

DCP 461 Working Group - Meeting 09

18 December 2025 at 13:00 - Web-Conference

| Attendee | Company |
|------------------------------|---------------------------|
| Working Group Members | |
| Aishwarya Harsure [AH] | NESO |
| Alexander Pentecost [AP] | Eclipse |
| Anne-Claire Leydier [ACL] | UK Power Distribution |
| Ben Godfrey [BG] | NGED |
| Brian Hoy [BH] | SP Electricity North West |
| Catherine Cleary [CC] | Roadnight Taylor |
| Drew Johnstone [DJ] | NPg |
| Edda Dirks [ED] | SSE Generation |
| Hector Eduardo Perez [HEP] | Scottish Power |
| Helen Slack [HS] | Centrica |
| Jack Purchase [JP] | NGED |
| John Harmer [JH] | Waters Wye |
| Karl Maryon [KM] | Drax |
| Lee Wells [LW] | NPg |
| Liam Sweeney [LS] | Ofgem |
| Mark Askew [MA] | SSE |
| Matthew Paige-Stimson [MPS] | National Grid |
| Natalija Zaiceva [NZ] | UKPN |
| Nina Sanghera [NS] | Drax |
| Rohan Sachdev [RS] | SSE Distribution |
| Will Bowen [WB] | UKPN |
| Code Administrator | |
| Craig Booth [CB] | ElectraLink |

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| Mel Kendal [MK] (Technical Secretariat) | ElectraLink |
| Richard Colwill [RC] (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 reviewed the minutes of the previous meeting and the actions. The below feedback regarding the previous meeting minutes is captured below:
- 1.5 CC queried whether paragraph 3.4.5 of the minutes is an accurate reflection as they do not remember this being agreed within the meeting and would like to discuss this further during today's meeting - other members also agreed that options 2.3 and 2.4 are not contingent on options 1.3 and 1.4 being taken forwards.
- 1.6 RS agreed with CC and stated that this discussion was not concluded during the previous meeting and would also like to further discuss this today.
- 1.7 MPS noted that the reasons for not taking forward options 1.3 and 1.4 also apply to options 2.3 and 2.4, however, these are not contingent on options 1.3 and 1.4.
- 1.8 WB queried whether there is a 'do nothing' option (option 0) for option 1, with the DNOs handling those costs under the option 2 options – BH explained that this will likely be an option 3 and will be further discussed today.
- 1.9 ED suggested it would be helpful to add to the previous minutes which Consultation questions were discussed and where the Working Group had arrived at. ED also suggested that the minutes include further detail of discussions held given the complexity of the discussions held during the last meeting.
- 1.10 DJ also suggested that the conclusions of discussions along with the voting outcomes of the previous meeting should also be included within the previous meeting minutes.
- 1.11 Following the above suggestions, the Secretariat informed the group that the Collated Consultation Responses document will contain the discussions held in relation to each question that was discussed, including the voting outcomes and decisions the group arrived at. Once completed, this document will be circulated to Working Group members for review.

- 1.12 After further discussion, the Secretariat agreed to amend the previous meeting minutes to reflect the points made above and remove the word 'contingent'.

ACTION 09/01: The Secretariat to update DCP 461 WG 08 Draft Minutes to reflect discussions held.

- 1.13 The current open actions can be found within the Appendix.

2. Purpose of the Meeting

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

3. Continuation of Consultation Responses Review

- 3.1 The Chair noted that the responses document contained confidential information and reminded Working Group members that it is not to be shared outside of the Working Group.
- 3.2 The key updates can be found below:
- 3.3 The Chair presented BH's email on screen. BH asked to clarify with the Working Group that they are clear what option 2.1 would look like prior to legal drafting. BH stated that it would push transmission costs all the way down to distribution voltage levels, and Option 2.2 is designed to avoid this consequence.
- 3.4 BH confirmed that option 2.1 is fine to go with, as long as the Working Group understands the potential consequential impacts of this option prior to legal drafting.
- 3.5 A number of members confirmed that they may have interpreted option 2.1 differently previously and were not fully aware of the potential impacts to subsequent Customers. CC stated that it would be beneficial to have further discussions around this today to see if option 2.1 is workable based on the points BH made. BG also agreed that there will be difficulty passing costs through to all Customers and may be unworkable.
- 3.6 JH queried whether leaning away from option 2.1 is discriminatory if you are shielding some Customers of the distribution network from sharing these costs, but other Customers are therefore having to pick up proportionally more. JH also asked for clarification as to whether option 2.1 is suggesting that domestic Customers should be shielded from any socialisation of the costs that the connecting Customer is not picking up - BH explained that this is about a connecting Customer at low voltage in option 2.1 could be at risk of being charged for some of the transmission works.
- 3.7 MPS stated that there is no such thing as a free connection for anyone. Even if a domestic Customer does not pay an upfront proportion of a grid supply point upgrade cost, they pay for it within the elements of their DUoS charge (the same way a demand Customer pays for their transmission via TNUoS charges).
- 3.8 CC asked the group whether terms such as 'shielding a Customer/Customer group from costs' could be avoided, and instead, state that Customers that contribute towards the capital cost contribution are the Customers where there would be an assessment of the impact at transmission and it and it is believed that it is inappropriate to pass that cost onto Customers where the electrical assessment was not done in the first place.

- 3.9 CC also clarified that as they interpreted option 2.1 incorrectly initially, they formally revoke their decision to support this option moving forward.
- 3.10 The Working Group re-looked at the Consultation responses to Q6 where respondents have their reasons for and against the option 2 options.
- 3.11 BH explained option 2.1 in more detail and reiterated that option 2.2 was developed to help mitigate/limit any unintended consequences.
- 3.12 After further discussion, the Working Group came to a consensus that there should be a solution that applies a threshold, the question is what the criteria for that threshold should be. BG stated that the benefits of option 2.1 had a threshold, but different to that set out in option 2.2 – BH suggested that the next steps should be developing the limitations (i.e., a capacity threshold) to ensure there are no unintended consequences, but something that does not mean that everyone has to pay.
- 3.13 It was also noted that the commentary around the consequences of not having those exceptions justifies option 2.1 being rejected.
- 3.14 In regard to the option 2 options, CC queried whether there is a strong majority view that option 2.1 is workable or not, following the debate. BH suggested that both options 2.1 and 2.2 could have legal drafting and then consulted on but provide additional information around the impacts of both options to clarify what they would look like.
- 3.15 LW agreed with the above and suggested that option 2.1 should be included within the second Consultation with further explanation around the potential unintended consequences prior to dismissing it without any additional feedback.
- 3.16 After further discussion, the Working Group agreed to develop the legal drafting for both option 2.1 and option 2.2 and to include within the second Consultation for wider industry feedback.
- 3.17 In regard to option 2.4, BH considered taking this forward originally, however mentioned that it may be more beneficial to develop a solution to present to Ofgem and see what the decision will be. If rejected due to a need for a threshold, this more complex piece of work can be carried out if this is what is desired.
- 3.18 LW confirmed that they would prefer option 2.4 to be included within the second Consultation but will also be happy to mention it within their response. ED and WB also agreed with LW in that option 2.4 should be taken forward.
- 3.19 BG agreed with BH as to how material this risk might be considering the strategic planning that is currently ongoing on the transmission system, and the connections reform.
- 3.20 BH noted that the concern with including option 2.4 moving forward is not the legal drafting, but how complex the work may be to arrive at a high-cost project threshold number and how this number would be calculated.
- 3.21 JH believed that the decision to not include a high-cost project threshold was agreed during the previous meeting and queried why the debate on whether to include option 2.4 is ongoing (as it was agreed to dismiss option 1.4 due to the same reason).

- 3.22 After further discussion, the Working Group came to a compromise in that option 2.4 will be included within the second Consultation for now, with members who are supportive of this option to think about what a potential methodology would look like for further discussion at the next meeting.

ACTION 09/02: Working Group members who are supportive of taking option 2.4 forward, to think about what a potential methodology would look like for further discussion at the next meeting.

- 3.23 The Secretariat also agreed to take an action to start developing the draft legal text for the Working Group to review at the next meeting.

ACTION 09/03: The Secretariat to start developing the draft legal text for the Working Group to review at the next meeting.

- 3.24 LS (Ofgem representative) informed the group that they are supportive of this idea in general, however, this may need to be taken away in terms of how this would work in this case. LS agreed to take an action to clarify internally what level of detail they would need in terms of a solution.

ACTION 09/04: LS to speak internally around what level of detail they would need in terms of the high-cost project threshold and feedback to the group.

- 3.25 Following the initial view from Ofgem, JH queried if the high-cost project threshold can be reconsidered within the option 1 options now that it has been agreed to retain it within the option 2 options – BH stated that this is a fair point, and if work can be done that is suitable than this can go forward.
- 3.26 The Chair presented the responses to question 7 that were supportive of taking forward option 3 within the Consultation to the Working Group for further discussion.
- 3.27 MPS explained that option 3 is for better alignment on a high threshold and does not believe that this option resolves the stated defect. LW disagreed with this and believes the stated defect is very broad, and it skews toward making it easier for developers to connect renewable generation.
- 3.28 MA raised concerns around option 3, whereby there are either Customers who are socialised as they are within the forecast (albeit not 100% accurate) or waiting for Customers to trigger the works and they have to wait potentially years to connect. LW disagreed and stated that this is no different to what happens now, and the other proposed options would not resolve this issue.
- 3.29 BH reiterated the three defects of this change – one is the infrastructure and assets sites causing a disparity (proposed solutions 1.1 and 1.2), one is where those charges for connection sites come through and there is a last man standing risk (proposed solution 2.1, 2.2 and 2.4). Another is where charges come in, there are inconsistencies with how these are applied (consistency is needed#). BH noted that the relative proposed solutions will only resolve that particular defect and not multiple (therefore suggesting there may be a need for three CPs for the three different defects).
- 3.30 The Working Group discussed the above and agreed it may be simpler and easier for readers if this was developed into three separate CPs that are all related (i.e., DCP 461 A/B/C). The Chair confirmed that there would not be any additional Working Groups, only the one DCP 461 group that meet for all of the variations.

- 3.31 ED suggested running the suggestion of 3 separate CPs to the Panel prior to the January DCUSA Panel meeting to gain their views. The Secretariat agreed to take an action to do this at the next DCUSA Panel meeting being held on 21 January 2026.

ACTION 09/05: The Secretariat to bring the discussions around the potential 3 DCP 461 CPs to the January DCUSA Panel meeting.

- 3.32 In terms of reviewing the collated Consultation document, it was suggested that the Secretariat provide conclusions/summaries of the responses to each question along with key themes that were mentioned, as this would be really beneficial when it comes to the Working Group reviewing large, collated Consultation response documents.

ACTION 09/06: The Secretariat to add conclusions/summaries along with key themes of each of the questions within Consultation 1 for easier reviewing within the Working Group.

- 3.33 BH agreed to take an action to start developing the draft legal text for options 1 and 2 for the Working Group to further develop during the next meeting. LW agreed to do the same for option 3.

ACTION 09/07: BH to start developing the draft legal text for options 1 and 2 for the Working Group to further develop during the next meeting.

ACTION 09/08: LW to start developing the draft legal text for option 3 for the Working Group to further develop during the next meeting.

- 3.34 The Secretariat also agreed to start developing the draft Consultation 2 document for the Working Group to further develop during the next meeting.

ACTION 09/09: The Secretariat to start developing the draft Consultation 2 document for the Working Group to further develop during the next meeting.

4. Agreed Next Steps

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

- BH to start developing the draft legal text for options 1 and 2.
- LW to start developing the draft legal text for option 3.
- The Secretariat to start developing the draft Consultation 2 document.

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 – 09 January 2026

- 6.1 The next Working Group meeting will be held on 09 January 2026 at 10am.

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. | Will Bowen | 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 | Ongoing. |
| 08/01 | HS to confirm if Centrica's support for option 1.3 would change now that the transformer charging/costs have been clarified; and | HS | Ongoing. |
| 08/02 | Secretariat to reach out to Ethical Power to clarify the point raised around option 1.3, particularly if connecting at 33KV whether this option would result in any transmission connection charges. | Secretariat | Ongoing. |
| 09/01 | The Secretariat to update DCP 461 WG 08 Draft Minutes to reflect discussions held. | Secretariat | New Action. |

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| 09/02 | Working Group members who are supportive of taking option 2.4 forward, to think about what a potential methodology would look like for further discussion at the next meeting. | Working Group | New Action. |
| 09/03 | The Secretariat to start developing the draft legal text for the Working Group to review at the next meeting. | Secretariat | New Action. |
| 09/04 | LS to speak internally around what level of detail they would need in terms of the high-cost project threshold and feedback to the group. | Liam Sweeney | New Action. |
| 09/05 | The Secretariat to bring the discussions around the potential 3 DCP 461 CPs to the January DCUSA Panel meeting. | Secretariat | New Action. |
| 09/06 | The Secretariat to add conclusions/summaries along with key themes of each of the questions within Consultation 1 for easier reviewing within the Working Group. | Secretariat | New Action. |
| 09/07 | BH to start developing the draft legal text for options 1 and 2 for the Working Group to further develop during the next meeting. | Brian Hoy | New Action. |
| 09/08 | LW to start developing the draft legal text for option 3 for the Working Group to further develop during the next meeting. | Lee Wells | New Action. |
| 09/09 | The Secretariat to start developing the draft Consultation 2 document for the Working Group to further develop during the next meeting. | Secretariat | New Action. |

Closed Actions

| Action Ref. | | Update | |
|-------------|---|-------------|---------|
| 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 | Closed. |

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| 06/01 | The Secretariat to invite Suppliers and CVA Registrants to join the DCP 461 Working Group. | Secretariat | Closed. |
| 06/02 | Lee Wells to make the agreed necessary updates (in regard to recent feedback) within the draft Consultation and circulate to the group for review prior to the next meeting. | Lee Wells | Closed. |
| 06/03 | The Secretariat to schedule the next Working Group meeting for 05 November 2025 for a final review of the draft Consultation document. | Secretariat | Closed. |
| 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 | Closed as consultation issued. |
| 07/01 | The Secretariat to circulate a clean version of the draft Consultation document, alongside the previously tracked changed version, for the Working Group to review and agree offline. | Secretariat | Closed as consultation issued. |
| 07/02 | The Secretariat to issue the Consultation to wider industry seeking feedback. | Secretariat | Closed as consultation issued. |