DCP 461 Working Group - Meeting 18

20 October 2026 at 10:00 - Web-Conference

Attendee	Company
Working Group Members	
Aishwarya Harsure [AH]	NESO
Alex Iknoic [AI]	Roadnight Taylor
Alex Pentecost [AP]	Eclipse Power
Brian Hoy [BH]	SP ENW
Catriona Glennie [CG]	SPEN
Drew Johnstone [DJ]	NPg
Erik Baguzis [EB]	Indigo Networks
Jack Purchase [JP]	NGED
John Harmer [JH]	Waters Wye
Lee Wells [LW]	NPg
Liam Sweeney [LS]	Ofgem
Matthew Paige-Stimson [MPS]	National Grid
Natalija Zaiceva [NZ]	UKPN
Rohan Sachdev [RS]	SSEN
Code Administrator	
Andy Green [AG] (Chair)	ElectraLink
Mel Kendal [MK] (Secretariat)	ElectraLink
Apologies	
Edda Dirks [ED]	SSE Generation
Tim Hipperson [TH] (Chair)	ElectraLink

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

1.4 The Chair invited the Working Group to review the previous meeting minutes – no further feedback was received, and the minutes were approved.

Open Actions

1.5 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 discuss the NESO Data and Impact Assessment and to discuss/finalise the nine solutions within the Working Group and agree next steps.

3. Discuss NESO Data & Impact Assessment

3.1 The Chair presented the anonymised dataset live-on-screen and invited the Working Group to further discuss the dataset and Impact Assessment.

3.2 The key updates can be found below:

3.3 AH explained to the group the distinguishment between the NGET dataset of 49 DNO schemes, (based on additional GSP scheme capability) and the original NESO sample of 10 transmission connection asset schemes (based on user-requested MW).

3.4 MPS considered that both user capacity and additional network capability were relevant. A small Customer could trigger an efficient upgrade that provided shared capacity for subsequent users; assessing efficiency solely against the triggering Customer's capacity could therefore be misleading.

3.5 BH explained that the HCPT (High-Cost Project Threshold) variants still required a credible threshold to be developed, regardless of whether members ultimately supported the mechanism. The intended protection was against unusually high cost-per-MW outcomes, rather than capturing most

embedded projects. BH prioritised a breakdown of the individual Customer capacities underlying each scheme.

3.6 MPS clarified that the MW column in the 49-scheme dataset represented additional transmission system capability, not the sum of Customer applications, and suggested relabelling it “Scheme Capability MW”. BH explained that the missing information was the number and individual sizes of the applications that had driven the works.

3.7 AH advised that some contracted Customer information might be available, however, linking all 49 schemes to the underlying offers and Bilateral Connection Agreements would require manual review across multiple sources. Complete coverage and a delivery timeframe could not yet be confirmed.

3.8 AI highlighted the importance of individual project capacities, explaining that applying the capability-based analysis to typical project sizes appeared to bring most projects above the proposed threshold. AI and BH suggested that Statement of Works or Appendix G application information could help identify the underlying projects.

3.9 AH presented the separate NESO sample of 10 schemes. Members clarified that the request should focus on embedded Customers, rather than directly transmission-connected Customers, and identify the individual projects making up each aggregate capacity. AI noted that the applications were relevant whether or not the associated offers had subsequently been accepted. AH indicated that a breakdown and potentially a further 10–15 schemes might be obtainable, subject to investigation.

3.10 Members discussed whether to continue seeking a breakdown of the 49 NGET schemes. BH noted that DNOs would need the scheme identities before they could assist and raised the risk of further data collection delaying progress. BH reiterated that the purpose of the analysis was to identify extreme cost risks and establish a meaningful threshold for Ofgem to assess, rather than determine at this stage whether the HCPT should ultimately be approved.

3.11 MPS suggested considering illustrative scenarios for Customers of different sizes, including 1 MW, 5 MW and 10 MW, to understand the potential effect of a threshold on smaller connections. MPS highlighted that liability could depend on location and the order in which Customers triggered an upgrade.

3.12 RS queried the geographical coverage and representativeness of the sample. AH confirmed that the 49-scheme dataset covered NGET only, whereas the NESO sample had been selected across TOs.

3.13 NZ queried the consistency of capability figures, power-factor treatment and the scope of costs in the NGET dataset. NZ considered that the wide range of costs needed explanatory commentary before the data could support a threshold.

3.14 MPS explained that costs could vary with location, land availability, civil works, foundations and the extent to which existing assets could be reused. Some low-cost schemes reflected protection or control changes rather than installation of major electrical plant. MPS suggested considering exclusion of exceptionally low-cost examples. NZ also raised transformer capacity as an alternative basis for analysis.

3.15 LW suggested moving forward on the principle of an HCPT and treating the consulted £125,000 per MW figure as indicative, with a more robust assessment if required. The Chair considered that parking further work could be an option, but members subsequently raised concerns about submitting an incomplete solution.

3.16 AI asked whether Ofgem could approve the principle subject to further threshold work. The Chair and LS explained that Ofgem could approve, reject or send back a proposal where further evidence was required. LS cautioned that a send-back could delay both the decision and implementation, and that proposals should ideally be capable of implementation if approved.

3.17 The Chair explained that as this change is a Part 1 matter, party voting would provide a recommendation to Ofgem. Parties could record concerns about the evidence or threshold in their voting rationale.

3.18 AI and BH remained uncomfortable progressing the consulted value. BH explained that the previous analysis had been understood as using customer-requested capacity rather than created capability and therefore did not establish the threshold as intended. BH also considered that an unsuitable value could distort voting on an otherwise supportable principle. LW maintained that the principle remained useful but acknowledged that a proper impact assessment needed a number.

3.19 BH queried whether an incomplete HCPT variant could delay decisions on all the solutions. LS agreed to seek internal advice on the scope for a decision in principle, including any precedent and the requirements for robust decision-making.

ACTION 18/01: LS to seek internally whether a HCPT option could be assessed or decided in principle without a settled threshold value, including the implications for decisions on the other options, and update the Working Group.

3.20 AH noted that the existing samples produced different indicative 95th-percentile values: approximately £100,000 per MW for the NESO user-MW sample and £125,000 per MW for the NGET capability-based sample. BH reiterated that the latter did not represent the intended Customer-capacity assessment.

3.21 RS advised that submitting no value, or a value known to be unsuitable, could simply defer the outstanding work. LS advised that Ofgem might be able to approve another option and reject an HCPT option, but further information could be required if the latter had merit. This would depend on the final reports and assessment.

3.22 MPS reiterated that the options retained cost-apportionment provisions and that DNO/DSO network planning could support efficient timing and location of transmission upgrades without an additional upstream HCPT. The Chair summarised an appetite to obtain further data if HCPT variants continued to be progressed.

3.23 In regard to the data request requirements, JH clarified that the starting point should be a breakdown of the individual project capacities underlying the 10-scheme NESO sample. The

capability-only NGET data could not answer that question without the corresponding Customer-request information. Following this, the Working Group agreed that a larger sample is desirable.

3.24 AH confirmed that the revised request was clear and agreed to contact the relevant teams. AH could not commit to a delivery date but would circulate an update once the position was known. The Chair noted support for this approach.

ACTION 18/02: AH to seek the number and individual MW capacities of the embedded Customer projects underlying each of the 10 NESO sample schemes; investigate adding approximately 10–15 further schemes where feasible; and circulate an update on availability and timescales once confirmed.

3.25 MPS stated that queue order, triggering responsibility and future Customer-size patterns could differ from the historical sample. Any conclusions would need to acknowledge those limitations. BH suggested an indicative analysis treating each underlying Customer as if it alone triggered the scheme cost, to illustrate potential cost-per-capacity outcomes.

3.26 LW supported starting with a clear breakdown of the existing 10 schemes while seeking a larger sample. LW highlighted that the costs must be consistently scoped transmission connection asset charges rather than other charges.

3.27 NZ suggested using signed offers from a longer historical period, rather than relying only on six months of data, given the position on Gate 2 offers. BH considered that unaccepted offers could also provide useful evidence of applicant behaviour and urged a pragmatic approach to avoid further delay.

3.28 AH confirmed that the priority would be the agreed 10-scheme breakdown and feasible additions. Gate 2 information would be considered if obtainable within the available time, rather than delaying the core request. NZ explained that like-for-like assessment should distinguish major asset installations from low-cost changes that released capacity. AH acknowledged the clarification.

3.29 The Chair concluded that there was a way forward for the data request and invited AH to raise further questions as necessary.

4. Discuss & Finalise 9 Solutions

4.1 The Chair invited the Working Group to discuss and finalise the nine solutions.

4.2 The key updates can be found below:

4.3 BH clarified that the intended grouping was four variants in the first Change Report, four in the second and one in the third, reflecting different issues and approaches rather than three variants per report.

4.4 As the three draft Change Reports were not yet available for the Working Group to review, JH suggested deferring substantive review until written drafts could be considered. BH agreed to assist with drafting Change Report 1, along with support from LW.

4.5 The Chair proposed that the Secretariat prepare an initial structure and draft content, allowing members to contribute to defined sections rather than start from a blank report. AG agreed to speak with RC and TH and provide an update to the Working Group.

ACTION 18/03: The Secretariat to produce a skeleton Change Report and agree with RC and TH how the three draft Change Reports will be developed and circulated for member input.

4.6 The Chair confirmed that all nine variants would continue to be progressed through three Change Reports in a four/four/one grouping. Detailed review was deferred pending draft reports. The Chair reiterated that an initial skeleton Change Report would provide a starting point for further development.

4.7 AH asked about the remaining meetings, legal review and timeline. The Chair initially suggested that the December DUCSA Panel on 16 December 2026 could be a target, with November appearing ambitious.

4.8 LW stressed that the HCPT data exercise was not itself an impact assessment. The group still needed to demonstrate how the options would change costs for connecting Customers and DUoS Customers relative to the current arrangements.

4.9 The Chair acknowledged the distinction and agreed that the work plan needed review to reflect drafting, analysis and assessment of Customer impacts.

ACTION 18/04: The Secretariat to review and update the Work Plan to reflect the outstanding Change Report drafting, data analysis, Customer Impact Assessment and legal review.

5. Agreed Next Steps

5.1 The Working Group discussed the next steps, and the following items were captured:

- LS to seek internally whether a HCPT option could be assessed or decided in principle without a settled threshold value, including the implications for decisions on the other options, and update the Working Group.
- AH to seek the number and individual MW capacities of the embedded Customer projects underlying each of the 10 NESO sample schemes; investigate adding approximately 10–15 further schemes where feasible; and circulate an update on availability and timescales once confirmed.
- The Secretariat to produce a skeleton Change Report and agree with RC and TH how the three draft Change Reports will be developed and circulated for member input.
- The Secretariat to review and update the Work Plan to reflect the outstanding Change Report drafting, data analysis, Customer Impact Assessment and legal review.

6. Any Other Business

6.1 The Chair asked the group whether there were any other items of business to discuss.

6.2 There were no other items raised.

7. Next Meeting Date – 09 November 2026

7.1 The Chair confirmed the next Working Group meeting is scheduled for 09 November 2026 at 10am.

APPENDIX A

New and Open Actions

Action Ref.	Action	Owner	Update
02/02	MA, BH and BG to pull together work done by previous ENA group to see if it can be used by the Working Group.	Mark/Brian/Ben	**On Hold (Post-Consultation 2)** *Members agreed to keep this action open as it is not required to consult, but may be required for an Impact Assessment, following the Consultation.*
16/02	The Secretariat to add an extra rationale to explain why the data is 6-months.	Secretariat	**Ongoing.** *The Chair will follow-up with RC and TH.*
16/04	AI and JP to have a discussion offline around looking across the DNO regions and look at the average sizes of the projects, and how many would meet the current threshold, versus not.	Alex Ikonic / Jack Purchase	**Ongoing.** *AI confirmed that discussions with JP had taken place and remained ongoing.*
16/05	The Secretariat to produce a recommendation paper to the DCUSA Panel on how best to hold the voting for each of the proposed options/solutions in relation to the 3 separate Change Reports.	Secretariat	**Ongoing.** *The Chair noted that the voting approach for the three was expected to be discussed at the DCUSA Panel on 21 October 2026 and agreed to follow this up.*

16/06	The Secretariat to locate the reference under Q4 that states 'protecting existing Customers from cost increase' within the collated Consultation responses document.	Secretariat	**Ongoing.** *The Chair will follow-up with RC and TH.*
17/03	The Secretariat to seek legal advice from Gowling for advice on translating the agreed policy intent into clear legal text.	Secretariat	**Ongoing.** *The Chair will follow-up with RC and TH.*
17/04	The Secretariat to seek legal advice from Gowling around the definitions/glossary in regard to the HCPT.	Secretariat	**Ongoing.** *The Chair will follow-up with RC and TH.*
17/05	The Working Group to relook at the way HCPT is referred to when further developing the legal text to ensure it is consistent.	Working Group	**Ongoing.** *This action will remain ongoing, pending further legal drafting.*
17/07	BH and LW to start developing the three Change Reports offline for the Working Group to review and further develop during the next meeting.	Brian Hoy / Lee Wells	**Ongoing.** *The draft Change Reports are not yet available for review. This action will remain open.*
18/01	LS to seek internally whether a HCPT option could be assessed or decided in principle without a settled threshold value, including the implications for decisions on the other options, and update the Working Group.	Liam Sweeney	**New Action.**
18/02	AH to seek the number and individual MW capacities of the embedded Customer projects underlying each of the 10 NESO sample schemes; investigate adding approximately 10–15 further	Aishwarya Harsure	**New Action.**

	schemes where feasible; and circulate an update on availability and timescales once confirmed.		
18/03	The Secretariat to produce a skeleton Change Report and agree with RC and TH how the three draft Change Reports will be developed and circulated for member input.	Secretariat	**New Action.**
18/04	The Secretariat to review and update the Work Plan to reflect the outstanding Change Report drafting, data analysis, Customer Impact Assessment and legal review.	Secretariat	**New Action.**

Closed Actions

Action Ref.			Update
16/03	LS to look further into whether Ofgem can state a preference within a send-back letter, and whether Option 3.1 would need to be its own FMR in order to be assessed (if taken forward).	Liam Sweeney	**Closed.** *LS confirmed that Option 3.1 did not necessarily require a standalone FMR (Final Modification Report). This action is now closed.*
17/01	AI to circulate the data spreadsheet to the Working Group offline for review (in relation to Action 16/04).	Aishwarya Harsure	**Closed.** *AI confirmed the spreadsheet had been circulated.*
17/02	AH to speak internally and seek whether NESO can assess disaggregated data for the 49 DNO schemes, showing the individual projects and capacities contributing to each aggregated scheme, and investigate whether limited additional recent data from other DNO areas can be added. If able to do so, AH agreed to bring this to the next Working Group for further discussion.	Alex Ikonic	**Closed.** *AH confirmed that initial internal discussions had taken place and would be covered under the NESO*

			agenda item during the meeting. It was agreed for this action to be closed.
17/06	AH to seek internally (NESO) for the required information to aid the Impact Assessment.	Aishwarya Harsure	**Closed.** *The group agreed for this action to be closed as the initial information for the Impact Assessment has been sought.*