

DCP 464 Working Group - Meeting 08

23 March 2026 at 10:00 - Web-Conference

Attendee	Company
Working Group Members	
Alexander Pentecost [AP]	Eclipse
Drew Johnstone [DJo]	NPg
Ed Grimsey [EG]	BU-UK
Edda Dirks [ED]	SSE Generation
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]	SSE
Code Administrator	
Andy Green [AG] (Chair)	ElectraLink
Mel Kendal [MK] (Technical Secretariat)	ElectraLink

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 draft legal text and discuss the solution development within the Working Group and agree next steps.

3. Review Draft Legal Text

- 3.1 The Chair presented the draft legal text live on screen for the Working Group to review and discuss.
- 3.2 The key updates can be found below:
- 3.3 The Chair informed the group that there were two versions of the draft legal shared offline prior to the meeting – one with comments provided by DJo and one provided by Gus Wood (Gowling).
- 3.4 OE mentioned that there are currently two options that have been considered to take forward, and queried whether the legal text provided by Gus covered both scenarios – members discussed this and the Chair agreed to reach out to Gus to clarify whether there was a second drafting missing, or whether amendment was only needed

ACTION 08/01: The Secretariat to clarify with Gus Wood (Gowling) whether there is a second drafting of the legal text to cover both scenarios, or whether one version was intentional as no further amendments were needed.

3.5 Draft Legal Text Review – DJo Comments

- 3.6 DJo informed the group that although 'distribution network' is not a defined term within Schedule 22, it is a defined term within DCUSA Section 1A and queried whether this needs to be capitalised.

- 3.7 DJo also raised a concern around the terms of the DNO being able to define the definition of reinforcement based on the site of the IDNO network, which a DNO does not always have at the time of the connection offer.
- 3.8 In regard to the wording around ‘..more than one entry/exit point’ OE queried whether a single Customer IDNO network can have multiple entry/exit points, and therefore meet the definition? OE stated that this was not their understanding of the intent.
- 3.9 RG explained that if there was a Customer with multiple exit points, they would already be treated as multiple use; Both RG and DJo agree with the concern around DNOs knowing whether there will be multiple entry/exit points, but suggest the onus would be on the applicant to ensure the DNO are made aware (as it will be assumed that they are a single Customer if they do not inform the DNO).
- 3.10 Where the legal text states that ‘The LDNO will be required to provide justification in such circumstances’, DJo suggested that additional legal text drafting will be needed to specify the nature and standard of justification that the LDNO must provide. Members agreed that this will need to be considered.
- 3.11 Following the above, ED suggested that defining ‘load growth’ may resolve this issue and provide the justification needed. Members discussed this and agreed that whether it’s a definition or added wording, something needs to be added to add clarity around ‘justification’. It was agreed to review the rest of the document and come back to this point.

ACTION 08/02: The Secretariat/Working Group to add clarity (wording/definition) around the term ‘justification’ within the legal text.

- 3.12 DJo suggested the below amendment to the definition of ‘Licensed Distribution Network Operator (LDNO):
- A licenced distribution network operator, meaning an IDNO Party, or a DNO Party operating an electricity distribution system outside of its Distribution Services Area.
- 3.13 Members were happy with the amendment to the LDNO definition.
- 3.14 DJo also provided the below amendment to the definition of ‘Distribution System’:
- The System (as defined in the Licence) consisting (wholly or mainly) of electric lines owned or operated by us, or for the purposes of 1.17 an LDNO, and used for the distribution of electricity.
- 3.15 ED stated that although helpful to have in the glossary, it may get missed by readers quite easily. ED suggested it may be more beneficial to include this clarification within the main body of text in addition to the glossary.
- 3.16 Draft Legal Text Review – GW Comments
- 3.17 In regard to DJo’s earlier concern around DNOs not having visibility of the network prior, ED queried whether this can be added as a requirement – DJo suggested that this could go through the demand entry requirements via the RIGS, however this only occurs on an annual basis, and a DCUSA change

would also be needed to amend Schedule 22 so that the changes are reflected within the CDCM. OE noted that this may need a licence change to do so.

- 3.18 Both OE and NW, and raised concerns around the term 'entry/exit points' suggesting that it may not be clear how this specifically links to 'multiple Customers'. Members discussed this, and although there was support that this is clear, it was agreed that respondents will be able to provide feedback and/or alternative wording within the next Consultation for the Working Group to consider.
- 3.19 In terms of the concern around DNOs not having visibility of the network prior to the connection offer, NW suggested adding words to the effect of the DNO being able to ask the IDNO to see their system added that this would be a reasonable request. Members agreed that this could be asked, however, MB stated that there would not need to be any changes to the legal text as DNOs already have the existing powers currently to ask for that information.
- 3.20 RG stated that, if necessary, the DNO could ask if an application did not declare the nature of their network. They would not refuse to issue but would assume if they had not declared any other connections, than they would be a single Customer.
- 3.21 DJo informed the group that there are a number of changes being drafted in [CMP 460 'Improving Transmission Connection Asset Charging'](#) in regard to sole/shared use, and suggested it may be beneficial to ask Gus to look further into how they have been drafted, as a similar approach could be used for this change. ED did note that this would be a good idea, however, there is still potential for a lot of change as it is still a working progress.
- 3.22 The Working Group also recommended that Gus also look at DCP 461 ['Reducing the Impact of Transmission Distribution Charges'](#) as there are potential interactions between this change, CMP 460 and DCP 461.
- 3.23 The Working Group also agreed to seek legal advice from Gus around clarifying/defining 'load growth' within the legal text.

ACTION 08/03: The Secretariat to seek legal advice from Gus around clarifying/defining 'load growth' within the legal text.

ACTION 08/04: The Secretariat to seek legal advice from Gus around using similar drafting that is being used within CMP 460.

- 3.24 Members went back to the discussion around the definition of LDNO; in regard to Paragraph 1.17 in Gus' version of the legal text, the group agreed to reject the deletion of the original text (which explains sole/shared use) and ask Gus if this would be better suited elsewhere within the legal text. The Working Group believe the wording should remain.
- 3.25 RG queried whether 'point of common coupling' is a defined term within the DCUSA – the Secretariat confirmed that it is a defined term, however, it is limited to a single connectee, which the Working Group believe would not be helpful.
- 3.26 In regard the third bullet point under Paragraph 1.38, ED suggested amending it to the below:
- In the case of additional capacity required to meet general load growth on the LDNOs network, then the Reinforcement costs will be borne by us (as described in Paragraph 1.6).

3.27 ED provided the above suggestions as it may be misunderstood where it is currently drafted. Members were happy with this amendment.

3.28 In regard to the amendment to the definition of LDNO, RG queried whether the definition within Schedule 16 will also need updating – the Chair agreed to take an action to seek legal advice on this from Gus Wood. MB suggested if the amendments do not substantially change the meaning, it may not be a material change to make. Other members agreed with this.

ACTION 08/05: The Secretariat to seek legal advice from Gus around whether the definition of LDNO within Schedule 16 needs updating.

3.29 Following the above discussions, the Working Group agreed for the Secretariat to provide Gus with the current drafted legal text along with feedback and questions and agreed it would be beneficial for Gus to attend the next Working Group meeting.

ACTION 08/06: The Secretariat to ask Gus Wood for his availability to attend the next Working Group meeting.

ACTION 08/07: The Secretariat to issue a meeting poll to the Working Group to schedule the next meeting (once Gus has provided his availability to attend).

3.30 NW suggested that providing illustrations/diagrams would be useful to provide Gus with when reviewing the legal text. Members agreed that the diagrams are really helpful, and RG agreed to provide updates diagrams.

ACTION 08/08: RG to circulate the updated diagrams to the Working Group for review.

ACTION 08/09: The Secretariat to provide the updated diagrams to Gus with the draft legal text for review once the Working Group have reviewed them.

3.31 Email Query

3.32 The Chair informed the group that Anne-Claire Leydier (ACL) had provided the below questions to the Working Group offline:

- What if the trigger for the reinforcement is because the IDNO is adding one or two MPANs to their network: that now means the reinforcement network will serve more than one entry point – should that be taken into consideration?
- Should the definition of shared use be ‘If you are an LDNO, then your distribution network’s use of our Distribution System will only be treated as shared use if your existing distribution network has more than one Entry/Exit Point (other than the point at which it connects to our Distribution System). If your existing distribution network only has one other Entry/Exit Point – **at the time of the application and once it has been delivered** – then the use of our Distribution System will be treated as sole use (and additional assets will therefore be treated as Extension Assets).
- It is unclear why using the terminology ‘Entry/Exit Point’ instead of MPAN.

3.33 MB explained that a change in metering tariff could add an MPAN to an existing Entry/Exit Point and this would not be treated as shared use from a connections point of view.

- 3.34 RG also explained that there could be a generation and demand MPAN on one Entry/Exit Point, therefore having two MPANs for what is still one Entry/Exit Point. This is why the term 'MPAN' has not been used for this change.
- 3.35 RG added that at the point where the network was installed, there was only one Entry/Exit Point and the Customer and LDNO asked for a load increase for additional Exit Points, it would be the proposed network that it would be considered against for whether it is shared use or not.
- 3.36 Following the above discussions, the Working Group agreed that no further changes are needed.

4. Agreed Next Steps

- 4.1 The Working Group discussed the next steps, and the following items were captured:
- RG to provide the Working Group and Secretariat with the updated diagrams for Gus.
 - The Secretariat to provide Gus with the updated diagrams, draft legal text and Working Group questions for review.
 - The Secretariat to reach out to Gus Wood (Gowling) for his availability to attend the next meeting.
 - The Secretariat to issue a meeting poll to the Working Group to schedule the next meeting.

5. Any Other Business

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

6. Date of Next Meeting – TBC

- 6.1 The next Working Group will be TBC. The Secretariat will issue a meeting poll to the Working Group in due course.

7. 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>
08/01	The Secretariat to clarify with Gus Wood (Gowling) whether there is a second drafting of the legal text to cover both scenarios, or whether one version was intentional as no further amendments were needed.	Secretariat	New Action.
08/02	The Secretariat/Working Group to add clarity (wording/definition) around the term 'justification' within the legal text.	Secretariat	New Action.
08/03	The Secretariat to seek legal advice from Gus around clarifying/defining 'load growth' within the legal text.	Secretariat	New Action.
08/04	The Secretariat to seek legal advice from Gus around using similar drafting that is being used within CMP 460.	Secretariat	New Action.
08/05	The Secretariat to seek legal advice from Gus around whether the definition of LDNO within Schedule 16 needs updating.	Secretariat	New Action.

08/06	The Secretariat to ask Gus Wood for his availability to attend the next Working Group meeting.	Secretariat	New Action.
08/07	The Secretariat to issue a meeting poll to the Working Group to schedule the next meeting (once Gus has provided his availability to attend).	Secretariat	New Action.
08/08	RG to circulate the updated diagrams to the Working Group for review.	Rob Gladstone / Working Group	New Action.
08/09	The Secretariat to provide the updated diagrams to Gus with the draft legal text for review once the Working Group have reviewed them.	Secretariat	New Action.

Closed Actions

Action Ref.		Update	
07/01	The Secretariat to circulate the most up-to-date version of draft legal text to the Working Group for review offline.	Secretariat	Closed.
07/02	GW to circulate an amended version of the draft legal text to the Working Group for review.	Gus Wood	Closed.