

# DCP 461 Working Group - Meeting 12

29 January 2026 at 13:00 - Web-Conference

Attendee	Company
<b>Working Group Members</b>	
Aishwarya Harsure [AH]	NESO
Ben Godfrey [BG]	NGED
Brian Hoy [BH]	SP Electricity North West
Drew Johnstone [DJ]	NPg
Ed Grimsey [EG]	BU-UK
Edda Dirks [ED]	SSE Generation
Erik Baguzis [EB]	Indigo
Jack Purchase [JP]	NGED
John Harmer [JH]	Waters Wye
Kyran Hanks [KH]	Waters Wye
Lee Wells [LW]	NPg
Liam Sweeney [LS]	Ofgem
Matthew Paige-Stimson [MPS]	National Grid
Natalija Zaiceva [NZ]	UKPN
Nikki Pillinger [NP]	Roadnight Taylor
Rohan Sachdev [RS]	SSE
Will Bowen [WB]	UKPN
<b>Code Administrator</b>	
Dylan Townsend [DT] (Chair)	ElectraLink
Mel Kendal [MK] (Technical Secretariat)	ElectraLink
<b>Apologies</b>	
Catherine Cleary [CC]	Roadnight Taylor
Claire Witty [CW]	SPEN
Craig Booth [CB]	ElectraLink

Ed Birkett [EB]	Low Carbon
Richard Colwill [RC]	ElectraLink

## 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 and Open Actions

- 1.4 The Chair shared the minutes of the previous meeting 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.
- 1.6 Regarding Action 09/05:
- The Chair informed the group that the DCUSA Panel provided their approval for the proposal for three alternative CPs to be raised and would accept these ex-committee for their approval once ready. It was noted that the Panel had some concerns related to how alternatives would ultimately be packaged for Party voting and expressed a desire for the Working Group to ensure Parties (and ultimately Ofgem) are able to easily understand what is being presented.
  - A Working Group member asked whether previous consultations had combined multiple alternatives within a single document as if this had been done previously, then it could be helpful to look to how such an approach was tackled in the past whilst developing this consultation. The Chair confirmed that while parallel consultations had occurred, these were for separate changes; in this case, all alternatives relate to the same overarching change, which supports a single consolidated consultation
  - Another Working Group member emphasised the need to avoid unnecessary procedural complexity and recommended consulting on all alternatives together, then splitting into individual CPs only at the Change Report stage.
- 1.7 Regarding Action 11/04:
- It was noted that an email had been circulated amongst the Working Group which noted that NESO could provide partial information and added that detailed reinforcement cost data and/or capacity values triggered each reinforcement would need to come from the Transmission Owners (TOs).

- AW informed the group that they do have some information which comes to them from the TOs, however, they do not hold the detailed cost figures or the capacity that triggered each reinforcement.
- Following this, AW stated that even if the information requested was to become available, this would not be something that can be delivered within a short time frame as it would take some time to gather.
- LW suggested that if one of the options needs this data to include a high-cost project threshold, then this may need to be a request sent out by Ofgem to gather the data needed. LS suggested that it may be worth reaching out to the TOs directly to confirm whether this is something that they can do, and if needed a request can be submitted to Ofgem to request this data on the behalf of the Working Group. LS confirmed they can take this action once the Working Group decide how they would like to progress with this.

## 1.8 Regarding Action 11/02

- MPS noted that this action was incorrectly actioned against himself, however, it was noted that this figure of between 5-125 years (for Scottish GSPs) is most likely the correct figure and not a typo.

## 2. Purpose of the Meeting

- 2.1 The Chair explained that the purpose of this meeting was to agree the go-live dates for each of the options, draft the no detriment provisions within the legal text and also the development of the draft Consultation 2 within the Working Group and agree next steps.

## 3. Review of Scenarios: Demand and Generation Sharing Transmission Assets

- 3.1 The Chair informed the group that this agenda item is to review and discuss the below scenarios:
- *Where demand and generation connections share transmission assets.*
  - *Whether the solutions provide the best cost reflectivity for how transmission asset costs are shared between these.*
- 3.2 MPS suggested that the question is more would you end up double cost-apportioning the charge (if equally sized demand and generation) if there was not some sort of scaling.
- 3.3 BH stated that for option 1 where there is no charge, this would not be a problem. For option 3 where charging in full, this would not be a problem. Option 2 may only be a complication within the methodology of how you cost-apportion. The legal text would need to be reviewed to see this is addressed. BH also suggested this could be a question for the Consultation.

**ACTION 12/01: The Working Group to cross-check the draft legal text (specifically for Option 2) to seek whether it addresses double cost-apportioning the charge.**

- 3.4 MPS also noted that there is an absence of this being dealt with in the transmission sector and it has been recognised as an issue. This will be for a later CUSC mod to resolve this triggering of both demand and generation at the same time.

- 3.5 BH agreed that it is worth looking over to see if there is an obvious solution, however, suggests that the progress should not be delayed trying to find an appropriate solution when the approval of that option is not a guarantee.

## 4. Agree when the 'Go-Live' Date would be for each of the Options

- 4.1 The Chair invited the group to discuss and agree when the Go-Live dates would be for each of the options.

- 4.2 The key updates can be found below:

- BH stated that the group had previously agreed on the different terminology between the implementation date (added to the Charging methodology) and the go-live date.
- The Working Group agreed the below implementation dates for the below options:

	Implementation Date	Go-Live Date
<b>Option 1</b>	1 month post Ofgem decision	1 month post Ofgem decision
<b>Option 2</b>	1 month post Ofgem decision	1 month post Ofgem decision
<b>Option 3</b>	01 April 2028	01 April 2028

- 4.3 LW does not agree that an implementation date for any of the proposed options should be before 01 April 2028, as this could mean that DNOs may receive costs that they have no allowances for during the ED2 period. Licence changes have also been proposed with option 3.

## 5. Draft the No Detriment Provisions in the Legal Text

- 5.1 The Chair presented the draft Legal Text document on screen for the Working Group to review and draft the No Detriment provisions.

- 5.2 The key updates can be found below:

- BH noted that this could be done in two different approaches – the various legal text for the options could be drafted and consulted on, or the matrix table could be provided within the Consultation to outline the principles of what each option is trying to do; with the aim of drafting the final legal text for the desired option chosen for the solution to be included within the Change Report.
- The Chair informed the group that it is unusual to issue a 'final' Consultation without some form of draft legal text for respondents to provide comments/feedback on.
- BH queried whether there is another solution where Ofgem could direct as part of their decision, therefore meaning the legal text would not need to be drafted. LS stated this would not be the most suitable scenario as Ofgem would then ultimately need to draft the legal text.
- Following the above discussion, BH agreed to take an action to draft the no detriment approach provisions within the draft legal text options offline for the Working Group to review.

**ACTION 12/02: BH to draft the no detriment approach provisions within the draft legal text options offline for the Working Group to review.**

## 6. Draft Consultation 2 Document – Content & Questions

- 6.1 The Chair presented the draft Consultation 2 document on screen for members to continue to review and develop the content and questions.
- 6.2 The Chair noted feedback provided by MPS on the draft Consultation2 document that suggests amendments to the previous text that was issued previously within the Consultation 1 document. The concern is that respondents may not be aware that the text has changed as it may be assumed the base text is the same; however, if amendments are agreed to be made, the group should consider how respondents are made aware that changes have been made to the original text.
- 6.3 BH suggested that it may be more suitable to keep the original text the same but could be further discussed as a post-Consultation note later in the document to make it easier for the respondent to follow.
- 6.4 The group reviewed the suggested amendments by MPS within the document. Once suggestion was the summary table of option 3.1 (under paragraph 4.41) to include the below:
- *High if only one connecting customer. Burden is reduced if multiple customers as costs are shared **but likely to remain a high burden**. The ECCR provides future safeguards against the upfront financial burden.*
- 6.5 LW suggested that 'likely' is replaced with 'may' – the group agreed with this amendment.
- 6.6 NP queried what is being classed as transmission assets, as there are some outliers – i.e., one-off costs. MPS stated that anything that is exceptionally requested by the user that is non-standard and drives extra costs of the standard compliant design that the TO would have delivered, would have avoided that cost; these would fall into a fully recovered cost one-off works charge to the party that triggered this. Anything outside of this would likely fall outside this and liability would fall directly on that party.
- 6.7 BH suggested that the draft legal text may need to be reviewed to see if it needs the ability to recover these exceptional charges and whether it was requested by the Customer or not as this may be helpful.

**ACTION 12/03: The Working Group to review the draft legal text to establish whether additional wording is needed to allow for the ability to recover exceptional charges and whether it was requested by the Customer or not.**

- 6.8 The Chair sought members views in relation to the naming for the different options (i.e., DCP 461 A,B, & C). Members were happy with the above suggestion; however, a concern was raised around referring to a CP number (i.e., DCP 461 A) when it does not yet exist. BH suggested it would be clearer if all of the work was included within this overarching Consultation and separate later (as opposed to 3 separate Consultations) but could make reference to the aim that they will split out at a later date with references.
- 6.9 In regard to paragraph 6.16, it was agreed to include wording to state that option 2.4 has now been agreed to put forward, however, this will be discussed further down within the conclusions section of the document.

- 6.10 In regard to paragraph 7.3, BH noted that following the discussions during this meeting, it may be worth making it clear that options 1.4 and 2.4 will still be progressed even if there is not a figure for the HCPT (i.e., refers to the threshold as XX/YY), as it not conditional on the value.
- 6.11 The Chair noted that there is currently a placeholder for paragraph 6.8 to allow for the inclusion of data analysis gathered by NEDO, TOs and DNOs. Members stated that the data is not forthcoming on the timescale, and there for agreed to proceed without the data.
- 6.12 MPS queried if there is any scope for the DNOs from their own knowledge to provide data – BH raised concerns around consistency and potential causes for delay. LW confirmed he can provide this data and will share it with the group once this has been gathered.
- 6.13 Members discussed adding questions around the HCPT/gathering data, and agreed that there would be two separate questions: do you agree with how the HCPT has been calculated and do you have any other approaches.
- 6.14 MPS suggested DNOs could check with their internal securities team (as opposed to offers team) as this should be able to give a data set that provides connection scheme costs for DNOs – AW confirmed they would check internally whether this is possible and update the group (although noted that the timeline for this is still uncertain).

**ACTION 12/04: AW to check with their internal securities team to see if it is possible to gather a data set that provides connection scheme costs for DNOs.**

- 6.15 In regard to paragraph 8.5 in relation to option 2, the Chair asked the group whether 5MW was the value the group have landed on and queried whether this needs consulting on. BH stated that there are two separate approaches, and members agreed that an explanation should be included within the Consultation with a question as to whether they are supportive.
- 6.16 In terms of legal text, the group discussed whether it would be more suitable to keep schedule 22 as is, with all of the suggested amendments colour coded within the same document so it is all in one place, however, this would result in a large document. The alternative option was to take extracts from each relevant section with the suggested amendments to keep the document shorter. The Secretariat agreed to take an action to carry out this task offline.

**ACTION 12/05: The Secretariat to draft the legal text for all options to show only the relevant changed extracts.**

- 6.17 In terms of the ECCR discussion within Section 8 of the Consultation, ED stated that it would be helpful to provide a link to the [ENA guidance document](#) in relation to the ECCR within the Consultation.
- 6.18 The Working Group also noted that there would be no impacts on the ECCR on options 1 or 2 but is relevant to option 3 as it potentially mitigates the risk of last man standing. DJ agreed to take an action to draft some wording for this paragraph.

**ACTION 12/06: DJ to provide an explanation in relation to ECCR impacts for paragraph 8.40 of the Consultation 2 document.**

- 6.19 In regard to option 2.1, ED queried if there is a single user that ends up paying in full, then would the ECCR be applied if there was a further user added using those assets – BH explained that potentially,

but there is a precedent within the ECCR that states where the HCPT is triggered, the single user accepts this and there is no reimbursement.

- 6.20 BH agreed that this should be brought out within the Consultation 2 document and agreed to take an action to do this offline.

**ACTION 12/06: BH to draft wording within the Consultation 2 document to explain the ECCR assumptions in relation to option 2.1.**

- 6.21 In terms of the objectives section, the group agreed to proceed with the proposers view for now and include the Working Group's view when drafting the Change Report.
- 6.22 Following the above discussions, Working Group members agreed to review the draft Consultation 2 document offline and provide any additional feedback/comments with the aim of finalising the document at the next meeting.

**ACTION 12/07: Working Group members to review the draft Consultation 2 document offline and provide any feedback/comments prior to the next meeting.**

## 7. Agreed Next Steps

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- 7.1 The Working Group discussed the next steps, and the following items were captured:
- The Secretariat and Working Group to make the necessary amendments to the draft legal text and draft Consultation 2.
  - Working Group members to review the draft Consultation 2 document offline and provide feedback/comments prior to the next meeting.
  - The Secretariat to schedule the next Working Group meeting for a final review of both the draft legal text and draft Consultation 2 documents.

## 8. Any Other Business

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

## 9. Date of Next Meeting – 05 February 2026

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- 9.1 The next Working Group meeting will be held on 05 February 2026 at 10:30am.

## 10. Attachments

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- Attachment 1\_DCP 461 Work Plan



## APPENDIX A

### New and Open Actions

Action Ref.	Action	Owner	Update
<b>02/02</b>	MA, BH and BG to pull together work done by previous ENA group to see if it can be used by the Working Group.	Mark / Brian / Ben	<b>On Hold (Post-Consultation).</b> <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>
<b>10/03</b>	BH, BG & LW to draft the 3 new CPs (BH – option 1, BG - option 2, LW – option 3) to review at the January DCUSA Panel.	Brian / Ben / Lee	<b>Ongoing.</b> <i>Will be presented at the February Panel.</i>
<b>12/01</b>	The Working Group to cross-check the draft legal text (specifically for Option 2) to seek whether it addresses double cost-apportioning the charge.	Working Group	<b>New Action.</b>
<b>12/02</b>	BH to draft the no detriment approach provisions within the draft legal text options offline for the Working Group to review.	Brian	<b>New Action.</b>
<b>12/03</b>	The Working Group to review the draft legal text to establish whether additional wording is needed to allow for the ability to recover exceptional charges and whether it was requested by the Customer or not.	Working Group	<b>New Action.</b>
<b>12/04</b>	AW to check with their internal securities team to see if it is possible to gather a data set that provides connection scheme costs for DNOs.	Aishwarya	<b>New Action.</b>



12/05	The Secretariat to draft the legal text for all options to show only the relevant changed extracts.	Secretariat	<b>New Action.</b>
12/06	DJ to provide an explanation in relation to ECCR impacts for paragraph 8.40 of the Consultation 2 document.	Drew	<b>New Action.</b>
12/07	BH to draft wording within the Consultation 2 document to explain the ECCR assumptions in relation to option 2.1.	Brian	<b>New Action.</b>
12/08	Working Group members to review the draft Consultation 2 document offline and provide any feedback/comments prior to the next meeting.	Working Group	<b>New Action.</b>

## Closed Actions

Action Ref.		Update	
09/05	The Secretariat to bring the discussions around the potential 3 DCP 461 CPs to the January DCUSA Panel meeting.	Secretariat	<b>Closed.</b> <i>Update was provided to the group.</i>
10/01	The Secretariat to seek advice at the January DCUSA Panel meeting as to whether it would be feasible to seek wider industry feedback around the 3 potential solutions (new CPs) within the DCP 461 Consultation, leading to the 3 new CPs going straight to Change Report.	Secretariat	<b>Closed.</b> <i>Update was provided to the group.</i>
10/02	BH to either include or reference to a definition of Transmission High-Cost Project Threshold within the draft Legal Text for option 2.4.	Brian	<b>Closed.</b> <i>BH noted that this has now been circulated but is yet to be reviewed.</i>
11/01	The Secretariat to seek whether the DCUSA Panel would agree to review the 3 CPs offline during an ex-committee meeting.	Secretariat	<b>Closed.</b> <i>The panel agreed to review and approve these ex-committee.</i>

11/02	The Secretariat to follow up with Matthew Paige-Stimson to Q5 of Consultation 1 in regard to the likely type of 5-125 years (cost for Scottish GSPs).	Secretariat	Closed.
11/03	The Secretariat to include an explainer paragraph to the beginning of the legal text commentary to explain that paragraph references are to the legal text document (not the Consultation).	Secretariat	Closed.
11/04	AW to seek internally what data is available from NESO in relation to capital costs on an upfront basis and customer requested capacity, and feedback to the group.	Aishwarya Harsure	Closed.
11/05	Once the available NESO data is known, the Working Group to make a request for specific data from NESO.	Working Group	Closed. <i>It was noted that when the data would be available is the current issue.</i>
11/06	The Secretariat to include specific line numbers when referencing 'see above' within the options matrix table.	Secretariat	Closed.
11/07	The Secretariat to circulate a clean version of the options matrix table to the Working Group offline for review.	Secretariat	Closed.
11/08	The Secretariat to include wording within the Consultation 2 document around ECCR provisions.	Secretariat	Closed.