

# DCP 452 Working Group Meeting 11

Date: 12 February 2026

Time: 10:00 – 13:00

Location: Microsoft Teams

Attendee	Company
<b>Working Group Member</b>	
Andrew Enzor [AE] (The Proposer)	Field Energy
Edda Dirks [ED]	SSE Generation
Kara Burke [KB]	Northern Powergrid
Giao Le [GL]	SSEN
Lorna Murray [LM]	SPEN
Tom Holderness [TH]	Ofgem
<b>Code Administrator</b>	
Dylan Townsend [DT] (The Chair)	ElectraLink Ltd

Apologies	Company
Alex Lam [AL]	National Grid Electricity Distribution

## 1. Administration

### Recording

- 1.1 The Chair opened the meeting by confirming that the session was being recorded, in line with the Working Group Terms of Reference.

### Apologies

- 1.2 The Chair informed attendees that formal apologies had been received from Alex Lam, representing National Grid Electricity Distribution (NGED).

### Competition Law Guidance

- 1.3 Attendees were reminded of the competition law guidance, which is now available via a hyperlink rather than embedded within the meeting pack. By participating in the meeting, all attendees were deemed to have accepted this guidance.

## Review of Previous Meeting Minutes

- 1.4 The Working Group reviewed the draft minutes from meeting 10. No additional comments were raised at this time.

## Review of Actions and Timelines

- 1.5 The group considered the current action log, as detailed in Appendix A of these minutes. Updates relating to outstanding actions have been captured within the log.

## 2. Purpose of the Meeting

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- 2.1 The Chair outlined the objectives for the meeting, which were to:
- Complete the Working Group's review of consultation responses
  - Review and sense-check the draft Change Report and updated impact assessment
  - Discuss concerns regarding the level of detail included within the impact assessment, with a request for the detailed analysis to be treated confidentially
  - Confirm the next steps towards finalisation and submission of the Change Report to the Panel

## 3. Final Review of Collated Consultation Responses

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- 3.1 The Chair confirmed that the collated consultation responses document had been updated following the group's previous review. Members were asked to agree that the document now accurately reflected respondent views and that the Working Group conclusions within were suitable for inclusion in the Change Report.
- 3.2 It was acknowledged, however, that members had not had sufficient time before the meeting to review the document in detail. Consequently, an action was recorded for Working Group members to review and confirm their comfort with the collated consultation responses document. The Chair clarified that the Working Group Conclusion summaries at the end of each question had already been transferred to section 5 of the Change Report, so a duplicate review was not necessary.

**Action: 11/01: Working Group members to review the updated collated consultation responses document and confirm if comfortable with the content contained within it.**

## 4. Review of Draft Change Report and Impact Assessment

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- 4.1 The Chair explained that the Change Report is an evolution of the consultation document, with two additional sections and one significantly amended section. The Working Group was guided through the main differences between the Change Report and the consultation document, with the aim of confirming which areas required detailed review.
- 4.2 Key points noted included:

- Section 5 contains the consultation questions and a summary of responses, replicating the summaries at the end of each question in the collated consultation responses. Members are only required to review one of these sections.
- Section 6 offers a summary of the Working Group’s final view on the solution and highlights two issues raised in the consultation responses:
  - Clarification text has been added to explain what Charge 1 is and is not. The new wording makes clear that Charge 1 is just one component of EDCM charges, and DCP 452 removes only the FCP Charge 1 component for directly affected customers. Other charges, such as contributions to direct costs, indirect costs, business rates, transmission exit charges, and the demand residual, remain unaffected. This clarification addresses consultation feedback suggesting the proposal might be interpreted as a broader exemption than intended. A placeholder was included for the results of the RFI on the relative proportion of the Charge 1 component, as agreed in the previous meeting.
  - Further text addresses the point that customers benefiting from DCP 452 may lose that advantage if their GSP later becomes interconnected, at which point Charge 1 would be reapplied. Conversely, future reconfiguration could result in Charge 1 becoming zero if reinforcement risk decreases.
- Section 10, which previously included the original impact analysis from the consultation (including “Table 1”), has been completely replaced. The new content was assembled by the Proposer and updated with members’ input between meetings 10 and 11. The group was asked to review the content in the change report, rather than referring to a separate document.

4.3 An extensive discussion followed on how best to present the relative importance of Charge 1, while ensuring sensitive or potentially misleading data was not published. One DNO member provided an internal snapshot via screen sharing, showing that the proportion of Charge 1 in total charges can range widely—from as little as 12% to as high as 86%.

4.4 DNO representatives expressed concerns about publishing detailed revenue splits or tables that could potentially allow reverse-engineering of customer-specific or network-specific information. It was ultimately agreed that the RFI data would no longer be required, and detailed quantitative tables showing Charge 1 as a percentage of other charges for each DNO would not be published. Instead, the Change Report would include a single DNO snapshot analysis of Charge 1’s significance. This approach was considered representative given the large variance observed. The Chair committed to drafting suitable wording for review by the Working Group.

**Action 11/02: the Secretariat to update the Change Report to incorporate wording regarding the single DNO snapshot analysis of Charge 1 significance as a percentage of all other components for subsequent review by the Working Group.**

4.5 The Chair confirmed that the Working Group’s assessment against DCUSA Charging Objectives would be completed in the final meeting. To assist, the Chair would align this with the majority view from consultation responses, which supported the solution’s ability to better facilitate DCUSA Charging Objectives two and three, with a minority expressing the opposite view.

## 5. Confidentiality and Publication of Impact Analysis

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- 5.1 The Chair reported that an email had been sent to members outlining concerns regarding the circulation of certain data within the Working Group. A request was made that all impact assessment data shared with members be treated as CONFIDENTIAL. Members were reminded that any data not published as part of the consultation should remain confidential, in accordance with Clause 57 'FURTHER INFORMATION PROVISIONS' of Section 3 of the DCUSA.
- 5.2 DNO members voiced concerns that the current impact assessment spreadsheet contained details which, combined with industry knowledge, could enable identification of individual customers or network characteristics. Even illustrative or archetypal figures could be sensitive due to the analysis structure.
- 5.3 The Proposer clarified that all calculations were based on published tariffs or those that were publicly published alongside the consultation and overlaid archetypal usage, not actual customer data, and the goal was to improve clarity in response to consultation feedback, not to disclose confidential information.
- 5.4 The Working Group recognised the importance of balancing transparency for stakeholders and Ofgem with the confidentiality concerns of DNOs. It was agreed that:
- The full impact analysis spreadsheet would be treated as confidential and shared with Ofgem only.
  - The content within the Proposer's document, which had been incorporated into the Change Report as the Impact Assessment narrative (including tables and explanations), would be reviewed by DNOs for suitability for publication.
  - The Change Report would clarify that the impact section illustrates overall patterns and effects, rather than individual customer outcomes, and customers wishing to assess site-specific impacts should refer to published before-and-after tariffs and use their own data.

**Action 11/03: Working Group members to review and feedback on the finalised impact assessment section of the Change Report (previously circulated as a separate document prepared by the Proposer)**

## 6. Next Steps and Work Plan

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- 6.1 The following next steps were agreed:
- The Secretariat will update the Change Report to incorporate all agreed refinements and circulate it to members.
  - Members are to review:
    - The updated Change Report (focusing on sections 5, 6, and 10)
    - The collated consultation responses document (focusing on the Working Group comments and summary sections)

- The Chair will send the legal text to the legal advisors for final review and will circulate the reviewed version to the Working Group once received.
- A final Working Group meeting will be held to approve all Change Report documentation. Following this, the documents will be submitted to the DCUSA Panel in time for their March meeting.
- The next meeting was scheduled for 02 March 2026 at 10:00.

## 7. Any Other Business

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### **Review of Separate Document on Applying DCP 452 Logic to Other Voltages**

- 7.1 The Proposer had prepared a discussion paper, prompted by a consultation response regarding the relevance of Ofgem’s decision to reject DCP 139. The paper set out the Proposer’s view on whether the logic applied to customers in DCP 452 could be extended to other voltage levels, although this remains outside the scope of DCP 452. Given the technical nature of the document, it was acknowledged that DNOs would need to consult internally with engineers before providing feedback. An action was recorded for DNO Working Group members to review and respond before deciding whether to attach the document to the Change Report.

**Action 11/04: DNO Working Group members to review and feedback on the separate document prepared by the Proposer related to applying the DCP 452 logic to other voltages, to determine if it should be attached to the Change Report.**

## 8. Next Meeting

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- 8.1 The next Working Group meeting is scheduled for 02 March 2026 at 10:00.

## Appendix 1 – Actions Log

### *New and Open Actions*

Ref.	Action	Owner	Update
11/01	Review the updated collated consultation responses document and confirm if comfortable with the content contained within it.	Working Group members	New Action.
11/02	Update the Change Report to incorporate wording regarding the single DNO snapshot analysis of Charge 1 significance as a percentage of all other components for subsequent review by the Working Group.	Secretariat	New Action.
11/03	Review and feedback on the finalised impact assessment section of the Change Report (previously circulated as a separate document prepared by the Proposer)	Working Group members	New Action.
11/04	Review and feedback on the separate document prepared by the Proposer related to applying the DCP 452 logic to other voltages, to determine if it should be attached to the Change Report.	DNO Working Group members	New Action.
10/08	1) provide a summary of Q7 and send a clean version to the Working Group for review; and 2) Update the work plan on the website.	Secretariat	Ongoing – Work plan still to be updated.

### *Closed Actions*

Ref.	Action	Owner	Update
10/01	The Secretariat to include wording within the Change Report that highlights for directly impacted customer, there is a possibility that if the network is re-configured in the future, it may end up being connected to another GSP and thus becoming an interconnected GSP, meaning the Charge 1 component would be added back into their charges.	Secretariat	Completed – content added to Change Report

Ref.	Action	Owner	Update
10/02	Include that it is charge 1 component which makes up one part of a number of components that result in capacity charges super-red unit rate, and that is the component what is being removed, within the Change Report.	Secretariat	Completed – content added to Change Report
10/03	Draft a potential Information Request/RFI to FCP DNOs.	Andrew Enzor	Completed – RFI template circulated to Working Group and DNO members asked to complete
10/04	Follow-up with the relevant DNOs offline to try to better understand the root cause of the unknown impacts.	Andrew Enzor	Completed – Bilateral emails exchanged and confirmation of unexplained impacts provided
10/05	Review the impact assessment document and spreadsheet circulated by the Proposer offline and provide feedback.	Members	Completed – Bilateral emails exchanged between Proposer and Working Group members and feedback incorporated into final version
10/06	Investigate whether the two noted sites within the consultation are impacted by this CP and update the group.	Alex Lam	Completed – Bilateral emails exchanged and confirmation of unexplained impacts provided
10/07	Relook at the data in table 1 for any inconsistencies and provide more clarity	Andrew Enzor	Completed – this formed part of the content within the document shared with members post meeting 10.