




DCUSA Change Proposal (DCP)		At what stage is this document in the process?
<h1>DCP 416:</h1> <h2>Electronic invoicing post MHHS</h2> <p>Date Raised: 14/11/22</p> <p>Proposer Name: Peter Waymont</p> <p>Company Name: Eastern Power Networks</p> <p>Party Category: DNO</p>		01 – Change Proposal
		02 – Consultation
		03 – Change Report
		04 – Change Declaration
<p>Purpose of Change Proposal:</p> <p>To create a new DCUSA owned DIP data message for electronic Distributor billing post MHHS</p>		
	<p>Governance:</p> <p>The Proposer recommends that this Change Proposal should be:</p> <ul style="list-style-type: none"> • Treated as a Part 2 Matter • Treated as a Standard Change • Progressed to the Working Group phase <p>The Panel will consider the proposer's recommendation and determine the appropriate route.</p>	
	<p>Impacted Parties:</p> <p>Suppliers/DNOs/IDNOs [CVA Registrants]</p>	
	<p>Impacted Clauses:</p> <p>21.5</p>	

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Indicative Timeline	
The Secretariat recommends the following timetable:	
Initial Assessment Report	16 November 2022
Consultation Issued to Industry Participants	January 2023
Change Report Approved by Panel	15 March 2023
Change Report issued for Voting	17 March 2023
Party Voting Closes	07 April 2023
Change Declaration Issued to Parties	11 April 2023
Change Declaration Issued to Authority	11 April 2023
Authority Decision	TBC

1 Summary

What?

- 1.1 A new flow needs to be introduced for site specific electronic billing in the post MHHS environment.

Why?

- 1.2 MHHS introduces new data flows using the DIP and JSON format, including for the HH consumption data. There will be removal or renaming of certain data items used in the current invoicing processes.

How?

- 1.3 By introducing a new DIP flow in JSON format, to be sent for electronic invoicing of counterparties post the implementation of the MHHS environment.

2 Governance

Justification for Part 1 and Part 2 Matter

It is considered that this is a Part 2 matter as it does not meet the criteria for Part 1.

Requested Next Steps

- 2.1 This Change Proposal should:

- Be treated as a Part 2 Matter;
- Be treated as a Standard Change; and
- Proceed to the Working Group phase.

- 2.2 While this change has an element of timeliness due to the MHHS programme it is not considered to need to be fast-tracked.

- 2.3 We have included CVA Registrants as being impacted in square brackets as it is unclear whether they will be using the DIP in future.

3 Why Change?

- 3.1 The change is required in order to be able to operate an electronic invoicing process in the MHHS environment.

- 3.2 We have included a straw man DIP flow structure as an attachment. We have called this REP-ebill for the time being.

4 Solution and Legal Text

Legal Text

4.1 Amend Clause 21.5 as shown

“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 **for non-MHHS customers and the [REP-ebill] for MHHS customers.**

Text Commentary

- 4.2 The text is drafted based on the concept that during transition it may be that both the existing D2021 will be required for non-migrated customers and the new flow will be required for migrated customers. A hard cutover to the new flow should be possible if it is understood that for non-migrated customers the DUoS Tariff Id field can be populated with the LLFC (assuming each is unique or that any use of the same coding is for the same tariff). A “MHHS yes/no” flag could be added, for example. In that case the legal text would need to introduce a cutover date e.g. replace the proposed red text with “until [date] and the [REP-ebill] thereafter”. This may be a better solution given any cancellation and rebilling of prior period invoices. However, consideration would need to be given to the impact if suppliers do not all use the DIP at the same time as part of a migration.
- 4.3 It should also be noted that the legal text proposed does not seek to mandate the use of electronic invoicing using the new flow. However, as many systems are changing for MHHS there may be opportunities for more/all parties to incorporate such functionality and an alternative solution could be developed by the working group to mandate electronic billing using the new flow. We believe changes to Clause 21.2B would be required e.g. “The Company shall submit and the User agrees to receive, accounts by sending an electronic invoice using the [REP-ebill] for all the User’s accounts (including revised accounts and credit-notes).”
- 4.4 We have focussed on site specific billing data in the attachment and have not sought to develop a flow that could be used for other billing types under DCUSA. However the working group may wish to widen the scope of the solution or propose an alternate that does so. This would suggest needing to move the relevant clauses (21.2B and 21.5) out of Clause 21 and possibly into the “Invoicing of Charges” section of Clause 19. Also the structure of the flow would need consideration.

5 Code Specific Matters

Reference Documents

5.1 Attachment 1 – straw man flow structure.

6 Relevant Objectives

DCUSA General Objectives		Identified impact
Please tick the relevant boxes. (See Guidance Note 9)		
<input checked="" type="checkbox"/>	1. The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks	Positive
<input type="checkbox"/>	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
<input type="checkbox"/>	3. The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences	None
<input checked="" type="checkbox"/>	4. The promotion of efficiency in the implementation and administration of the DCUSA	Positive
<input type="checkbox"/>	5. Compliance with the EU Internal Market Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	None

6.1 Objective 1 - The ability to charge DUoS in a governed process enables the Distributors to recover their revenue and hence maintain the network. Objective 4 - Moving the processes into the post MHHS environment enhances the efficiency of processes administrated under the DCUSA.

7 Impacts & Other Considerations

7.1 This potentially impacts REC and BSC, so should be raised and discussed at the Cross Code Steering Group.

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

7.2 MHHS Programme

Does this Change Proposal Impact Other Codes?

BSC.....	<input checked="" type="checkbox"/>	MRA.....	<input type="checkbox"/>
CUSC.....	<input type="checkbox"/>	SEC.....	<input type="checkbox"/>
Grid Code.....	<input type="checkbox"/>	REC.....	<input checked="" type="checkbox"/>
Distribution Code..	<input type="checkbox"/>	None.....	<input type="checkbox"/>

Consideration of Wider Industry Impacts

7.3 No further impacts identified beyond developing the flow.

Confidentiality

7.4 None.

8 Implementation

Proposed Implementation Date

8.1 In readiness for start of MHHS migration for the legal text. New flow to be ready for any required testing in advance of this.

9 Recommendations

The Code Administrator will provide a summary of any recommendations/determinations provided by the Panel in considering the initial Change Proposal. This will form part of a Final Change Report.