

DCP 476 Working Group - Meeting 03

21 September 2026 at 10:00 - Web-Conference

Attendee	Company
Working Group Members	
Chris Ong [CO]	UKPN
Ed Grimsey [EG]	BU-UK
Hakan Feridun [HF]	Energunite
Jo Brown [JB]	National Grid
Nik Wills [NW]	Stark
Peter Waymont [PW]	UKPN
Philip Mark [PM]	SSE
Ryan Farrell [RF]	NPg
Shyam Doraiswamy [SD]	Ofgem
Code Administrator	
Andy Green [AG] (Chair)	ElectraLink
Mel Kendal [MK] (Secretariat)	ElectraLink
Apologies	
Edda Dirks [ED]	SSE Gen
Giao Le [GL]	SSEN
Jenny Harvey [JH]	National Grid
Lorna Murray [LM]	SPEN

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 collated Consultation responses document within the Working Group and agree next steps.

3. Review of Collated Consultation Responses

- 3.1 The Chair invited the Working Group to review and further discuss the collated Consultation responses document.
- 3.2 The key updates can be found below:
- 3.3 The Chair informed the group that the legal text was not included in the initial Consultation as the preferred solution had not been determined. A second Consultation is expected, providing an opportunity to refine the solution, address banding, define capacity allocation and test implementation implications.
- 3.4 The Chair confirmed that there were 9 respondents to this Consultation.
- 3.5 **Q1 – ‘Do you understand the intent of DCP 476?’**
- 3.6 The Chair informed the group that the majority of respondents (8) understood the intent of this CP.
- 3.7 One respondent asked for the proposal to include multi-MPAN sites with a single Supplier, citing possible differences in DUoS allocation between DNOs. Members discussed this and suggested that this may be outside the scope of this change and should be addressed via another CP.
- 3.8 The Chair agreed to take an action to reach out to this respondent to seek further clarification and examples of the suggested single Supplier issue. RF stated that these examples would be beneficial to allow DNOs to investigate whether the issue occurs within their licence areas.

ACTION 03/01: The Secretariat to reach out to SSE Energy Customer Services to seek further clarification and examples of the suggested single Supplier issue.

3.9 Q2 – ‘Do you support the principles of DCP 476?’

- 3.10 The Chair informed the group that the majority of respondents (8) support the principles of this CP, with one respondent agreeing to support if the single Supplier issue is addressed.
- 3.11 Members reiterated that including the single Supplier issue may be out of scope of this change as it could move the proposal beyond the original issue that this CP was raised to address; however, members agreed to review the outcome of the agreed action for further clarity around this.
- 3.12 The Working Group concluded that there was sufficient support to continue developing the proposal. The immediate focus should remain on multi-MPAN sites registered to different Suppliers, while the concerns relating to single-Supplier arrangements should be recorded and considered separately.

3.13 Q3 – ‘Do you have experience of the issue described in the consultation?’

- 3.14 The Chair informed the group that several respondents identified sites containing more than one MPAN where the MPANs are registered to different Suppliers. These responses described operational difficulties, the need for manual billing arrangements and uncertainty over how fixed and capacity charges should be allocated.
- 3.15 One respondent stated that there are instances where they (a Supplier) may supply all of the MPANs on a multi MPAN site but have signed supply contracts at different times. This could lead to the full site fixed charge being applied to all MPANs, whilst the DNO will only bill the single Supplier once for the site as a whole. The Working Group discussed this and suggested that this may be a Supplier pricing issue which should be able to be resolved internally.
- 3.16 Following the above, the Secretariat agreed to take an action to reach out to the respondent for further clarification around the Supplier pricing issue.

ACTION 03/02: The Secretariat to reach out to respondent 01 [confidential] to seek further clarification around their Supplier pricing issue.

- 3.17 The Working Group noted that similar outcomes may arise during MHHS migration where the MPANs associated with one site do not migrate at the same time. This can result in MPANs associated with the same site being processed through different billing arrangements, even where the Supplier has not changed.
- 3.18 The group discussed the term lead MPAN (following a respondent’s feedback) and stated that this is widely used in billing systems and connection agreements but are being replaced in the market-wide half-hourly environment by site IDs. The group agreed that terminology and educational guidance may need to be clarified, although changing the underlying registration process is likely outside the scope of this Working Group.
- 3.19 Members agreed to consider whether MHHS migration and delayed Supplier registration are separate transitional issues or whether the eventual DCP 476 solution should also cater for those circumstances.

3.20 **Q4 – ‘What is your organisation's current approach when a site-specific billed site has multiple MPANs registered with different Suppliers?’**

3.21 The Chair informed the group that the responses also showed differences in the treatment of fixed charges and residual charging bands. Some parties allocate the band according to the capacity assigned to each individual MPAN, while other approaches retain the tariff or band that applied to the combined site. Certain arrangements require manual intervention or case-by-case decisions.

3.22 In regard to NGEDs confirmed approach of splitting them apart and billing each Supplier for the whole capacity unless notified, the proposer noted that this is the preferred alternative option.

3.23 The group identified banding and fixed charges as more significant concerns than the capacity charge itself. The capacity charge can generally be apportioned so that the total remains equivalent, but splitting MPANs can change the number and level of fixed-charge bands, potentially increasing or reducing the site's total cost.

3.24 Several respondents described manual processes because systems cannot reliably identify affected sites or automatically handle split relationships. The group agreed that the final approach should establish a consistent process, whether implemented manually or through system changes.

3.25 **Q5 – ‘Do you have any understanding as to why some customers choose to appoint multiple Suppliers across different MPANs for a single site?’**

3.26 The Working Group noted that the responses identified a range of possible reasons for multi-Supplier arrangements. These included commercial decisions, advice from brokers, historical arrangements, separately operated parts of a site, phased developments and resilience requirements involving separate feeders or supplies.

3.27 Members also noted that not every multi-Supplier arrangement appears to result from a deliberate customer decision. Some may arise through incomplete Supplier transfers, where only one MPAN associated with a site is transferred. Customers or incoming Suppliers may not always be aware that other MPANs form part of the same site or connection arrangement.

3.28 The group noted that splitting a site can sometimes move capacity into lower bands and reduce DUoS or transmission charges, while in other cases it can create multiple higher-band fixed charges. This creates a risk of deliberate or unintended gaming and needs to be considered when designing the final solution.

3.29 In regard to NGEDs response, the Working Group recognised the appeal of preventing these arrangements from occurring in the first place; however, members noted that there may be wider regulatory or licence obligations which allow customers to choose their supplier for each MPAN.

3.30 The Working Group agreed that this should be checked, as it may limit the ability to prevent these arrangements through DCUSA.

3.31 **Q6 – ‘Having considered the potential solution approaches and worked examples, do you prefer Option A or Option B?’**

- 3.32 The Chair informed the Working Group that the Consultation responses did not provide a clear consensus. Option A was generally regarded as the simpler approach because it would divide the site capacity evenly between the MPANs. This would provide a straightforward methodology and could be easier to administer where the actual capacity attributable to each MPAN is not known.
- 3.33 Option B was viewed by some respondents as more reflective of the physical or operational configuration of the site because capacity would be apportioned rather than divided equally. However, the responses raised questions about how the appropriate allocation would be established, who would determine it and how changes would be maintained over time.
- 3.34 Members considered concerns that either option could produce fixed-charge outcomes that differ from those applying to the original combined site. Depending on the applicable charging-band thresholds, dividing the capacity could place MPANs into different bands or result in more than one MPAN remaining within the original band. There were therefore concerns about fairness, cost reflectivity and potential incentives to restructure Supplier arrangements.
- 3.35 One member proposed applying equal allocation by default so billing can proceed immediately, while allowing a customer-specific allocation where the customer provides evidence or later requests a different split. PM agreed to take an action to seek further clarification internally and feedback to the group.

ACTION 03/03: PM to seek further clarification internally in regard to SPENs response to Q6 and feedback to the group.

- 3.36 After further discussion, the Working Group did not reach a final decision on whether such an approach should be adopted, and that neither Option A nor Option B should be progressed unchanged at this stage. It was agreed that further solution development and testing are required before a preferred approach can be selected.
- 3.37 ***Q7 – ‘Have you identified any alternative solutions?’***
- 3.38 The Chair informed the group that respondents had raised a number of considerations around how any solution should be applied in practice. Members recognised that the core issue was not only how capacity should be apportioned across MPANs where a site becomes split, but also how fixed charges and residual banding should be treated.
- 3.39 It was noted that the Consultation responses had highlighted differences in current DNO approaches, reinforcing the need for greater consistency within DCUSA.
- 3.40 The group discussed whether a single approach could be applied across all scenarios, or whether the treatment may need to vary depending on the circumstances in which the site became split.
- 3.41 Members agreed that further consideration should be given to whether different scenarios require different treatment, particularly where a split arises unintentionally or temporarily.
- 3.42 The group noted that the next stage should focus on refining the potential solution options and ensuring that any proposed approach avoids creating opportunities for gaming or inconsistent customer outcomes.

3.43 Conclusions

- 3.44 Following the review of questions 1 to 7 of the collated Consultation responses document, the Working Group agreed that the responses provide sufficient evidence that inconsistent treatment exists and that greater clarity is required within DCUSA. There was broad support for addressing the issue, but the review did not identify a settled solution.
- 3.45 Following the above discussions, the Chair stated that the remaining Consultation questions will need to be reviewed at a subsequent meeting and agreed to schedule the next meeting for 28 September 2026 at 10am.

ACTION 03/04: The Secretariat to schedule the next Working Group meeting (04) for 28 September 2026 at 10am to continue the review of the collated Consultation document.

4. Agreed Next Steps

- 4.1 The Working Group discussed the next steps, and the following items were captured:
- The Secretariat to schedule the next Working Group meeting (04) for 28 September 2026 at 10am to continue the review of the collated Consultation document.

5. Any Other Business

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

6. Date of Next Meeting – 28 September 2026

- 6.1 The next Working Group meeting is scheduled for 28 September 2026 at 10am.

7. Attachments

- Attachment 1_DCP 476 Work Plan
- Attachment 2_DCP 476 Collated Consultation Responses_WG Comments v0.2
[CONFIDENTIAL]

APPENDIX A

New and Open Actions

Action Ref.	Action	Owner	Update
03/01	The Secretariat to reach out to SSE Energy Customer Services to seek further clarification and examples of the suggested single Supplier issue.	Secretariat	New Action.
03/02	The Secretariat to reach out to respondent 01 [confidential] to seek further clarification around their Supplier pricing issue.	Secretariat	New Action.
03/03	PM to seek further clarification internally in regard to SPENs response to Q6 and feedback to the group.	Philip Mark	New Action.
03/04	The Secretariat to schedule the next Working Group meeting (04) for 28 September 2026 at 10am to continue the review of the collated Consultation document.	Secretariat	New Action.

Closed Actions

Action Ref.			Update
02/01	Update the consultation document to reflect the Working Group's agreed drafting changes and circulate the revised consultation for final Working Group review.	Secretariat	Closed.
02/02	Revise the worked examples, option descriptions and supporting explanation	Chris Ong	Closed.