

DCP 473 Working Group Meeting 04

17 August 2026 at 1:30pm – Web-conference

Attendee	Company
Working Group Members	
Chris Ong [CO]	UKPN
Donna Jamieson [DJ]	IDCSL
Edda Dirks [ED]	SSE
Ian Chadwick [IC]	AEN
John Harmer [JH]	Waters Wye
Kavya Kavya [KK]	Brook Green Supply
Kelly McLaughlin [KM]	NGED
Laura Quinn [LQ]	SPEN
Liam Sweeney [LS]	Ofgem
Louise Bunney [LB]	NPg
Mark Bellman [MB]	ENWL
Nik Wills [NW]	Stark
Peter Waymont [PW]	UKPN
Victoria Burkett [VB]	EON
Code Administrator	
Andy Green [AG]	ElectraLink
Hannah Proffitt [HP]	ElectraLink
Apologies	
Jo Brown [JB]	National Grid
Ed Grimsey [EG]	BUUK

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, noting suggested amendments submitted by MB. The Working Group agreed with these amendments and the Secretariat agreed to update the website.
- 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 complete the review of the consultation responses and discuss next steps.

3. Review Consultation Responses

Consultation Responses Review

- 3.1. The Chair provided a summary of discussions at the last meeting and advised that they would be continuing the review from Question 9 as this is where they reached at the previous meeting.
- 3.2. The Chair added that at the previous meeting, ED had raised a query around how legacy deenergised sites would be treated in comparison to sites being newly deenergised. The Chair noted that the group may want to consider this.
- 3.3. The Proposer suggested that setting an implementation date for a certain period in the future would allow parties to be warned of the upcoming change and would avoid discrimination. The group agreed.
- 3.4. ED noted that there are four solution options currently under consideration and that different implementation timelines would be appropriate for each option. The Chair agreed that implementation will be discussed later on as part of the consultation responses.

Question 9 – For Suppliers only, what are the processes/obligations you have to follow to ensure that any de energisation or energisation change is valid and correctly recorded? If there are specific obligations, i.e. in the REC/BSC, what are they?

- 3.5. Five Suppliers responded to this question with several noting that energisation and de-energisation changes are governed by existing industry processes and obligations, particularly under the REC and

BSC, with Suppliers responsible for ensuring that changes are correctly recorded in relevant market systems.

- 3.6. One response suggested that that DCUSA should work with REC and BSC to align the relevant obligations. The Chair advised that this had been discussed at a previous Working Group meeting and that VB had taken an action to refer to REC. The REC were comfortable that this change would not interact with their current processes. The Chair stated that they believe the same to be true regarding the BSC.
- 3.7. Members agreed that if Parties have challenges related to the current processes, they should contact the REC and BSC directly. VB added that REC are currently undertaking reviews of their processes and therefore this would be a good opportunity for any issues to be raised.
- 3.8. One response suggested to refer this question to the Cross Code Steering Group (CCSG). The Chair stated that they believe this is not necessary.

Question 10 – Are there any other steps you take to establish who is responsible for a site?

- 3.9. Three parties responded advising that they do have processes in place. Respondents referred to using existing account records, site contact details, head office or finance contacts, online searches, mapping tools, Companies House searches, Land Registry information, and other third-party data sources to identify the current owner, occupier or responsible party. One of the respondents also noted that they may use specialist tracing companies or third-party revenue protection agencies to attend sites, undertake visual investigations and speak with neighbouring businesses where responsibility cannot otherwise be established.
- 3.10. One response stated that Suppliers should be supporting their agents in gaining access to deenergised CT supplies for their regular safety inspections, however that many of the older deenergised supplies are no longer in existence, so responsibility cannot be established.
- 3.11. One respondent stated that they do not take any other steps to establish who is responsible for a site. A further respondent noted that they also do not, unless a chargeable disconnection is required.
- 3.12. Eight parties gave no comment.
- 3.13. JH referenced the possible situation in which a tenant leaves a deenergised site, and questioned whether there is any relationship between the landlord and the Supplier who supplied that tenant. JH noted that the deemed contract that would exist, does not as there is no supply of power. JH questioned what the Supplier should do as they have no customer to pass charges on to.
- 3.14. The Proposer advised that they have suggested that an addition could be made to the National Terms of Connection (NTC) to address this scenario. The Proposer noted that their suggestion is detailed within their response to Question 12 (relating to the legal text).
- 3.15. ED noted that the matter of deemed contracts had previously been referred to Gowling, and suggested their response should be reviewed again. ED added that Ofgem recently held a consultation on deemed contracts and standard licence conditions 7.3 and 7.4, which outlined that for a deemed contract to exist, the customer must have the ability to consume energy.
- 3.16. A link to that consultation can be found here - [Consultation on Deemed Contracts and Standard Licence Conditions 7.3 and 7.4 | Ofgem](#)
- 3.17. The Chair agreed that once the legal text has been drafted, Gowling will be consulted and can be invited to attend a Working Group meeting.

Question 11 – Should there be an exemption for certain type of scenarios such as a site that is de energised for revenue protection purposes, bad debt, bankruptcy etc. If so, what scenarios should be exempt and what should the process look like?

- 3.18. Views were mixed, with differing views on whether exemptions should apply. Several respondents considered that exemptions could be difficult to define and apply consistently which could create inequity between customers, while also reducing the effectiveness of the proposed solutions and creating potential loopholes.
- 3.19. Several responses noted that under Option C it would not be necessary to have an exemption for the scenarios listed in the question as charges will not be applied.
- 3.20. Three respondents agreed that exemptions should apply as it increases the bad debt and all customers ultimately end up paying. One of the respondents noted the importance of any exception framework being clearly defined and governed.

Question 12 – Is the legal text sufficiently clear on what processes need to be followed before the capacity is removed or DUoS charges are passed by the DNO to the Supplier?

- 3.21. Six respondents stated that they believe the legal text is sufficiently clear. Three respondents provided no comment.
- 3.22. One response noted that the legal text is only in Schedule 16 which only applies to CDCM customers, and questioned how this captures EDCM (EHV) customers. The Proposer noted that there is currently nothing within the EDCM that prevents charging deenergised sites. Therefore legal text on this is not required. The response also suggested that it would be useful if a standard letter template could be drafted for DNOs to issue to the customer for standardisation. The Chair agreed that this could be considered if it agreed for customer contact steps to be added into DCUSA.
- 3.23. Several responses provided suggested amendments to the legal text. The Chair noted that following completion of the consultation responses review, the group would complete a detailed review of the legal text and consider all comments.

Question 13 – Do you consider that the proposal better facilitates the DCUSA Objectives? If so, please detail which of the DCUSA Objectives you believe are better facilitated and provide supporting reasons. If not, please provide supporting reasons.

- 3.24. Seven respondents stated that they felt their response was dependent on the solution option. These are summarised below:
- One response stated that Solutions C and D better facilitate Charging Objectives 2 and 3.
 - One response stated that Solution C better facilitates Charging Objective 2 and General Objective 1.
 - One response stated that Solution A better facilitates Charging Objectives 2 and 3 and General Objective 1.
 - One response stated that Solution C better facilitates Charging Objectives 2 and 3.
 - One response stated that Solution C better facilitates DCUSA Objectives, but did not specify which ones.
 - One response stated that Solution C better facilitates Objectives 1, 2 and 3 (not specifying Charging or General Objectives).

- One response stated that Solutions A and B did not better facilitate any of the objectives. Solution D would be difficult to implement. The respondent indicated they support Solution C but did not mention specific objectives.

3.25. Four respondents did not specify that their responses were dependent on the solution option. These are summarised below:

- One response stated that Objectives 1, 2 and 3 were better facilitated but did not specify whether they were referring to General or Charging Objectives.
- One response stated that Charging Objectives 1, 2 and 3 and General Objectives 1 and 2 were better facilitated.
- One response stated that Charging Objectives 1, 2 and 3 and General Objectives 1 and 4 were better facilitated.
- One response stated that Charging Objective 3 was better facilitated.

3.26. One respondent stated they felt that none of the DCUSA Objectives were better facilitated by the solution, and two respondents provided no comment.

3.27. The Chair agreed to summarise the responses into table format to be included in the Change Report.

Action 04/01 – The Chair to capture the responses to Question 13 (Relating to DCUSA Objectives) within a table/series of tables to be included in the Change Report.

Question 14 – Do you agree with the proposed implementation date? If not, please provide supporting reasons.

3.28. Eight respondents indicated that they agree with the proposed implementation date. A further respondent stated that they agreed, but only for Option C. One respondent stated that they also agree, however do not believe the solutions are fully developed enough to implement at this time.

3.29. One respondent stated that although they do not support the solutions, they understand the rationale of the proposed implementation date.

3.30. One response suggested amending the implementation date to 01 April 2027 to align with DCP 440 “consuming de-energised sites”. The Chair suggested that this would be considered at a later stage.

3.31. Two respondents stated that they do not believe the proposed implementation date allows parties adequate time to prepare for the change.

3.32. *Question 15 – Are you aware of any wider industry developments that may impact upon or be impacted by this CP?*

3.33. Ten respondents indicated that there were not aware of any wider industry impacts. Two respondents did not provide a response.

3.34. One respondent highlighted that the Market-wide Half-Hourly Settlement (MHHS) programme represents a significant cross-code reform (BSC, REC and DCUSA) and will be introducing new data flows, processes, and settlement arrangements across the electricity market. The response noted that DCP 473 will need to align with MHHS design, particularly in relation to data flows, metering status, and customer identification processes.

- 3.35. One respondent highlighted that the Ofgem Cost Allocation Recovery Review (CARR) could look at this area, however, the work is still in the initial discussions and is likely too far in the future to be considered at this time.
- 3.36. *Question 16 – Do you have any other comments on DCP 473?*
- 3.37. Ten respondents did not provide any further comments.
- 3.38. One response outlined that they do not support the change, stating that while the underlying issue is valid, the proposed solutions are disproportionate and risk creating additional complexity, operational burden and financial risk. Their key concerns include bad debt, difficulties identifying and enforcing responsibility against customers, increased costs for distributors, potential gaming, inconsistent application, and future reinforcement costs where capacity is removed or sites are disconnected.
- 3.39. Another respondent agreed that some of the solution options will place unmanageable administrative and related costs onto the DNO. I.e. Disconnection is a chargeable process and this DCP does not take the charging of a possible vacant site into account.
- 3.40. One response noted that they agree with the Proposer's preference for Solution A, given the original intent of the proposal to reduce socialisation and improve cost-reflectivity. The response noted that the other 3 alternatives are open to gaming, provide less benefits to reduced socialisation, and would require more expensive system changes.
- 3.41. One response mentioned previous concerns/discussion regarding the REC MPAN Life Cycle, but reiterated that there is no interaction.
- 3.42. JH highlighted that in Schedule 2B 12.11C, there is an opportunity for the DNO to reduce the capacity or change the MIC or MEC after 12 months. JH noted that if the customer does not respond, the DNO has the opportunity to refer to Ofgem for a decision. JH questioned whether this mechanism is adequate and whether anyone has tried to do this. The Proposer advised that they have done this, however have not received agreement from the customer. The Proposer noted that they have not experienced a situation where the customer has not responded and they have referred to Ofgem.
- 3.43. JH questioned whether this existing clause could be reinforced to make it more effective. The Proposer agreed to look into this.

Action 04/02 – The Proposer (PW) to investigate whether Schedule 2B 12.11C could be amended to make it more effective.

Discussion on Solution Options to Take Forward

- 3.44. The Working Group agreed to vote on which options should be taken forward. Solution A will automatically be taken forward as decided by the Proposer.
- 3.45. Solution B – no members voted in favour of taking this solution forward.
- 3.46. Solution C – five members voted in favour of taking this solution forward.
- 3.47. Solution D – no members voted in favour of taking this solution forward.
- 3.48. The Chair confirmed that Solutions A and C would be taken forward.

Legal Text

- 3.49. ED noted the importance of clearly documenting the timelines for the processes associated with the solution options. The Chair agreed.
- 3.50. The Chair agreed to aggregate all of the legal text comments provided through the consultation onto the legal text for Solutions A and C so that these can be discussed at the next meeting.

Action 04/03 – The Chair to aggregate all of the legal text comments provided through the consultation onto the legal text for Solutions A and C to be discussed at the next meeting.

- 3.51. The Chair also agreed to list all the matters that require further discussion/clarification for consideration at the next meeting.

Action 04/04 – The Chair to list all the matters that require further discussion/clarification for consideration at the next meeting.

4. Next Steps and Work Plan

- 4.1. Members agreed on the following next steps.
- The Chair to aggregate the legal text comments provided through the consultation onto the legal text for Solutions A and C.
 - The Chair to list all the matters that require further discussion/clarification.
 - The Working Group to meet again on Wednesday 02 September at 10am to discuss the above.

5. Any Other Business

- 5.1. No other business was raised.

6. Next Meeting

- 6.1. The date of the next meeting is Wednesday 02 September at 10am.

New and Open Actions

Action Ref.	Action	Owner	Update
04/01	The Chair to capture the responses to Question 13 (Relating to DCUSA Objectives) within a table/series of tables to be included in the Change Report.	The Chair	New action.
04/02	The Proposer (PW) to investigate whether Schedule 2B 12.11C could be amended to make it more effective.	The Proposer (PW)	New action.
04/03	The Chair to aggregate all of the legal text comments provided through the consultation onto the legal text for Solutions A and C to be discussed at the next meeting.	The Chair	New action.
04/04	The Chair to list all the matters that require further discussion/clarification for consideration at the next meeting.	The Chair	New action.

Closed Actions

Action Ref.	Action	Owner	Update
03/01	The Chair to issue a poll containing possible dates for the next meeting.	The Chair	Action closed.