

DCP 461 Working Group - Meeting 04

22 October 2025 at 10:00 - Web-Conference

Attendee	Company
Working Group Members	
Alex Pentecost [AP]	Eclipse Power
Amanda McFarlane [AMF]	Aurora
Andrew Malley [AM]	Ofgem
Brian Hoy [BH]	ENWL
Drew Johnstone [DJ]	NPg
Ed Birkett [EB]	Low Carbon
Ed Grimsey [EG]	BU-UK
Edda Dirks [ED]	SSE Gen
Erik Baguzis [EB]	Indigo Networks
Hector Perez [HP]	Scottish Power
Helen Stack [HS]	Centrica
Jack Purchase [JP]	National Grid
John Harmer [JH]	Waters Wye
Liam Sweeney [LS]	Ofgem
Matthew Paige-Stimson [MPS]	National Grid
Monique Periera [MP]	Indigo
Natalija Zaiceva [NZ]	UKPN
Niall Coyle [NC]	NESO
Nikki Pillinger [NP]	Roadnight Taylor
Nina Sanghera [NS]	Drax
Thomas Fellows [TF]	SSE

Will Bowen [WB]	UKPN
Code Administrator	
Craig Booth [CB] (Chair)	ElectraLink
Mel Kendal [MK] (Technical Secretariat)	ElectraLink
Apologies	
Aishwarya Harsure [AH]	NESO
Ben Godfrey [BG]	National Grid
Diandra Orodan [DO]	BU-UK

1. Administration

Recording

- 1.1 The Chair noted that the meeting is being recorded. The purpose of this recording is purely to aid the Technical Secretariat in producing an accurate report of the meeting.

Apologies

- 1.2 The Chair noted received apologies. These can be found in the attendees list above.

Competition Law Guidance and Terms of Reference

- 1.3 The Working Group agreed to be bound by the Competition Law Guidance for the duration of the meeting.

Previous Minutes and Open Actions

- 1.4 The Chair shared the minutes for meeting 03 and there were no further comments/feedback. These minutes were approved.
- 1.5 The Chair provided the updates on the current open actions; these can be found within the Appendix.

2. Purpose of the Meeting

- 2.1 The Chair explained that the purpose of this meeting is to review and discuss the potential options to take forward and review/refine the draft Consultation within the Working Group and agree next steps.

3. Discuss Potential Options to take Forward

- 3.1 The Chair invited DJ to provide an overview of the DCP 461 alternative options document to the Working Group for further discussion – this was shared live on screen.
- 3.2 They key updates can be found below:
- 3.3 DJ explained that this proposed third option aligns with what DNOs are already currently doing.
- 3.4 ED suggested that the proposed option paper could be beneficial in terms of identifying what areas of Schedule 32 may need amending.
- 3.5 Working Group members discussed the need to be aware that where DNOs have socialised Transmission costs due to their strategic nature, then many of the options around cost treatment will bring new costs into existing connection contracts for Customers. MA explained that this could impact their commercial viability of those schemes. To avoid this, a forward-looking implementation (i.e., new contracts signed) may be needed.
- 3.6 BH suggested that this CP will most likely need to be split into two separate changes at the least.
- 3.7 In regard to the additional option paper, members suggested that the wording needs to be clearer in terms of what costs DNOs should pass on and what costs should be socialised (ensuring DNOs are only passing on costs that their licence allows them to do).

- 3.8 NP raised a concern around whether some DNOs will continue to take the position of SGTs being funded through RIIO and whether the additional solution will be realistic going forward. BH confirmed that the aim is to ensure that for ED3, all DNOs will have consistency – there are many potential answers to the solutions, but the main focus is the solution itself and clarity on how these are processed will be clarified at a later date.
- 3.9 NZ queried that in relation to [CMP 460 'Improving Transmission Connection Asset Charging'](#), whether the solution would be applicable from the date it goes live, or whether it would be retrospective – BH confirmed that the CMP460 working group hasn't gone live yet, so we will not have knowledge of their intended solution yet.
- 3.10 JP stated that it must be made clear what the Working Group are aiming to for if this CP is approved. JP asked DJ if they have set any type of capacity cut-off, where a certain number of connections would not be passed through – DJ explained that the additional proposal clarifies what elements of those costs would be charged as capital/non-capital.
- 3.11 AM suggested that the Working Group should consider whether the aim of the solutions is to apply for contracts that are taken out once the CP has been approved, or to connections at the point the connections are made. AM also suggested it should be considered as to how the costs are applied to DNOs.
- 3.12 AM confirmed that Ofgem has reached out to the connections team to find out when there will be a better understanding of SGT treatment for ED3.
- 3.13 BH noted that the different solutions may have various implementations, depending on which one is progressed/approved. This is something that needs to be considered within the Working Group.
- 3.14 The Secretariat agreed to take an action to circulate the additional options paper to the Working Group post-meeting.

ACTION 04/01: The Secretariat to circulate the additional options paper to the Working Group for review.

4. Review/Refinement of the Draft Consultation

- 4.1 The Chair invited the Working Group to both review and refine the draft Consultation document – this was presented live on screen.
- 4.2 The key updates can be found below:
- 4.3 In regard to paragraph 1.1, ED provided the group with a flow chart that may help to clarify what is being explained within the wording. Members agreed that this may be useful including three different outcomes. BH agreed to take an action to review the flow chart and amend as needed alongside the draft Consultation.
- 4.4 Following the above, the Secretariat added EB's flow chart into the draft Consultation (under paragraph 1.1) with the intent of this being updated as necessary.

ACTION 04/02: BH to review the flow chart by EB and update as needed, alongside the draft Consultation.

- 4.5 In regard to paragraph 1.2, ED queried why the words ‘particularly these Customers’ (those seeking to connect low carbon generation or large-scale demand) was used, and whether there was evidence to support this statement – it was noted that these types of Customers have been observed by NGED. MPs also stated that these Customers are more likely to connect at Transmission and more likely to disconnect at Distribution level.
- 4.6 EB suggested that it is key to make it clear who this applies to (i.e., distribution projects that are out of scope of transmission charges, including that mentioned in [CMP 446 ‘Increasing the lower threshold in England and Wales for Evaluation of Transmission’](#)) somewhere within this Consultation, as it will be key information for developers.
- 4.7 In relation to the bullet point under paragraph 1.4 ‘fully socialise via TNUoS’, members agreed that there needs to be wording included within the Consultation to state that this was discussed within the Working Group but agreed that this is not for DCUSA and will be covered under CMP 460.
- 4.8 NZ queried what is meant by ‘above standard rate’ – BH explained that at the time, the costs were charged at a fixed £ per Megawatt. BH stated that it is not intuitive to have a standard rate as the costs will vary and be non-reflective.
- 4.9 ED made a suggestion whereby the bullet points under paragraph 1.4 to be reworded to state what the Working Group will be specifically looking at (i.e., what options to be taken forward) and then previously looked at options could be flagged in a later section of the draft Consultation to explain why this option(s) is no longer being progressed by the Working Group. Members agreed with this approach.
- 4.10 In regard to paragraph 4.10, members discussed whether TOs or NESO should be referred here – after further discussion, members agreed to remove the current reference to TOs and leave as ‘in accordance with the CUSC’.
- 4.11 Members discussed the potential options that may be taken forward within this CP; ED suggested that they are renamed as ‘ABC /123’ to help minimise any ambiguity for the reader when responding to the draft Consultation.
- 4.12 In regard to paragraph 4.25, BH asked the group whether there needs to be wording included that explains the current distribution CAF apportion rules – JP suggested that this would be beneficial to show what the group are basing it on. After further discussion, it was agreed that this would be more suitable to be included within an annex as opposed to within the main body of the Consultation itself.
- 4.13 Following the above, WB agreed to take an action to draft wording to explain the current distribution CAF apportion rules to be included as an annex.

ACTION 04/03: WB to draft wording to explain the current distribution CAF apportion rules to be included as an annex.

- 4.14 EB queried whether the Consultation needs to mention the application of interim or enduring non-firm access – BH suggested that this may not be necessary to include within the initial Consultation, but it will be worth considering once more feedback has been received from wider industry.
- 4.15 EB agreed to draft a question relating to the above and circulate this to the group to review with the potential of including this within the Consultation.

ACTION 04/04: EB to draft a Consultation question around the application of interim or enduring non-firm access and circulate to the group for review.

- 4.16 Members discussed and agreed to including a question asking, ‘do you have any other comments on the options?’.
- 4.17 As members were reviewing the DCUSA Charging Objectives, members agreed to remove these for now along with the related question but note that this will be included and addressed within Consultation 2 with separate questions for each option going forward.
- 4.18 Following this, it was agreed to remove the current paragraph 5.3 to ensure that the respondent is not influenced in any way.
- 4.19 Under section 8 (legal text commentary), ED suggested including references to which Schedule 32 sections the group believe will need amending, i.e., Schedule 1-22) – BH suggested it may be more beneficial to keep the first Consultation as simple as possible. MPS suggested it may be too soon to include this information around the legal text as the solutions have not been clearly determined yet.
- 4.20 After further discussion, it was agreed to add a caveat under the ‘amended clauses’ section at the top of the Consultation to state that ‘other Schedules to be identified during the development of the solution). A placeholder for additional text was also included under the legal commentary section for ED to draft and potentially include.

ACTION 04/05: ED to draft additional wording/explanation to potentially be included under the legal text commentary section within the draft Consultation.

- 4.21 After further discussion, BH agreed to take an action to refine the draft Consultation offline. The Secretariat agreed to issue a shared link to members of the Working Group to allow all members to work on and provide feedback on the draft Consultation.

ACTION 04/06: BH to refine the draft Consultation offline.

ACTION 04/07: The Secretariat to issue a shared link to allow all members to work on and provide feedback on the draft Consultation.

5. Agenda Items for Next Meeting

- 5.1 The Working Group discussed the next steps, and the following items were captured:
- Members to draft their necessary updates to be included within the draft Consultation.
 - BH to refine the draft Consultation offline.
 - The Secretariat to issue a shared link to the draft Consultation to members for feedback.

6. Any Other Business

6.1 The Chair asked the group whether there were any other items of business to discuss.

6.2 There were no other items raised.

7. Date of Next Meeting – 30 October 2025

7.1 The next Working Group meeting will be held on 30 October 2025 at 1pm.


8. Attachments

- Attachment 1_DCP 461 Work Plan

APPENDIX A

New and Open Actions

Action Ref.	Action	Owner	Update
01/05	LS to seek further guidance internally around when Ofgem would like to see the Change Declaration and update the group at the next meeting.	LS	Ongoing. <i>It was agreed to keep this action open as there was currently no further updates that could be provided by Ofgem.</i>
02/02	MA, BH and BG to pull together work done by previous ENA group to see if it can be used by the Working Group.	MA / BH / BG	Ongoing. <i>No further updates were provided, agreed to keep action open.</i>
04/01	The Secretariat to circulate the additional options paper to the Working Group for review.	Secretariat	New Action.
04/02	BH to review the flow chart by EB and update as needed, alongside the draft Consultation.	BH	New Action.
04/03	WB to draft wording to explain the current distribution CAF apportion rules to be included as an annex.	WB	New Action.
04/04	EB to draft a Consultation question around the application of interim or enduring non-firm access and circulate to the group for review.	EB	New Action.

04/05	ED to draft additional wording/explanation to potentially be included under the legal text commentary section within the draft Consultation.	ED	 New Action.
04/06	BH to refine the draft Consultation offline.	BH	New Action.
04/07	The Secretariat to issue a shared link to allow all members to work on and provide feedback on the draft Consultation.	Secretariat	New Action.

Closed Actions

Action Ref.			Update
03/01	BH to update the options document.	BH	Closed.
03/02	DJ to confirm with LW what his comments around licence conditions meant within the options document.	DJ	Closed.