DCP 454 Working Group Meeting 03

7 July 2026 at 10:00 - Web-Conference

Attendee	Company
Working Group Members	
Chris Barker	SP ENW
Chris Ong	UKPN
Donna Jamieson	IDCSL
Ed Grimsey	BUUK
Edda Dirks	SSE Generation
Gordon McFadzean	TNEI
Itunu Akin-Olawale	SP ENW
James Jones	SSEN
John Harmer	WatersWye
Kavya	Brook Green Supply
Louise Robinson	ESPUG
Mark Bellman	SP ENW
Mustafa Kaka	CEPA
Nik Wills	Stark
Oliver Bubb-Humfryes	CEPA
Ryan Farrell	NPg
Seun Adepapo	NGED
Tony Collings	Ecotricity
Observers	
Tamara Satmarean	OZEV
Thomas Holderness	Ofgem
Code Administrator	
Richard Colwill	Chair
Craig Booth	Technical Secretariat
Apologies	

1. Administration

Recording

1.1 The Chair notified members that this Working Group 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. The recording will be deleted once these minutes have been approved.

Competition Law Guidance and Terms of Reference

1.2 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.

2. Purpose of the Meeting

2.1 The Chair set out that the purpose of the meeting was to refresh Working Group members on the history and progress of DCP 454, given that the previous meeting had taken place over a year earlier, and to consider the modelling and impact assessment requirements needed to assess the proposal and determine the evidence required to support its development.

3. Background to DCP 454

3.1 The Chair explained that the issue originated from DCP 420, which had been raised by National Grid Electricity Distribution (NGED) following engagement with a local authority. The local authority highlighted challenges in investing in electric vehicle (EV) charging infrastructure, noting that while government policy encouraged investment, low initial utilisation rates meant that residual charging costs could make some projects economically unviable.

3.2 Further engagement undertaken by the Working Group identified that this issue extended beyond local authorities and affected a wider range of EV charging operators. Discussions with the EV Trade Association provided additional examples where low initial demand at sites created barriers to investment, despite expectations that utilisation would increase over time.

3.3 The Working Group had previously considered a number of options aimed at providing relief from residual charges during the early stages of EV infrastructure deployment. These included:

3.3.1 allowing eligible sites to move to a lower residual charging band, thereby reducing residual charges; and

3.3.2 removing eligible sites from the Schedule 32 residual charging arrangements and instead applying a pence-per-kilowatt charge based on consumption levels.

3.4 Under the latter approach, sites with low initial utilisation would pay lower residual charges, with charges increasing as demand and consumption grew over time.

3.5 The Chair noted that consultation responses and previous Working Group discussions had indicated a preference for the second option, namely removing eligible sites from Schedule 32 and applying a consumption-based residual charging mechanism.

3.6 The Chair explained that DCP 454 was developed alongside DCP 420, which considered an alternative form of residual charge relief for EV charging infrastructure. Feedback from affected customers had emphasised the importance of implementing support as quickly as possible to remove barriers to investment.

3.7 As a result, the original proposals were split into two separate modifications. DCP 420 focused on allowing eligible sites to move to a lower residual charging band, while DCP 454 was raised as a standalone change proposal to explore the alternative option of removing eligible sites from Schedule 32 and applying a consumption-based residual charging mechanism.

3.8 The rationale for separating the proposals was to provide greater flexibility for regulatory approval. This would allow Ofgem, if minded to do so, to approve DCP 420 as a shorter-term measure while implementing DCP 454 at a later date as a more enduring solution. The Chair noted that, despite the separate proposals, the two modifications are closely linked and much of the Working Group's future work is expected to be undertaken jointly.

4. Impact Assessment Requirement

4.1 The Chair explained that progress on DCP 454 had been delayed due to the complexity of undertaking the required impact assessment and modelling work. The Working Group needed to understand both the impact of the proposal on other network users and the implications of the proposed charging arrangements.

4.2 A key challenge was identifying a sufficiently representative population of EV charging sites for analysis. ChargeUK assisted by engaging with its members and facilitating the collection of information from EV charging operators. This information was then supplemented through further engagement with Distribution Network Operators to obtain the data required for modelling purposes.

4.3 The Chair also noted that the Working Group needed to understand the proportion of the EV charging market covered by the data collected to ensure that any impact assessment would be meaningful and robust. Initial attempts to obtain market share data through the Department for Transport were unsuccessful, as the data was held by a third party and could not be shared under existing contractual arrangements.

4.4 The Working Group subsequently engaged with Zapmap, an external provider of EV charging data, to obtain the information required. Funding was sought and approved by the DCUSA Panel to support the purchase of this dataset, enabling the analysis to proceed.

4.5 The Chair explained that analysis of the collected EV charging data showed that the Working Group had information covering approximately 35% of the market. As this did not represent the entire market, assumptions would be required when undertaking the impact assessment.

4.6 While the DCUSA team regularly undertakes impact assessments, the Chair noted that assessing the effects of residual charging changes under the post-TCR charging framework is complex and continues to be an area where industry participants are developing their understanding. Discussions with Ofgem highlighted that the assessment involves more than simply calculating under-recovered revenues and reallocating those amounts in future years. Changes to charging arrangements can also

affect customer distribution across charging bands and alter average consumption patterns, creating wider impacts that need to be considered.

4.7 Given these complexities, the Secretariat considered it beneficial to engage CEPA/TNEI to provide independent expertise and assurance. Their role would be to confirm that the available dataset was sufficiently representative to support a meaningful impact assessment and to ensure that any assumptions and extrapolations from the available market data were robust and appropriately applied.

4.8 The Chair explained that the Working Group needed to agree the modelling and impact assessment requirements needed for DCP 454, recognising that CDCM modelling would be required to assess the charging impacts of the proposal, alongside a broader impact assessment to understand the effects on other customers.

5. Review of Modelling Specification

CEPA's Proposed Approach and Deliverables

5.1 Oliver outlined CEPA's understanding of the required deliverables and confirmed that the proposed approach was workable. He explained that the impact assessment would be based on the EV charging point data collected for the 2025/26 charging year. Although more recent charging models are now available, CEPA's interpretation was that the latest CDCM, EDCM and CRP models would be used with the historic EV charging data so that the impacts of the proposed changes could be assessed consistently.

Model Outputs and Documentation

5.2 Oliver noted that CEPA would provide a full set of impact assessment outputs alongside a record of the changes made to the charging models. This documentation would explain any model amendments, assumptions or areas where interpretation had been required. Rather than drafting text specifically for inclusion in model user guides, CEPA would document assumptions in the format normally used within its modelling reports, allowing these to be incorporated into the model user guide assumption logs where appropriate.

Additional Modelling Requirements

5.3 Oliver recommended that the scope should explicitly include the production of amended CDCM, EDCM and CRP models. While these models could theoretically be commissioned at a later stage, he advised against delaying this work. In his view, undertaking all required modelling as part of a single exercise would reduce the risk of compressing timescales later in the process and would allow sufficient time for quality assurance.

Use of Assumptions and Data Interpretation

5.4 Oliver explained that, while the model specification was sufficiently developed for CEPA to begin work, the detailed assumptions required could not be fully identified until the underlying datasets had been reviewed. He anticipated that some degree of data interpretation and assumption-setting would be necessary during the modelling process.

5.5 As an example, Oliver noted that information provided on EV charging customers could be used to derive assumptions relating to load factors for the eligible customer group. However, further consideration may also be needed regarding the impact on load factors for customers outside that group. Similarly, assumptions relating to coincidence factors may need to be developed and tested, including consideration of whether EV charging customers should be treated in the same way as existing customer groups or whether alternative assumptions would be more appropriate.

Need for Further Engagement During Modelling

5.6 Oliver advised that CEPA would likely review the information provided once the work was formally commissioned and may need to pause periodically to seek clarification on specific points. He distinguished between two types of uncertainty:

5.6.1 where there is uncertainty regarding the policy intent or operation of the proposed solution, CEPA would seek direction from the Working Group before proceeding; and

5.6.2 where assumptions are required solely to facilitate impact assessment modelling, CEPA would generally be comfortable applying reasonable expert judgement and documenting the assumptions made within the final analysis.

5.7 Oliver concluded that the current model specification appeared sufficiently developed to proceed, subject to further discussions once the detailed input data had been received and reviewed.

Discussion on Transmission Demand Residual (TDR) Charges

5.8 Thomas queried whether Transmission Demand Residual (TDR) charges would be included within the scope of the modelling and impact assessment. He noted that previous Working Group discussions had suggested that transmission charging impacts may have been considered out of scope and highlighted the importance of clarifying the treatment of these charges.

Interaction Between Distribution and Transmission Charging

5.9 Oliver explained that the treatment of TDR charges for the affected customer groups was an important consideration. He noted that domestic and small non-domestic customers pay transmission residual charges through a volumetric mechanism, but he was uncertain how transmission residual charges were currently recovered from the HV and LV site-specific customers within the scope of DCP 454. Oliver observed that, if DCP 454 replaces a banded residual charging approach at distribution level while transmission continues to apply a banded methodology, there could be consequential impacts that may need to be considered by a CUSC modification.

5.10 Ryan explained that affected customers are currently allocated to a charging band and that transmission charging information is provided through a monthly reporting process. He noted that if eligible EV charging sites were moved onto a different distribution charging arrangement, consideration would be needed as to whether those customers would retain their existing transmission charging bands or whether alternative arrangements would be required. Ryan suggested that this raised a wider question about whether the proposed solution should have any interaction with transmission charging arrangements.

Applicability to EDCM Customers

5.11 The Chair sought confirmation from network representatives as to whether the proposal was intended to apply to EDCM customers.

5.12 Ryan explained that the proposed volumetric charging solution was not readily applicable to EDCM customers because EDCM charging arrangements are largely based on fixed and capacity-related charges, with only limited volumetric charging elements. As a result, the proposal's intended mechanism of recovering residual charges through consumption-based charging would not function effectively for EDCM sites.

5.13 Ryan noted that the Working Group had previously assumed that there would be very few, if any, EV charging customers connected under EDCM arrangements. Consequently, the proposal had primarily been developed with CDCM customers in mind.

5.14 Oliver noted that, although the proposed solution had primarily been developed for CDCM customers, the Working Group should not assume that EDCM can be excluded entirely from the modelling exercise. He explained that residual charges are also apportioned within EDCM arrangements and that these impacts would need to be considered as part of the assessment.

5.15 In particular, Oliver highlighted that some LDNO-served LV/HV customers have their charges calculated using EDCM methodologies. As a result, any changes to residual charge allocation under DCP 454 could have consequential impacts within the EDCM framework. For this reason, he stated that EDCM modelling should be included within the scope of the commissioned work, regardless of whether the proposed charging solution is ultimately applied directly to EDCM customers.

Requirement for Legal Text

5.16 Oliver highlighted that access to the draft legal text would be essential before model implementation could be completed. CEPA needed to ensure that the model changes accurately reflected the legal drafting and that there were no inconsistencies between the charging models and the proposed DCUSA amendments. He noted that producing models that conflicted with the approved legal text would create implementation risks and undermine the validity of the assessment.

5.17 The Chair confirmed that draft CDCM legal text had been developed and was available. However, equivalent EDCM legal text had not been prepared, reflecting previous Working Group discussions regarding whether EDCM customers would be affected by the proposal.

5.18 The Chair shared the legal text on screen for the Working Group to review.

Discussion on Tariff Design and Legal Text

5.19 Oliver identified a potential issue with how EV charging point customers were being categorised within the charging framework. Customers are currently grouped into existing site-specific categories, including LV Site Specific, LV Sub Site Specific and HV Site Specific customers, with EV charging point customers already sitting within those categories. His interpretation of the draft drafting was that it appeared to create a new standalone category for EV charging points.

5.20 Oliver suggested that, rather than creating a completely new customer category, the more appropriate approach would be to create EV charging point sub-categories within each existing voltage-level grouping. This would effectively introduce separate EV charging point tariffs for LV Site Specific, LV Sub Site Specific and HV Site Specific customers.

Need for Voltage-Level Specific Tariffs

5.21 Oliver explained that this approach would preserve the underlying charging principles already embedded within the charging methodology. Customers connected at different voltage levels receive different charging treatments because they make use of different network assets and incur different costs.

5.22 Under this proposed approach:

5.22.1 EV charging point customers would continue to receive the same underlying fixed charges associated with their voltage level;

5.22.2 existing assumptions relating to service model assets would remain unchanged;

5.22.3 existing use-of-system charging components and pass-through costs would continue to apply; and

5.22.4 only the residual charging element would be altered, with residual charges being recovered through the proposed volumetric mechanism.

5.23 Oliver noted that the legal text was broadly aligned with this outcome but may need to be amended to reflect the creation of additional tariff rows within existing categories rather than creating a single new EV charging point category.

5.24 Oliver explained that establishing a single EV charging point tariff across all voltage levels could produce inappropriate charging outcomes, as LV, LV Sub and HV customers face different network costs and should therefore not receive identical tariff treatment.

5.25 Ryan agreed with Oliver's interpretation and confirmed that separate tariffs would be required for each voltage level. He stated that there would need to be distinct EV charging point tariffs for:

5.25.1 LV Site Specific customers;

5.25.2 LV Sub Site Specific customers; and

5.25.3 HV Site Specific customers.

5.26 Ryan agreed that a single tariff spanning all voltage levels would not be appropriate and confirmed that the proposed solution should retain differentiation by voltage level. The Working Group acknowledged that this principle would need to be reflected within both the legal drafting and the modelling specification.

5.27 Oliver noted that if EV charging point customers are treated the same as other LV Site Specific customers for all charging components except residual charges, the modelling would be relatively straightforward and could use existing charging assumptions and methodologies. However, if EV

charging point customers are considered materially different and treated as a separate customer category, this could lead to tariff differences beyond the residual charge element. He suggested that the impact assessment could demonstrate the difference between a residual-only change and the creation of a new customer category with wider charging implications.

5.28 The Working Group agreed that the legal drafting would need to be updated to create separate tariffs for the relevant voltage levels. The Chair acknowledged that this element had not yet been reflected in the drafting and noted that the table would need to be amended accordingly. He suggested that the legal text could be reviewed with CEPA after the meeting to ensure it accurately reflected the intended solution before the modelling is formally commissioned.

Impact Assessment Year and Data Alignment

5.29 Ryan questioned why the impact assessment had been specified to use 2025/26 charges and suggested that the latest published charging models should instead be used, as they would be more representative of any future implementation date and may simplify the modelling exercise.

5.30 Oliver explained that the EV charging point dataset had been collected at a specific point in time and represented approximately one-third of the market. He noted that the data could be scaled and extrapolated to reflect a later charging year, such as 2027/28, but doing so would require additional assumptions. Oliver suggested that the original rationale for using 2025/26 charges was likely to maintain alignment between the charging models and the period from which the EV charging point data had been collected, thereby increasing confidence in the robustness of the impact assessment. The Working Group agreed to clarify the basis for the original decision.

Modelling Specification & Legal Text Actions

Action 03/01	Update the modelling specification based on feedback from CEPA in the meeting.
Action 03/02	Update the table under clause 92(a) to reflect the different EV charging site tariffs.
Action 03/03	Clarify the basis for the decision to use charging years 2025/26 for the impact assessment.

6. Discussion of the Approach

CEPA's Proposed Modelling Approach

6.1 Oliver explained how residual charges are currently calculated within the CDCM and outlined his initial view of how DCP 454 could be modelled. He noted that most CDCM inputs, including revenue requirements, network-level assumptions, service model asset values, load factors and coincidence factors, are defined at existing customer-category level and would not need to change. His initial assumption was that EV charging point customers would remain within their existing customer categories, meaning only the residual charging arrangements would be amended.

6.2 The key modelling change would involve identifying EV charging point customers within the existing residual charging bands and creating a separate EV charging point residual charging group. Customers and volumes associated with eligible EV charging sites would be moved into this new group, while all other charging components would remain unchanged.

Assumptions and Data Requirements

6.3 Oliver noted that the most important data requirement would be accurate forecasts of customer numbers and volumes for EV charging point customers. He also highlighted the need to make assumptions regarding the proportion of customers served through LDNO networks. While this could potentially affect the results, he suggested adopting a simple proportional approach and capturing any limitations qualitatively within the impact assessment rather than introducing unnecessary modelling complexity.

Residual Charge Allocation

6.4 Oliver explained that the proposed charging mechanism would allocate residual revenue to the EV charging point group based on its share of overall consumption volumes, broadly mirroring the way residual charges are currently recovered from unmetered supplies. As a result, the impacts of the proposal would be heavily influenced by the electricity consumption levels of the eligible EV charging point customers.

6.5 Oliver noted that the outcome of the proposal was not necessarily certain. If the eligible EV charging point customers have relatively low utilisation levels, they could benefit from the new charging arrangement by contributing less residual revenue than they do under the existing banded approach. Conversely, if they are high-volume electricity users, their allocated share of residual costs could increase, potentially resulting in higher charges than under the current arrangements.

Future Charging Outcomes

6.6 Ryan observed that, while the proposal had been developed to support EV charging infrastructure during the early stages of deployment when utilisation levels are relatively low, there was a possibility that the charging arrangement could become less favourable as utilisation increased. At higher usage levels, EV charging point operators could potentially pay more than they would under the existing banded residual charging framework.

6.7 Mark noted that the long-term impacts would depend on how demand across EV charging point operators evolves over time.

6.8 Oliver agreed and suggested that the impact assessment should explore these outcomes. He noted that the assessment could demonstrate how the proposal affects both underutilised and highly utilised charging sites, while also considering how the overall EV charging customer class may evolve over time. The Working Group discussed that increasing utilisation could significantly alter the amount of residual revenue recovered from the customer group under the proposed volumetric charging approach, creating different outcomes from those seen under the current fixed-band charging arrangements.

7. Consumer Impact Considerations

7.1 Edda suggested that the impact assessment could distinguish between the impacts on EV charging site owners and the impacts on end consumers using the charging infrastructure. She observed that the proposal had been developed in response to concerns from site owners about the affordability of residual charges and questioned whether the charging outcomes for site owners and end users might differ under the proposed arrangement.

Potential Behavioural Impacts

7.2 Oliver agreed that the point was relevant and likely to be of interest to Ofgem. He noted that the proposal would shift part of the cost recovery mechanism from a fixed residual charge towards a more volumetric, consumption-based charge. While CEPA would not typically model the downstream effects of how costs are passed through to end users, he agreed that the impact assessment should highlight this change and acknowledge any potential behavioural implications.

7.3 Oliver suggested that the assessment should focus on identifying how charge components increase or decrease under the proposal and note that these changes could influence customer behaviour, without undertaking a detailed analysis of how site operators choose to recover costs from EV users.

7.4 Edda suggested that understanding the potential impact on end consumers and any unintended consequences would be important.

8. Transmission Residual Charges

8.1 John questioned whether the proposed solution will effectively address the underlying issue for EV charging operators if it only changes distribution residual charges. He noted that transmission residual charges can be significant and argued that, unless a complementary change is made through the CUSC to alter the way transmission residuals are recovered, the proposal may not fully resolve the cost concerns faced by EV charging sites.

8.2 Ryan agreed that the interaction with transmission charging arrangements remained unclear. He noted that previous discussions had considered retaining customers within their existing transmission charging bands while only changing their distribution charging arrangements. However, he highlighted that if customers are removed from the Schedule 32 residual charging framework, the Working Group would need to understand how transmission charges would continue to be applied and reported.

8.3 Oliver provided an initial assessment of the relative scale of DUoS and TNUoS residual charges. He explained that the significance of distribution and transmission residuals varies considerably by network area. In some regions, distribution residuals can be materially higher than transmission residuals, while in others the opposite may be true.

8.4 Oliver noted that, even if transmission charging arrangements remain unchanged, reducing distribution residual charges could still provide a meaningful benefit for certain EV charging sites, particularly those with low utilisation. However, he acknowledged that the greatest benefit would be achieved if both distribution and transmission charging arrangements were aligned.

8.5 Ryan shared charging data indicating that, at least in some regions and charging years, transmission residual charges can be significantly higher than distribution residual charges. Oliver agreed that transmission residuals could represent a substantial proportion of overall costs. Oliver suggested the change could still have a material impact in some areas and should be assessed through the impact assessment.

8.6 Oliver explained that the effectiveness of the proposal is likely to vary by region due to differences in residual charging levels. He suggested that this regional variation would be an important aspect of the impact assessment.

Action 03/04	Reach out to the CUSC to understand the impact of the DCP 454 solution (customers removed from residual charging band) on transmission residual charges.

9. Scope of DCP 454

Eligibility Scope for EV Charging Sites

9.1 Edda queried whether the Working Group had reached a final position on the types of EV charging sites eligible for the proposal. She noted that earlier discussions had focused on rapid and ultra-rapid charging sites and sought clarification as the draft specification appeared to suggest this remained unresolved.

Discussion on Scope Expansion

9.2 Craig explained that the original focus on rapid and ultra-rapid charging infrastructure stemmed from evidence that these sites faced particular challenges under existing residual charging arrangements. However, he recalled that the scope was subsequently broadened during discussions under DCP 420, including consideration of whether there was any justification for excluding other types of EV charging sites. He also noted practical limitations in the available Zapmap data, which was not sufficiently granular to identify charging types at individual sites.

9.3 Ryan recalled that the agreed scope was linked to the eligibility definition used within the proposal rather than being limited solely to rapid and ultra-rapid charging points.

Clarification of Agreed Scope

9.4 The Chair acknowledged that the draft specification had created confusion and confirmed that the reference to rapid and ultra-rapid charging sites was not intended to indicate an unresolved policy decision. He explained that the eligibility criteria had previously been considered through DCP 420 and were reflected within the consultation material, which defined the scope around eligible EV charging sites rather than solely by charging speed.

9.5 The Chair confirmed that the Working Group would revisit the historical discussions and consultation material to provide a clear record of how the eligibility criteria had been determined. He agreed that the model specification should be updated to remove any ambiguity and ensure the agreed scope of the proposal is presented clearly.

Action 03/05	Review minutes and produce summary of the discussions and decisions around: 1.) scope of the CP – which EV charging sites are in scope; and 2.) raising of a CUSC mod – whether the intent of DCP 454 is to provide relief from transmission residual charges.

10. Environmental Impacts

10.1 Thomas asked whether the change proposal should consider and describe any environmental benefits arising from the proposal, noting that while environmental impacts are not a specific DCUSA charging objective, they can be referenced in change reports and may be relevant to Ofgem's decision-making.

10.2 The Chair considered that, if residual charges are currently acting as a barrier to investment in EV charging infrastructure, the proposal could help improve the viability of new charging projects and support the wider rollout of EV charging facilities. However, the Chair also noted that assessing and quantifying any environmental benefits would be challenging and would likely require assumptions about the extent to which the proposal influences investment decisions and the deployment of additional charging infrastructure.

11. Cost of Public EV Charging Review

11.1 Mark raised the Cost of Public EV Charging Review and shared his view that the original driver behind the EV charging residual charge work was the potential disincentive to investment in public EV charging infrastructure, together with the difficulties being experienced by organisations already operating in the EV charging point market. He asked the Working Group to consider whether the proposals being developed under DCP 454 would materially change those economics and therefore address the underlying concerns that prompted the work.

11.2 John recalled the earlier discussions under DCP 420, explaining that the Working Group had previously debated whether DCUSA was the appropriate framework through which to address the issue. He noted that concerns had been raised regarding whether the charging arrangements could be discriminatory, but that the Working Group had ultimately proceeded on the basis that DCUSA should develop a solution unless directed otherwise by Ofgem. From that perspective, he considered Mark's question to be valid, as there remained a broader regulatory question about whether DCUSA was ultimately the right mechanism for resolving the problem.

11.3 The Chair agreed that considerations had previously been raised with stakeholders and the DCUSA Panel and noted that the current direction remained for the Working Group to continue progressing the change. He acknowledged that there is always a risk that wider regulatory developments could alter the appropriateness of the proposed solution, but at present the expectation is that the Working Group should continue its work.

12. DCP 420 Progress and Impact Assessment

12.1 Ryan asked for an update on DCP 420, noting that it had originally been intended as a quick interim solution and querying how far away the proposal was from progressing.

12.2 The Chair confirmed that an impact assessment is still required before DCP 420 can move forward. He explained that a separate request will need to be raised, although the assessment is expected to utilise much of the same data gathered for DCP 454. The next Working Group meeting is expected to focus on finalising the modification, reviewing the legal text and agreeing the scope of the impact assessment.

Approach to the DCP 420 Impact Assessment

12.3 Ryan questioned whether the assessment could be relatively straightforward, based on identifying eligible sites and calculating the impact of moving them to a different residual charging band or providing residual charge relief.

12.4 Oliver explained that his understanding was that DCP 420 would not require any changes to the charging models themselves. Instead, the proposal would operate as an adjustment applied outside the models, whereby eligible customers would receive relief from part of their residual charges. As a result, the impact assessment could focus on quantifying the cost of the relief provided and demonstrating how that cost would be redistributed across other customers, without requiring extensive model development.

12.5 Oliver noted that the complexity of the assessment would ultimately depend on the Working Group's requirements. If members wished to explore wider impacts, such as implications for future charging arrangements, additional analysis could be undertaken, provided the scope was clearly defined.

Need for a Robust Assessment

12.6 Ryan observed that the proposed assessment sounded more detailed than a typical impact assessment for this type of modification. He suggested that, if the impacts proved immaterial, a simpler approach might be sufficient, whereas a more detailed assessment would be justified if there were material redistribution effects.

12.7 Craig explained that the Working Group cannot assume that the DCP 454 solution will ultimately be approved and replace the DCP 420 solution. While DCP 420 has often been viewed as a temporary solution, there remains a possibility that it could become a longer-term arrangement if DCP 454 is not implemented. For that reason, the impact assessment should be sufficiently robust and should not rely on assumptions that DCP 420 will only operate for a short period.

13. Next Meeting

13.1 The date of the next meeting will be determined via a poll.

14. Any Other Business

14.1 No other business was raised.

New and Open Actions

Action Ref.	Action	Owner	Update
02/02	Consider creation of a plan to understand how this would all be implemented if approved.	Secretariat	Ongoing
03/01	Update the modelling specification based on feedback from CEPA in the meeting.	Chair	New Action
03/02	Update the table under clause 92(a) to reflect the different EV charging site tariffs.	Chair	New Action
03/03	Clarify the basis for the decision to use charging years 2025/26 for the impact assessment.	Secretariat	New Action
03/04	Reach out to the CUSC to understand the impact of the DCP 454 solution (customers removed from residual charging band) on transmission residual charges.	Chair	New Action
03/05	Review minutes and produce summary of the discussions and decisions around: 3.) scope of the CP – which EV charging sites are in scope; and 4.) raising of a CUSC mod – whether the intent of DCP 454 is to provide relief from transmission residual charges.	Secretariat	New Action

Future Topics For Discussion

Minutes Ref.	Topic	Raised By	Status
01/Para 6.1	Does the DCP 420/454 Working Groups need to do any work to project the volumes of EV CPO charging sites increasing based on DCP 420/this CP being approved.	Chris Berry, SEFirst	Ongoing

Closed Actions

Action Ref.	Action	Owner	Update
01/01	DNO member colleagues to provide feedback on concerns raised above, if possible.	DNO Colleagues	Completed
01/02	Secretariat to issue the draft legal text.	Secretariat	Completed
02/01	Secretariat to draft a modelling specification regarding CDCM model impacts.	Secretariat	Completed