

DCP 476 Working Group - Meeting 01

22 July 2026 at 10:00 - Web-Conference

Attendee	Company
Working Group Members	
Chris Ong [CO]	UKPN
Clair Richards [CR]	National Grid
Donna Jamieson [DJ]	Idcsl
Ed Grimsey [EG]	BUUK
Edda Dirks [ED]	SSE Gen
Giao Le [GL]	SSEN
Jenny Harvey [JH]	National Grid
Laide Adekanle [LA]	SPEN
Lorna Murray [LM]	SPEN
Code Administrator	
Andy Green [AG] (Chair)	ElectraLink
Mel Kendal [MK] (Technical Secretariat)	ElectraLink
Apologies	
Jo Brown [JB]	National Grid
Komal Brown [KB]	SPEN
Philip Mark [PM]	SSE

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.

Actions

- 1.4 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 review and discuss the Change Proposal within the Working Group and agree next steps.

3. Overview of DCP 476 Change Proposal

- 3.1 The Chair invited the Proposer [CO] to provide an overview of the DCP 476 Change Proposal to the Working Group.
- 3.2 The key updates can be found below:
- 3.3 The purpose of this Change Proposal is to determine how a site-specific billed site which has multiple MPANs but which are traded with different Suppliers should be treated.
- 3.4 Currently where a site has multiple MPANs it is often billed one fixed charge and one capacity charge to recognise the connection agreement is with the whole site. However, there are no controls in industry processes that cause the MPANs to remain aligned and they can be split over more than one Supplier. This causes more than one billing account to be required, and capacity to be split (often pro-rated?) over the billing accounts. This results in two or more standing charges being applied to the site for both DUoS and TNUoS, increasing the costs ultimately to the Customer. It is important that this is fully considered in any proposed solution for this change, as using the whole site capacity for the banding of each MPAN could result in three higher bands being applied where the site has three MPAN each with different Suppliers, rather than three lower bands if the capacity was split, or a single higher band applied should all the MPANs be with the same Supplier.
- 3.5 Schedule 32 of DCUSA would appear to suggest that the site should be banded on the whole site's total capacity which leads to invoices quoting a (split) capacity that may not be aligned to the band the tariff is for.

- 3.6 However that may be unclear from an invoice validation perspective, and it could be preferable to change the band so that each billing account is billed based upon the capacity allocated to each MPAN. This would lead to questions as to what should then happen if the MPANs become re-aligned.
- 3.7 To resolve this, CO suggested to include a clear definition of how a site with multiple MPANs which are registered to different Suppliers are treated for the allocation of their standing and capacity charges and also how they are banded.

4. Review and Discussion of the Change Proposal

- 4.1 The Chair invited the Working Group to both review and discuss the DCP 476 Change Proposal.
- 4.2 The key updates can be found below:
- 4.3 ED informed the group that a similar change was previously raised (DCP 328 '[Use of system charging for private networks with competition in supply](#)') which was private network focused and was initially raised prior to the TCR. This change was ultimately rejected, however, ED suggested it may be beneficial to reflect on the outcomes of this change.
- 4.4 CO understands where the relevance can be seen between the two CPs, however, confirmed that this change was raised without the consideration of DCP 328. CO also explained that this change is in relation to standard arrangements and those connected directly to an IDNO/DNO only.
- 4.5 Following this, members agreed it would be beneficial to have a Consultation question around private networks, along with commentary within the Consultation which references DCP 328.
- 4.6 CO stated that the current arrangements do not appear to be what was initially intended; banding capacity and splitting capacity has always been an issue. CO suggested issuing two separate Consultations – the first Consultation can include a number of illustrations with numbers for some regions to help make it easier for the respondents to understand what this CP is trying to communicate and the questions that are being asked. The second Consultation can include the proposed draft legal text based on the responses received from the first Consultation. Members agreed with this approach.
- 4.7 ED stated that the definition of 'single site' is the key parameter and suggested that it may be worth considering whether changes will also need to be made to Schedule 32 – this may be worth having a Consultation question on.
- 4.8 LM raised a concern around trying to codify something that may not be fully understood by the Customer and/or broker. CO agreed and stated that it would be useful to have a clear set of arrangements that state, if this scenario occurs, this is how the capacity is split and how the banding is treated. If this can be made clear within the legal text, parties and/or brokers can be referred to this.
- 4.9 Following the above discussion, ED suggested a Consultation question around whether a change to the DCUSA is necessary or whether clarity can be achieved via a guidance document. Members agreed however, CO believes that a legal text change would be necessary.

4.10 ED also raised a concern around data gathering using DCP 328 as an example – the concern is that parties may not want to contribute as their understanding of the rules may be incorrect and therefore may not want to declare themselves as non-compliant. CO did not disagree, however, explained that DCP 328 was seeking information which a number of the private networks did not have.

4.11 Agreed Consultation Questions

- *Do you understand the intent of the CP?*
- *Do you support the principles of the CP?*
- *Do you have any experience of the issue explained? If so, please elaborate.*
- *What is your current approach to the explained issue?*
- *Do you have any understanding as to why the issue is becoming more apparent?*
- *Do you think that there are interactions with DCP 328 and that private networks need to be considered or excluded as part of the solution?*
- *If private networks should be included, how could this be done?*
- *If private networks should be excluded, how could this be done?*
- *The Working Group have identified two solutions, do you believe there are any other solutions?*
- *What schedules within the DCUSA do you believe would need to be updated for solutions A, B, and any alternatives that you have identified?*
- *What would these updates look like?*
- *Would there be any system changes required as part of any of the solutions highlighted and if so, how long would these system changes take to implement?*
- *Are there any associated approximate cost involved in these system changes?*
- *Any additional comments?*

4.12 CO agreed to take an action to produce a number of examples that illustrate potential solutions for the Working Group to review.

ACTION 01/01: CO to produce a number of examples that illustrate potential solutions for the Working Group to review.

4.13 DJ explained that their IDNO billing systems may struggle with the allocation of capacity. LM agreed with this and suggested their billing systems may not be set up to routinely deal with multiple MPAN sites. It was agreed to ask this question within the second Consultation.

- 4.14 Following discussions, the Working Group agreed to schedule the next meeting for 18 August 2026 to have a final review of the draft Consultation document, with the aim of issuing out to industry the following week.

ACTION 01/02: The Secretariat to schedule the next Working Group meeting for 18 August 2026 to finalise the draft Consultation document.

5. Agreed Next Steps

- 5.1 The Working Group discussed the next steps, and the following items were captured:
- CO to produce a number of examples that illustrate potential solutions for the Working Group to review.
 - The Secretariat to schedule the next Working Group meeting for 18 August 2026 to finalise the draft Consultation document.

6. Any Other Business

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

7. Date of Next Meeting – 18 August 2026

- 7.1 The next Working Group meeting is scheduled for 18 August 2026 at 10am.

8. Attachments

- Attachment 1_DCP 476 Work Plan

APPENDIX A

New and Open Actions

Action Ref.	Action	Owner	Update
01/01	CO to produce a number of examples that illustrate potential solutions for the Working Group to review.	Chris Ong	New Action.
01/02	The Secretariat to schedule the next Working Group meeting for 18 August 2026 to finalise the draft Consultation document.	Secretariat	New Action.

Closed Actions

Action Ref.			Update