

# DCP 464 Working Group - Meeting 04

03 December 2025 at 13:00 - Web-Conference

Attendee	Company
<b>Working Group Members</b>	
Donna Jamieson [DJa]	IDCSL
Drew Johnstone [DJo]	NPg
Ed Grimsey [EG]	BU-UK
Edda Dirks [ED]	SSE Generation
Erik Baguzis [EB]	Indigo Networks
Finn Breen [FB]	ESP
Ian Burman [IB]	Green GEN Cymru
Mallory Hogan [MH]	Eclipse
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
<b>Code Administrator</b>	
Andy Green [AG] (Chair)	ElectraLink
Mel Kendal [MK] (Technical Secretariat)	ElectraLink
<b>Apologies</b>	
Charles Deacon [CD]	Eclipse

## 1. Administration

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### 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

- 1.4 The Chair invited the Working Group to review the previous meeting minutes – no further feedback was received, and the minutes were approved.

### Open Actions

- 1.5 The Chair confirmed that all actions captured within this meeting will be recorded within the action log; this can be found in the Appendix.
- 1.6 The Working Group discussed a number of open actions, and the key updates can be found below:

## 2. Purpose of the Meeting

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- 2.1 The Chair explained that the purpose of this meeting is to review and continue to develop the draft Consultation within the Working Group and agree next steps.

## 3. Review and Develop the Draft Consultation

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- 3.1 The Chair invited the Working Group to discuss and agree the draft Consultation content.
- 3.2 The key updates can be found below:
- 3.3 ED confirmed that the definition of LDNO, as stated within the DCUSA. Members discussed this and felt comfortable to include this.
- 3.4 In regard to paragraph 1.5, members agreed to remove 'connection arrangement' and replace with '... connect to that section of the existing Distribution System upstream of the LDNO point of connection'. A further reference to 'connection arrangements' within the same paragraph was updated to 'Distribution System' to align with the above.
- 3.5 The group agreed that all references to 'Distribution System' within the document should be capitalised (to align with the definition as stated within DCUSA) and the Secretariat agreed to take an action to update these offline.

**ACTION 04/01: The Secretariat to ensure all references to 'Distribution' within the Consultation document are capitalised.**

- 3.6 In regard to paragraph 1.6, the group agreed to include additional wording to state ‘...whether or not assets utilised by the existing LDNO connection...’.
- 3.7 MB and TT suggested updating paragraphs 1.3 and 4.3 to reference DCUSA Schedule 22, as opposed to the CCCM. Members agreed that this would be more suitable.
- 3.8 Members discussed the potential third solution, and it was noted that this was previously discounted due to it being out of scope of this change (as it related to how LDNOs recovers their charge). DJ provided additional wording regarding the discussion held around this scenario for the Working Group to further develop, and the below was agreed to be included as paragraphs 4.6, 4.7 and 4.8:
- *An alternative approach was discussed within the Working Group for scenario 6 in that the LDNO is provided with a mechanism to socialise upgrade costs via their own DUoS. This approach would mirror the current treatment (pending on the outcome of DCP 461 ‘[Reducing the Impact of Transmission Distribution Charges](#)’) of DNO’s via TSO’s in that the TSO sees the DNO as a single Customer despite having multiple downstream Customers.*
  - *An IDNO Working Group member confirmed that currently, if they are liable for upgrade costs, there is no mechanism to recover this via DUoS. In addition, another concern was raised regarding this approach, suggesting it may be unfair between IDNOs and their different size portfolios to socialise costs.*
  - *It was agreed that this approach would need to be considered as a change that sits outside of the scope of this Change Proposal, and also the DCUSA.*
- 3.9 ED suggested a footer is added to the above wording to reference that it is dependant on the outcome of DCP 461 ‘[Reducing the Impact of Transmission Distribution Charges](#)’ – the group discussed this and therefore is included above.
- 3.10 In regard to the addition of paragraph 7.8, TC stated that reinforcement can be uncertain and there is currently no mechanisms within the price control to manage this uncertainty. MB queried whether it is appropriate for the Customers of DNOs to be funding the reinforcement works that only provides benefit to the Customers of IDNOs only? DJ mentioned that a similar query to this was raised and discussed within the DCP 461 Working Group.
- 3.11 Following this, TC agreed to take an action to update paragraph 7.8 to separate them into two separate paragraphs that explains the impacts of each option and outline who would be paying for the upgrade work.

**ACTION 04/02: TC to update paragraph 7.8 into two paragraphs which explains the impacts of each option and outline who would be paying for the upgrade work.**

- 3.12 The Working Group agreed to update Q6 of the Consultation document to ask ‘IDNOs only: In regard to scenario 6, how many times have you been charged for upgrade works when they have been treated as extension assets? Please provide both the volumes and value of these instances.’. It was also agreed to include a footnote within this question to the relative reference.
- 3.13 Members circled back to paragraph 1.2, and it was debated whether the definition should be referenced from Schedule 22 as opposed to Schedule 16. ED suggested this may need legal advice

sought in order to be precise, however, other members stated that there is enough information with either definition for the respondent to respond in full to the Consultation and therefore does not need legal advice. After further discussion, it was agreed to amend paragraph 1.2 to state the following:

- *'...For the avoidance of doubt, LDNO can refer to IDNO parties, or to DNO parties namely the holder of a licence to distribute electricity.'*

3.14 In regard to the Glossary of Terms, RG agreed to take an action to complete this offline to be included within the Consultation for the Working Group to review.

**ACTION 04/03: RG to complete the Glossary of Terms for the Working Group to review.**

3.15 The Secretariat agreed to circulate a clean version of the draft Consultation to the Working Group for review and members agreed that this could be done offline. Once the final review is complete, the aim is to issue the Consultation to wider industry for feedback in mid-December (with a response deadline in January 2026) for a 20 Working Day window due to the Christmas period. Members were happy with this approach.

**ACTION 04/04: The Secretariat to circulate the draft Consultation to the Working Group for a final review offline.**

**ACTION 04/05: The Secretariat to issue the final version of the Consultation to wider industry for feedback.**

3.16 The Secretariat agreed to issue a doodle poll for the next Working Group meeting to review the Consultation responses once a deadline date has been agreed.

**ACTION 04/06: The Secretariat to issue a doodle poll for the next Working Group meeting.**

## 4. Any Other Business

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

4.2 There were no other items raised.

## 5. Date of Next Meeting – TBC

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5.1 The next Working Group meeting is TBC. A doodle poll will be issued in due course.

## 6. Attachments

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- Attachment 1\_DCP 464 Work Plan

## APPENDIX A

### New and Open Actions

Action Ref.	Action	Owner	Update
01/03	The Secretariat to seek legal advice around how the additional wording should be added to paragraph 1.17 within Schedule 22.	Secretariat	<b>Ongoing.</b> <i>This will be completed in due course.</i>
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	<b>Ongoing.</b> <i>Materials are still being sought after.</i>
04/01	The Secretariat to ensure all references to 'Distribution' within the Consultation document are capitalised.	Secretariat	<b>New Action.</b>
04/02	TC to update paragraph 7.8 into two paragraphs which explains the impacts of each option and outline who would be paying for the upgrade work.	TC	<b>New Action.</b>
04/03	RG to complete the Glossary of Terms for the Working Group to review.	RG	<b>New Action.</b>
04/04	The Secretariat to circulate the draft Consultation to the Working Group for a final review offline.	Secretariat	<b>New Action.</b>
04/05	The Secretariat to issue the final version of the Consultation to wider industry for feedback.	Secretariat	<b>New Action.</b>
04/06	The Secretariat to issue a doodle poll for the next Working Group meeting.	Secretariat	<b>New Action.</b>

## Closed Actions

Action Ref.			Update
02/01	The Secretariat to update all references to 'IDNO' to 'LDNO'.	Secretariat	<b>Closed.</b>
02/02	The Secretariat/Working Group to draft a glossary/annex to be included within the draft Consultation to clarify terms being used.	Secretariat / Working Group	<b>Closed.</b>
03/01	The Secretariat to check the impacted parties for the SCRs and look to use the same within this CP.	Secretariat	<b>Closed.</b>
03/02	Tom Cadge to draft additional wording that provides clarity between the references to LDNO and IDNO for the group to further review.	Tom Cadge	<b>Closed.</b>
03/03	Rob Gladstone to send the Secretariat an updated example 6 diagram to use under paragraph 1.6 of the Consultation.	Rob Gladstone	<b>Closed.</b>
03/04	The Secretariat to insert the updated example 6 diagram under paragraph 1.6 of the Consultation.	Secretariat	<b>Closed.</b>
03/07	The Secretariat to circulate a clean version of the draft Consultation to review offline.	Secretariat	<b>Closed.</b>
03/05	Drew Johnstone agreed to take an action to amend paragraph 4.6 to clarify the third option and inconsistent treatment.	Drew Johnstone	<b>Closed.</b> <i>Was discussed during the meeting.</i>
03/06	The Secretariat to include additional wording within section 4 of the draft Consultation that outlines why the potential third option was considered by the Working Group and why this was ultimately discounted.	Secretariat	<b>Closed.</b> <i>Was discussed during the meeting.</i>