

DCP 473 Working Group Meeting 10

16 October 2026 at 14:00pm – Web-conference

Attendee	Company
Working Group Members	
Blessing Ekpe [BE]	SSE
Mark Bellman [MB]	SPENWL
Donna Jamieson [DJ]	IDCLS
Mark Jones [MJ]	SSE
John Harmer [JH]	Waters Wye
Nik Wills [NW]	Stark
Ryan Farrell [RF]	NPg
Victoria Burkett [VB]	EON
Peter Waymont [PW]	UKPN
Ihiechi Okwelle [IO]	Ofgem
Code Administrator	
Andy Green [AG]	ElectraLink
Apologies	
Jo Brown [JB]	National Grid
Hannah Proffitt [HP]	ElectraLink

1. Administration

Recording

- 1.1. The Chair informed Working Group members that, as per the Terms of Reference, the meeting would be recorded for the purpose of aiding the Technical Secretary in producing an accurate record of the meeting. The recording will be deleted no later than 60 days after the meeting.

Competition Law Guidance and Terms of Reference

- 1.2. The Working Group reviewed the “Competition Law Guidance” and “Terms of Reference”. All Working Group members agreed to be bound by the Competition Law Guidance for the duration of the meeting.

Action Log & Review of Minutes

- 1.3. The Chair presented the minutes of the previous meeting. The Working Group approved the minutes.
- 1.4. A summary of the open actions and updates are included in the appendix.

2. Purpose of the Meeting

- 2.1. The Chair explained that the purpose of the meeting was to discuss the feedback received from Gowlings on the legal text and to review the Change Report.

3. Review/Legal Text

- 3.1. The Working Group reviewed the revised Solution A legal text.
- 3.2. PW highlighted a separate issue with the DCP 440 baseline drafting and advised that a housekeeping Change Proposal had been raised to correct it. The Working Group noted that this would need to be considered when finalising DCP 473.

Traded status

- 3.3. Pw suggested that the drafting should refer to whether an MPAN had the status of “Traded”, rather than describing the individual registration conditions.
- 3.4. ViB suggested cross-referring to the existing industry definition, while RF noted that an appropriate registration or enquiry service could potentially provide the operational indicator.
- 3.5. The Working Group agreed that the Chair would ask the legal adviser to confirm the appropriate definition or cross-reference.
- 3.6. The Working Group also agreed that Current Transformer and Whole Current terminology should be applied consistently across the drafting, including appropriate capitalisation and definitions.

National Terms of Connection

- 3.7. The Working Group considered the proposed amendments to the National Terms of Connection covering circumstances where a de-energised connection point did not have an express or deemed supply contract.
- 3.8. The Working Group were broadly content with the proposed approach, subject to the terminology and drafting amendments discussed.

Solution C legal text

- 3.9. The Chair explained that elements of the Solution C process had been moved from Schedule 16 into the National Terms of Connection, reflecting that the process concerned the contractual relationship between the Distributor and connectee. The Working Group was content with this approach in principle.

Import and export capacity

- 3.10. The Working Group considered whether the drafting should refer only to Maximum Import Capacity or also include Maximum Export Capacity.
- 3.11. It was agreed that the provisions should cover MIC and/or MEC, as applicable, recognising that a site could have both import and export capacity and these could differ at MPAN level.

- 3.12. The Working Group remained content to progress Solution C, subject to the drafting amendments and further.

Further development of Solution E

- 3.13. The Working Group considered Solution E in more detail, including the previously discussed 28-day non-payment period.
- 3.14. The Working Group agreed that the issue was more complicated than determining an appropriate number of days, particularly where DUoS invoicing, customer contact and Supplier billing occurred at different points.

Backdating and removal of charges

- 3.15. PW highlighted that the proposed approach could leave the Supplier exposed to DUoS charges between the Distributor's invoice and the Supplier establishing that the customer was not going to pay.
- 3.16. The Working Group's discussion indicated that, where the customer did not elect to retain and pay for the capacity, the intended outcome should avoid leaving uncollected charges with the Supplier. The Chair agreed to seek further clarification from the legal adviser on the appropriate effective date and backdating arrangements.

Billing disputes and payment arrangements

- 3.17. PW also highlighted circumstances where a customer had not paid for legitimate reasons, including a disputed bill or an agreed payment arrangement.
- 3.18. JH considered that Solution E needed to distinguish between a customer simply failing to pay and circumstances where the Supplier and customer were actively resolving a billing or payment issue.
- 3.19. The Chair agreed to ask the legal adviser to consider appropriate provisions for valid billing disputes, financial difficulty and agreed payment arrangements.
- 3.20. The Working Group agreed to continue developing Solution E, recognising that further legal drafting and consideration were required before the solution could be finalised.

Charges where capacity is reduced to zero

- 3.21. The discussion moved to whether fixed charges should continue where MIC/MEC had been reduced to zero.
- 3.22. The Chair explained that the solutions had different underlying purposes:
- Solution A was primarily a charging and cost-socialisation approach.
 - Solution C was primarily intended to recover unused network capacity.
 - Solution E sought to address capacity recovery while also reducing the potential for Supplier bad debt.
- 3.23. RF agreed that Solution C had principally been developed as a capacity-recovery mechanism. John Harmer similarly understood that where capacity was reduced to zero, the intention was that charges would no longer flow to the MPAN.

- 3.24. MB questioned the interaction with fixed charges and the original cost-reflectivity issue. Following discussion, the Working Group agreed that the intended charging treatment under Solutions C and E needed to be made clearer in both the legal text and Change Report.
- 3.25. RF questioned references to “half-hourly sites”, noting that DCP 473 was specifically intended to address CT-metered sites and that Whole Current smart metering could also involve half-hourly data.
- 3.26. MB and PW agreed that the terminology could cause ambiguity. The Working Group agreed that the intended scope should be explained to the legal adviser and the references reviewed consistently across Solutions A, C and E.
- 3.27. JH raised concerns about the operational impact on Suppliers of processing the initial volume of legacy de-energised sites.
- 3.28. VB noted that Suppliers would need to manage the additional activity if the change was approved. The Working Group noted that the implementation date would be known in advance and that the initial workload should principally represent a one-off transition exercise.
- 3.29. RF presented the developing Solution A timeline, covering legacy sites, newly de-energised sites and sites becoming de-energised at implementation.
- 3.30. The Working Group confirmed that charges for existing legacy sites would commence from the implementation date, while sites becoming de-energised subsequently would be charged from the point of de-energisation.
- 3.31. PW identified an error within the timeline and suggested including an additional eventual disconnection scenario to show when charging would cease.
- 3.32. RF agreed to make the amendments, agreeing to combine the updated material with the Solution C timeline and circulate it to the Working Group.

Change Report

- 3.33. Due to the time spent reviewing the legal drafting, the Working Group did not undertake a detailed review of the Change Report.
- 3.34. The Chair noted that the report should be further updated to distinguish clearly between the purposes of Solutions A, C and E, particularly Solution A’s charging and cost-socialisation approach compared with the capacity-recovery focus of Solutions C and E.
- 3.35. Working Group were asked to review the Change Report and provide any further comments.

4. Next Steps and Work Plan

- 4.1. Following a discussion of availability, Friday 06 November 2026, 10:00 to 13:00 was identified as the preferred next meeting slot, subject to attendees' availability.

5. Any Other Business

- 5.1. No other business was raised.

6. Next Meeting

6.1. The date of the next meeting is Friday 06 November at 10am.

New and Open Actions

Action Ref.	Action	Owner	Update
06/02	Check how supplier contractual arrangements may affect the treatment or pass-through of charges where a customer elects to retain capacity.	VB	Action ongoing.
08/01	The group to revisit the discussion on the proposed 28 day period in the new solution (Solution E) and to check this against Supplier processes and any relevant licensing requirements.	All	New action.
08/03	RF to update the timeline diagrams in line with decision to update the energisation period from 28 days to 6 months. RF to also create a diagram for Solution A.	RF	New action.
10/01	Circulate the outstanding revised legal text to the Working Group once received.	The Chair	New action
10/02	Review clause 139C and report back to the Working Group.	JH	New Action

Closed Actions

Action Ref.			Update
06/01	Review the available site data and share relevant analysis with the working group, including the age profile of de-energised sites.	The Chair	Action closed.
07/01	JH and RF to work together to finalise the timeline diagrams and send to the Chair once complete.	The Chair	Action closed.

07/02	The Chair to send the legal text to Gowlings for legal review following the meeting.	The Chair	Action closed.
07/03	The Chair to begin drafting a Change Report for discussion at the next meetings.	The Chair	Action closed.
08/02	The Chair to ask Gowlings to prepare legal text for the new alternative solution (Solution E), including wording on backdating.	The Chair	Action closed.
08/04	The Chair to refer to Gowlings regarding the possibility of the gaming clause including consideration of cumulative patterns, such as a site being de-energised for a specified proportion of a longer reference period, rather than relying only on one continuous period.	The Chair	Action closed.
08/05	The Chair to ask Gowlings to include an obligation in the Solution C legal text for DNOs to contact the customer following capacity removal, stating that capacity had been reduced to zero and explaining what would be required for future re-energisation.	The Chair	Action closed.
09/01	Amend the Change Report to explain the proposer's rationale for continuing to progress Solution A following the legal review, and highlight the wording to Peter Waymont.	The Chair	Closed.
09/02	Amend the Change Report so that Solution E is described as having been developed by the Working Group following the legal review, rather than being proposed by the legal adviser.	The Chair	Closed.

09/03	Update the Solution C section of the Change Report to reflect the agreed treatment where a site re-energises for less than six months, including that the 12-month clock does not pause.	The Chair	Closed.
09/04	Produce/update timeline for Solution A, including consideration of legacy and newly de-energised sites.	RF	Closed.