

DCP 461 Working Group - Meeting 05

30 October 2025 at 13:00 - Web-Conference

Attendee	Company
Working Group Members	
Ben Godfrey [BG]	National Grid
Brian Hoy [BH]	ENWL
Catherine Cleary [CC]	Roadnight Taylor
Claire Witty [CW]	SPEN
Drew Johnstone [DJo]	NPg
Ed Birkett [EB]	Low Carbon
Ed Grimsey [EG]	BU-UK
Edda Dirks [ED]	SSE Gen
Hector Perez [HP]	Scottish Power
Helen Stack [HS]	Centrica
Jack Purchase [JP]	National Grid
John Harmer [JH]	Waters Wye
Karl Maryon [KM]	Drax
Liam Sweeney [LS]	Ofgem
Mark Askew [MA]	SSE
Niall Coyle [NC]	NESO
Nikki Pillinger [NP]	Roadnight Taylor
Will Bowen [WB]	UKPN
Code Administrator	
Craig Booth [CB] (Chair)	ElectraLink

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. Review/Refinement of the Draft Consultation

- 3.1 The Chair invited the Working Group to continue reviewing the draft Consultation document – this was presented live on screen.
- 3.2 The key updates can be found below:
- 3.3 In regard to paragraph 1.1, ED suggested that from the DNO comparison table, at least one DNO is able to fund the costs via their AR, creating a second level of inconsistency (in addition to the GSP categorisation). BH stated that this will be covered within the diagram that will be inserted below.
- 3.4 In regard to paragraph 1.3, DJo suggested that ‘shared equitably across beneficiaries’ is not necessarily true for the generality of Customers who would be directly impacted financially. CC suggested replacing ‘equitably’ with ‘appropriately’ – the Working Group agreed to this amendment.
- 3.5 In regard to paragraph 3.2, members agreed it would be more beneficial to move the current paragraph 3.21 to sit below paragraph 3.2 to provide the reader with an explanation of a ‘single user’.

- 3.6 CC also suggested additional wording should be added to paragraph 3.2 to explain what the GSP class categorisation is depending on what applies (i.e., linking the terms Connection Asset with Connection Site and Infrastructure Assets with Infrastructure Site.) The Working Group agreed to the additional wording, and this was added to the document.
- 3.7 Within paragraph 3.9, it was agreed to amend the wording to state 'but this does not address the inconsistencies with differing treatment for infrastructure and connection sites' to the paragraph.
- 3.8 There is a ratio provided in relation to the percentage of Infrastructure Sites across different areas under paragraph 4.11; NC informed the group that more accurate data has been requested internally to seek a better understanding of this percentage and if it needs to be updated.

ACTION 05/01: Niall Coyle to seek internally a better understanding of the percentage of Infrastructure Sites across different areas, and update if needed.

- 3.9 Within the table provided under Section 4, ED suggested that box 3 may need to be updated to reflect that DNOs may hope that future funding through allowances is available as Ofgem have not confirmed that this will definitely be funded. It was also considered whether it needs to be made clear what is/is not in scope of this change. The Working Group agreed to consider this once the remainder of the document has been reviewed.
- 3.10 In relation to the options presented within the draft Consultation, CW queried how these would work in practice – BH suggested this is something that will need further consideration once the responses have been received and feedback provided on the options presented.
- 3.11 In response to the above, MA also suggested adding a section with a high-level explanation of potential implementation processes for each of the options, including potential challenges they may face as this may impact responses. BH confirmed there is already wording drafted within the Consultation around the no detriment impact on Customers, however, it does not go into detail around the potential implementation processes as this will be developed following the first consultation and consulted on in the second consultation.
- 3.12 After further discussion, MA agreed to provide examples of where the principles may not apply (i.e., in Scotland) and add this to the draft Consultation for members to review.

ACTION 05/02: Mark Askew to provide examples of where the principles may not apply (i.e., in Scotland) and add to the draft Consultation for members to review.

- 3.13 There was a discussion held in relation to the addition of paragraphs 4.36 and 4.37 around the no detriment approach; EB suggested there may be potential detriment to Customers if Ofgem do not approve this CP and that this should be outlined clearly. Both MA and BH explained that the wording has been included to protect Customers from the lack of clarity around the current arrangements.
- 3.14 Following this, BH stated that these paragraphs have been added to seek wider industry feedback around developing a no detriment approach initially, and the responses can be used to support the CP when given to the Ofgem for decision. EB stated that a no detriment approach will have its own challenges, however it was agreed to consult on this at a high level initially. Members agreed to include a question to ask 'what are the pros and cons of adopting an approach that causes no

detriment to contracted Customers? Please provide your rationale'. Members agreed that this would enable more useful information to be provided by respondents.

- 3.15 In regard to the legal text commentary section of the draft Consultation, ED confirmed that the additional wording has been drafted at high-level due to the solution not yet being decided on. ED did note that it may be useful to cross-check the references with the potential options.
- 3.16 In regard to the current Consultation questions (specifically questions 2 and 3), JP suggested whether it would be more beneficial to split the questions out based on the defect (defect 1/defect 2). Members discussed this, and it was noted that this could be considered, however noting that it may complicate the responses.
- 3.17 Following the review of the draft Consultation, members agreed that the document is almost ready and it would be beneficial for the Secretariat to circulate a clean version of the draft Consultation for the Working Group to provide any additional feedback offline. Once feedback has been received, the Working Group will then convene for a final review of the draft Consultation prior to issuing to wider industry.

ACTION 05/03: The Secretariat to circulate a clean version of the draft Consultation to the Working Group for final feedback offline prior to the next Working Group meeting.

4. Agenda Items for Next Meeting

- 4.1 The Working Group discussed the next steps, and the following items were captured:
- The Secretariat to circulate a clean version of the draft Consultation to the Working Group for final feedback offline.

5. Any Other Business

- 5.1 The Chair asked the group whether there were any other items of business to discuss.
- 5.2 There were no other items raised.

6. Date of Next Meeting – 04 November 2025

- 6.1 The next Working Group meeting will be held on 04 November 2025 at 9am.

7. Attachments

- Attachment 1_DCP 461 Work Plan

APPENDIX A

New and Open Actions

Action Ref.	Action	Owner	Update
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	On Hold (Post-Consultation). <i>Members agreed to keep this action open as it is not required to consult, but may be required for an Impact Assessment, following the Consultation.</i>
04/03	WB to draft wording to explain the current distribution CAF apportion rules to be included as an annex.	WB	Ongoing. <i>Drafting has commenced, but still final amendments needed.</i>
05/01	Niall Coyle to seek internally a better understanding of the percentage of Infrastructure Sites across different areas, and update if needed.	Niall Coyle	New Action.
05/02	Mark Askew to provide examples of where the principles may not apply (i.e., in Scotland) and add to the draft Consultation for members to review.	Mark Askew	New Action.
05/03	The Secretariat to circulate a clean version of the draft Consultation to the Working Group for final feedback offline prior to the next Working Group meeting.	Secretariat	New Action.

Action Ref.		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	Closed. <i>LS confirmed that Ofgem are comfortable with both the verbally discussed January timescale or March timescale.</i>
04/01	The Secretariat to circulate the additional options paper to the Working Group for review.	Secretariat	Closed.
04/02	BH to review the flow chart by EB and update as needed, alongside the draft Consultation.	BH	Closed.
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	Closed.
04/05	ED to draft additional wording/explanation to potentially be included under the legal text commentary section within the draft Consultation.	ED	Closed.
04/06	BH to refine the draft Consultation offline.	BH	Closed.
04/07	The Secretariat to issue a shared link to allow all members to work on and provide feedback on the draft Consultation.	Secretariat	Closed.