

DCP 464 Working Group - Meeting 06

17 February 2026 at 13:00 - Web-Conference

Attendee	Company
Working Group Members	
Drew Johnstone [DJo]	NPg
Ed Grimsey [EG]	BU-UK
Edda Dirks [ED]	SSE Generation
Ephie Chalakateva [EC]	National Grid
Erik Baguzis [EB]	Indigo Networks
Ian Burman [IB]	Green GEN Cymru
Louise Robinson [LR]	ESP
Martin Brace [MB]	UKPN
Nik Wills [NW]	Stark
Ollie Easterbrook [OE]	National Grid
Owen Black [OB]	SPEN
Rob Gladstone [RG]	SSEN Distribution
Tracey Taylor [TT]	SPENW
Code Administrator	
Andy Green [AG] (Chair)	ElectraLink
Mel Kendal [MK] (Technical Secretariat)	ElectraLink
Apologies	
Charles Deacon [CD]	Eclipse

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

- 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.

2. Purpose of the Meeting

- 2.1 The Chair explained that the purpose of this meeting is to continue to review the collated Consultation responses document, review the draft legal text and discuss the solution development within the Working Group and agree next steps.

3. Continued Review of Collated Consultation Responses

- 3.1 The Chair presented the collated Consultation responses live on screen for the Working Group to continue to review and discuss.

- 3.2 The key updates can be found below:

3.3 **Q11**

- 3.4 The Chair informed the group that the majority of respondents (10 out of 16) were not aware of any wider industry impacts of this change, however, the remaining 6 respondents noted the below:

- Impact of the Access SCR on IDNOs ability to pass through reinforcement costs.
- Interaction of IDNO-to-IDNO connections if reinforcement costs are incurred on the embedded DNO network and the downstream IDNO has multiple connections.
- Potential overlap with DCP 461 '[IDNO Connection Applications: Treatment of Existing Assets](#)'.
- CMP 460 '[Improving Transmission Connection Charging](#)' may have an impact this change.

- Ongoing Connections Reforms as well as the development of the tRESP and RESP may affect how connection assets might be categorised.

3.5 In regard to the pass through of costs, TT stated that it would be dependant on the type of connection to the IDNO network. If the IDNO had an application for a new connection to their network, there would be a method of charging them, dependant on what the load is.

3.6 The Working Group noted and agreed that there is an overlap between this change and DCP 461 /CMP 460 and agreed that this needs to be presented clearly within the Change Report.

3.7 **Q12**

3.8 The Chair informed the group that the majority of respondents (12) agreed with the proposed implementation date.

3.9 Two respondents suggested implementation should be one month following approval.

3.10 The Chair queried whether the implantation of this change will be retrospective or forward-looking – the group confirmed the intent of this change is to be forward-looking only.

3.11 One respondent suggested that the proposed implementation of ‘at the earliest opportunity’ needs to be considered, as the approval of option 2 would affect residual charges which would fall under the 15-month DUoS tariff notice period. RG queried was unsure why this would be affected as the DUoS recovery as a mechanism is not within this scope – the Working Group agreed that this is most likely a question that can be better understood once an Impact Assessment has been carried out.

3.12 **Q13**

3.13 The Chair informed the group that the majority of respondents (14) had no further comments on this change.

3.14 One respondent stated that they would support monitoring post implementation of either option to ensure that impacts on DUoS and connections best serves Customers and efficiency and fairness in the market.

3.15 Another respondent stated the Working Group may want to consider that this could set a precedent as to how IDNO/DNO connection are treated for other operational interactions (i.e., GSOP for power cuts and Generation applications).

3.16 The responses were noted by the Working Group.

4. Review Draft Legal Text

4.1 The Chair presented the draft legal text live on screen for the Working Group to review and discuss.

4.2 The key updates can be found below:

4.3 The Working Group noted one respondent provided a suggested ‘option 3’ in regard to draft legal text, which can be found below:

- Option 3: CCCM 1.17 to read “Reinforcement is defined as assets installed that add capacity (network or fault level) to the existing shared use Distribution System. For the purposes of assessing whether the existing Distribution System is shared use, any IDNO connection shall be treated as a single connected customer. **Where there is more than one connection connecting to the same section of the existing Distribution System and each such connection is from the same LDNO licensee, the assets will [not] be defined as Reinforcement.**

- 4.4 RG stated that based on the suggested legal text wording above, this would contradict the current position on multiple exit points where there may be metered Customers, and these would be regarded as two separate connections (even if the same owner).
- 4.5 Following this, the Working Group agreed to discount the above suggestive legal text.
- 4.6 Another respondent proposed adding “For the purposes of assessing whether the existing Distribution System is shared use, any existing IDNO connection shall be treated as a single connected customer.” This suggestion was proposed to strengthen the purpose of the change.
- 4.7 Although members agreed that the suggested wording does reflect the purpose of the change, it was debated whether there could be a risk of discrimination between Customers and lead to any unintended consequences. Following discussions, it was agreed to further consider the suggested wording when a wider review of the draft legal text is carried out.
- 4.8 It was also suggested to align the terms ‘IDNO/LDNO’ – the Working Group agreed to consider this when carrying out a wider review of the draft legal text.
- 4.9 In response to the Consultation, a respondent stated that the legal text is too ambiguous and open to interpretation, as it does not clearly spell out how ‘any IDNO connection shall be treated based on the number of connections to the IDNO Distribution System’.
- 4.10 TT stated that the wording is in relation to the definition of what Reinforcement is, whereby a DNO that has more than one Customer will be considered as shared use. ED agreed that this makes it clear, but this should be outlined clearly within the legal text to avoid any ambiguity. DJ stated that once shared use is defined, this will help the wording to be clearer.
- 4.11 Another respondent stated that if option 2 proceeds, they feel that ‘number of connections’ may be too ambiguous (unless shared use is defined) and suggested the use of MPAN may be more appropriate. Members stated that using the term MPAN may be limiting.
- 4.12 A respondent suggested the below amendment to the draft legal text:
- Option 2: CCCM 1.17 to read “Reinforcement is defined as assets installed that add capacity (network or fault level) to the existing shared use Distribution System. For the purposes of assessing whether the existing Distribution System is shared use, any IDNO connection shall be treated based on the number of Metering Points supplied by to the IDNO Distribution System.”
- 4.13 The above suggestion was noted by the Working Group, and they agreed to consider this within the wider review of the legal text.

- 4.14 Following the feedback received via the Consultation, the Chair presented the four variations of options of draft legal text for the Working Group to review.
- 4.15 OE queried whether wording needs to be added around how new IDNO connections should be treated – it was agreed that anything that does not meet the definition of reinforcement will be treated by current BAU processes.
- 4.16 In regard to option 2 v3, RG suggested replacing the term ‘metering points’ with ‘number of entry/exit points’ as this may be more useful terminology.
- 4.17 The definitions below were noted by the Working Group:
- **Entry/Exit Point** – a point at which electricity, whether metered or unmetered, enter or exit our Distribution System.
 - **Premises** – means any land, building or structure.
- 4.18 Based on the above definitions, it was agreed that it may be suitable to leave the option 2 v1 and option 2 v2 draft legal text variations as is, however, include ‘shared use’ as a defined term.
- 4.19 Members discussed the potential wording to define the term ‘shared use’; MB stated that it is about the number of electrical connections to the network that is key, not the number of users. Two suggestions were put forward for the definition of shared use:
- **Shared Use** - “any Asset which is used for carrying electricity to or from multiple Exit / Entry Points, including to an embedded network that itself has multiple Exit or Entry Points”.
 - **Shared Use** – “where there is more than one connection to the DNO/IDNO network”.
- 4.20 Members noted that the terms LDNO/IDNO need to be further discussed as to which term is used throughout the document. RG suggested the terms host/embedded network could be used.
- 4.21 TT queried whether the scenarios where its either general load growth or a new connection needs to be considered, as this may change how the legal text is drafted – RG agreed that clarification is needed somewhere, however, does not believe that it would change the drafting of the legal text.
- 4.22 The Chair also noted that although it may be useful if there was some standardisation of what justification meant and how this was applied, this is an existing issue and may be out of scope of this change.
- 4.23 Members discussed whether this this would be considered as a separate issue or whether it aligns with the intent of adding clarity to how IDNOs are charged, as this could leave ambiguity in Schedule 22. TT suggested referencing back to paragraph 1.36 which would give equality of treatment (the IDNO is being treated in the same manner as a DNO Customer would).
- 4.24 ED queried whether there is a risk of ambiguity around the term host network – OE stated that host network is already defined within the DCUSA (where the company is an EDNO, the network of the host DNO), however, it was noted that this may be in context of something else.

4.25 Following discussions around the legal text, it was agreed that it may be beneficial to seek legal advice and invite Gus from Gowling WLG to the next Working Group meeting.

4.26 The points to seek further legal advice from Gus can be found below:

- Would a derogation be required dependant on the impact assessment of the adjustments to residual charges being small?
- Is the use of host and embedded networks sufficiently clear? Is the use of host, embedded and shared use needs to be defined terms or are they able to be used within the body of the legal text?
- How best can the legal text consider the justification for incremental load growth provisions?
- Is the use of the term connection, within the draft legal text, sufficiently clear?

ACTION 06/01: The Secretariat to invite Gus from Gowling WLG to the next Working Group to review and discuss the draft legal text.

4.27 TT suggested some alternate legal text drafting for paragraph 1.38 which can be found below:

- Where another LDNO with a distribution network that is connected to our Distribution System requires an increase in capacity to its distribution network, the voltage at the POC for assessing the Voltage Level will be:
- in the case of a new extension to the network of the other LDNO, the voltage of connection at which the Extension Assets will connect to the other LDNO's network; or
- in the case of additional capacity required in respect of a customer connected to the existing assets of the LDNO, the voltage at which the customer connects to the LDNO's network; or
- in the case of additional capacity required to meet general load growth on the LDNO's network, as defined in paragraph 1.36, then the Reinforcement costs will be borne by us. The LDNO will be required to provide justification in such circumstances.

4.28 The Chair added this to the draft legal text document, alongside the other variations, and the Working Group agreed that this can be reviewed during the next meeting. The Chair also agreed to take an action to circulate the draft legal text document to the Working Group post-meeting.

ACTION 06/02: The Secretariat to circulate the draft legal text document to the Working Group post-meeting.

4.29 The Chair informed the group that once Gus' availability has been provided, a meeting poll will be issued to the Working Group for the next meeting.

ACTION 06/03: The Secretariat to issue a meeting poll to the Working Group for the next meeting.

5. Agreed Next Steps

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

- The Secretariat to invite Gus from Gowling WLG to the next Working Group to review and discuss the draft legal text.

6. Any Other Business

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

7. Date of Next Meeting – TBC

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

8. Attachments

- 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	Ongoing. <i>This will be completed in due course.</i>
05/03	The Secretariat to develop a matrix showing how many respondents preferred each option and a list of pros and cons for each of the options.	Secretariat	Ongoing. <i>This will be completed in due course.</i>
06/01	The Secretariat to invite Gus from Gowling WLG to the next Working Group to review and discuss the draft legal text.	Secretariat	New Action.
06/02	The Secretariat to circulate the draft legal text document to the Working Group post-meeting.	Secretariat	New Action.
06/03	The Secretariat to issue a meeting poll to the Working Group for the next meeting.	Secretariat	New Action.

Closed Actions

Action Ref.			Update
01/05	RG/TC to provide previously presented materials (i.e., with Ofgem and COG) relating to discussions around this CP, to the next	RG / TC	Closed.

	Working Group meeting for review, to aid the development of the Consultation.		
04/03	RG to complete the Glossary of Terms for the Working Group to review.	RG	Closed.
05/01	EG to communicate the points to consider in relation to NPg's Consultation response to Q3, to Working Group members to consider offline.	EG	Closed.
05/02	The Working Group to revisit adding an ECCR-style second-comer provision as an alternate proposed solution.	Working Group	Closed.
05/04	The Secretariat to follow-up with Last Mile to confirm that the meant to refer to option 2 when referencing option 2a.	Secretariat	Closed. <i>Confirmed that they were responding to option 2.</i>