem representative and warn them that DCP 458 may be updated to a Part 1 matter and is an urgent change.

- 3.66 One respondent highlighted that if Suppliers are not meeting their DCUSA obligations to provide the contact details, this should be escalated to the appropriate authority to enforce compliance. The Working Group acknowledged that this had been mentioned earlier in the meeting. The Proposer noted that the only form of escalation is Ofgem who enforce the licence.
- 3.67 The Working Group agreed that the remaining responses had been addressed already during previous discussions.

## 4. Agree Solution to be Taken Forward

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- 4.1 The Working Group agreed that the alternative legal text drafted during the meeting alleviates some of the concerns surrounding using a default capacity.
- 4.2 The Chair agreed to draft the Change Report including both solutions and suggested that the Working Group could make a decision on how to proceed at the next meeting. Members agreed. Members agreed that they will finalise the legal text at the next meeting.
- 4.3 The Proposer asked whether the change can be submitted for Panel approval ex-committee as it is an urgent change. The Chair agreed that it could, and that they could make this decision at the next meeting.

## 5. Agree Next Steps/Work Plan

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- 5.1 In summary, the following next steps were agreed.
- The Chair agreed to draft a Change Report for review at the next meeting (including both solutions).
  - Members to agree which solution to progress and to finalise the legal text, at the next meeting.
  - Members to agree if the Change Report should be submitted for Panel approval ex-committee.

## 6. Next Meeting

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- 6.1 The next meeting will be held on Monday 15 September at 1pm.

## 7. Any Other Business

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- 7.1 No other business was raised.

## Attachments

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- Attachment 1 – DCP 458 Collated Consultation Responses



- Attachment 2 - DCP 458 Alternate Legal Text

## New and Open Actions

Action Ref.	Action	Owner	Update
02/01	The Chair to contact Drax to clarify what method they are intending to use to share with Distributors which customers they are migrating as part of the DCP 414 obligation.	Chair	<b>New action.</b>
02/02	The Chair to add an item to the next SIG agenda regarding removing SDEP from the guidance document and leaving email only.	Chair	<b>New action.</b>
02/03	The Chair to speak to the Panel Ofgem representative and warn them that DCP 458 may be updated to a Part 1 matter and is an urgent change.	Chair	<b>New action.</b>

## Closed Actions

Action Ref.			Update
01/01	Chair to draft a consultation and issue to the Working Group for review.	Chair	<b>Action closed.</b> Complete.
02/01	Chair to issue the consultation to DCMDG and SIG members, in addition to the usual recipients.	Chair	<b>Action closed.</b> Complete.

03/01	Secretariat to raise awareness of the DCP 458 consultation at the next DCMDG meeting.	Secretariat	<b>Action closed.</b> Complete.
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