

DCP 473 Working Group Meeting 01

29 April 2026 at 10am – Web-conference

Attendee	Company
Working Group Members	
Blessing Ekpe [BE]	SSE
Chris Barker [CB]	ENWL
Chris Ong [CO]	UKPN
Donna Jamieson [DJ]	IDCSL
Ed Grimsey [EG]	BU-UK
Edda Dirks [ED]	SSE
Erik Baguzis [EB]	Indigo Networks
Ian Chadwick [IC]	AEN
Jo Brown [JB]	National Grid
John Harmer [JH]	Waters Wye
Kavya Kavya [KK]	Brook Green Supply
Mark Bellman [MB]	ENWL
Nik Wills [NW]	Stark
Peter Waymont [PW]	UKPN
Ryan Farrell [RF]	NPg
Victoria Burkett [VB]	EON
Code Administrator	
Andy Green [AG]	ElectraLink
Hannah Proffitt [HP]	ElectraLink

1. Administration

Recording

- 1.1. The Chair informed Working Group members that, as per the Terms of Reference, the meeting would be recorded for the purpose of aiding the Technical Secretary in producing an accurate record of the meeting. The recording will be deleted no later than 60 days after the meeting.

Competition Law Guidance and Terms of Reference

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

Action Log & Review of Minutes

- 1.3. The Chair presented the minutes of the previous meeting. No comments were raised.
- 1.4. A summary of the open actions and updates are included in the appendix.

2. Purpose of the Meeting

- 2.1. The Chair set out that the purpose of the meeting was to review the draft consultation and legal text, and discuss next steps.

3. Overview and Update on DCP 463

- 3.1. The Chair advised that DCP 463 was originally raised to address the issue of non-consuming de-energised sites reserving capacity without incurring charges, leading to costs being distributed across all customers.
- 3.2. During the DCP 463 Working Group, alternative solutions were suggested, but the DCUSA Panel did not allow a change to the intent of DCP 463, prompting the Proposer to withdraw DCP 463 and raise DCP 473 which has a broader scope.
- 3.3. The Chair clarified that DCP 473 is a continuation of the work done under DCP 463 but with an expanded scope to consider not only charging for reserved capacity but also alternative solutions such as grace periods, capacity reduction, or removal, and even physical disconnection.

4. Review Draft Consultation

- 4.1. The Chair presented the process steps agreed at the last DCP 463 meeting. The Chair clarified that these were not to form part of the legal text, but that they were a starting point to work from when creating the legal text.
- 4.2. The Working Group reviewed the steps and discussions/decisions are summarised below.
- 4.3. Regarding Step 1, RF asked why the DNO has to write to the customer within 18 months of de energisation and questioned how this will help with long term de energised sites.

- 4.4. The Chair clarified that the process states 'within 18 months of the date of de energisation or implementation of the change', which will ensure that long term de energised sites will benefit from the change as well.
- 4.5. The Chair clarified that at the previous meeting the group had suggested 24 months would be a reasonable 'grace period' before customers start being charged. The DNO writing to the customer within 18 months would then allow the Supplier a minimum of 6 months to identify the customer and begin their processes. The Chair noted that the group agreed to ask a question in the consultation regarding whether 24 months was an appropriate period, and therefore this may change depending on responses.
- 4.6. RF asked what would happen if the DNO missed that 18 month deadline to write to the customer. The Chair highlighted that step 1 states 'the capacity will be set to zero at the end of the two year period or six months from the date of the letter, whichever is the later of the two dates'. Therefore this still allows the Supplier six months, even if the DNO is late sending the letter.
- 4.7. JH suggested adding wording to state it is at the DNOs discretion. Members questioned whether the timeframe of 18 months should be included, if it is at the DNOs discretion.
- 4.8. CB highlighted that DNOs may want to follow up with these sites once there are emerging capacity restraints on the networks, therefore a cut off of 18 months would be unhelpful.
- 4.9. MB cautioned against duplicating or conflicting with existing DNO processes for assessing capacity constraints and potential disconnection (including customer/supplier engagement to confirm whether capacity is still needed).
- 4.10. Members discussed the administrative burden of writing to customers. The group reviewed the previously gathered data surrounding numbers of de energised sites, noting that there will be a larger one off exercise and then a smaller ongoing task.
- 4.11. Members discussed the timescales and two potential paragraphs were drafted, one outlining that the DNO should write within 18 months of de energisation, and the other outlining that the DNO should write after a period of 18 months. A majority of members voted for the paragraph outlining that the DNO should write within 18 months of de energisation.
- 4.12. Members agreed to leave the 'grace period' as 24 months for now, and to ask for views in the consultation.
- 4.13. VB suggested that a consequential change would be needed to the REC (the RMP Life Cycle Schedule and the Secure Data Exchange Schedule) as there will need to be a process for Suppliers to follow once contact has been made. PW disagreed, noting that they felt a REC change would not be needed. VB agreed to look into this further. The Chair agreed to reach out to REC to ask that a representative attends the next meeting.

Action 01/01 – VB to look into whether a consequential change will be needed to the REC (the RMP Life Cycle Schedule and the Secure Data Exchange Schedule).

Action 01/02 - The Chair agreed to reach out to REC to ask that a representative attends the next meeting to discuss potential consequential changes.

- 4.14. Regarding Step 2, ED asked what would happen if the customer replied to the DNO rather than to the Supplier. The Chair added wording to clarify that the customer or Supplier can contact the DNO.

- 4.15. Regarding Step 3, members agreed to add an additional scenario stating that if the customer contacts the Supplier or the DNO and states they want to release the capacity before the end of the grace period, the capacity is set to zero.
- 4.16. Members discussed the possible scenario in which the Supplier does not want the supply re energised due to bad debt, revenue protection etc. The Chair advised he had looked into this and found that a Supplier can refuse to offer contracts to sites where reasonable, but they cannot withdraw from that supply entirely and leave it without supply. The Chair added that many Suppliers have processes in place for this, such as taking a security deposit etc. before re energising.
- 4.17. Members agreed that these exceptions should be clearly defined to prevent gaming or ambiguity, but acknowledged that proving the circumstances would be challenging. Members also noted that these circumstances are likely to be rare as in situations of bad debt/revenue protection, the customer is unlikely to contact the Supplier or DNO to request to retain their capacity.
- 4.18. Based on the above discussions, the updated steps are as follows.

Step 1

The DNO writes to the customer, at the site address and a registered address they reasonably believe is the customers registered office, landlord etc, copying in the supplier (contract manager) saying if the capacity is still required DUoS charges will be incurred or the capacity will be set to zero at

(i) the end of the two year period from the date of implementation of the change, or

(ii) six months from the date of the letter, whichever is the later of the two dates, which will be specified."

Step 2

If the DNO hasn't heard from the customer or the supplier within 3 months of the end of the grace period, the DNO contacts the supplier and customer raising that the grace period is due to end in 3 months and that capacity/charged will be removed at the end of the grace period if no instruction is given.

Step 3

(A) If the customer contacts the supplier to advise they want to keep the capacity, the supplier agrees and informs the DNO, and DUoS charges are to be incurred at the end of the grace period. If the customer contacts the DNO, the DNO must direct the customer to the supplier.

(B) If the supplier highlights that there is an exception for the capacity charges to be incurred (i.e. due to previous bad debt, revenue protection issues etc), then at the end of the grace period, the capacity is set to zero. This needs to be confirmed to the DNO and the customer by the supplier.

(C) If the customer doesn't contact the supplier nor the DNO, the capacity is set to zero at the end of the grace period.

(D) If the customer contacts the Supplier or the DNO and states they want to release the capacity before the end of the grace period, the capacity is set to zero.

- 4.19. The Chair agreed to produce and circulate draft legal text following the meeting. This can then be reviewed by the group at the next meeting.

Action 01/03 – The Chair to produce and circulate draft legal text following the meeting.

- 4.20. The Chair noted that based on discussions held at this meeting, the consultation document would need to be updated, however suggested that the questions agreed at the previous meeting are reviewed.
- 4.21. Members agreed to update Question 4 to remove the term ‘grace period’ as they felt it could cause confusion.
- 4.22. Members discussed Question 6, noting that it refers to the option of physical disconnection. Members discussed whether to keep this in, noting it is an expensive and lengthy process. Members agreed to leave it in at this stage and reconsider when reviewing the updated version of the consultation.
- 4.23. Members discussed Question 11 and considered whether the change should be assessed against the Charging Objectives (as originally raised) or whether it should be assessed against the general objectives as well.
- 4.24. PW questioned whether both can be included. The Chair took an action to look into this.

Action 01/04 – The Chair to look into whether a DCP can be assessed against both the Charging Objectives and the DCUSA General Objectives.

- 4.25. MB suggested adding an additional question asking which of the suggested solutions most reduces the extent of socialisation of the cost of unused capacity. Members agreed.
- 4.26. MB also suggested that further clarity is added to the consultation regarding the original solution option that does not include a grace period. The Chair agreed to add this in when updating the document.
- 4.27. The updated consultation questions are as follows.

Number	Questions
1	Do you understand the intent of this CP?
2	Do you support the principles of this CP?
3	Are there any alternative solutions that the Working Group have not considered, both as part of DCP 463 and 473? If so, please elaborate.
4	Is a period of 24 months an appropriate timescale before any charges/capacity removal for de energised sites occurs? If not please explain why and provide any alternative timescales
5	Are the processes open to gaming? If so, please elaborate on how and why and any steps that can be taken to mitigate?
6	Which of the 4 suggested solutions do you prefer?
7	Which of the suggested solutions in your opinion most reduces the extent of socialisation of the cost of unused capacity?
8	<u>For Suppliers only</u> , what are the processes/obligations you have to follow to ensure that any de energisation or energisation change is audited/auditable? If there are specific obligations, i.e. in the REC/BSC, what are they?
9	Are there any other steps you take to establish who is responsible for a site?

10	Should there be an exemption for certain type of scenarios such as a site that is de energised for revenue protection purposes, bad debt, bankruptcy etc. If so, what scenarios should be exempt and what should the process look like?
11	Is the legal text sufficiently clear on what processes need to be followed before the capacity is removed or DUoS charges are passed by the DNO to the Supplier?
12	Do you consider that the proposal better facilitates the DCUSA Charging Objectives? If so, please detail which of the General Objectives you believe are better facilitated and provide supporting reasons. If not, please provide supporting reasons. (TBC)
13	Do you agree with the proposed implementation date? If not, please provide supporting reasons.
14	Are you aware of any wider industry developments that may impact upon or be impacted by this CP?
15	Do you have any other comments on DCP 473?

4.28. The Chair agreed to update the consultation document based on discussions and to circulate it to members along with the legal text.

Action 01/05 - The Chair to update the consultation document based on discussions and to circulate to members.

5. Next Steps and Work Plan

5.1. Members agreed on the following next steps.

- The Chair to produce and circulate draft legal text following the meeting.
- The Chair to update the consultation document based on discussions and to circulate to members.
- Members to meet again on 13 May 2026 at 10am to review the legal text and consultation.

6. Any Other Business

6.1. No other business was raised.

7. Next Meeting

7.1. The next meeting will be held on 13 May 2026 at 10am.

New and Open Actions

Action Ref.	Action	Owner	Update
01/04	The Secretariat to seek legal advice (and Ofgem views thereafter) once the Consultation responses have been collated and reviewed.	The Chair	Action ongoing. <i>This is ongoing.</i>
01/01	VB to look into whether a consequential change will be needed to the REC (the RMP Life Cycle Schedule and the Secure Data Exchange Schedule).	VB	New action.
01/02	The Chair agreed to reach out to REC to ask that a representative attends the next meeting to discuss potential consequential changes.	The Chair	New action.
01/03	The Chair to produce and circulate draft legal text following the meeting.	The Chair	New action.
01/04	The Chair to look into whether a DCP can be assessed against both the Charging Objectives and the DCUSA General Objectives.	The Chair	New action.
01/05	The Chair to update the consultation document based on discussions and to circulate to members.	The Chair	New action.

Closed Actions

Action Ref.	Update
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07/01	The Secretariat to update the minutes as per discussions at Meeting 07 and reupload them to the website.	The Chair	Action closed. <i>Complete.</i>
07/02	The Chair to identify current obligations on Suppliers regarding identifying unknown occupiers/customers.	The Chair	Action closed. <i>Discussed during the meeting.</i>
07/03	The Chair to investigate and clarify Supplier obligations regarding maintaining contracts for non-domestic customers, especially in scenarios where Suppliers may not wish to supply a customer.	The Chair	Action closed. <i>Discussed during the meeting.</i>
07/04	The Chair to produce a draft of the consultation and issue to members, along with a process map of the agreed steps.	The Chair	Action closed. <i>Complete.</i>