DCP 476 Working Group - Meeting 06

02 November 2026 at 10:00 - Web-Conference

Attendee	Company
Working Group Members	
Alex Pentecost [AP]	Eclipse Power
Chris Ong [CO]	UKPN
Edda Dirks [ED]	SSE Gen
Giao Le [GL]	SSEN
Lorna Murray [LM]	SPEN
Louise Bunney [LB]	NPg
Louise Robinson [LR]	ESP
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	
Erik Baguzis [EB]	Indigo Networks
Hakan Feridun [HF]	Energunite
Jenny Harvey [JH]	National Grid
Jo Brown [JB]	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.

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.

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 further discuss the potential solutions and to review the draft Consultation 02 document within the Working Group and agree next steps.

3. Review Draft Consultation 02 Document

3.1 The Chair invited the Working Group to review and further develop the draft Consultation 02 document. The document was shared live-on-screen and updates were made during the meeting.

3.2 The key updates can be found below:

3.3 ED also suggested that further clarity could be added into the document to help readers distinguish between the DCP 476 Consultation 01 responses and the DCP 476 Consultation 02 questions – the Secretariat agreed to take an action to revise the Consultation 02 document to separate Consultation 01 Conclusions from Consultation 01 questions.

ACTION 06/01: The Secretariat to revise the Consultation 02 document to separate Consultation 01 Conclusions from Consultation 01 questions.

3.4 ED presented illustrative examples comparing the fixed-charge outcomes under the three approaches developed to date:

- **Option 1:** Retain the Site's residual band and split the total fixed charge between Suppliers, either equally or proportionally.

- **Option 2:** Retain the Site's residual band and apply the full Site fixed charge to each Supplier.
- **Option 3:** Band MPANs or Supplier groupings separately using their allocated capacity.

3.5 Members considered the examples helpful in demonstrating the different outcomes and agreed that they should be included within Section 1 of the Consultation 02 document, alongside the explanatory narrative.

ACTION 06/02: The Secretariat to include the agreed illustrative options within Section 01 of the Consultation 02 document.

3.6 CO suggested that the illustrative capacity figures should be aligned with the relevant Band 4 threshold to avoid confusion. Members also agreed that the capacity-charging approach could be explained through concise narrative rather than adding further options to the fixed-charge comparison.

3.7 Following this, ED agreed to revise the illustrative capacity figures to align with the relevant Band 4 threshold and refine the supporting narrative, once the updated version of the Consultation 02 document has been received by the Secretariat.

ACTION 06/03: The Secretariat to send and updated version of the draft Consultation 02 document to ED offline for further amendments.

ACTION 06/04: ED to revise the illustrative capacity figures to align with the relevant Band 4 threshold and refine the supporting narrative.

3.8 RF suggested including information on the system changes associated with each option. Members noted that splitting the fixed charge would require changes to Durabill, whereas other approaches might be supported by existing functionality.

3.9 CO cautioned against presenting the capabilities of one billing system as representative of all DNO and IDNO systems. The Working Group agreed that the Consultation 02 document should provide appropriate context and obtain further evidence on system impacts, rather than allow current functionality to dictate the solution.

3.10 The Working Group confirmed the proposed capacity approach - the overall site MIC would remain unchanged and would be split equally between MPANs by default, with the Customer and DNO able to agree an alternative proportional split.

3.11 Members clarified that the default split should follow the number of MPANs rather than the number of Suppliers. For example, where four of five MPANs were registered to one Supplier, that Supplier would account for four-fifths of the capacity and associated charges.

3.12 PW questioned whether separate banding was appropriate where the underlying Connection Agreement had not changed. Members discussed the risk that an administrative capacity split would not reflect the physical configuration or operational use of the site, and that using it to determine residual bands could produce inappropriate outcomes.

3.13 ED noted that the other options could also require changes to Schedule 32 and initially suggested that these implications should be considered before discounting Option 3. Following further

discussion, members distinguished changes to charging provisions from changes affecting the underlying Connection Agreement.

3.14 The Working Group agreed not to progress with Option 3. The Consultation 02 document would explain that it had been considered and set out the reasons for discounting it, including Connection Agreement implications, complexity and potential gaming. No specific question would be asked on its removal; however, it was noted that respondents can provide related comments within the 'any additional comments' question at the end of the document if they wish to do so.

3.15 The Secretariat agreed to take an action to remove option 3 from the solutions offered within the Consultation 02 document and include the Working Groups rationale for discounting it within the conclusions section.

ACTION 06/05: The Secretariat to remove option 3 from the solutions offered within the Consultation 02 document and include the Working Groups rationale for discounting it within the conclusions section.

3.16 No majority preference was established between the remaining fixed-charge approaches. Members agreed that the Consultation 02 document would therefore seek industry views without directing respondents towards a preferred option.

Overview of Consultation 01 Conclusions

3.17 The Chair took members through the draft summary of the nine responses to Consultation 01.

Q1 - 'Do you understand the intent of DCP 476?'

3.18 The Chair reported that respondents understood the intent of the proposal. One respondent had requested further information on the types and approximate numbers of affected sites to help assess the scale and potential impacts. Members noted the value of clear practical examples.

Q2 - 'Do you support the principles of DCP 476?'

3.19 The response summary demonstrated support for establishing a clear and consistent approach within DCUSA. One respondent had suggested extending the scope to multi-MPAN sites registered to a single Supplier.

3.20 The Working Group retained its focus on multi-MPAN sites registered to different Suppliers. The single-Supplier concern had been considered through the previous clarification work and related more closely to Supplier pricing arrangements.

Q3 - 'Do you have experience of the issue described in the consultation?'

3.21 Respondents described affected sites across different voltage levels, manual billing interventions and uncertainty over MIC allocation and fixed charges. The summary also identified circumstances involving staggered MHHS migration and separate supply contracts for individual MPANs.

3.22 Members noted that the solution should operate clearly where the relevant charging circumstances arose, including temporary or unintended splits, without seeking to resolve wider MHHS registration matters.

Q4 - 'What is your organisation's current approach where a site-specific billed site has multiple MPANs registered to different Suppliers?'

3.23 The Chair outlined the differing approaches reported by respondents, including equal or proportional capacity splits, collective treatment at EHV and treatment of MPANs as separate sites for billing purposes.

3.24 The review reinforced the need for a consistent approach within DCUSA. The Chair amended the drafting to distinguish appropriately between site-level and MPAN-level treatment.

Q5 - 'Why do customers appoint different Suppliers to MPANs forming part of the same site?'

3.25 The summary identified commercial arrangements, separate feeders, operational requirements, historical arrangements and security-of-supply considerations. Supplier transfers and MHHS migration could also result in unintended separation.

3.26 Members recognised that Customers could have legitimate reasons for appointing multiple Suppliers. The charging arrangements should therefore respect Customer choice while avoiding inappropriate charging incentives.

Q6 - 'Having considered the potential solution approaches, do you prefer Option A or Option B?'

3.27 Responses did not establish a clear preference between an equal capacity split under Option A and proportional allocation under Option B. Equal splitting was considered simpler to administer, while proportional allocation could better reflect the site's configuration or use.

3.28 The Working Group retained the hybrid approach of an equal split by MPAN as the default, with an alternative proportional split available by agreement between the Customer and DNO.

Q7 - 'Have you identified any alternative solutions?'

3.29 Suggestions included a default equal capacity split with an alternative allocation available by agreement, approaches reflecting the Connection Agreement and retention of the overall site's residual band.

3.30 ED requested a short recap of the original capacity options so that readers could distinguish them from the fixed-charge options being developed for Consultation 02. Members also clarified the distinction between splitting capacity by MPAN and levying the resulting charges on the relevant Supplier.

3.31 Following the above discussion, the Chair agreed to include this within the draft Consultation 02 document.

ACTION 06/06: The Secretariat to add a concise recap of Consultation 01 (Option A and B) and clarify that capacity is split by MPAN, with the associated charges passed to the relevant Suppliers.

Q8 - 'Does DCP 476 interact with DCP 328?'

3.32 The Chair outlined the distinction between DCP 328's private-network and metering arrangements and the circumstances addressed by DCP 476. Members retained the position that DCP 328 provided relevant historical context but was not a direct dependency determining the DCP 476 solution.

Q9 - 'Should private networks be within scope?'

3.33 Members noted concerns that deliberately widening the proposal to address private networks would introduce additional complexity and risk delaying resolution of the core issue.

3.34 The Working Group retained the position that an arrangement should not be automatically excluded purely because it involved a private network. Applicability should depend on whether it met the relevant site criteria.

Q10 - 'Would implementation require system changes?'

3.35 Responses identified potential changes to billing systems, tariff or LLFC allocation, MPAN-level charging information and processes for identifying affected sites and maintaining capacity allocations.

3.36 Members noted that the impacts depended on the solution selected and that further evidence was required from DNOs and IDNOs.

Q11 - 'Would those system changes result in material implementation costs?'

3.37 Respondents had generally been unable to provide firm costs before the final solution was determined. Potential costs included development, testing and process changes. The summary also highlighted possible impacts on existing fixed-price supply contracts where charging outcomes changed.

Q12 - 'Do you have any other questions or comments?

3.38 The Chair summarised additional matters raised, including the number and types of affected sites, MPANs returning to the same Supplier, de-energisation and re-energisation, communications following Supplier changes, potential interaction with DCP 424 and duplication of fixed charges.

Development of Consultation 02 Questions

3.39 Members agreed that the questions should explicitly refer to both capacity and capacity charges, distinguishing these from fixed charges and residual-band allocation. References to "allocation" should be qualified consistently to avoid ambiguity.

3.40 The Consultation would seek preferences between the two remaining fixed-charge approaches, including equal or proportional sharing under Option 1, together with reasons, unforeseen consequences and alternative solutions.

3.41 ED questioned whether different approaches to splitting capacity and fixed charges could introduce unnecessary complexity. Members agreed that Consultation responses should help establish whether consistent treatment was preferable or whether there were reasons to adopt different methods.

3.42 Members recognised that removing Option 3 reduced some potential gaming risks. ED also highlighted that applying multiple full fixed charges could discourage customers from appointing different Suppliers.

3.43 The Working Group agreed to include a specific question seeking explanations of potential gaming opportunities and possible mitigations, rather than a simple yes/no response.

3.44 The Working Group agreed that DNOs and IDNOs should identify the system changes associated with each residual charging option, engaging their system providers where necessary. CO supported broadening the system-impact question beyond billing systems, as implementation could also affect linked finance systems and other processes.

3.45 The Chair confirmed that the outstanding IDNO capacity-system information would be incorporated when received.

3.46 Members retained a question on the changes to, or consequences for, existing TCR provisions. The Working Group recognised that a departure from existing arrangements would require a clear justification.

3.47 Members agreed that the Consultation should explicitly test both directions of the scenario: an MPAN becoming de-energised and subsequently returning to use.

3.48 ED suggested making the potential transmission-residual implications more explicit. Following discussion, members retained the broad cross-code question, supported by narrative acknowledging potential transmission-charging impacts.

3.49 The Working Group clarified that DCP 476 was not dependent on a CUSC change. Parties could raise changes through the relevant code arrangements if they wished to address consequential outcomes.

Legal Text / Objectives / Implementation / Impacts and Considerations

3.50 The Working Group agreed that Consultation 02 would not include fully drafted legal text. The preferred solution and system impacts needed further development before detailed drafting could be settled.

3.51 Members agreed that the legal commentary should identify potentially affected provisions, including Schedules 16, 17, 18 and 32, without suggesting that final drafting was being provided. CO requested consistent references to Schedules 16, 17 and 18 throughout.

3.52 The wording was amended to explain that the eventual drafting would clarify both the agreed capacity approach and the fixed-rate residual charging solution. The location of dedicated multi-MPAN provisions would be considered after the review of the Consultation 02 responses.

3.53 The Working Group agreed to defer detailed legal drafting until the Consultation 02 responses had been reviewed. CO noted that the fixed-charge arrangements had not been fully tested through Consultation 01, and that further evidence or alternative solutions could require substantial changes to any text drafted at this stage.

3.54 Members supported a third, focused Consultation covering legal text, implementation and the applicable objectives, with the intention of presenting a single developed solution and a better understanding of system impacts.

3.55 ED noted that the different charging options could produce different outcomes and that an assessment against the applicable objectives should not be presented as an agreed Working Group view. CO confirmed that the existing assessment could remain as the Proposer's view. Members agreed to remove the objectives question from Consultation 02 and seek views through the third consultation once the solution was further developed.

3.56 The Working Group confirmed that implementation should be prospective and would not require historic charges to be recalculated. CO requested the removal of 'normally' and replacement of 'should not' with 'would not' to make this position unambiguous. Members agreed that the implementation date would be determined after review of the Consultation 02 responses, rather than asking respondents to agree a date at this stage.

3.57 The Working Group acknowledged that supporting guidance could assist consistent application across DNOs, IDNOs and Suppliers. Members agreed that it was too early to determine its content before selecting the charging solution. The need for guidance would be revisited after Consultation 02, including whether the final legal text explained the process sufficiently without separate guidance.

3.58 The Chair reviewed the draft impact statements, which identified no impacts on current SCRs or significant industry change projects, no additional consumer impacts beyond those described in the proposal, and no environmental impacts.

3.59 Members revisited the wording on potential CUSC implications. CO advised that it should not imply that a CUSC modification was required to implement DCP 476. The Chair amended the wording to reflect that parties might identify consequential impacts and could choose to raise changes through the relevant code arrangements. DCP 476 remained a standalone proposal with no dependency on a CUSC change.

Agreed Next Steps

3.60 The Chair agreed to consolidate the amendments and send the updated draft Consultation 02 document to ED first. ED confirmed that she would update the illustrative examples and supporting context, including the total site capacity and Band 4 threshold, and return the document to the Secretariat for wider circulation.

ACTION 06/07: The Secretariat to make the necessary updates to the draft Consultation document and send to ED offline.
ACTION 06/08: The Secretariat to issue the updated draft Consultation document to the Working Group once ED's updates have been included.

3.61 Members agreed to reconvene to review and finalise the document before issue. The meeting could be cancelled if the outstanding amendments were resolved offline. The Secretariat agreed to schedule the next Working Group meeting for 11 November 2026 at 10am.

ACTION 06/09: The Secretariat to schedule the next Working Group meeting for 11 November 2026 at 10am.

4. Agreed Next Steps

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

- The Secretariat to make the necessary updates to the draft Consultation document and send to ED offline.
- ED to revise the illustrative capacity figures to align with the relevant Band 4 threshold and refine the supporting narrative.
- The Secretariat to issue the updated draft Consultation document to the Working Group once ED's updates have been included.
- The Working Group to review and finalise the draft Consultation 02 document during the next meeting scheduled for 11 November 2026.

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 – 11 November 2026

6.1 The next Working Group meeting is scheduled for 11 November 2026 at 10am.

7. Attachments

- Attachment 1_DCP 476 Work Plan

APPENDIX A

New and Open Actions

Action Ref.	Action	Owner	Update
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	**Ongoing.** *PM explained that if an MPAN changes Supplier, then each MPAN will receive a full fixed-charge.* *The Chair agreed to seek an update from EB before closing this action.*
06/01	The Secretariat to revise the Consultation 02 document to separate Consultation 01 Conclusions from Consultation 01 questions.	Secretariat	**New Action.**
06/02	The Secretariat to include the agreed illustrative options within Section 01 of the Consultation 02 document.	Secretariat	**New Action.**
06/03	The Secretariat to send and updated version of the draft Consultation 02 document to ED offline for further amendments.	Secretariat	**New Action.**
06/04	ED to revise the illustrative capacity figures to align with the relevant Band 4 threshold and refine the supporting narrative.	Edda Dirks	**New Action.**
06/05	The Secretariat to remove option 3 from the solutions offered within the Consultation 02 document and include the Working Groups rationale for discounting it within the conclusions section.	Secretariat	**New Action.**

06/06	The Secretariat to add a concise recap of Consultation 01 (Option A and B) and clarify that capacity is split by MPAN, with the associated charges passed to the relevant Suppliers.	Secretariat	**New Action.**
06/07	The Secretariat to make the necessary updates to the draft Consultation document and send to ED offline.	Secretariat	**New Action.**
06/08	The Secretariat to issue the updated draft Consultation document to the Working Group once ED's updates have been included.	Secretariat	**New Action.**
06/09	The Secretariat to schedule the next Working Group meeting for 11 November 2026 at 10am.	Secretariat	**New Action.**

Closed Actions

Action Ref.			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	**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.**
04/03	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	**Closed.**