

DCP 476 Working Group - Meeting 05

09 October 2026 at 10:00 - Web-Conference

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

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 Workgroup reviewed the outstanding actions and clarifications from the previous meeting. It was noted that the earlier query concerning the single-supplier scenario could be closed, as the clarification received related more to supplier pricing arrangements than the specific issue DCP 476 was seeking to address.
- 1.5 The Workgroup also discussed how capacity is currently dealt with within billing systems. PM explained that the new billing system was capable of retaining the overall site capacity and splitting this where MPANs were registered to different Suppliers. The discussion confirmed that this provided a useful basis for considering the capacity solution further.

2. Purpose of the Meeting

- 2.1 The Chair explained that the purpose of this meeting is to continue with the review and discussion of the collated Consultation responses, review the system capabilities actions and agree next steps.

3. Review of Collated Consultation Responses and Agreement on the Approach

- 3.1 The Workgroup returned to the capacity options discussed during previous meetings and considered how these should operate where there were more than two MPANs at a site.
- 3.2 The Working Group discussed an example where a site had five MPANs, with four remaining with one Supplier and one moving to another. It was agreed that the intention should be for the capacity to follow the number of MPANs, meaning that in this example the capacity would be split 80:20 rather than 50:50 across the two suppliers.
- 3.3 PM checked the available system guidance during the meeting and confirmed that the site's capacity is split between Suppliers based upon the number of MPANs registered to each Supplier. The Work Group therefore agreed that the proposed approach should be to split capacity equally across the

number of MPANs as the default position, while still allowing the customer to agree an alternative proportional split with the DNO where required.

- 3.4 It was suggested that rather than reopening this issue completely through consultation, respondents should be asked whether they could identify any unforeseen consequences arising from the proposed approach.
- 3.5 The Work Group then moved on to the outstanding question of how fixed/residual charges should be treated once the MPANs forming part of a single site were registered to different Suppliers.
- 3.6 Three potential approaches were discussed. The first would retain the site's existing band but divide the fixed charge between the relevant MPANs. The second would also retain the site's existing band but apply the full fixed charge to each MPAN. The third would effectively separate the MPANs for banding purposes, with each MPAN receiving its own band and associated charge.
- 3.7 There was discussion around whether the second option represented the simplest approach from a systems perspective. However, some Working Group members questioned whether it would produce an appropriate customer outcome, particularly where an individual MPAN would attract a lower band if considered independently.
- 3.8 The Working Group considered whether it was sufficiently comfortable with one option to indicate a preference within the consultation. It was agreed that there was not currently a clear Working Group preference and that the consultation should therefore describe all three approaches neutrally and ask respondents which they preferred and why.
- 3.9 Working Group members considered whether billing-system providers should be approached before the consultation to establish the likely cost and complexity of the different solutions.
- 3.10 The discussion concluded that the system providers themselves should not determine the preferred policy solution, particularly where information concerning development costs could be commercially sensitive. Instead, it was agreed that the consultation should ask DNOs and IDNOs about the extent of any billing-system changes required. Parties could then engage with their own system providers as necessary when preparing their responses.
- 3.11 The Working Group agreed that this should allow any particularly difficult or prohibitive system impacts associated with an option to be identified through the consultation process.
- 3.12 The Working Group discussed how the three approaches interacted with the existing TCR arrangements and the DCUSA definition of a site.
- 3.13 It was noted that Options 1 and 2 broadly retain the concept of the existing site and its band, although the way the resulting charge is applied would differ. Option 3 could require greater consideration of the site definition because the MPANs would effectively be treated separately for banding purposes.
- 3.14 Working Group members agreed that the consultation should acknowledge the TCR rather than attempting to work around it but also agreed that if a solution is identified that has better outcomes for customers and parties that went against the TCR, the rationale for the approach could be provided and reasons why the approach is defensible from a customer and party outcome

perspective. A neutral question was therefore agreed to be included by asking respondents whether they considered that any changes or consequences arose for the existing TCR provisions under the different options.

- 3.15 The Working Group also discussed whether the different approaches could have consequences for transmission charging. RF noted that the treatment of MPANs could affect the information passed through for transmission charging purposes and that the different options could therefore result in different outcomes.
- 3.16 Members agreed that DCP 476 should not attempt to resolve matters that properly sat within another industry code. However, any potential consequential impacts should be identified and acknowledged within any further documentation. It was agreed that the consultation will ask whether respondents could identify wider implications arising under other industry codes but not ask specific questions on this matter.
- 3.17 The Working Group discussed how the proposed arrangements would operate where one MPAN within a multi-MPAN site became de-energised and was subsequently re-energised. It was agreed that this scenario should be reflected within the consultation so that the consequences of the different solutions could be properly understood.
- 3.18 There was also discussion around whether implementation should require historic arrangements to be revisited. The general view was that the change should operate on a forward-looking basis, rather than requiring charges to be retrospectively recalculated.
- 3.19 The Working Group agreed that the next step should be to proceed with a second consultation rather than carrying out separate engagement with billing-system providers beforehand.
- 3.20 The consultation would seek views on the agreed capacity approach, the three alternatives for fixed/residual charging, unforeseen consequences, billing-system impacts, the existing TCR provisions and any wider impacts across industry codes. The usual Charging Objectives questions would also be included.
- 3.21 Working Group members agreed that the consultation should remain reasonably concise and should avoid repeating background information already covered within the first consultation where this was not necessary. Where appropriate, readers could instead be directed back to the earlier material.
- 3.22 ED offered to put the three fixed/residual charging options into a table so that the approaches could be presented clearly within the consultation.
- 3.23 The Workgroup considered whether legal text should accompany the second consultation. Members recognised that providing legal text could help respondents understand how each solution would work, although the precise drafting requirements were not yet clear.
- 3.24 It was agreed that Andy Green would prepare initial drafting for the agreed capacity approach and the different residual/fixed-charge options. The Workgroup could then review the drafting alongside the consultation and decide whether it was sufficiently developed to include.
- 3.25 The Working Group discussed whether the changes would sit within Schedule 32 or whether provisions dealing specifically with the charging of multi-MPAN sites would be more appropriately

included elsewhere, including potentially Schedule 16. This would be considered further once the initial legal text had been developed.

3.26 The consultation questions the Working Group initially agreed to ask are below

- 1) Do you foresee any unintended or unforeseen consequences arising from the proposed capacity approach?
- 2) Does your current MHHS billing system allow capacity to be split in the manner proposed?
- 3) Which of the three fixed/residual charging solutions do you prefer and why?
- 4) Are there any unforeseen consequences associated with any of the three solutions that the Workgroup has not considered?
- 5) Are there any other solutions that the Workgroup has not considered? If so, please provide details.
- 6) What is the scale and nature of the billing-system changes required to implement each solution?
- 7) Do you foresee any changes to, or consequences for, the existing TCR provisions under any of the proposed options?
- 8) Are there any wider implications associated with any of the options across other industry codes? If so, please provide details.
- 9) Do you consider the proposed change better facilitates the applicable Charging Objectives? Please provide reasons for your response.

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 (06) for 02 November 2026 at 10am to continue to discuss the potential solutions and to review the draft of the second consultation;
- The secretariat to produce a draft consultation document and share with the Working Group
- The chair to produce some draft legal text for the Working Group to review.

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 – 02 November 2026

- 6.1 The next Working Group meeting is scheduled for 02 November 2026 at 10am.

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	Ongoing.
03/02	The Secretariat to reach out to respondent 01 [confidential] to seek further clarification around their Supplier pricing issue.	Secretariat	Ongoing.
03/03	PM to seek further clarification internally in regard to SPENs response to Q6 and feedback to the group.	Philip Mark	Ongoing.
04/01	ED and PW to provide further clarity for the three different options regarding the split of the fixed charges.	Edda Dirks and Peter Waymont	New Action
04/02	PM and EB to speak to the Durabill User Group members to discuss the current capabilities of the billing system.	Phil Mark and Erik Baguzis	New Action
04/03	The Chair to begin to draft the second consultation document and share with the Working Group in readiness for the next Working Group meeting	Andy Green	New Action

Closed Actions

Action Ref.			Update
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	Closed.

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	Closed
03/02	The Secretariat to reach out to respondent 01 [confidential] to seek further clarification around their Supplier pricing issue.	Secretariat	Closed
03/03	PM to seek further clarification internally in regard to SPENs response to Q6 and feedback to the group.	Philip Mark	Closed
04/01	ED and PW to provide further clarity for the three different options regarding the split of the fixed charges.	Edda Dirks and Peter Waymont	Closed
04/02	PM and EB to speak to the Durabill User Group members to discuss the current capabilities of the billing system.	Phil Mark and Erik Baguzis	Closed