

DCP 469 ‘Cross Code Standardisation of Charging Arrangement Notice Periods’ Working Group Meeting 06

Monday, 27 July 2026 @ 10am via Microsoft Teams

Attendee	Company
Working Group Members	
Charles Mott [CM]	SSEN
Chris Ong [CO]	UKPN
Christos Papaevangelou [CP]	NGED
Dave Wornell [DW]	NGED
Ed Grimsey [EG]	BUUK
Edda Dirks [ED]	SSE Generation
Emma Clark [EC]	SSEN
Emma Robinson [ER]	E.ON
Harvey Takhar [HT]	NESO
James Knight [JK]	British Gas
John Harmer [JH]	Waters Wye
Karl Maryon [KM]	Drax
Lorna Murray [LM]	SPEN
Louise Robinson [LR]	ESP Electricity
Niall Coyle [NC]	NESO
Nik Wills [NW]	Stark
Peter Waymont [PW]	UKPN
Ryan Farrell [RF]	Northern Powergrid
Tony Collings [TC]	Ecotricity
Ofgem Observer	
Andrew Malley [AM]	Ofgem
Code Administrator	
Melissa Kendal [MK]	ElectraLink
Dylan Townsend [DT]	ElectraLink

Apologies	Company
Lee Stone [LS]	E.ON
Tim Aldridge [TA]	Ofgem

1. Administration

Recording

- 1.1 The Chair opened the meeting and reminded members that the meeting was being recorded solely to support the production of an accurate set of minutes.

Apologies

- 1.2 Apologies were noted from Lee Stone and Tim Aldridge.

Competition Law Guidance

- 1.3 The Chair reminded the Working Group that the Competition Law Guidance for Panels and Working Groups applied throughout the meeting and that the Working Group agreed to be bound by the Competition Law Guidance for the duration of the meeting.

Review of Previous Minutes and Outstanding Actions

- 1.4 The minutes of the previous meeting had been circulated with the meeting pack. No comments had been received either during the meeting or by email, and the Working Group agreed that the minutes should be taken as an accurate record.
- 1.5 The Working Group reviewed the outstanding actions from previous meetings, and updates related to these actions can be found in Appendix A of the minutes.

2. Purpose of the Meeting

- 2.1 The Chair explained that the purpose of the meeting was to review the draft consultation document, consider the amendments and comments that had been received, and agree next steps. He noted that the latest version available to him was the version circulated by ED late the previous week.
- 2.2 ED and CO both confirmed that the consultation draft was still at an early stage of revision and that the meeting represented the first substantive round of Working Group review of the comments and amendments.

3. Review of Draft Consultation Document

Summary and introductory narrative

- 3.1 The Working Group began its review at the start of the draft consultation. Minor amendments to paragraph 1.1, clarifying the background to DCP 437, were accepted without objection.
- 3.2 The Working Group agreed that the introductory section required further refinement to explain more clearly the problem DCP 469 seeks to solve, its expected benefits, the relationship with DCP 437 and the rationale for proposing a two-month notice period. CO agreed to develop revised wording, with the Working Group noting that the section may require wider restructuring once that drafting has been prepared.
- 3.3 The Working Group also agreed a small number of drafting changes to improve the flow of the introduction, including removing duplicated RFI wording.

Action 06/01: CO to draft revised wording for the consultation introduction, clarifying the problem DCP 469 seeks to solve, the expected benefits of the proposal, and the relationship between DCP 469 and DCP 437.

RFI overview

- 3.4 The Working Group then reviewed the summary of the DCP 469 RFI responses and accepted a number of amendments proposed by ED in a version that had been circulated to members before the meeting. The amendments included wording on the number of supplier responses received, the stated impact of a two-month notice period and the particular concerns raised for non-domestic customers.
- 3.5 The Working Group agreed that the RFI summary should explain that shorter notice periods may increase uncertainty when pricing non-domestic contracts, as final DUoS charges would be unknown for longer. It was also noted that supplier responses had not provided detailed evidence on the calculation of risk premia, and that domestic customers were considered to be partly insulated by the price cap.
- 3.6 The Chair proceeded on the basis that the amendments could be accepted for the purposes of progressing the draft, while allowing members to revisit the wording after the meeting if required.

DNO analysis of notice periods and charge volatility

- 3.7 The Working Group discussed the DNO analysis comparing allowed revenue under the current 15-month notice period with a shorter notice period scenario. Members agreed that the consultation should make clear that the analysis shows what would have happened historically if charges had been set using more up-to-date information, as some members felt that they would otherwise be attempting to present definitive conclusions about future outcomes.
- 3.8 Members discussed the distinction between year-on-year tariff volatility and supplier certainty. One member considered that shorter notice periods reduce volatility by enabling more accurate inputs to be used, while another member emphasised that suppliers value earlier certainty for contracting purposes and questioned the interpretation of volatility as compared to stability and that those words can take on different meanings depending on who it applies to. One member noted that correction factors and other allowed revenue inputs, not only inflation, can drive year-on-year movements under the current arrangements.
- 3.9 The Working Group agreed that the relevant drafting should refer to “year-on-year volatility” and should be framed around the historic counterfactual analysis. One member requested greater transparency on the calculations and assumptions used for the two-month scenario, and the Secretariat agreed to recirculate the previously shared workbook and supporting material.

Action 06/02: The Secretariat to recirculate the previously shared allowed revenue / volatility analysis workbook and supporting material to all Working Group members.

- 3.10 The Working Group also considered whether RIIO-ED1 data or previous derogations from the 15-month notice requirement could provide useful context. Members noted that the RIIO-ED1 arrangements operated differently and that previous derogations appeared to relate mainly to Supplier of Last Resort costs. The Group agreed that these points should be treated as contextual rather than determinative.

Presentation of charts, figures and titles

- 3.11 The Working Group discussed the presentation of graphs and figures within the consultation document. Members suggested that tables and figures should be numbered and queried whether a chart title referring to an “Average Domestic Customer Bill” could be misleading where the chart related to DUoS charges rather than a full supplier bill.
- 3.12 The Chair agreed to add consistent figure and table numbering, review captions and amend or crop misleading chart titles where appropriate.

Action 06/03: The Secretariat to introduce consistent figure and table numbering, review chart captions, and amend or crop misleading chart titles where appropriate.

DNO risk premia calculator

- 3.13 The Working Group reviewed the section on the DNO risk premia calculator, which was described as an illustrative framework for assessing potential supplier risk premia where future DUoS charges are uncertain. Members noted that supplier pricing approaches are commercially sensitive and that the model relies on assumptions, including domestic customer data, which may not directly reflect non-domestic impacts.
- 3.14 The Working Group discussed whether the consultation should state that volatility is lower under two-month notice. Some members were of the strong view that the analysis supported this conclusion, while others preferred more cautious wording reflecting the historic nature of the analysis and the Working Group’s differing perspectives on certainty, predictability and year-on-year variability.
- 3.15 The Working Group agreed that numerical outputs should be presented in a balanced way, including both two-month and 15-month notice cases where relevant. The draft was updated to include the correct comparative risk premia values for 12-month and 24-month contracts.
- 3.16 One member queried the underlying analysis of how the ‘Maximum changes to Prices’ parameter under the 2-month period of 10% was arrived at, and noted that without this information, it is hard to argue for or against it. RF confirmed that this figure is based on the maximum percentage on dotted line within the graph presented under paragraph 4.2. With this, RF agreed to take an action to include a cross-reference within the draft consultation document to clarify the basis for the 10% input assumption used in the Risk Premium Calculator.

Action 06/04: RF to include a cross-reference within the draft consultation document to clarify the basis for the ‘Maximum changes to Prices’ parameter under the 2-month period of 10% used in the Risk Premium Calculator.

Pass-through contracts, domestic customers and non-domestic impacts

- 3.17 The Working Group discussed whether the consultation sufficiently distinguished between fixed-price contracts, pass-through arrangements and customers subject to the domestic price cap. Members noted that pass-through customers may not face the same supplier risk premium, while small commercial customers may be more exposed because they are less likely to have pass-through arrangements and are not protected by the domestic price cap.

Consideration of other notice periods and indicative charges

- 3.18 No substantive comments were raised on the sections covering alternative notice periods and indicative charges.

DUoS notice periods and pricing volatility vs pricing certainty – Ofgem’s CARR

- 3.19 The Working Group considered the section summarising its assessment of the DNO analysis. Members agreed that incomplete placeholder text could be removed and that the consultation should include a concise explanation of the trade-off between shorter and longer notice periods before discussing Ofgem’s Cost Allocation and Recovery Review (CARR).
- 3.20 The Working Group agreed in principle to include a consultation question inviting comments on the analysis provided. One member considered that the drafting should not overstate uncertainty where the analysis supported reduced year-on-year volatility under shorter notice, while another considered that consultees should be given a clear opportunity to comment on the analysis.
- 3.21 The draft section on Ofgem’s CARR was noted as explaining the trade-off between predictability and accuracy: longer notice provides earlier visibility but relies more heavily on forecasts, while shorter notice enables more up-to-date inputs but reduces forward visibility. It was noted that a member had included a comment in the document for links to be provided to the relevant CARR materials and the Secretariat agreed to add appropriate links to those materials and any other cited material.

Action 06/05: The Secretariat to add appropriate links to Ofgem CARR materials or other cited material in the consultation document.

- 3.22 The Working Group reviewed proposed consultation questions on the trade-off between reduced year-on-year DUoS tariff volatility and greater charge certainty under the current 15-month notice period. Members agreed that the questions should avoid leading wording and should focus on respondents’ preferences with respect to reduced year-on-year volatility or greater tariff certainty and the reasons for their preference.
- 3.23 The Working Group agreed that any question directed at end customers would likely be answered by industry parties, trade bodies or representative bodies on their behalf. The wording was therefore amended to reflect responses on behalf of end consumers.
- 3.24 Members discussed potential bodies to target as part of the consultation, including Citizens Advice, the Energy Intensive Users Group and possible bodies representing small commercial customers. The Secretariat agreed to consider targeted distribution to those groups.

Action 06/06: The Secretariat to consider targeted consultation distribution to Citizens Advice, the Energy Intensive Users Group and any suitable bodies representing small commercial customers.

4. Next Steps and Work Plan

- 4.1 The Working Group did not have sufficient time to complete its review of the remaining consultation sections. The Chair noted that comments under the impacts section, the section on changes to DNO time bands, the DCUSA objectives, implementation and legal text would need to be reviewed at the next meeting.
- 4.2 Given the number of unresolved drafting points and actions, the Chair confirmed that the next steps would be to complete the actions arising from the meeting, circulate the updated consultation document after the meeting, and use the next Working Group meeting to continue and, if possible, finalise the consultation document.

Action 06/06: The Secretariat to circulate the amended draft consultation document following the meeting .

- 4.3 The Working Group agreed for the next meeting to be held on Tuesday 4 August 2026 from 10:00 to 13:00.

5. Any Other Business

- 5.1 No further business was raised. The Chair thanked members for their contributions and closed the meeting.

6. Date of Next Meeting – 04 August 2026

- 6.1 The next Working Group meeting is scheduled to be held on 04 August 2026 at 10am.

7. Attachments

- Attachment 1_DCP 469 Allowed Revenue Template_20260310
- Attachment 2_DCP 469 Work Plan

APPENDIX A

New and Open Actions

Ref	Action	Owner	Update
01/01	The Secretariat to gather further information around CMP 286/287 for future Working Group discussions.	Secretariat	Ongoing.
05/02	The Secretariat/Working Group to review the collated RFI responses and ensure that all comments have been addressed within the draft Consultation document.	Secretariat / Working Group	This will be picked up as part of the wider consultation review during the meeting. It was agreed that the action could be closed if the review confirmed that the relevant points had been addressed; otherwise, it would remain open. To be confirmed at next meeting.
06/01	Draft revised wording for the consultation introduction, clarifying the problem DCP 469 seeks to solve, the expected benefits of the proposal, and the relationship between DCP 469 and DCP 437.	CO	New Action.
06/02	The Secretariat Re-circulate the previously shared allowed revenue / volatility analysis workbook and any associated supporting material to all Working Group members.	Secretariat	New Action. <i>UPDATE: circulated post meeting and as an attachment to these minutes.</i>
06/03	The Secretariat to introduce consistent figure and table numbering, review chart captions, and amend or crop misleading chart titles where appropriate.	Secretariat	New Action.
06/04	Include a cross-reference within the draft consultation document to clarify the basis for the 'Maximum changes to Prices' parameter under the 2-month period of 10% used in the Risk Premium Calculator.	RF	New Action.
06/05	Add appropriate links to Ofgem CARR materials or other cited material in the consultation document.	Secretariat	New Action.
06/06	The Secretariat to consider targeted consultation distribution to Citizens Advice, the Energy Intensive Users Group and any suitable bodies representing small commercial customers	Secretariat / Working Group	New Action.
06/07	Circulate the amended draft consultation document following the meeting.	Secretariat	New Action.

APPENDIX A

Closed Actions

Ref		Update	
05/01	The Secretariat to circulate the supporting data slides [provided by CO] to the Working Group for review post-meeting.	Secretariat	These had been circulated. Closed.
05/03	The Secretariat/Working Group to include the volatility analysis and how the counterfactual was calculated within the draft Consultation document.	Secretariat / Working Group	It was confirmed that the relevant detail had been included within the draft consultation document. Closed.
05/04	CO to look at the potential of alternative notice periods greater than the proposer 2 months solution.	Chris Ong	CO confirmed that he had provided wording on potential alternative notice periods greater than the proposed two-month solution, and that this had been incorporated into the draft consultation document. Closed.
05/05	CO to provide commentary for working group review in relation to indicative charges and the practicality of the cap solution.	Chris Ong	CO confirmed that he had provided wording on indicative charges and the practicality of a cap solution, which had similarly been incorporated into the consultation draft. Closed.
05/06	Produce a clear narrative of the assumptions used in the calculator is needed for the consultation document.	Secretariat	It was noted that additional wording had been included in the consultation document and so the action could be closed, however, another action could be opened if members considered the wording was insufficient during the document review. Closed.
05/07	The Secretariat to schedule the next Working Group meeting for 21 July 2026 at 10am.	Secretariat	Meeting had been arranged and then rescheduled. Closed.