

DCP 475 Working Group - Meeting 02

25 June 2026 at 10:00 - Web-Conference

Attendee	Company
Working Group Members	
Alex Pentecost [AP]	Eclipse
Andrew Linkie [AL]	SSE
Ed Grimsey [EG]	BU-UK
Edda Dirks [ED]	SSE Gen
John Harmer [JH]	Waters Wye
Louise Bunney [LB]	NPg
Mark Bellman [MB]	SP ENW
Mark McLean [MM]	SPEN
Muntasir Sarker [MS]	EDF
Peter Frampton [PF]	VPI
Shyam Doraiswamy [SD]	Ofgem
Steve Backhouse [SB]	UKPN
Tom Jenkins [TJ]	Indigo
Veronique Martre [VM]	UKPN
Code Administrator	
Andy Green [AG] (Chair)	ElectraLink
Mel Kendal [MK] (Technical Secretariat)	ElectraLink
Apologies	
Ryan Farrell [RF]	NPg

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 – prior to this meeting, feedback/comments were received by JH which were reviewed by the group live during the meeting.
- 1.5 The Chair noted that most of the changes were adding clarity to the previous minutes, and these were approved by the Working Group. The Secretariat agreed to accept the changes and issue an updated version of the minutes from WG 01.

ACTION 02/01: The Secretariat to accept the amendments to the WG 01 Draft Minutes and issue an updated version.

- 1.6 No further feedback was received, and the minutes were approved.

Open Actions

- 1.7 The Chair confirmed that all actions captured within this meeting will be recorded within the action log; this can be found in the Appendix.
- 1.8 Action 01/01 – The Chair noted that a number of members have provided feedback and that this will be further discussed within the Working Group.
- 1.9 ED suggested that there may not be many embedded generators currently falling under these provisions as this is relatively new, and not all new connectee's would have signed up to this. Following this, ED suggested it may be worth members looking over the provisions more closely to see where they would help solve and/or address the situation.
- 1.10 Action 01/02 – JH informed that they have reached out to the Site for further information and are awaiting a response.
- 1.11 PF provided the group with an example of where one Site has a partial Curtailment with a firm connection. In theory, this would open up DGNU payments, however, this was not relevant in this case as it was only a partial Curtailment. PF state that this is a scenario where the current arrangements leave generators in a difficult situation as although there is a firm connection, it appears not to be that firm in practice, with no relevant compensation mechanism.
- 1.12 The Chair suggested that further discussions may be needed around the numerous definitions/understandings of what 'firm' and 'non-firm' means. The Working Group agreed with this

as many DNOs refer to it differently. ED also suggested that it should be made clear that these definitions are not legally defined within the DCUSA and are used differently by organisations.

2. Purpose of the Meeting

- 2.1 The Chair explained that the purpose of this meeting is to review the draft RFI document within the Working Group and agree next steps.

3. ED3 Business Plan Guidance Discussion

- 3.1 The Chair invited SB to discuss an overview of the ED3 Business Plan Guidance with the Working Group.
- 3.2 The key points can be found below:
- 3.3 SB informed the group that following network feedback, Ofgem have confirmed that they are going to introduce five different metrics within ED3 to measure all DNOs for generation outages. The metrics used to measure this are:
- Generator Minutes Lost
 - Generation Lost
 - Low Carbon Generation Lost
 - Capacity Normalised Generation Lost
 - Low Carbon Capacity Normalised Generation Lost
- 3.4 SB informed the group that all DNOs will be required to provide a baseline for the above metrics and targets will be set for each baseline (above/below).
- 3.5 JH queried how firm this guidance from Ofgem is and whether this CP could do anything to refine this – SB could not answer the above, however, noted that some of the guidance has already been consulted on, with more consultations likely to follow.
- 3.6 The suggested it may be beneficial to seek an Ofgem representative specifically for this group as this change is likely to be reviewed together with the ED3 guidance/provisions when Ofgem make their decision. The Working Group agreed, and the Secretariat took an action to seek an Ofgem representative for this Working Group.

ACTION 02/02: The Secretariat to seek an Ofgem representative for this Working Group.

4. Review Draft RFI Document

- 4.1 The Chair presented the draft RFI document live on screen for the Working Group to review and further develop.
- 4.2 The key updates can be found below:
- 4.3 [RFI Response Template \[JH\]](#)
- 4.4 The Chair invited JH to provide an overview of the RFI response table produced as an outcome to an action from the previous meeting. This was presented live on screen for the Working Group to review and feedback on.

- 4.5 JH explained that the first sheet collects data on the affected sites. JH noted that there appears to be two valid definitions of "firm" connection; one physical and one commercial. These have therefore been split into (i) 1 or 2 circuit connection and (ii) curtailable or non-curtailable connection.
- 4.6 To avoid respondents having to input every single individual site, JH suggested a catch all for the remainder of their portfolio, allowing them to put in the individual sites only, who have experienced issues - but also capturing the remaining MW capacity and outage percentage for context.
- 4.7 JH also allowed flexibility in defining each 12-month period for collected data in case this helps with each company's reporting periods. This means the data is not inherently able to be collated for the same time period, but the intent is to capture changes to the magnitude/duration of capacity reductions experienced.
- 4.8 JH explained that there is a column to capture the cause of the capacity reduction at a site if known.
- 4.9 JH stated that this RFI response template has been created this way to capture the estimated lost MW hours against the amount of MW hours that was thought to be going to export during that period. Small task for respondents to provide.
- 4.10 ED suggested that due to the level of detail being requested within this RFI, it may be worth asking a generator to complete a 'test run' but completing the RFI and/or complete the data request response table (response form) first to gain a better understanding of the complexity of the task, prior to issuing out to industry.
- 4.11 Following this, ED raised a concern around seeking potentially commercially sensitive data and also outlined that this may be a complex task. JH explained that if there are generators who are affected by this, he would assume that they would put time into completing the response form to ensure that there is acknowledgement of the scale of the problem.
- 4.12 The Working Group noted the response table produced by JH, and agreed that the current draft RFI questions may need to be updated to align with what information the table is asking for.
- 4.13 Draft RFI Document
- 4.14 In regard to the definition's glossary, members noted that without having the discussions and agreements of the glossary terms, there are limits as to how far the Working Group can go with drafting and finalising the RFI document. Following this, members agreed to review/refine the rest of the draft RFI document (without the definitions glossary table).
- 4.15 JH queried whether demand users are being included within this RFI for responses, or whether it is seeking responses from embedded generators only – JH confirmed that they would like to include demand users, however, do not expect there to be many responses. The Working Group discussed this and agreed it may be beneficial to include demand users, and this was added live on screen.
- 4.16 The Working Group discussed the feedback provided by members around the draft RFI questions.
- 4.17 Following a concern raised earlier by ED around the RFI potentially asking for commercially sensitive data, the Chair asked the group for clarity around how the data received is going to be handled

shared and how the data is going to be used. The Chair did note that a lot of the data being requested can already be found publicly, however, welcomed member feedback around this.

- 4.18 After further discussion, the Working Group were leaning towards the information being requested via the RFI is not commercially sensitive and reiterated that a 'test run' could help confirm this.
- 4.19 In regard to question 1, ED queried whether the question is asking for the number of sites, or number of interruptions at each of those sites – JH clarified that the response table is requesting individual sites and how long they have been interrupted. JH believes that this change is look at outages somewhere, but not necessarily on the network that you are connected to but is preventing you doing what would be expected under the connection agreement.
- 4.20 JH also explained that the number of interruptions or number of sites is important, it's the total percentage of time that the generator is out (inability to export megawatt hours). With this, it was suggested that maybe the question may need rephrasing to make this clear.
- 4.21 SB stated that there a different type of outages, for example where a DER (Distributed Energy Resource) is directly impacted by the works, or because there is more curtailment-based work for a firm site. SB did note that they will always make use of curtailable connections first in any case, where possible.
- 4.22 JH confirmed that those types of scenarios are exactly what this change is intending to capture, not constraints in normal running where curtailable contracts could be used to manage.
- 4.23 ED mentioned that it would be helpful to show the legal definition of the term outage, with an explanation of what this means in practice (i.e. the examples set out by SB).
- 4.24 Members agree to amend question 02 to ask, 'Where you aware of the compensation schemes listed within this RFI?'
- 4.25 Members agreed that it would be useful to ask respondents, 'In addition to those already identified...'.
- 4.26 MB queried whether it would be worth adding to the table, the period of notice each site received for each site than generator identifies. MB noted the group of course would like to avoid increasing the scope of this change, however, this change is something that can help benefit generators in a reasonable timeframe.
- 4.27 SB suggested that from a DNOs perspective, if NDOs could provide enough notice for an outage that allows a DER or a company to bring forward planned maintenance or carry out works that they were already planning to do during an outage, they may take another outage for themselves later I the year. SB stated that it would be unfair to then penalise the DNO for having an outage later on in the year.
- 4.28 SB believes that if people started to do this, DNOs may then start to enforce the clause in the connection agreement – the Working Group agreed that this is something to consider whilst progressing with this change.

- 4.29 Following these discussions, the Working Group agreed to remove question 7, 8 and 9 as they no longer seem relevant to the RFI and are deemed out of scope of this change. These were deleted live during the meeting.
- 4.30 To replace the previous questions 7,8 and 9, MB suggested adding the below question to replace them:
- With sufficient notice, are you able to mitigate losses? If so, what notice would be required and what would be the maximum period of outage to mitigate losses?
- 4.31 In relation to the above question, JH stated that with sufficient notice they could mitigate some losses if the outage were short; but if the outage is going to be several months, there is not a lot that can be done.
- 4.32 ED raised a concern that the responses to the above question may come back with it depends on each individual scenario. MB noted that it is important to highlight that the notice period itself is not something the Working Group is looking to change. With that being said, JH stated that it is not that the issue with notice period is an issue, but the Working Group are not able to address this within this CP. This issue would need to be raised as a separate CP, and therefore the Working Group agreed to not include the above suggested question from the RFI but stated this is more of a Consultation question.
- 4.33 Following the review of the draft RFI, the Secretariat agreed to take an action to update and finalise the document to reflect discussions held and circulate to the Working Group offline for review.

ACTION 02/03: The Secretariat to update the draft RFI document and circulate to the Working Group for review offline.

- 4.34 The group also agreed to go ahead with the generator 'test run' of the RFI to see what data is able to be gathered prior to issuing out officially. JH agreed to go back to the generator who previously provided their data for this change to see if they can complete the RFI test run, and ED also agreed to speak internally to see if this can be completed.

ACTION 02/04: The Secretariat to provide both JH and ED with the RFI ready for a 'test run' of the two generators to complete.

- 4.35 Other members of the group were asked to contact the Secretariat if they would like to support the 'test run' of the RFI.
- 4.36 Members also agreed that it would be beneficial to include an introductory paragraph within the RFI to help those who are supporting the 'test run' to explain what the RFI is doing and the reasons why this data is being requested. JH agreed to take this action to produce this paragraph.

ACTION 02/05: JH to produce an introductory paragraph for the RFI to explain what the RFI is doing and the reasons why this data is being requested.

- 4.37 Members agreed to provide feedback on the draft RFI by close of play 01 July 2026.
- 4.38 The Secretariat agreed to issue a meeting poll to the Working Group to schedule the next meeting in due course.

ACTION 02/06: The Secretariat to issue a meeting poll for the next Working Group meeting in due course (once feedback on the draft RFI has been received).

5. Agreed Next Steps

- 5.1 The Working Group discussed the next steps, and the following items were captured:
- The Secretariat to make the necessary updates to the draft RFI for the Working Group to review.
 - JH to produce introductory paragraph to be included at the beginning of the draft RFI.
 - Members to inform the Secretariat if they wish to support the 'test run' of the RFI.
 - The Secretariat/Working Group to consider starting to produce the definitions glossary within the draft RFI.
 - The Secretariat to issue a meeting poll in due course, for the next Working Group meeting to finalise the draft RFI and issue out.

6. Any Other Business

- 6.1 The Chair asked the group whether there were any other items of business to discuss.
- 6.2 Definitions Glossary
- 6.3 ED suggested that it important that the Working Group begin working on the definitions glossary in order to progress finalising the draft RFI. The Chair confirmed that this needs to be completed, and agreed to start working on this whilst making the necessary updates to the draft RFI and during the next Working Group meeting, once scheduled.
- 6.4 There were no other items raised.

7. Date of Next Meeting – TBC

- 7.1 The next Working Group meeting is currently TBC, and the Secretariat will issue a meeting poll to members in due course.

8. Attachments

- Attachment 1_DCP 475 Work Plan

APPENDIX A

New and Open Actions

Action Ref.	Action	Owner	Update
01/01	The Secretariat/Working Group to look at the Curtailable Connections provisions that are set out in Schedule 2D and carry out further analysis as to how well these currently work.	Secretariat / Working Group	Ongoing. <i>To be discussed within the Working Group.</i>
01/02	JH to speak to the site directly (that was unable to connect to the network for several months) and ask for permission to feedback more information to the group.	JH	Ongoing. <i>Awaiting response.</i>
02/01	The Secretariat to accept the amendments to the WG 01 Draft Minutes and issue an updated version.	Secretariat	New Action.
02/02	The Secretariat to seek an Ofgem representative for this Working Group.	Secretariat	New Action.
02/03	The Secretariat to update the draft RFI document and circulate to the Working Group for review offline.	Secretariat	New Action.
02/04	The Secretariat to provide both JH and ED with the RFI ready for a 'test run' of the two generators to complete.	Secretariat / John Harmer / Edda Dirks	New Action.
02/05	JH to produce an introductory paragraph for the RFI to explain what the RFI is doing and the reasons why this data is being requested.	John Harmer	New Action.
02/06	The Secretariat to issue a meeting poll for the next Working Group meeting in due course (once feedback on the draft RFI has been received).	Secretariat	New Action.

Closed Actions

Action Ref.			Update
01/03	JH to produce the tables for both questions 1 & 2 of the RFI.	JH	Closed.
01/04	The Secretariat to produce a draft RFI document offline for the Working Group to review during the next meeting.	Secretariat	Closed.