

DCP 446 Working Group Meeting 07

22 September 2026 at 10:00 - Web-Conference

Attendee	Company
Working Group Members	
Liam Sweeney [LS]	Ofgem (Observer)
Elizabeth Meldrum [EM]	SSEN
Donna Jamieson [DJ]	IDCSL
Lucy Reebe-Wing [LW]	UKPN
Mark Rose [MR]	UKPN
Owen Black [OB]	SPEN
Peter Waymont [PW]	UKPN
Brian Sweeney [BS]	UKPN
Erik Grimsey [EG]	BU-UK
Shaun Longstaff [SL]	NGED
Callistus Obidiozor	NGED
Code Administrator	
Richard Colwill [RC]	Chair

1. Administration

Recording

- 1.1 The Chair informed members that this Working Group meeting 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.

Apologies

- 1.2 No apologies were received ahead of the meeting.

Competition Law Guidance and Terms of Reference

- 1.3 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 advised that the purpose of the meeting was to review the legal text and the draft Change Report.

3. Review Legal Text

- 3.1 The Working Group reviewed the revised legal text. The main point discussed was whether to include the wording “or which are otherwise outside of your control”. The Working Group agreed not to include this wording, as it was considered too broad. It was noted that customers could potentially rely on a wide range of circumstances as being outside their control when seeking to avoid liability for emergency disconnection costs.
- 3.2 Working Group members also considered comments raised by OB on the drafting. These focused on whether the wording around a “new connection” was sufficiently clear, and whether this was distinct from re-establishing supply or re-energising a Connection Point. Members also discussed a drafting point to ensure the legal text referred consistently to the Company, rather than switching between “the Company” and “our”. The Working Group was content that these points had been addressed in the revised drafting and agreed that the legal text should be issued to Gowling for review.

Action 07/01: Issue legal text to legal advisors for review.

4. Review of Draft DCP 446 Change Report

- 4.1 The Working Group reviewed Section 7 of the draft Change Report to check that the points raised in Ofgem’s send-back letter had been covered. This included customer impacts and cost responsibility, the application of charges and reconnection after emergency works, SLC 10AA and customer fairness, dispute process transparency, terms and definitions, and the need to retain flexibility in how the provisions are applied.

- 4.2 The Working Group was content that these areas had been addressed in the draft Change Report. However, members agreed that further wording should be added to explain why a quantitative assessment of the costs had not been provided. The Working Group noted that, due to the infrequent and unpredictable nature of emergency disconnections, it has not been possible to undertake a quantitative assessment of the costs that may otherwise be socialised across the wider customer base.
- 4.3 The Working Group also agreed that the Change Report should make clear that the change would help ensure that unsafe and unlawful costs are not socialised across other customers.

Action 07/02: Circulate updated Change Report to working group members.

5. Next Steps & Work Plan

- 5.1 The following next steps were agreed:
- The Chair to issue the legal text to Gowling for review.
 - The Chair to circulate the updated Change Report to the working group for review.

6. Any Other Business

- 6.1 No other business was raised.

New and Open Actions

Action Ref.	Action	Owner	Update
07/01	Issue legal text to legal advisors for review.	Secretariat	Completed
07/02	Circulate updated Change Report to working group members.	Secretariat	Completed

Closed Actions

Action Ref.			Update
05/01	Proposer to collaborate with his internal colleagues to jointly draft an initial straw-man document setting out the high-level process for emergency disconnections, reconnections, disputes, and charging decisions, how reasonableness and vulnerability (SLC 10AA) are assessed in practice, and what content is proposed for including in the DCUSA versus supporting guidance documents.	Mark Rose	Action closed. <i>This was circulated ahead of the meeting and discussed during the meeting.</i>
06/01	The Chair to issue the legal text to Gowling for review.	The Chair	New action.
06/02	The Chair to draft the new section for inclusion in the Change Report, and issue to members for review.	The Chair	New action.