

# DCP 463 Working Group - Meeting 01

16 October 2025 at 13:00 - Web-Conference

Attendee	Company
<b>Working Group Members</b>	
Alexander Pentecost [AP]	Eclipse Power
Blessing Ekpe [BE]	SSE
Chris Ong [CO]	UKPN
Ed Grimsey [EG]	BU-UK
Edda Dirks [ED]	SSE Gen
John Harmer [JH]	Waters Wye
Monique Periera [MP]	Indigo
Nik Wills [NW]	Stark
Peter Waymont [PW]	UKPN
Ryan Farrell [RF]	NPg
<b>Code Administrator</b>	
Andy Green [AG] (Chair)	ElectraLink
Mel Kendal [MK] (Technical Secretariat)	ElectraLink
<b>Apologies</b>	
Hannah Proffitt [HP]	ElectraLink

## 1. Administration

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- 1.1 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 and agreed to the Terms of Reference.
- 1.2 An action log has been created, and all updates are provided in **Appendix A**.

## 2. Purpose of the Meeting

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- 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 463 Change Proposal

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- 3.1 The Chair invited the proposer [PW] to provide an overview of the DCP 463 Change Proposal to the Working Group.
- 3.2 The key updates can be found below:
- 3.3 Distributors have an obligation to maintain a connection. Associated to this is the maintenance of the capacity of the connection. DUoS is charged to recover the costs of maintaining the connection and the capacity but it is not charged for non-consuming de-energised sites on site-specific billing or aggregated billing.
- 3.4 De-energised sites, with site-specific billing, are able to retain capacity on the network without being charged for it under the current methodologies. The National Terms of Connection, at Section 3, do not allow DNOs to remove capacity except with the agreement of the customer.
- 3.5 So other customers who are energised are faced with enduring capacity charges whereas any non-consuming de-energised customers can continue to “reserve” the capacity at no charge. This leads to inefficient cost signals being given.
- 3.6 This change excludes Whole Current metered non-consuming customers. These are more dispersed and their individual impact on the network reduced. As part of MHHS Design we argued to add a field into the “supercustomer” data to count de-energised sites but this was subsequently used to count consuming de-energised sites only (which we deem are not “de-energised”).
- 3.7 When queried, the programme stated that they do not have access to the counts of non-consuming de-energised Whole Current sites. To include such sites would therefore require fundamental change to the data used in MHHS. This is not the right time to consider that.

## 4. Review and Discussion of the Change Proposal

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- 4.1 The Chair invited the Working Group to both review and discuss the DCP 463 Change Proposal.
- 4.2 The key updates can be found below:
- 4.3 The Chair noted that [DCP 440 ‘Consuming “de-energised” sites’](#) was raised and Ofgem were supportive of this, and falls into Ofgem’s strategic review.

- 4.4 RF stated that there is a difference between a de-energised site and a consuming de-energised site, whereby a consuming de-energised site was originally an error. RF also queried why the previously raised [DCP 411 'Charging De-energised sites'](#) was rejected – PW explained that there are rights under the NTC (National Terms of Connection) to disconnect a site if they are long-term de-energised and not paying for their capacity.
- 4.5 RF also queried whether Suppliers should be charging the Customer if they are de-energised – there were no Suppliers on the call to provide further information around this, however, ED did confirm that SSE Generation do not charge their de-energised sites.
- 4.6 ED raised concerns around this CP potentially not addressing the points made by Ofgem in the DCP 411 rejection letter
- 4.7 The Chair shared the DCP 411 Ofgem decision letter on screen for the group to review and further discuss.
- 4.8 It was noted that Ofgem suggested Suppliers may find it difficult to contact certain Customers/Sites and may create some distortion. RF suggested that in some cases, there may be not Customer of a de-energised site meaning that Suppliers would not have a Customer to contact to recover the costs charged to them by DNOs. The Chair stated that there will always be someone responsible for a site (i.e., building owner), albeit it can be complex. PW echoed this.
- 4.9 JH raised an issue with this CP and stated that it is unfair to put Suppliers in a position to continue providing a service to Customers who will definitely not pay the charges (i.e., if a Customer has gone bankrupt with no means to pay).
- 4.10 ED reiterated that something different needs to happen with this CP in comparison to DCP 411, in order for this to succeed (i.e., addressing Ofgem's decision points in DCP 411). PW stated that an unworkable process regarding DUoS costs was produced within DCP 411 as Ofgem had suggested this process was discriminatory to some Suppliers; by proposing to charge everyone, this CP eliminates this issue.
- 4.11 RF asked the group what happens if a Customer of a de-energised site does not have a connection agreement (with no capacity), or if they willingly reduce of their capacity to zero, how do we stop them from receiving the fixed charge – PW suggested that the Customer should still pay a fixed charge as they will still be maintaining assets (it was noted that the Customer should also request a re-banding if willingly reducing their capacity).
- 4.12 Members agreed it may be worth considering asking Suppliers and DNOs what checks they have in place before logically disconnecting an MPAN as there is the potential for this to happen to avoid charges.
- 4.13 The group reviewed the Ofgem commentary for DCUSA Charging Objective 3 (DCP 411 decision letter) and came to an agreement that more clarity around their decision and justification for rejection as it is not clear. The Secretariat agreed to take an action to contact Ofgem to seek a representative for this Working Group.

**ACTION 01/01: The Secretariat to seek an Ofgem representative to join the DCP 463 Working Group.**

- 4.14 RF suggested that there may be ambiguity around whether the DNO obligation for maintaining the connection could also be interpreted as an obligation to maintain the capacity of the capacity; during the [DCP 181 Working Group meeting 03](#), an Ofgem representative stated that their interpretation was that the DNO has an obligation to maintain the physical connection, but not to maintain the capacity of the connection.
- 4.15 Following this, PW suggested that his interpretation of the electricity Act states that the requirement to make a connection extends to the requirement to maintain a connection. PW went on to state the requirement to make a connection is for the Customer to state their required capacity.
- 4.16 Following the above discussion, it was agreed that it may be beneficial to seek legal advice around this, and to provide some clarity.

**ACTION 01/02: The Secretariat seek legal advice around the DNO obligation for maintaining the connection (i.e., does this include maintaining the capacity).**

- 4.17 JH queried whether there is a cost to a physical connection, and if there is no Customer to pay for this connection, can the site be disconnected – The Chair confirmed that there is no current incentive for the Supplier to disconnect a site if there is no Customer to pay for it. RF also explained that Suppliers make sites safe by de-energising them without digging up the cable and disconnecting.
- 4.18 RF queried why deenergised sites are exempt from DUoS charges; RF confirmed that it would be helpful to understand the original principles for this decision being made.
- 4.19 JH suggested that it would be beneficial to gain Ofgem's views in regard to DCP 411 prior to seeking feedback to wider industry. PW clarified that this CP has tried to mitigate the points noted in Ofgem's decision on DCP 411, and this CP is a new CP, not an amendment of DCP 411. The Chair confirmed that an Ofgem representative will be sought to attend this Working Group moving forward (agreed action above).

## 5. Draft Consultation Questions

- 5.1 *The Working Group discussed and developed a number of Consultation questions to issue to wider industry for further feedback. These can be found below:*
- *In the attached table **(to be added by the Secretariat)** can you please detail how many MPANs you have on record that are De Energised with their total capacity that match the below criteria:*
    - *HH MIC/MEC sites; and*
    - *Were previously energised; and*
    - *Is traded; and*
    - *Has been De-energised for greater than 30 working days*
  - *Does the electricity act (Section 16-23) obligate a distributor to hold capacity as well as maintain the connection assets for De-Energised sites? What are these obligations.*

- *For suppliers only- Are there any existing obligations or processes that you are utilising or could utilise in order to minimise the volume of long term De-Energised sites that maintain capacity? Please provide details on these processes that you are or could utilise.*
- *For Suppliers only- Are you as a supplier prevented by regulation/legislation from charging capacity to De-Energised sites? If so, what is the regulation/legislation that prevents this?*
- *For Suppliers only- Do you charge capacity on De-Energised sites?*
- *For both Supplier and Distributors-In what circumstances can a traded MPAN be logically disconnected.*
- *For Distributors only- What checks do you have in place to ensure that logical disconnection have the correct controls in place and aren't carried out on physically live services.*
- *For Distributors Only- Does reserved capacity on a De-Energised site impact neighbouring sites e.g. if a new site wants to connect, and there is a nearby De-Energised site, is this De-Energised sites capacity taken into consideration. Please provide details of how and why.*
- *Do you believe that De-Energised site should contribute to the DUoS charges where they have capacity reserved? Please provide rationale as to why you believe these sites should or should not contribute to DUoS?*

5.2 Members discussed whether a table could be provided for respondents to complete, including volume of MPANs, days de-energised and total capacity (similarly to that of DCP 411). After some discussion, the Secretariat agreed to take an action to lift and shift the table used within the data request from DCP 411 and amend as needed within the draft Consultation.

**ACTION 01/03: The Secretariat to create a new data request table similarly to the one used within DCP 411 and include within the draft Consultation.**

5.3 In regard to the question to Suppliers being prevented by regulation/legislation from charging capacity de-energised sites, members agreed it may be beneficial to seek legal advice once the responses have been collated and reviewed. It was also suggested that the responses alongside the legal advice could be taken to Ofgem to seek their views.

**ACTION 01/04: The Secretariat to seek legal advice (and Ofgem views thereafter) once the Consultation responses have been collated and reviewed.**

5.4 Following the drafting of the Consultation questions, it was agreed for the Secretariat to develop the draft Consultation and circulate to members for review offline. Once finalised, the Secretariat informed the group that the aim is to issue the Consultation to wider industry on 03 November 2025, with a response deadline of 24 November 2025.

**ACTION 01/05: The Secretariat to circulate the draft Consultation to the Working Group for review offline by 29 October 2025.**

**ACTION 01/06: The Secretariat to issue the Consultation to wider industry on 03 November 2025.**

5.5 The Working Group agreed to schedule the next meeting to be held on 01 December 2025 to review the Consultation responses.

## 6. Agenda Items for Next Meeting

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6.1 The Working Group discussed the next steps, and the following items were captured:

- The Secretariat to draft a Consultation document and circulate to the Working Group for offline review.
- Once finalised, the Secretariat to issue the DCP 463 Consultation to wider industry.
- The Working Group will meet on 01 December 2025 at 1pm to review and discuss the Consultation responses.

## 7. Any Other Business

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

7.2 There were no other items raised.

## 8. Date of Next Meeting – 01 December 2025

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8.1 The next Working Group meeting will be held on 01 December 2025 at 1pm.

## 9. Attachments

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- Attachment 1\_DCP 463 Work Plan

## APPENDIX A

### New and Open Actions

Action Ref.	Action	Owner	Update
<b>01/01</b>	The Secretariat to seek an Ofgem representative to join the DCP 463 Working Group.	Secretariat	<b>New Action.</b>
<b>01/02</b>	The Secretariat to seek legal advice around the DNO obligation for maintaining the connection (i.e., does this include maintaining the capacity).	Secretariat	<b>New Action.</b>
<b>01/03</b>	The Secretariat to create a new data request table similarly to the one used within DCP 411 and include within the draft Consultation.	Secretariat	<b>New Action.</b>
<b>01/04</b>	The Secretariat to seek legal advice (and Ofgem views thereafter) once the Consultation responses have been collated and reviewed.	Secretariat	<b>New Action.</b>
<b>01/05</b>	The Secretariat to circulate the draft Consultation to the Working Group for review offline by 29 October 2025.	Secretariat	<b>New Action.</b>
<b>01/06</b>	The Secretariat to issue the Consultation to wider industry on 03 November 2025.	Secretariat	<b>New Action.</b>

### Closed Actions

Action Ref.			Update