# DCP 473 Working Group Meeting 03

15 June 2026 at 1pm – Web-conference

| Attendee | Company |
|---|---|
| **Working Group Members** | |
| Alexander Pentecost [AP] | Eclipse Power |
| Blessing Ekpe [BE] | SSE |
| Chris Ong [CO] | UKPN |
| Donna Jamieson [DJ] | IDCSL |
| Edda Dirks [ED] | SSE |
| Ian Chadwick [IC] | AEN |
| Jo Brown [JB] | National Grid |
| John Harmer [JH] | Waters Wye |
| Kavya Kavya [KK] | Brook Green Supply |
| Kelly McLaughlin [KM] | NGED |
| Liam Sweeney [LS] | Ofgem |
| Mark Bellman [MB] | ENWL |
| Mark Jones [MJ] | SSE |
| 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 consultation responses, and discuss next steps.

## 3. Review Consultation Responses

3.1. The Chair advised that 14 responses had been received from a range of participants. The Chair went through the responses and asked for comments from members. A summary of the responses and discussions can be found below.

*Question 1 – Do you understand the intent of this CP?*

3.2. All 14 respondents indicated that they understood the intent of the CP.

*Question 2 – Are you supportive of the principles of this CP?*

3.3. Responses were mixed, with broad support for the objective.

3.4. Several respondents supported the general principle, but many qualified their support depending on the solution ultimately taken forward. A clear theme in the responses was opposition to solutions that would impose DUoS charges on Suppliers for de-energised sites, largely due to concerns around unrecoverable costs, bad debt, and the practical difficulty of identifying and recovering charges from responsible customers.

3.5. In contrast, a number of respondents expressed greater support for approaches that would release or remove unused capacity without creating additional charging liabilities for Suppliers, with several specifically favouring capacity removal or disconnection options.

3.6. The Chair highlighted one response suggesting that the approach to the backlog of these supplies should be addressed differently to de energisation requests going forward.

3.7. ED clarified that they believe for legacy cases, the longer time window is appropriate, but for new cases, it should be addressed sooner. ED acknowledged however that a 24 month window for all does cover all bases. The Chair agreed that this could be discussed further, under the question regarding grace periods.

3.8. One respondent highlighted deemed contracts within the Electricity Act. The Chair noted that this had already been addressed by the legal advisers, however could be checked again once the solution has been finalised.

*Question 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.*

3.9. 13 respondents stated that they had no alternative solutions.

3.10. One response suggested a hybrid of solutions A and D. BE explained that their suggestion was that from the proposed implementation date the distributors could start charging the site with no grace period. And in parallel, distributors could provide notice to customers and suppliers of their intention to disconnect if they do not hear back within a certain time frame. BE suggested that this is less of an administrative burden and may motivate the customer to engage as they will have started to be charged.

3.11. One member questioned who would pay for the disconnection. ED suggested that disconnection is not unique to this DCP and that there is already a process in place. The Chair noted that the current disconnection process was looked at as part of the previous legal review under DCP 463 and it was agreed that it is not currently a robust process. The Chair noted that this is something that will need to be considered in more detail if this solution is progressed.

*Question 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.*

3.12. Several respondents considered 24 months to be reasonable, particularly where it would allow sufficient time for customer identification, engagement, and the orderly treatment of the existing backlog of de-energised sites.

3.13. However, a significant number of respondents felt that 24 months was too long, raising concerns that it would prolong cost socialisation, create opportunities for gaming, and add unnecessary administrative complexity.

3.14. Suggested alternatives ranged from 3–6 months to 12 months, while some respondents considered that, for future de-energisation requests, the decision on whether capacity should be retained could be made at the point of de-energisation, avoiding the need for an extended grace period altogether.

3.15. The Chair highlighted one response which stated they were unclear how the Working Group had reached the suggested 24 month window. The Chair noted that this was based on discussions held under DCP 463 and agreed to advise the commenter of this.

*Question 5 - Which of the 4 suggested solutions do you prefer?*

3.16. Three respondents indicated a preference for Solution A (Charge Capacity and Fixed charges from the date of de energisation or the implementation date of this change, whichever is latest).

3.17. Five respondents stated that they preferred Solution C (The removal of any reserved Capacity after a period of 24-months has elapsed from the date of de energisation or the implementation date of this change, whichever is latest), with one suggesting an alternative grace period of 3 to 6 months.

3.18. Four respondents indicated that they prefer the fourth option (The full-service removal/disconnection of an MPAN after a 24-month period has elapsed.) with one noting that they required further clarity on the end to end process.

3.19. One respondent noted that all four solutions create disproportionate risk, cost, or complexity, including bad debt exposure, inconsistent treatment, administrative burden, direct distributor costs, and the risk of future reinforcement costs if demand returns after capacity has been removed or the site disconnected. The respondent noted that capacity removal would have the least unintended consequences out of the proposed solutions.

3.20. CO argued that if a customer's capacity is set to zero and they subsequently want to start using again, they will still be connected to the network but won't have an agreed capacity. They will therefore need to contact the DNO to request it, and if infrastructure works are required the customer would be chargeable for that.

3.21. JH also disagreed with the commenters point that the administrative burden is not worth it, noting that the amount of reserved capacity in these cases is significant (as discussed under DCP 463).

3.22. KM raised the possibility of newly deenergised sites being given a shorter grace period than legacy sites as the time is not required to identify the customer. JH noted that this would not be the case if the Supplier had been the one to request the de energisation. The Chair noted that this point could be discussed further in future.

3.23. Considering the mixed responses to this question and the strong arguments put forward for each, members acknowledged that they may want to put forward multiple options when moving to voting stage.

*Question 6 - Which of the suggested solutions in your opinion most reduces the extent of socialisation of the cost of unused capacity?*

3.24. The split of responses largely echoed the response to Question 5, with Solution C attracting the greatest overall support as the option most likely to reduce the socialisation of unused capacity without creating additional unrecoverable costs for Suppliers. Respondents supporting Solution C generally considered that it would release unused capacity back to the network while avoiding the bad debt and cost recovery concerns associated with charging-based options.

3.25. By contrast, several respondents argued that Solution A would most directly reduce socialisation by ensuring de-energised sites immediately face the costs of reserved capacity, thereby removing the subsidy borne by other network users.

3.26. A smaller number of respondents considered Solution D to be the most effective means of ending cost socialisation, as it removes the service entirely.

3.27. One response outlined that they do not consider that any of the proposed solutions provide a robust or sustainable reduction in cost socialisation of unused capacity.

3.28. JH noted that one response stated that bad debt costs can be socialised by Suppliers and disagreed with this statement, noting that this is not possible. MJ noted that rather than these costs being socialised across industry, Suppliers would need to socialise these internally.

3.29. JH noted that Suppliers are operating in a competitive market where their margins are under pressure from other Suppliers. If one Supplier has a lot of these cases they would be disproportionately affected.

*Question 7 - What are your thoughts on the customer contact process that has been suggested for the 3 alternative solutions?*

3.30. Responses to Question 7 were mixed, but generally indicated that respondents viewed the proposed customer contact process as a reasonable starting point, while raising concerns about its practical effectiveness and clarity of responsibilities.

3.31. Several respondents supported the staged approach and considered the timelines broadly appropriate, particularly as a means of improving transparency before any action is taken.

3.32. However, a recurring theme was that the process may be difficult to operate effectively where customers are unknown, unresponsive, or linked to bad debt or revenue protection activity. A number of respondents also questioned whether DNOs or Suppliers are best placed to lead communications, with some arguing that Suppliers are better positioned due to their existing customer relationships and contact details, while others preferred communications to remain with DNOs.

3.33. Overall, respondents generally recognised the value of a structured contact process, but many felt that further detail, standardisation, and clarity on obligations, escalation routes, and exception handling would be needed to ensure it is workable in practice.

3.34. One response suggested that there should be a designated point of contact for these queries rather than the DCUSA contract manager. VB highlighted that this will ensure that communications reach the correct person and are less likely to be missed. The Chair acknowledged that this may require a change to the legal text.

3.35. Members suggested that increasing the number of contacts increases the risk of contact being outdated and makes it harder for parties to find the correct contacts.

*Question 8 - Are the processes open to gaming? If so, please elaborate on how and why and any steps that can be taken to mitigate?*

3.36. Two respondents noted that gaming is unlikely as the cost and effort involved would reduce the incentive to exploit the process. One respondent provided no comment.

3.37. The remaining responses agreed that the proposed processes are open to gaming, particularly where a defined grace period applies. The main concern raised was that customers could briefly re-energise and then de-energise a site in order to reset the clock and avoid charges, capacity reduction, or disconnection.

3.38. Several respondents suggested that this risk could be mitigated through clearer legal drafting and tighter rules, such as requiring a continuous de-energisation period, limiting the number of re-energisation/de-energisation cycles within a set timeframe, or preventing short periods of re-energisation from restarting the full grace period.

## 4. Next Steps and Work Plan

4.1. Members agreed on the following next steps.

- The Chair to issue a poll containing possible dates for the next meeting. The purpose of the next meeting will be to complete the review of the consultation responses.

Action 03/01 - The Chair to issue a poll containing possible dates for the next meeting.

## 5. Any Other Business

5.1. No other business was raised.

## 6. Next Meeting

6.1. The date of the next meeting is TBC.

## New and Open Actions

| Action Ref. | Action | Owner | Update |
|---|---|---|---|
| **03/01** | The Chair to issue a poll containing possible dates for the next meeting. | The Chair | **New action.** |

## Closed Actions

| Action Ref. | | | Update |
|---|---|---|---|
| **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 | **Action closed.**<br>*VB advised that a consequential change will not be required to the REC.* |
| **02/01** | The Chair to update the consultation document and legal texts based on discussions and to circulate to members. | The Chair | **Action closed.**<br>*Complete.* |