

DCP 464 Working Group - Meeting 01

29 October 2025 at 10:00 - Web-Conference

Attendee	Company
Working Group Members	
Donna Jamieson [DJa]	IDCSL
Drew Johnstone [DJo]	NPg
Ed Grimsey [EG]	BU-UK
Edda Dirks [ED]	SSE Generation
Erik Baguzis [EB]	Indigo Networks
Ian Burman [IB]	Green GEN Cymru
Louise Robinson [LR]	Espug
Mark Mclean [MM]	SPEN
Martin Brace [MB]	UKPN
Nik Wills [NW]	Stark
Ollie Easterbrook [OE]	National Grid
Owen Black [OB]	SPEN
Rob Gladstone [RG]	SSEN Distribution
Tom Cadge [TC]	BU-UK
Tracey Taylor [TT]	SPENW
Code Administrator	
Craig Booth [CB] (Chair)	ElectraLink
Mel Kendal [MK] (Technical Secretariat)	ElectraLink
Apologies	
Graeme Barton [GB]	SSE Corporate

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.

Open Actions

- 1.4 The Chair confirmed that all actions captured within this meeting will be recorded within the action log; this can be found in the Appendix.

2. Purpose of the Meeting

- 2.1 The Chair explained that the purpose of this meeting is to review and discuss the Change Proposal within the Working Group and agree next steps.

3. Overview of DCP 464 Change Proposal

- 3.1 The Chair invited the proposer [RG] to provide an overview of the DCP 464 Change Proposal to the Working Group.
- 3.2 RG confirmed that the intent of this Change Proposal ("CP") is to clarify and align the DNO approach to the charging methodology applied to network asset(s) for IDNO applications when the IDNO is the sole user of specific network asset(s).
- 3.3 RG informed the group that Paragraph 1.17 of the Connection Common Charging Methodology (CCCM) states "Reinforcement is defined as assets installed that add capacity (network or fault level) to the existing shared use Distribution System."
- 3.4 Where an IDNO requests to increase its capacity and no other DNO customer are connected to the existing connection arrangement, the IDNO could be considered as the sole user and therefore not meet the above shared use definition meaning they could be charged the full cost of any reinforcement works.
- 3.5 This Change Proposal provides two options, and points for consideration:
 - Option 1: The IDNO shall be considered a sole use user and therefore network upgrades to DNO owned assets are not considered shared use assets. Where only the IDNO is connected as the IDNO is the only party in contract with the DNO through a BCA, the IDNO shall fully fund network upgrades.

- Option 2: The DNOs shall take into account how many end users are connected to the IDNO network. The DNO owned assets could be considered as shared use assets if there is more than one end user connected downstream of the DNO/IDNO boundary.

4. Review and Discussion of the Change Proposal

- 4.1 The Chair invited the Working Group to both review and discuss the DCP 464 Change Proposal.
- 4.2 The key updates can be found below:
- 4.3 ED queried if there was a certain assessment criterion or a threshold for number of end users in regard to option 2 (shared use) – RG explained that with option 2, the only time it would be considered as a sole user would be if there was a single end user. Two or more end users would consider it shared use. ED stated that this may need to be clarified further within the document.
- 4.4 ED also stated that there may be a potential interaction with DCP 461 [‘Reducing the Impact of Transmission Distribution Charges’](#) and suggested that it may be beneficial for members to review this CP for any links.
- 4.5 TC stated that DCP 461 is different from this CP in that it is looking at who pays for reinforcement, this CP is around whether the connection application itself is considered as reinforcement.
- 4.6 TC suggested it may be beneficial to ask DNO members where they stand as it may be beneficial for the Working Group to better understand their position.
- 4.7 MB stated that they would class an IDNO as a single party based on their understanding of the licence conditions. TT and DJo echoed MB with the same understanding.
- 4.8 Members discussed the interpretation of ‘shared use’ and noted that while ‘Distribution System’ is a defined term, ‘shared use’ is not. TC provided the group with examples such as multiple Customers downstream of an IDNO and need for multiple GSoP payments as suggestions of how ‘shared use’ arrangements already exist in practice.
- 4.9 Further clarification was provided that the Distribution System must be owned and operated by the DNO, but that sharing can still occur between downstream Customers. The group discussed how the term ‘shared use’ could be interpreted as referring to systems used by multiple Customers, even if this is not capitalised or formally defined.
- 4.10 DJa suggested whether ‘shared asset’ could be a defined term as part of the solution and make reference to how many MPANs there are – as part of the Portfolio Billing process, if there is more than one MPAN, then that would be a shared asset as DUoS is being recovered (this would conflict with treating IDNOs as a single Customer).
- 4.11 It was mentioned that if option 2 was progressed, there may need to be changes made to the distribution licence; the Chair noted that the process is not currently known if the Working Group wanted to progress an option that required a change to the distribution licence.

- 4.12 TC suggested that option 2 would not require a change to the distribution licence as the definition is for 'Distribution System' and not shared use. MB debated this point suggesting that the change would be to the specific definition of 'Distribution System', not defining 'shared use'.
- 4.13 Following the above discussion, the Chair agreed to take an action to seek further information around the process of making a distribution licence change following a DCUSA Working Group.

ACTION 01/01: The Secretariat to seek further information around the process of making a distribution licence change following a DCUSA Working Group.

- 4.14 EB stated that if the IDNO is regarded as a single use customer in the example provided within the CP, there is no cost recovery mechanism for reinforcement upstream to their demand customers that are connected to the IDNO network (no socialisation route).
- 4.15 EB also stated that the Working Group should note the intent of the Access SCR reforms and how an IDNO would be treated in this instance. An action was taken to review the Access SCR decisions and bring this to the next meeting for further discussion.

ACTION 01/02: The Secretariat/EB to review the Access SCR decisions and bring this to the next meeting for further discussion.

- 4.16 In regard to the drafting of the options, TC suggested that 'IDNO' should be amended to 'LDNO' to ensure consistency – members agreed that the amendments should be made. The Secretariat made these amendments live during the meeting.
- 4.17 The Chair asked members if there were any preferences within both options 1 and 2 – as no preferences were given, it was agreed to progress all options under option 1 and 2 to Consultation for wider industry feedback.
- 4.18 Members discussed how the additional wording to Schedule 22 should appear (i.e., as a new paragraph with re-numbering or adding as 1.17a). After further discussion, it was agreed to leave the drafting as is for now and seek legal advice on how best to include the additional wording in due course.

ACTION 01/03: The Secretariat to seek legal advice around how the additional wording should be added to paragraph 1.17 within Schedule 22.

- 4.19 In regard to the development of the Consultation, TC suggested a question around how a DNO would treat a Customer in this circumstance as the intent is not to create an incentive or motivation for a customer to choose an IDNO based on cheaper reinforcement.
- 4.20 DJ suggested that it may be beneficial for respondents to view diagrams within the Consultation which are in line with those within the CDCM – members agreed that this would be beneficial, and RG agreed to take an action to create these diagrams.

ACTION 01/04: RG to create diagrams which are in line with those within the CDCM to be included within the Consultation.

- 4.21 In terms of taking this CP for previous discussions with Ofgem and COG (ENA Connections Commercial Operating Group), the Chair queried whether there is any existing material that could be

used to aid the development of the Consultation – both RG and TC agreed to take an action to provide the Working Group with previously presented materials for review during the next meeting.

ACTION 01/05: RG/TC to provide previously presented materials (i.e., with Ofgem and COG) relating to discussions around this CP, to the next Working Group meeting for review, to aid the development of the Consultation.

- 4.22 In terms of impacts to Customers, TC suggested that with option 1, less reinforcement cost is socialised there is therefore more impact directly to connecting customers, whereas with option 2, costs are socialised and spread over more customers.
- 4.23 In terms of implementation, if approved, members agreed that a lead time of 3 months would be needed to make the changes prior to the next standard DCUSA release.
- 4.24 TC suggested a question around how many times an IDNO has been charged for reinforcement as it has been determined to be a sole use asset. From that, the socialisation costs could be determined. TT stated you would need to determine whether it meets the definition of reinforcement and therefore be the shared use distribution system; if they do not meet this definition, by default, it will become extension assets in how it is charged. This would mean it would not be that easy to determine.
- 4.25 To help determine the quantity of impact, RG suggested asking IDNO members how many requests have they made for this situation and how they have charged it as it may be a smaller dataset (compared to DNOs) for the Working Group to analyse – IDNO representatives agreed to take this information away and bring back to the Working Group for review at the next meeting.

ACTION 01/05: IDNO representatives to bring available data sets around how many requests they have made for this situation and how they have been charged, to the next Working Group for further discussion.

- 4.26 In regard to option 2, TT queried whether it would take effect from the date the application was received – MB suggested an applicable date would need to be applied from when applications are received (similarly to that of Access SCR).
- 4.27 Members discussed the need to ask a question wider industry as to how they would like to see the implementation of this CP taken forward – it was agreed that the Working Group will consider this when developing the Consultation.

5. Agenda Items for Next Meeting

- 5.1 The Working Group discussed the next steps, and the following items were captured:
- The Secretariat to seek further information around the process of making a distribution licence change following a DCUSA Working Group.
 - The Secretariat/EB to review the Access SCR decisions and bring this to the next meeting for further discussion.
 - RG to create diagrams which are in line with those within the CDCM to be included within the Consultation.

- RG/TC to provide previously presented materials (i.e., with Ofgem and COG) relating to discussions around this CP, to the next Working Group meeting for review, to aid the development of the Consultation.
- IDNO representatives to bring available data sets around how many requests they have made for this situation and how they have been charged, to the next Working Group for further discussion.

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 – 11 November 2025

- 7.1 The next Working Group meeting will be held on 11 November 2025 at 1pm.

8. Attachments

- Attachment 1_DCP 464 Work Plan

APPENDIX A

New and Open Actions

Action Ref.	Action	Owner	Update
01/01	The Secretariat to seek further information around the process of making a distribution licence change following a DCUSA Working Group.	Secretariat	New Action.
01/02	The Secretariat/EB to review the Access SCR decisions and bring this to the next meeting for further discussion.	Secretariat / EB	New Action.
01/03	The Secretariat to seek legal advice around how the additional wording should be added to paragraph 1.17 within Schedule 22.	Secretariat	New Action. <i>This will be completed in due course.</i>
01/04	RG to create diagrams which are in line with those within the CDCM to be included within the Consultation.	RG	New Action.
01/05	RG/TC to provide previously presented materials (i.e., with Ofgem and COG) relating to discussions around this CP, to the next Working Group meeting for review, to aid the development of the Consultation.	RG / TC	New Action.
01/06	IDNO representatives to bring available data sets around how many requests they have made for this situation and how they have been charged, to the next Working Group for further discussion.	IDNO Representatives	New Action.

Closed Actions



Action Ref.

Update

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