

DCP 446 Working Group Meeting 06

14 April 2026 at 13:00 - Web-Conference

| Attendee | Company |
|------------------------------|------------------|
| Working Group Members | |
| Liam Sweeney [LS] | Ofgem (Observer) |
| Elizabeth Meldrum [EM] | SSEN |
| Erik Baguzis [EB] | Indigo Networks |
| Mark Rose [MR] | UKPN |
| Owen Black [OB] | SPEN |
| Peter Waymont [PW] | UKPN |
| Code Administrator | |
| Hannah Proffitt [HP] | Secretariat |
| Richard Colwill [RC] | Chair |
| Apologies | |
| Brian Sweeney [BS] | UKPN |

1. Administration

Recording

- 1.1 The Chair informed members that this Working Group meeting would be recorded. No members objected to this. The purpose of this recording is purely to aid the Technical Secretariat in producing an accurate report of the meeting.

Apologies

- 1.2 Apologies are included in the table above.

Competition Law Guidance and Terms of Reference

- 1.3 The Working Group reviewed the “Competition Law Guidance”. All Working Group members agreed to be bound by the Competition Law Guidance for the duration of the meeting and agreed to the Terms of Reference.

2. Purpose of the Meeting

- 2.1 The Chair advised that the purpose of the meeting was to review the legal text and the narrative provided by PW.

3. Review Legal Text/Narrative

- 3.1 PW presented a document to the group which included the legal text and the Ofgem decision. PW had added commentary addressing the points in the Ofgem letter with corresponding legal text amendments.
- 3.2 PW explained that, while processes were discussed at the previous meeting, he had deliberately not set out a detailed process or prescriptive schedule/rules, as DNOs will have their own processes and over-defining them could be constraining and reduce flexibility and pragmatism.
- 3.3 PW summarised his comments as follows.
- 3.4 In response to Ofgem’s question on why this approach is considered more efficient than socialising costs, PW noted it provides a clear signal to customers that behaviours giving rise to these costs are not acceptable.
- 3.5 SL added that they agree costs due to criminal behaviour, e.g. cannabis farms, should not be socialised. The group agreed this point will be explained in the Change Report.
- 3.6 In response to Ofgem’s request for further consideration of the disputes process, PW noted that the National Terms of Connection (NTC) have a clause in Section 3 and 4 covering the disputes process, but there is no clarity in Section 2 other than contact details. PW noted he had added wording to the legal text highlighting that the disputes process will be detailed in the invoice, but not detailing what it is. This is due to DNOs having differing processes.
- 3.7 In response to Ofgem’s request for further clarification on the reconnection process, PW advised he had added wording to clarify.

- 3.8 In response to Ofgem’s point regarding customers not being reconnected unless the relevant charge is paid, irrespective of the circumstances of the disconnection, PW noted he had amended the legal text to retain liability for the first charge without hindering the reconnection.
- 3.9 Regarding Ofgem’s point that the legal text lacks definitions of the terms ‘emergency disconnection’ and ‘emergency de-energisation’, PW outlined that they do not use these terms in the legal text. PW added that he believed not all of the disconnections were emergency situations, some were just unplanned. Therefore, they have not been added.
- 3.10 In response to Ofgem’s point regarding clarity being needed in the legal text to exclude an emergency due to circumstances outside the customers control, PW advised he had added an exclusion for ‘Acts of God’. PW noted that this term is used in the NTC.
- 3.11 The group reviewed the Ofgem decision letter and noted that they had covered all of the points raised. LS agreed that addressing these points in the legal text and Change Report will be moving in the right direction.
- 3.12 LS suggested that the Change Report include a brief explanation, as discussed by the Working Group, that the legal text avoids prescribing rigid processes in order to retain DNO flexibility to deal with cases pragmatically, which may also be beneficial from a customer perspective. The group agreed.
- 3.13 The Chair agreed to issue the legal text to Gowling for review. The Chair also agreed to draft the new section for inclusion in the Change Report, and issue to members for review.

Action 06/01 – The Chair to issue the legal text to Gowling for review.

Action 06/02 - The Chair to draft the new section for inclusion in the Change Report, and issue to members for review.

4. Next Steps & Work Plan

4.1 The following next steps were agreed:

- The Chair to issue the legal text to Gowling for review.
- The Chair to draft the new section for inclusion in the Change Report, and issue to members for review.

5. Any Other Business

5.1 No other business was raised.

New and Open Actions

| Action Ref. | Action | Owner | Update |
|-------------|---|-----------|--------------------|
| 06/01 | The Chair to issue the legal text to Gowling for review. | The Chair | New action. |
| 06/02 | The Chair to draft the new section for inclusion in the Change Report, and issue to members for review. | The Chair | New action. |

Closed Actions

| Action Ref. | | | Update |
|-------------|---|-----------|--|
| 05/01 | Proposer to collaborate with his internal colleagues to jointly draft an initial straw-man document setting out the high-level process for emergency disconnections, reconnections, disputes, and charging decisions, how reasonableness and vulnerability (SLC 10AA) are assessed in practice, and what content is proposed for including in the DCUSA versus supporting guidance documents. | Mark Rose | Action closed. <i>This was circulated ahead of the meeting and discussed during the meeting.</i> |