DCUSA

| DCUSA Change Declaration | At what stage is this document in the process? |
|---|---|
| # DCP 344<br>## Solutions for new approach to billing and remittance<br>***Date raised:*** **26 February 2019**<br>***Proposer Name:*** **Mark Jones**<br>***Company Name:*** **SSE Energy Supply Limited**<br>***Company Category:*** ***Supplier*** | **01 – Change Proposal**<br>**02 – Consultation**<br>**03 – Change Report**<br>**04 – Change Declaration** |

**Purpose of this Change Proposal:**

This Change Proposal seeks to introduce a new approach for billing that will create efficiencies for DCUSA Parties and better facilitate competition.

| | |
|---|---|
| ✔ | DCUSA Parties have voted on DCUSA Change Proposal (DCP) 344 with the outcome being a recommendation to the Authority as to whether or not the Change Proposal (CP) should be accepted. As DCP 344 is considered to be a Part 1 Matter, the recommendation will be issued to the Authority for their final decision.<br>The DCUSA Parties consolidated votes are provided as Attachment 2. |
| ✔ | **For DCP 344, DCUSA Parties recommend to the Authority to:**<br>• **Accept the proposed variation (solution); and**<br>• **Accept the implementation date.** |
| ! | **Impacted Parties:** Supplier parties, DNO parties, IDNO parties |
| ! | **Impacted Clauses:** 21. 'Site-Specific Billing and Payment' |


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**Any questions?**

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## Timetable

The timetable for the progression of the CP is as follows:

### Change Proposal timetable

| Activity | Date |
|---|---|
| Initial Assessment Report Approved by Panel | 20 March 2019 |
| First consultation issued to Parties | 29 August 2019 |
| Second consultation issued to Parties | 25 January 2021 |
| Third consultation issued to Parties | 08 December 2021 |
| Change Report approved by Panel | 15 February 2022 |
| Change Report issued for Voting | 18 February 2022 |
| Party Voting Ends | 11 March 2022 |
| Change Declaration issued to Authority | 15 March 2922 |
| Authority Decision | April 2022 |
| Implementation | Next DCUSA release that is more than six-months after Authority approval. |



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# 1 Executive Summary

## What?

1.1 DCUSA Parties currently have two options for processing billing; manual billing or using the Data Transfer Network (DTN) to transmit D2021 and D2026 flows (known as DUoS e-billing). The e-billing route enables automated processing of large amounts of data over a secure network, while manual billing is time and labour intensive by comparison which is prone to errors and is less secure.

1.2 While the Distribution Use of System (DUoS) e-billing service offers significant advantages, this is a commercial product owned by ElectraLink that Parties must pay to use. ElectraLink's DUoS e-billing service was developed with the intention that the initial price of e-billing is offset by the benefits it brings to Parties' billing practices. For some Parties this cost is justified and manageable, but for some this may not be the case. The indirect result is that predominantly larger parties with greater revenues have access to the DUoS e-billing service and the benefits it brings, while smaller Parties and market entrants with smaller budgets tend to use manual billing.

## Why?

1.3 As stated above, there are currently two options for processing billing; manual billing or use of the DUoS e-billing service. This results in an inconsistent approach meaning that some Parties need two sets of processes and systems in place to send and/or receive invoices leading to an increase in costs associated with the upkeep of dual processes.

## How?

1.4 By DCUSA Ltd procuring the DUoS e-billing service from ElectraLink so that all DCUSA Parties use the e-billing service, and the costs of the service is apportioned between Parties via the cost recovery mechanisms already set out in the DCUSA.

# 2 Governance

## Justification Part 2 Matter

2.1 This Change Proposal should be treated as a Part 1 Matter as the solution aims to deliver a solution that addresses inefficiencies in current processes that lead to avoidable errors and unnecessary risk.


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## Next Steps

2.2 DCUSA Parties have voted and the outcome of the Party vote acts as a recommendation to the Authority as to whether or not this CP should be accepted. Parties recommend that DCP 344 should be accepted and therefore, that the change should be made.

# 3 Why Change?

## Background of DCP 344

3.1 As stated above, the variation in billing approaches in the industry create a significant amount of manual processing.

3.2 Following the withdrawal of DCP 307 'Requiring IDNOs to comply with D2021 Billing', the Proposer sought to gain an understanding as to whether there were any other potential solutions or ideas that industry participants were aware of and that should be considered prior to raising a new CP. This was carried out by raising a DCUSA Issues Form (DIF) which was submitted for consideration by the DCUSA Standing Issues Group (SIG). DIF 54 'Issues related to the multiple methods for the sending and/or receiving of accounts and potential solutions for a common approach' was raised on 23 July 2018 and discussed by the SIG during their meeting on 27 July 2018. Attachment 3 contains the DIF 54 document and the minutes from the SIG meeting in which it was discussed. Subsequently, this CP was raised to seek a solution to address the above issues.

# 4 Solution

4.1 The DCUSA Panel established a Working Group to assess DCP 344. This Working Group consisted of DNO, Supplier, IDNO and Ofgem representatives. Meetings were held in open session and the minutes and papers of each meeting are available on the DCUSA website – www.dcusa.co.uk.

4.2 Following a review of the CP form, the Working Group agreed that the solution they will seek to develop should only relate to the Clause 21 'Site-Specific Billing and Payment', which applies in respect of those Charges that relate to Metering Points or Metering Systems, where:

- the electricity imported via an Exit Point or exported via an Entry Point is not reported in the Supercustomer DUoS Report; and/or
- the Use of System Charge is not comprised solely of one or more standing charges and/or one or more Unit Rates; and/or
- the Use of System Charge is specified in the Relevant Charging Statement as not being billed by Settlement Class.

## DCP 344 Consultation 1

4.3 In order to develop the proposed solution further the DCP 344 Working Group issued a consultation to industry.

4.4 The Working Group agreed to take forward two potential solutions, which are set out below:


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- Option A: Those not currently using the DUoS e-billing service have the option to use an agreed format/template to ensure consistency with invoicing, e.g. a designated spreadsheet containing all relevant items.
- Option B: DCUSA Ltd to procure DUoS e-billing service from ElectraLink so that all DCUSA Party's use the e-billing service and the costs of the service is apportioned between Parties via the cost recovery mechanisms set out in the DCUSA.

## Option A

4.5 It was considered that Option A represents an improved approach compared to the status quo; however, the general principle is quite similar in nature to that of the status quo. Option A retains the mix of a manual invoicing process but with an agreed format/template to be utilised as well as the option to use the DUoS e-billing service by entering into a commercial contract with ElectraLink who provides the service.

4.6 In order for Parties to assess this option, the Working Group developed a spreadsheet as an example of what format a uniform manual invoice could take, which is provided as Attachment 4 to this Change Report. The Working Group reviewed the output of DCP 312 'Standardisation of the Reporting of HH Portfolio Billing Data by EDNOs' of which was an example spreadsheet that contained HH Portfolio billing data for a specific month. This example spreadsheet was used as a basis to develop the potential spreadsheet as the format for a uniform manual invoicing approach for DCP 344.

## Option B

4.7 Option B represents an improvement on solutions presented as part of previous CPs, which attempted to mandate and/or compel individual Parties to enter into a contract with ElectraLink for the DUoS e-billing service. This previous solution resulted in a number of concerns around the vires of the DCUSA to contain such a provision as well as other concerns related to costs of the service itself and also those associated with undertaking any potential contract negotiation.

4.8 The Working Group's rationale for the proposal for DCUSA Ltd to procure the DUoS e-billing service from ElectraLink is due to the precedence of other such arrangements previously set out in the DCUSA (prior to the Retail Energy Code). The precedence being the Theft Risk Assessment Service (TRAS) arrangements, the Energy Theft Tip-Off Service (ETTOS) arrangements and more specifically the Theft Assessment Calculator. Combined, Clause 5.3. and its sub-clause 5.3.15, stated the following:

> "5.3 Without prejudice to any other duties or obligations imposed on it under this Agreement, the Panel shall, subject to and in accordance with the other provisions of this Agreement:
>
> 5.3.15 arrange for a Theft Assessment Calculator to be procured, maintained and made available to those Parties obliged to use it in accordance with Schedule 23, which calculator must provide a means for assessing unrecorded units in compliance with the requirements of Schedule 23, must be procured from and maintained by a person that is reasonably independent of the Parties, and may Version 11.2 Section 1B 73 be procured jointly with those persons making equivalent arrangements for gas;"


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4.9 The solution proposed under Option B for DCUSA Ltd to procure DUoS e-billing service from ElectraLink so that all DCUSA Party's use the e-billing service would resolve a number of concerns raised with respect to the similar solutions proposed by previous CPs and thus the Working Group agreed that this option should be taken forward alongside Option A.

4.10 The consultation received 11 responses comprising of five DNOs, two IDNO, and four Suppliers. The full response to the consultation and Working Group feedback can be found in Attachment 5. The responses are summarised below:

**Q1: Do you understand the intent of DCP 344?**

4.11 All respondents understood the intent of this CP.

**Q2: Are you supportive of the principles of DCP344?**

4.12 The Working Group noted that 5 out of the 11 respondents appeared to be fully supportive of the principles of the CP and that 4 respondents were generally and/or broadly supportive of the principles of the CP and indicated within their responses as to some caveats associated with their support. The Working Group noted that one respondent was not supportive of the principles of the CP but did not provide any rationale as to the reasons why and the remaining respondent stated that they were ambivalent with respect to the principles of DCP 344 as they "are comfortable with the existing arrangements'.

**Q3: Do you encounter any issues with the current processes of manual billing?**

4.13 The Working Group noted that approximately half of the respondents stated they encounter issues with the current processes of manual billing. One common theme is that they state that it is a time-consuming process which makes it difficult to validate the invoices within timescales. It was also noted that there has been a sustained increase in the volume of invoices received due to HH settlement and an increase in IDNOs. The other respondents have stated that they do not encounter issues with the current process as they have internal automated processes in place to reduce the timescales or the numbers are not high enough to cause an issue. The Working Group also noted the comment that for those Suppliers that only have a small number of MPANs the benefits realised would not be as much as those that have higher MPANs.

**Q4: Do you have any comments on the concerns/benefits described in the table under paragraph 4.7?**

4.14 One respondent was keen to investigate further the possibility of creating a DTC flow and the Working Group agreed to investigate this further. The Working Group also noted the concern regarding Option B and ElectraLink no longer being DCUSA Code Administrator and agreed that this would not create an issue as this would be a service procured by DCUSA Ltd, contracted with ElectraLink. Regarding the comment raised about ability to apply adequate controls on the use of spreadsheet, the Working Group agreed that if this solution was taken forward they would consider the control and consistency of the spreadsheets from a financial auditing perspective.


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## Q5: What are your views on Option A and Option B and what is your preferred option and why?

4.15 The Working Group noted that 7 of the 11 respondents indicate that Option B was their preferred Option, one indicated that the creation of a DTC flow was their preferred option, one indicated option A was their preferred option and two did not indicate a preferred option at this time. The Working Group noted the comment regarding HMRC requirements and will ensure that any solution that is taken forward is audited to ensure that it meets HRMC requirements. The Working Group also noted that once a solution has been determined and further defined, along with proposed legal text that the costs of the solution will be included in the second consultation. As above the Working Group noted it will consider the control and consistency of the spreadsheets from a financial auditing perspective, if this solution is taken forward.

## Q6: Do you have any alternative solutions you would like the Working Group to consider?

4.16 The Working Group noted that 8 of the 11 respondents did not have any alternative solutions that they wished for the Working Group to consider. One respondent stated that their preferred option would be the creation of a DTC flow and two stated that an alternative option could be to send an invoice in PDF format, with the spreadsheet provided as backing data. The Working Group agreed to give further consideration to both these options.

## Q7: Do you believe the proposed solutions better facilitate the DCUSA General Objectives?

4.17 The Working Group noted the comments regarding the DCUSA General Objectives and agreed to review these further once a solution had been agreed and further defined along with legal text.

## Q8: Are you aware of any wider industry developments that may impact upon or be impacted by this CP?

4.18 The Working Group noted the comments related to potential ways that billing services may change as a result of the output from the Access and Forward-Looking Charging SCR which has looked at who should calculate network charges and bill suppliers. It was also noted that the billing services may change as a result of the Market Wide Half Hourly Settlement reforms. The Working Group agreed to keep a watching brief on these areas of work to ensure that any impacts are recognised and accounted for.

## Q9: Do you have any other comments on the DCP 344?

4.19 The Working Group noted the comment regarding costs and once a solution has been agreed, the group will ensure that where it can do so, it will provide further detail on any expected associated costs within any further consultation. The Working Group noted the comment made regarding the reference in the consultation that **DCP 268 'DUoS Charging Using HH settlement data'** could give rise to an increase in Site Specific billing and that the respondent does not believe this to be the case as the move to HH settlement won't change the fact that they will be billed on an aggregated basis.


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4.20 The Working Group also noted that a respondent suggested that full standardisation in the approach to site specific billing would not be achieved via this change if it overlooks invoices raised under Section 2B 'Distributor to Distributor/OTSO Relationships' of the DCUSA to which the group agreed to consider whether invoices raised under Section 2B should be included within the scope of the CP.

### Further consultation

4.21 One concern raised from the Working Group was the lack of responses from Suppliers. Initially this concern was added to an agenda of the Ofgem Independent Supplier Forum, but no more responses were received and subsequently a further consultation was issued. This consultation received a further seven responses consisting of two DNOs, three Suppliers, one IDNO and one response submitted anonymously. Of the two DNO responses, one had responded to the initial consultation and therefore this new consultation gained six new responses.

4.22 The full response to the consultation and Working Group feedback can be found in Attachment 6. The responses are summarised below:

4.23 Similar to the first consultation, all respondents understood the intent of the CP and were supportive or broadly supportive of the principles of the CP.

4.24 Of the six new respondents to the consultation four expressed their preferred solution was Option B and two stated their preferred option was Option A.

4.25 All respondents agreed that DCP 344 should only relate to Clause 21 'Site-Specific Billing and Payment'.

4.26 Similar to the respondents from the first consultation, respondents were keen to understand the costs relating to the procurement of the DUoS e-billing service.

## Working Group Conclusions and Next Steps

4.27 The Working Group identified the following areas of further work having discussed the parties' responses to the consultations:

- Consider whether the scope of this CP should be expanded from just considering Clause 21 'Site-Specific Billing and Payment',
- Consider further the proposed solution of creating a DTC flow which would be similar in form to the current optional DUoS e-billing service.
- Consider any Access and Forward-Looking Charging SCR impacts on this CP.
- Agree Working Group proposed solution.
- If preferred solution is Option A:
  - Consider whether the spreadsheet should also be accompanied with a PDF invoice
  - Ensure that the spreadsheet alone meets HMRC requirements
  - Mitigate any control risks
- If preferred solution is Option B provide further details in relation to the costs associated.


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### Scope of DCP 344

4.28 The Working Group considered whether the scope of this CP could be extended to also cover similar aspects of DCUSA Section 2B regarding DNO to IDNO billing. After consideration, the Working Group agreed to maintain the current scope of this CP and therefore the proposed solution will only relate to the Clause 21 'Site-Specific Billing and Payment'. The reason for this is that the Working Group believe that any change to the current e-billing system should sit out of scope of this CP. It is also believed that implementation of this CP, will still bring significant benefits in relation to creating a consistent approach to Clause 21 'Site-Specific Billing and Payment'.

### Option of Creating a New DTC Flow

4.29 The Working Group noted that only one Party was supportive of create a new DTC flow. After consideration the Working Group considered that as this service is already available through e-billing it would seem costly to create further DTC flows to facilitate billing and remittance through a DTC data flow. It was also noted that ElectraLink claims ownership of the IPR for the DUoS e-billing solution and therefore creation of an identical DTC flow is deemed not feasible.

4.30 The Working Group conclusion was to not develop this solution further.

### Access and Forward-Looking Charging SCR impacts

4.31 The Working Group considered the Access and Forward-Looking Charging SCR and noted that this is likely to impact on the tariffs rather than the mechanism for billing. The Working Group is aware of a possibility that Ofgem will descope DUoS from this SCR but a decision has not yet been made. After discussion, the Working Group was of the view that DCP 344 should not be impacted by the SCR.

### Working Group Preferred Solution

4.32 After reviewing both consultations, there were a total of 18 respondents. 1 respondent replied to both consultations and therefore have only been counted once for the purposes of the below analysis.

4.33 Below provides details of the number of Parties supportive of each option:

- Option A – 3
- Option B – 11
- Creation of DTC flow – 1
- No preferred option – 2

4.34 After further consideration of the proposed solutions, the Working Group were minded to recommend Option B. The reason for this is that within both consultations, the majority of respondents preferred Option B and the Working Group position is that this solution offers the most benefit. Below provides details of the Working Group pros and cons for both Option A and Option B:


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| Approach to invoicing | Concerns | Benefits |
|---|---|---|
| • **Use of the existing DUoS e-billing service and introduction of manual invoicing using an agreed spreadsheet (Option A)** | • Inconsistent approach meaning that some Parties need two sets of processes and systems in place to send and/or receive invoices leading to an increase in costs associated with the upkeep of dual processes. | • Parties can choose the method that best suits them but only in so far as both payer and payee agree that the approach used is the one that is best suited. |
| • **DCUSA Ltd procuring DUoS e-billing service (Option B)** | • If parties wanted to fully automate the process, they may have to update systems, or as a minimum would have to update processes if they wanted to maintain a manual solution<br>• Potential need for those Parties to undertake testing of new method and conduct internal training | • Single process used by all<br>• New entrants will know what to expect prior to acceding.<br>• Reduction of errors and/or delays seen in manual invoicing<br>• Increased efficiency in the validation of DUoS invoices<br>• Comprehensive electronic record of invoices<br>• Costs associated with DUoS e-billing service would be socialised amongst all DNO, IDNO and Suppliers in line with the current procedures in the DCUSA<br>• Parties who currently use the DUoS e-billing service would not require any system development<br>• Supports DCUSA's digitalisation strategy |

4.35 Whilst the Working Group were minded to recommend Option B, they were aware of some consultation responses in relation to the associated costs for DCUSA procuring the e-billing service and therefore it was agreed to issue a third consultation, with this additional cost information included. The consultation would seek industry views on their preferred solution (Option A or B), based on the newly provided cost information.

## DCP 344 Consultation 3

4.36 The consultation received 11 responses comprising of one DNO, five IDNOs, and two Suppliers. Three respondents submitted either anonymously or confidentially. The full response to the consultation and Working Group feedback can be found in Attachment 7. The responses are summarised below:

**Q1: What is you preferred DCP 344 option? Please provide the rationale for your answer.**

4.37 Seven of the respondents preferred Option B, whilst one preferred Option A. one was not supportive of the CP (however stated that Option A would be their preferred solution is one is pursued), one


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stated they have no preferred solution and one stated they needed additional information due to a perceived lack of information around costings.

**Q2: Will there be any costs as a result of implementing either Option? If so, please provide an indicative cost.**

4.38 There were mixed responses regarding the costs of each option. Some respondents stated that Option A would result in no cost, whilst others noted costs ranging from £1K to £35K. In relation to Option B, some indicated no costs, one indicated significant costs, and some indicated minor costs.

**Q3: If Option A is your preferred solution, does the proposed template capture all the information that is needed?**

4.39 Most who responded believed that the spreadsheet captured everything needed. The Working Group noted that there could be additional notes added to the Excel spreadsheet to explain each data item in response to one respondent's comment, if Option A was progressed further.

**Q4: If option B is your preferred solution, do you agree that a six-month lead time is appropriate? If not, provide your rationale.**

4.40 A majority of respondents believed that a six-month lead time is appropriate if Option B is implemented. One respondent believed the lead time should be a minimum of 12-months. Some respondents suggest a six-month transition for Option A if this was the preferred solution and the Working Group agreed that if Option A was progressed a six-month lead time would also be appropriate for this solution.

**Working Group Conclusions following third consultation**

4.41 As stated above, prior to the third consultation the Working Group were minded to recommend Option B as the proposed solution for DCP 344, however recognised that some respondents were keen to understand further the associated costs for this solution.

4.42 The third consultation provided an indicative cost in relation to DCUSA Ltd procuring the DUoS e-billing service from ElectraLink.

### Costs to Option B

4.43 An indicative cost for such a license arrangement was included in the DCUSA Budget for 2022/ 2023, which was circulated to all Parties.

4.44 This would be recharged to Parties as per other DCUSA costs. This currently works by splitting the cost equally across Distributors and Suppliers and then those costs will be split across Parties according to market share as per Clause 8.9 of DCUSA.

4.45 Below provides some examples of how the costs would be calculated based on an illustrative cost of £200,000.


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| | |
|---|---|
| **Allocation to Suppliers or Distributors** | £100,000 |

| **Example for Party Category** | | |
|---|---|---|
| MPAN Count | Market Share % | Cost across example MPAN counts |
| 1,000 | 0.0031% | £3.09 |
| 10,000 | 0.0309% | £30.90 |
| 50,000 | 0.1543% | £154.30 |
| 100,000 | 0.3086% | £308.60 |
| 500,000 | 1.5430% | £1,543.00 |
| 1,000,000 | 3.0859% | £3,085.90 |
| 32,405,144 | 100.0000% | £100,000.00 |

4.46 In line with the first two consultations, a majority of the respondents indicated their preference for Option B. After further review of each solution and the perceived benefits of each, the Working Group agreed that the Option B should be progressed as the proposed solution for DCP 344.

### Proposed Solution

4.47 DCUSA Ltd to procure DUoS e-billing service from ElectraLink so that all DCUSA Parties use the e-billing service, and the costs of the service is apportioned between Parties via the cost recovery mechanisms set out in the DCUSA.

4.48 It should be noted that Parties already contracted with ElectraLink for the e-billing service will be transferred to these new arrangements if DCP 344 is approved and would not be at risk of being charged twice.

4.49 It should also be noted that if the Date Transfer Network or the e-billing service provided by ElectraLink is unavailable there is provision within DCUSA to revert back to manual billing.

4.50 The proposed legal text is detailed further in Section 8.

# 5 Code Specific Matters

## Reference Documents

5.1 None


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# 6 Relevant Objectives

## Assessment Against the DCUSA Objectives

6.1 For a DCUSA Change Proposal to be approved it must be demonstrated that it better facilitates the DCUSA Objectives. There are five General Objectives and six Charging Objectives. The full list of objectives is documented in the DCUSA.

6.2 The Working Group considers that the following DCUSA Objectives are better facilitated by DCP 344.

| DCUSA General Objectives | Identified impact |
|---|---|
| ☐ 1 The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks | None |
| ☐ 2 The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent therewith) the promotion of such competition in the sale, distribution and purchase of electricity | None |
| ☐ 3 The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences | None |
| ☒ 4 The promotion of efficiency in the implementation and administration of the DCUSA | Positive |
| ☐ 5 Compliance with the Regulation on Cross-Border Exchange in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators. | None |

6.3 The Working Group believes that DCP 344 will better facilitate DCUSA General Objective 4 as it seeks to deliver a solution that addresses inefficiencies in current processes that lead to avoidable errors and unnecessary risk.

# 7 Impacts & Other Considerations

## Does this Change Proposal impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

7.1 As stated above, the Working Group was of the view that DCP 344 should not be impacted by the SCR.

## Does this Change Proposal Impact Other Codes?

BSC ☐
CUSC ☐
Grid Code ☐
REC ☐
SEC ☐
Other ☐


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None ☒

## Consumer Impacts

7.2 The Working Group does not consider there to be any consumer impacts as a result of DCP 344.

## Environmental Impacts

7.3 In accordance with DCUSA Clause 11.14.6, the Working Group assessed whether there would be a material impact on greenhouse gas emissions if DCP 344 were implemented. The Working Group did not identify any material impact on greenhouse gas emissions from the implementation of this CP.

## Confidentiality

7.4 This Change is not confidential.

# 8 Implementation

## Proposed Implementation Date

8.1 It is proposed that this CP should be implemented in the next DCUSA release that is more than six-months after Authority approval.

# 9 Legal Text

9.1 The Working Group proposes the following legal text in relation to the proposed DCP 344 solution.

**Amend Clause 21.2B in Section 2A (Distributor to Supplier/Generator Relationships):**

21.2B The Company shall submit, and the User agrees to receive, the accounts under this Clause 21 as an electronic invoice sent using the D2021 data flow for all of the User's accounts (including revised accounts and credit-notes). For the avoidance of doubt, Clause 59.4 shall apply to the sending of accounts during any period in which the Date Transfer Network or the e-billing service using the D2021 data flow is unavailable.

**Add the following new Clauses 21.3A in Section 2A (Distributor to Supplier/Generator Relationships):**

21.3A Following each payment under this Clause 21, the User shall submit a remittance advice note to the Company using the D2026 data flow. For the avoidance of doubt, Clause 59.4 shall apply to the sending of remittance advice during any period in which the Date Transfer Network or the e-billing service using the D2026 data flow is unavailable.

**Delete Clauses 21.5 in Section 2A (Distributor to Supplier/Generator Relationships):**


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21.5 Not used. ~~For the purposes of this Clause 21, the following terms shall have the following meanings: "electronic invoice" means an account providing the data items set out in data flow D2021 (as amended from time to time) sent using the Data Transfer Network.~~

9.2 The DCP 344 legal text can also be found in Attachment 1.

# 10 Voting

10.1 The 344 Change Report was issued to DCUSA Parties for Voting on 18 February 2022.

### Part 1 Matter: Authority Decision is Required

## DCP 344: Proposed Variation (Solution)

10.1 With regards to DCP 344, the Parties' recommendation to the Authority is that the change solution is accepted. For the majority of the Party Categories that were eligible to vote, the sum of the Weighted Votes of the Groups in each Party Category which voted to accept the change solution was more than 50%.

## DCP 344: Implementation Date

10.1 The Parties' recommendation to the Authority is that the implementation date is accepted. For the majority of the Party Categories that were eligible to vote, the sum of the Weighted Votes of the Groups in each Party Category which voted to accept the implementation date was more than 50%

**The table below sets out the outcome of the votes that were received in respect of the DCP 344 Change Report that was issued on 18 February 2022 for a period of 15 working days.**

| DCP 344 | WEIGHTED VOTING | | | | |
|---|---|---|---|---|---|
| | DNO | IDNO | SUPPLIER | CVA REGISTRANT[1] | GAS SUPPLIER[2] |
| CHANGE SOLUTION | Accept | Reject | Accept | Not Eligible | Not Eligible |
| IMPLEMENTATION DATE | Accept | Reject | Accept | Not Eligible | Not Eligible |

# 11 Recommendations

## DCUSA Parties Recommendation

11.1 DCUSA Parties have voted on DCP 344 and in accordance with Clause 13.5, the Parties have been deemed to recommend to the Authority that the Change Proposal be Accepted.

[1] This Party Category was not eligible to vote on this CP

[2] This Party Category was not eligible to vote on this CP


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# 12 Attachments

- Attachment 1: DCP 344 Legal Text
- Attachment 2: DCP 344 Consolidated Party Votes
- Attachment 3: DIF 54 and SIG Meeting Minutes
- Attachment 4: Example Invoicing Template
- Attachment 5: DCP 344 First Consultation and Industry Responses
- Attachment 6: DCP 344 Second Consultation and Industry Responses
- Attachment 7: DCP 344 Third Consultation and Industry Responses
- Attachment 8: DCP 344 Change Proposal


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