DCP 461 Working Group - Meeting 19

09 November 2026 at 10:00 - Web-Conference

Attendee	Company
Working Group Members	
Alex Ikonic [AI]	Roadnight Taylor
Andrew Dudkowsky [AD]	NESO
Ben Godfrey [BG]	National Grid
Drew Johnstone [DJ]	NPg
Ed Grimsey [EG]	BU-UK
Edda Dirks [ED]	SSE Generation
Erik Baguzis [EB]	Indigo Networks
Jack Purchase [JP]	NGED
Joe Braithwaite [JB]	Eclipse Power
John Harmer [JH]	Waters Wye
Karl Maryon [KM]	Drax
Liam Sweeney [LS]	Ofgem
Matthew Paige-Stimson [MPS]	National Grid
Natalija Zaiceva [NZ]	UKPN
Nikki Pullinger [NP]	Roadnight Taylor
Rohan Sachdev [RS]	SSEN
Code Administrator	
Mel Kendal [MK] (Secretariat)	ElectraLink
Tim Hipperson [TH] (Chair)	ElectraLink
Apologies	
Aishwarya Harsure [AH]	NESO

Brian Hoy [BH]	SP ENW

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.

1.6 **Action 18/01:** LS advised that legal guidance on whether an HCPT option could be assessed in principle without a settled value, as having a value in principle would provide a clearer basis for a decision – the Working Group agreed, and LS agreed to take this as an action and update the group as soon as possible.

ACTION 19/01: LS to obtain internal legal guidance on assessing an HCPT option without a settled threshold value, including implications for the other options, and update the Working Group, by email before the next meeting (if available).

2. Purpose of the Meeting

2.1 The Chair explained that the purpose of this meeting is to review and discuss the NESO Data and Impact Assessment and to review and agree the structure of the three draft Change Reports within the Working Group and agree next steps.

3. Review and Discuss NESO Data & Impact Assessment

3.1 The Chair invited the Working Group to further discuss the dataset and Impact Assessment.

3.2 The key updates can be found below:

3.3 The Chair outlined AH's email update that approximately 10–15 additional transmission connection asset schemes might be available in around two weeks, whereas identifying the embedded Customer

projects and individual capacities could take months. Members considered whether additional scheme costs alone would provide the evidence required.

3.4 MPS distinguished the cost and capability of transmission upgrades from the size and sequencing of the Customers triggering them. Historical costs could be outdated, while connection order and future Customer patterns limited the conclusions that could be drawn from the available sample.

3.5 AI highlighted that additional scheme costs alone would not answer the question - the number and individual MW capacities of embedded Customer projects were essential. AD confirmed that both costs and capacities were required. AI explained that the data would support a more representative threshold estimate.

3.6 The Chair noted that any further data should be analysed before the next meeting where possible. DJ suggested that BH's previous threshold work could provide a starting point, but responsibility for further analysis was not confirmed.

3.7 On reviewing the existing spreadsheet, AI explained that analysis using average project sizes across DNO areas suggested that many ordinary projects would exceed the capability-based HCPT, reinforcing the need for individual Customer MW data.

3.8 AI and NP supported exploring submission of the HCPT principle without a defined value to avoid further delay. DJ noted that the value was needed to assess impacts on DUoS Customers and consumers. BG suggested progressing the reports while supporting Ofgem with further cost-transparency data after Phase 1 Gate 2 offers had been issued.

3.9 LS reiterated that Ofgem would need sufficient evidence of consumer impacts for all options. If further information was required for an HCPT decision, the work would still need to be completed and a send-back could delay the decision. Internal legal guidance remained outstanding under the relevant open actions and will be updated in due course.

3.10 The Working Group refined the data request live during the meeting. NZ emphasised comparing consistently scoped transmission connection asset costs, including associated equipment, rather than mixing major installations with minor one-off works. AI reiterated the need to identify how many individual projects drove each scheme and their MW capacities. MPS highlighted site-specific cost variation and the limited statistical value of subdividing a small sample geographically.

3.11 JH confirmed that the underlying requirement had not changed from the previous meeting. AI restated the request as a breakdown of the projects driving each of the 49 schemes and the MW capacity of each project. Members suggested that Appendix G and offer documentation could help identify the information.

3.12 AD agreed to take an action to seek justification for the estimate of months rather than weeks, including whether the information required manual contract searches or could be reported more readily. AD proposed testing one scheme first to validate that the output met the Working Group's needs. The Chair supported checking the timescale and exploring a single-scheme example. It was noted that Scheme and Customer identities would need to be anonymised.

ACTION 19/02: AD to validate the data-extraction timescale and explain the reasons for any months-long delay.

ACTION 19/03: AD to investigate obtaining an anonymised breakdown for one scheme for validation before extending the exercise.

3.13 NP suggested the possibility of Working Group assistance with extracting the data under a Non-Disclosure Agreement (NDA). MPS raised potential statutory confidentiality restrictions. Following this suggestion, AD agreed to take an action to seek legal advice around whether this could be a possibility, and under what arrangements, a Working Group member could assist with the analysis using data shared under an NDA.

ACTION 19/04: AD to seek legal advice around whether an NDA is possible, and under what arrangements, a Working Group member could assist with the analysis using data shared under an NDA.

4. Discuss and Agree Structure of Draft Change Reports (x3)

4.1 The Chair invited the Working Group to discuss and agree on the structure of the three draft Change Reports.

4.2 The key updates can be found below:

4.3 The Secretariat presented the combined skeleton Change Report. The existing four/four/one grouping remained as the basis for drafting: four Option 1 variants in Report 1, four Option 2 variants in Report 2, and Option 3.1 in Report 3. In regard to the indicative timetable, the Secretariat flagged that the Christmas period could require revised voting dates.

4.4 Members supported keeping each report focused on its own solutions to reduce repetition and improve engagement. LS recommended clear signposting to the original proposal or other relevant material. The Working Group were happy with this approach. Information about options no longer being progressed would be retained in an appendix rather than repeated in full in the main report; it was agreed that the relevant diagrams would remain.

ACTION 19/05: The Secretariat to tailor each report to its relevant solutions, signpost supporting background, move detailed material on options not being progressed to an appendix, and retain relevant diagrams.

4.5 The Secretariat queried the relationship between the Consultation option labels and Options 2.2 and 2.2a. Members discussed the distinction between applicability thresholds and the separate HCPT but did not settle the mapping. The Chair agreed that the earlier minutes should be checked, with any remaining uncertainty referred back to the Working Group. The Working Group were happy with this approach.

ACTION 19/06: The Secretariat to cross-check the earlier minutes and consultation material, confirm the descriptions and numbering of Options 2.2 and 2.2a and their HCPT variants, and update the drafts Change Reports (or refer unresolved points to the Working Group).

4.6 The Chair supported retaining the Consultation questions and conclusions relevant to each report's solutions, with cross-references where needed. The Working Group agreed that Consultation 1 questions 9–13 would be retained across all three reports. The Secretariat agreed to complete the outstanding Consultation 2 response review and conclusions and develop the final-solution rationale.

ACTION 19/07: The Secretariat to complete the outstanding Consultation 2 response review and conclusions and develop the final-solution rationale.

5. Review of Solution Descriptions

5.1 The Working Group reviewed the Change Report 1 descriptions – the Chair noted support for both the Option 1.1 and Option 1.2 descriptions and the two variants incorporating Option 1.4, under which exceptionally high-cost projects would remain subject to the HCPT arrangements.

5.2 NP referred to the Transmission Evaluation Assessment threshold under CMP446. DJ distinguished the Customers exposed to connection charges from the wider DUoS Customers who would bear socialised costs. Following this, members agreed that the final Change Reports should clearly explain the interaction with the Transmission Evaluation Assessment threshold and distinguish connecting-Customer exposure from wider DUoS cost-recovery.

ACTION 19/08: The Secretariat/Working Group to ensure that the final Change Reports clearly explain the interaction with the Transmission Evaluation Assessment threshold and distinguish connecting-Customer exposure from wider DUoS cost-recovery.

5.3 The Secretariat presented Option 2.2 as cost apportionment with applicability criteria, such as capacity or voltage, intended to avoid exposing very small connections to transmission-level costs. The separate Option 2.2a description and associated HCPT wording required offline checking under the previously recorded action.

5.4 Option 3.1 was described as consistent recovery of the relevant transmission reinforcement costs from connecting Customers, without DUoS socialisation, with clarified DCUSA drafting, recognition of ECCR interactions and necessary licence drafting progressed in parallel. Members noted that they were happy that the description reflected the approach.

5.5 The Chair queried whether the three draft Change Reports should be prepared with alternative HCPT wording (with and without a settled value) – after further discussion, members favoured waiting for ADs feedback (agreed actions), to avoid duplicate drafting. The Chair agreed, and confirmed that the framework could progress, but the approach to describing the HCPT would await confirmation of data availability and timescales.

6. Review of Draft Legal Text

6.1 The Working Group considered how to progress the draft legal text. JP advised against duplication if outstanding data affected drafting and suggested seeking initial legal advice. DJ confirmed that Option 3.1 draft legal text had already been consulted on and needed reviewing within the Working Group against Consultation comments that were received. JP noted that he did not expect the Impact Assessment data itself to change the options.

6.2 The Secretariat presented the current version of draft legal text that was previously consulted on - rather than review this document live during the meeting, members supported reviewing it offline alongside the relevant Change Report (once each draft Change Report has been drafted).

ACTION 19/09: The Secretariat to include the relevant existing draft legal text within each of the three draft Change Reports.

ACTION 19/10: The Working Group to review the draft legal text alongside the relevant draft Change Reports (once drafted), and solution descriptions prior to submitting the legal text to Gowling for review.

6.3 ACTION – The Secretariat to include the relevant existing legal text with each of the three draft Change Reports. Working Group members to review it alongside the solution descriptions and identify any final amendments before submission to Gowling for legal review.

7. Agreed Next Steps

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

- LS to obtain internal legal guidance on assessing an HCPT option without a settled threshold value, including implications for the other options.
- AD to validate the data-extraction timescale and explain the reasons for any months-long delay.
- AD to investigate obtaining an anonymised breakdown for one scheme for validation before extending the exercise.
- AD to seek legal advice around whether an NDA is possible, and under what arrangements, a Working Group member could assist with the analysis using data shared under an NDA.
- The Secretariat to tailor each report to its relevant solutions, signpost supporting background, move detailed material on options not being progressed to an appendix, and retain relevant diagrams.
- The Working Group to review the draft legal text alongside the relevant draft Change Reports (once drafted).

8. Any Other Business

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

8.2 There were no other items raised.

9. Next Meeting Date – TBC

9.1 The Chair confirmed the next Working Group meeting is currently TBC – a meeting poll will be issued to schedule the next Working Group meeting in due course.

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 there were no further updates.*
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.*
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	**Ongoing.**
19/01	LS to obtain internal legal guidance on assessing an HCPT option without a settled threshold value, including implications for the other options, and update the Working Group, by email before the next meeting (if available).	Liam Sweeney	**New Action.**
19/02	AD to validate the data-extraction timescale and explain the reasons for any months-long delay.	Andrew Duskowsky	**New Action.**
19/03	AD to investigate obtaining an anonymised breakdown for one scheme for validation before extending the exercise.	Andrew Duskowsky	**New Action.**

19/04	AD to seek legal advice around whether an NDA is possible, and under what arrangements, a Working Group member could assist with the analysis using data shared under an NDA.	Andrew Duskowsky	**New Action.**
19/05	The Secretariat to tailor each report to its relevant solutions, signpost supporting background, move detailed material on options not being progressed to an appendix, and retain relevant diagrams.	Secretariat	**New Action.**
19/06	The Secretariat to cross-check the earlier minutes and consultation material, confirm the descriptions and numbering of Options 2.2 and 2.2a and their HCPT variants, and update the drafts Change Reports (or refer unresolved points to the Working Group).	Secretariat	**New Action.**
19/07	The Secretariat to complete the outstanding Consultation 2 response review and conclusions and develop the final-solution rationale.	Secretariat	**New Action.**
19/08	The Secretariat/Working Group to ensure that the final Change Reports clearly explain the interaction with the Transmission Evaluation Assessment threshold and distinguish connecting-Customer exposure from wider DUoS cost-recovery.	Secretariat / Working Group	**New Action.**
19/09	The Secretariat to include the relevant existing draft legal text within each of the three draft Change Reports.	Secretariat	**New Action.**
19/10	The Working Group to review the draft legal text alongside the relevant draft Change Reports (once drafted), and solution descriptions prior to submitting the legal text to Gowling for review.	Working Group	**New Action.**

Closed Actions

Action Ref.	Update

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	**Closed.** *Agreed for action to be closed as Secretariat to produce a skeleton Change Report superseded this 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.	Aishwarya Harsure	**Closed.**
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	**Closed.** *Skeleton Draft Change Report was drafted and presented to the Working Group for further discussion regarding the structure.*
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	**Closed.**