

DCP 469 Working Group - Meeting 09

30 September 2026 at 10:00 - via Microsoft Teams

Attendee	Company
Working Group Members	
Amanda McFarlane [AMF]	Aurora
Chris Barker [CB]	SP ENW
Chris Ong [CO]	UKPN
Dave Wornell [DW]	NGED
Ed Grimsey [EG]	BUUK
Edda Dirks [ED]	SSE Generation
Emma Robinson [ER]	E.ON
Gregory Edwards [GE]	Centrica
Harvey Takhar [HT]	NESO
Ionela Arvas [IA]	Green Gen Cymru
John Harmer [JH]	Waters Wye
Karl Maryon [KM]	Drax
Lee Stone [LS]	EON
Mark Jones [MJ]	SSE
Niall Coyle [NC]	NESO
Nik Wills [NW]	Stark
Peter Waymont [PW]	UKPN
Ryan Farrell [RF]	Northern Powergrid
Tim Aldridge [TA]	Ofgem
Tony Collings [TC]	Ecotricity
Code Administrator	
Mel Kendal [MK] (Technical Secretariat)	ElectraLink
Richard Colwill [RC] (Chair)	ElectraLink

Apologies	Company
Charles Mott [CM]	SSEN
Emma Clark [EC]	SSE
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.

Previous Minutes and Open Actions

- 1.4 The Chair shared the previous minutes and there were no further comments/feedback. These minutes were approved.
- 1.5 The Chair provided the updates on the current open actions; these can be found within the Appendix.

2. Purpose of the Meeting

- 2.1 The Chair explained that the purpose of the meeting was to continue to review the collated Consultation 02 responses document within the Working Group and agree next steps.

3. Review of Collated Consultation Responses Document

- 3.1 The Chair presented the collated Consultation responses document live on screen for the Working Group to review and discuss.
- 3.2 The key updates can be found below:
- 3.3 The Chair informed the group that there were 16 respondents to the DCP 469 Consultation, with seven respondents supporting and eight respondents opposing the proposed reduction from 15 months' notice to two months' notice. The group also noted that there was one neutral response.
- 3.4 The group noted that Suppliers generally prioritised price certainty, whilst DNOs and IDNOs prioritised cost reflectivity and lower annual volatility.
- 3.5 TC stated that there appear to be two extremes presented in terms of a solution, either 15-month notice or 2-month notice and suggested there should be a figure that falls in between (given the split of the responses).
- 3.6 LS also queried whether time-band changes should accompany the notice period change, and suggested that this should be treated separately to this CP. Following this, CO explained that the current DCUSA wording gives time-band changes and change publication the same 15-month period but accepted that linking them could create unnecessary implementation complications.
- 3.7 In regard to the 'Consideration of Other Notice Period Options' within Section 4 of the Consultation document, CO informed the group that all options remained open for further discussion. CO noted that the Cost Information Review pack already provides illustrative charging information based on the best available data, although this may become misleading where key inputs (particularly allowed revenue)

remain unknown or change significantly. While indicative charges could be helpful to Suppliers, the Working Group had previously considered and decided against this approach.

- 3.8 CO explained that the proposed 2-month notice period was intended to provide an enduring and consistent solution. A longer “halfway house” notice period could reduce some uncertainty but would still require an Ofgem derogation at each price control transition, as DNOs may not know their allowed revenue sufficiently far in advance. A 2-month notice period would allow final charges to be published when the necessary data is available, provide certainty over publication timings, and avoid recurring shortened notice periods and derogations.
- 3.9 LS stated that there is currently no guarantee that Ofgem are going to give a delay at this point in time and may be an at-risk approach. CO suggested the group may have a better understanding of what is going to happen further down the line.
- 3.10 CO confirmed that the Working Group could revisit the options previously considered.
- 3.11 JH suggested to the group that in terms of moving forward, it may be more suitable for the Secretariat to produce a Change Report and include summaries of the two extreme views from industry and provide this for Ofgem to review.
- 3.12 CO explained that setting charges 15-months in advance, before allowed revenues are confirmed, risks material forecasting errors and subsequent under or over-recovery. CO noted that Customers generally favour accurate, stable charges over a longer notice period and considered that a shorter period would reduce year-on-year volatility; however, acknowledged the opposing Supplier and DNO positions and suggested further consideration of indicative charges, time bands and a possible 6/9-month compromise.
- 3.13 RF stated that the Ofgem Consultation is out at the minute where they are looking at the first 2 years of ED3; Ofgem are aware of the arguments both for and against and therefore seems unnecessary to develop an additional Consultation.
- 3.14 In terms of drafting the Change Report, the Chair proposed recording Supplier, DNO and Working group views separately, including the arguments for indicative charges, time-band treatment and alternative notice periods. This would allow Ofgem and respondents to see which options had been considered without presenting unresolved mitigations as agreed solutions.
- 3.15 Following the above discussions, the Secretariat agreed to take an action to complete the Collated Consultation Responses document with the relevant summaries so that the evidence provided can then be included within the draft Change Report.

ACTION 09/01: The Secretariat to take an action to complete the Collated Consultation Responses document with the relevant summaries so that the evidence provided can then be included within the draft Change Report.

- 3.16 The Working Group discussed the extent to which distribution charges are passed through to Customers and whether market-wide half-hourly settlement could enable pass-through products to be offered more widely. Members noted that this could reduce Supplier risk but transfer greater exposure to Customers, who would retain the option of choosing either pass-through or fully fixed contracts.
- 3.17 CO advised that the Consultation analysis showed a materially shorter notice period would significantly reduce year-on-year charging volatility and avoid the 30–40% swings that may occur under the current arrangements.

- 3.18 DW proposed removing the 15-month notice requirement for time-band changes, as it offered limited benefit and could create additional difficulties for Suppliers. DW also recommended undertaking analysis of a 6-month notice period using the same methodology and updated allowed-revenue assumptions, to avoid Ofgem subsequently requesting further analysis or returning the proposal to the Working Group.
- 3.19 Members agreed that the additional analysis should be completed before determining the preferred option. It was noted that any hybrid solution differing from the 2 or 15-month options would require further Consultation to obtain stakeholders' views.
- 3.20 TA informed the group that Ofgem have not yet made a decision, however expected to tell DNOs what to do for December and was still aiming to publish a final decision by the end of October. CO recalled that a final published decision had previously been expected around mid-to-late October.
- 3.21 TA stated that Ofgem's recently published strategic direction statement appeared to contemplate alignment with the shortest existing notice periods, however, suggested that the relevant charges might not ultimately remain at 2-months. Ofgem therefore considered six or 8-month alternatives worth keeping under review.
- 3.22 Following the above discussions, DW agreed to take an action to circulate the 6-month calculation and methodology to the Secretariat, who will then issue to the Working Group for review offline. DNO members of the group also agreed to either reproduce/review the 6-month analysis, including the volatility and risk-premium inputs, prior to the next meeting.

ACTION 09/02: DW to circulate the 6-month calculation and methodology to the Secretariat, who will then issue to the Working Group for review offline.

ACTION 09/03: DNO members to reproduce/review the 6-month analysis, including the volatility and risk-premium inputs, prior to the next meeting.

- 3.23 Once the 6-month DNO analysis has been completed and reviewed, the Working Group can the discuss and determine whether the 6-month notice period option should be pursued. If the Working Group decide that this is a viable option to move forward with, it was agreed that an additional Consultation will need to be developed and issued. If the group decide it is not a viable option to move forward with, the reasons will be clearly outlined within the Change Report.
- 3.24 The Chair clarified that the next Working Group meeting will be used to review the outcome of the 6-month analysis and decide whether this is a viable option (and whether an additional Consultation is required). The Working Group will also review the wording to be included within the Change Report with the aim of presenting the final Change Report to either the November or December DCUSA Panel meeting.
- 3.25 The Working Group were happy with this approach.

4. Agreed Next Steps

- 4.1 The Working Group discussed the next steps, and the following items were captured:
- The Secretariat to complete the Collated Consultation Responses document with the relevant summaries so that the evidence provided can then be included within the draft Change Report.

- DW to circulate the 6-month calculation and methodology to the Secretariat, who will then issue to the Working Group for review offline.
- DNO members to reproduce/review the 6-month analysis, including the volatility and risk-premium inputs, prior to the next meeting.

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 – 08 October 2026

- 6.1 The next Working Group meeting is scheduled to be held on 08 October 2026 at 1pm.

7. Attachments

- Attachment 1_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.
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	Ongoing. <i>The Chair informed the group that a response was received with thanks for the invitation, however, a confirmation to attend has not yet been received and the response deadline date has now been extended. The Working Group will be updated once this has been confirmed.</i>
09/01	The Secretariat to take an action to complete the Collated Consultation Responses document with the relevant summaries so that the evidence provided can then be included within the draft Change Report.	Secretariat	New Action.
09/02	DW to circulate the 6-month calculation and methodology to the Secretariat, who will then issue to the Working Group for review offline.	Dave Wornell	New Action.
09/03	DNO members to reproduce/review the 6-month analysis, including the volatility and risk-premium inputs, prior to the next meeting.	DNO Members	New Action.

Closed Actions

Ref	Action	Owner	Update
07/06	The Secretariat to discuss including both the DCUSA General and Charging Objectives within this CP at the August DCUSA Panel meeting and feedback to the group.	Secretariat	Closed.
08/01	ED to reread Section 1 of the Consultation document, in particular paragraphs 1.6 and 1.7 (potentially splitting them).	Edda Dirks	Closed.

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08/02	The Secretariat to contact Ofgem representatives (Andrew Malley/Tim Aldrige) to see if there is a link and/or references that can be provided, in relation to the CARR analysis, within the draft Consultation	Secretariat	Closed.
08/03	CO to review both paragraphs 6.3 and 6.4 of the draft Consultation and revise as necessary.	Chris Ong	Closed.
08/04	CO to revise the wording with paragraph 7.1 of the draft Consultation document to provide further clarity around the implementation of this change.	Chris Ong	Closed.
08/05	CO to revise and update the draft legal text and the Secretariat will issue to the group for offline review.	Chris Ong	Closed.
08/06	The Secretariat to issue the draft Consultation and associated documents to the Working Group for final offline review.	Secretariat	Closed.
08/07	The Secretariat to issue the final Consultation to wider industry for feedback.	Secretariat	Closed.
08/08	The Secretariat to issue a meeting poll to all members for availability of the next meeting (to review collated Consultation responses).	Secretariat	Closed.