Company	Confidential/ Anonymous	1. Do you understand the intent of the CP?
Anonymous	Anonymous	Yes, we understand the intent of the CP.
ENSTROGA Ltd	Non-confidential	Yes
Electricity North West	Non-confidential	Yes, we understand the intent of the change.
Leep Electricity Networks Ltd	Non-confidential	Yes
ScottishPower Energy Retail Ltd	Non-confidential	Yes.
SP Manweb and SP Distribution	Non-confidential	Yes
Utilita Energy LTD	Non-confidential	We do understand the intent of this CP.

Company	Confidential/ Anonymous	**2. Are you supportive of the principles of the CP?**
Anonymous	Anonymous	Yes, we are supportive of the principles of the CP.
ENSTROGA Ltd	Non-confidential	Yes, we are supportive of the proposal. BUT we in our opinion every change must benefit all the participants regardless of their size. That means, that cost and implementation effort must also be suitable for smaller organisations.

Electricity North West	Non-confidential	We are broadly supportive of the principles.
Leep Electricity Networks Ltd	Non-confidential	Yes
ScottishPower Energy Retail Ltd	Non-confidential	Yes, we are keen to establish a consistent approach.
SP Manweb and SP Distribution	Non-confidential	Yes
Utilita Energy LTD	Non-confidential	We support the principle that there should be a standard approach available to all parties who are not already using Electralinks E-billing service.

Company	**Confidential/ Anonymous**	3. Do you encounter any issues with the current processes of manual billing?
Anonymous	Anonymous	Yes. We are a small supplier with approximately 6300 MPANs. We have not procured Electralinks e-billing service and therefore currently receive the invoices as pdfs. To ensure the invoices are accurately added to the system we have provide a dedicated resource to do this. This is very resource intensive and not an efficient use of the staff member's time as the work is monotonous and risks manual data entry issues. An automated solution is much more preferable to us.
ENSTROGA Ltd	Non-confidential	No
Electricity North West	Non-confidential	We don't have any significant issues with the current manual billing processes. As we are able to automatically email the bills in PDF format to all of the Suppliers set up for this method of billing, no manual intervention is needed. It's worth noting that we have very few issues with suppliers stating that bills have not been received by email.

		There is currently supplier choice available for billing and the two options we currently provide of a PDF and e-billing seem to cover supplier needs, but we appreciate the manual processing involved in receiving one PDF which contains multiple invoices.
Leep Electricity Networks Ltd	Non-confidential	No
ScottishPower Energy Retail Ltd	Non-confidential	Yes, dependant on IDNO's not changing their format. We need to operate individual processes for IDNO's.
SP Manweb and SP Distribution	Non-confidential	The only issue relates to emailing DUOS site-specific PDF invoices to those CVA registrants who insist in receiving individual PDF invoices when they have multiple invoices. Every other supplier accepts receiving all their PDF invoices emailed in a batch. In order to accommodate this for the CVA registrants requires a manual intervention by the DNO. We would prefer a consistent approach for all PDF DUOS invoicing.
Utilita Energy LTD	Non-confidential	At this time, we are unaware of any issues with the current manual billing process.

Company	**Confidential/ Anonymous**	4. What are your views on Option A, Option B Option C and what is your preferred option and why?
Anonymous	Anonymous	Option B as it involves the greatest number of benefits for all parties eg • Single process used by all • New entrants will know what to expect prior to acceding. • Reduction of errors and/or delays seen in manual invoicing • Increased efficiency in the validation of DUoS invoices • Comprehensive electronic record of invoices • Costs associated with DUoS ebilling service would be socialised amongst all Parties in line with the current procedures in the DCUSA • Parties who currently use the DUoS e-billing service would not require any system development

ENSTROGA Ltd	Non-confidential	Our preference is option A. A standardized billing template is everything we need as a small supplier. A new e-billing system will require resources and additional cost, where a standard billing template is only creating little extra effort.
Electricity North West	Non-confidential	Option B is our preferred option – please see response below to Q5 for our reasoning.
Leep Electricity Networks Ltd	Non-confidential	Option B would be our preferred option as this would reduce the resource required for billing and provide greater assurance of accuracy however costs for this option have not been clarified in order to establish whether this would be financially viable for us. If Option B is cost prohibitive then Option A would become our preferred option – we currently manually process billing and the template proposed would be beneficial to our current process.
ScottishPower Energy Retail Ltd	Non-confidential	Our preferred option would be **Option B**, as it would streamline the process, one process for everything, for minimum cost. We have made this decision assuming that the current providers remain in place. If a tender is required, resulting in a new provider being appointed there is a risk this could not be delivered at minimum cost for us. Our views on the options are: Option A: The introduction of an agreed template would assist to ensure consistency, however if this solution was implemented, there would also be a requirement for Governance i.e. no changes can be made without agreement and sign off as currently IDNO's can change their DUoS invoice formats without consultation or notice. Option B: This would see IDNOs using the same dataflow files as the DNOs removing the need to manually key invoice data. If this option is implemented, we would not expect to incur any additional cost from Electralink. Option C: The implementation of this option would require a new data flow which would have a cost impact due to development and testing and would be dependent on IDNOs developing a solution. A further consideration is can a solution be designed that does not infringe Electralink IP or would additional licensing costs be expected. As any new flows would need to be developed under the REC it is unclear at this time when this could be rolled out.

SP Manweb and SP Distribution	Non-confidential	We do not support option A or C as we believe Option B is the best option. Option B is the best option as it opens up the option for all suppliers to receive their HH site-specific invoices by e-billing and at the same time allows the CVA entrant to still receive their invoices on a PDF. Further-more options A and C would involve costs to the DNOs to deliver.
Utilita Energy LTD	Non-confidential	Our chosen solution is Option A, manual billing/remittance but with a standardised template for all parties to use. Our views and reasoning are as follows. Option A – This is our chosen solution; we believe it will be possible to deliver this solution quickly to all parties, and should boost efficiency adequately for the volume of invoices being processed manually whilst having minimum financial/system impact on all parties. Option B – This would be our second choice; we currently use the E-billing service for all the sites we are able to for, the small number of invoices in need of manual processing could be automated if DCUSA LTD was to acquire the service. However, we believe that the time and resource it would take parties not currently using E-billing to implement the service would outweigh the benefit of DCUSA LTD purchasing this from Electralink. Option C – This option was many of the draw back seen in option B, many parties would have to undertake a lot of change to accommodate the use of new DTC flows, and alongside the service already available through E-billing it would seem redundant to create further DTC flows to facilitate billing and remittance through data flow. Furthermore, this option comes with a large amount of uncertainty regarding the viability as outlined in this consultations supporting document.

Company	**Confidential/ Anonymous**	5. Do you agree that DCP 344 should only relate to the Clause 21 'Site-Specific Billing and Payment'? If not, please give reasons.
Anonymous	Anonymous	BPG would have to make internal software changes so ensure the flow can be stored in the relevant database tables and coding changes to ensure the data from the tables is incorporated into the existing algorithms. However, we believe Option B is the best and most cost effective option compared to Options A or C, or the current situation.

ENSTROGA Ltd	Non-confidential	Option A – none Option B – Additional Resoruces and costs which are not justified for smaller suppliers Option C – Additional Resoruces and Development work with software provider.
Electricity North West	Non-confidential	Option A would require system changes to enable a report to be produced in the designated format, and then be able to select this as an additional billing option and allow for the spreadsheet to be automatically attached to an email and sent to the customer in the same way that PDF invoices currently are. Option B would have no system impacts but there could be an impact on suppliers who currently rely on PDFs. Option C would require a change to our billing system to allow for the creation of this new dataflow and to add this as a billing option, when the D2021 is already in place.
Leep Electricity Networks Ltd	Non-confidential	Option A – No impact on internal systems Option B – Some system development may be needed however the costs associated with this are unknown currently Option C – Some system development may be needed however the costs associated with this are unknown currently; it is anticipated that this would be the most costly solution
ScottishPower Energy Retail Ltd	Non-confidential	Option A: A technical specification, development and testing would be required. Option B: No changes required. See above for our assumption. Option C: This is dependent on the design of the new dataflow.
SP Manweb and SP Distribution	Non-confidential	Option A impacts are – A new csv report in the designated format Change to emailing of invoices to produce the new csv report and attach it to emails Change to supplier billing details to indicate whether supplier receives PDF or excel format invoices Allowing DURABILL to produce Excel format files using BI Publisher Option B impacts are –

		no changes would be required to the system to comply with option B. Option C impacts are – Creation of the new DTC flow Change to production of HH invoices to determine whether to use the existing functionality or post-CMP344 functionality to produce the HH invoices
Utilita Energy LTD	Non-confidential	Anticipated system impacts for the solutions are as follows. Option A – This would pose only a process change to us, no systems would need to be updated for created. Option B – As we already use E-billing this would pose no change to our systems. Option C – This would cause a significant system change to implement the use of a new DTC flow.

Company	**Confidential/ Anonymous**	6. Do you agree that DCP 344 should only relate to the Clause 21 'Site-Specific Billing and Payment'? If not, please give reasons.
Anonymous	Anonymous	Yes
ENSTROGA Ltd	Non-confidential	Yes
Electricity North West	Non-confidential	It seems appropriate that Clause 21 relates to DCP 344 as that contains the term "electronic invoice" in respect of the D2021
Leep Electricity Networks Ltd	Non-confidential	Yes

ScottishPower Energy Retail Ltd	Non-confidential	Yes.
SP Manweb and SP Distribution	Non-confidential	Yes
Utilita Energy LTD	Non-confidential	We agree that DCP 344 should only relate to Clause 21 'Site-Specific Billing and Payment'

Company	**Confidential/ Anonymous**	7. Do you have any other comments on the DCP 344?
Anonymous	Anonymous	
ENSTROGA Ltd	Non-confidential	No
Electricity North West	Non-confidential	It will be useful to have the views of smaller supplier parties on the current and proposed solutions.
Leep Electricity Networks Ltd	Non-confidential	No
ScottishPower Energy Retail Ltd	Non-confidential	If option B is taken forward, we will need to understand what the funding split would be between suppliers and DNOs. If this can be developed and rolled out within 2021/2022 budget, has this already been included in the budget?
SP Manweb and SP Distribution	Non-confidential	No
Utilita Energy LTD	Non-confidential	We have no further comments.