

DCP 416 Working Group - Meeting 02

31 January 2023 at 14:00 - Web-Conference

Attendee	Company
Working Group Members	
Donna Jamieson [DJ]	Energy Assets
Hazel Paterson [HP]	SPEN
Laura Quinn [LQ]	SPEN
Laurie Harman [LH]	Centrica
Peter Waymont [PW]	UKPN
Robert Short [RS]	SSE
Tim Porter [TP]	SSE
Tom Perryman [TP]	St-Clements
Tracey Dunn [TD]	ENWL
Tracey Pitcher [TP]	National Grid
Code Administrator	
Andres Alvarez [AA]	ElectraLink
Andy Green [AG] (Chair)	ElectraLink
Mel Kendal [MK] (Technical Secretariat)	ElectraLink
Apologies	

1. Administration

- 1.1 The Working Group reviewed the “Competition Law Guidance” and “Terms of Reference”. All Working Group members agreed to be bound by the Competition Law Guidance for the duration of the meeting and agreed to the Terms of Reference.
- 1.2 An action log has been created and all updates are provided in **Appendix A**.

2. Purpose of the Meeting

- 2.1 The Chair explained that the purpose of this meeting is to review and discuss and review the collated Consultation responses within the Working Group and agree next steps.

3. Review Collated Consultation Responses

- 3.1 The Chair presented the DCP 416 collated Consultation responses to the Working Group to further discuss. The document was updated live during the meeting, and can be found as **Attachment 1**.

Question 1

- 3.2 All bar one responder stated that they understand the intent of the CP – one responder stated that they believe there is a level of ambiguity about the scope.

Question 2

- 3.3 All responders understand the principles of this CP. Three responders support the introduction of a new dip flow, however mentioned that they support it for the post-MHHS environment, the potential to modify the current D2021 flow (as opposed to a new dip flow) and not supportive of e-billing being mandatory without further scrutiny.
- 3.4 The Working Group discussed the processes between modifying the current D2021 flow and a new dip flow, and mainly due to futureproofing it was agreed that a new dip flow would be the most appropriate process to follow.
- 3.5 There was a concern raised around the tight timescales for switching over to a new dip flow, however it was confirmed that there will be some time provided to prepare for the switch and will not be an immediate process.
- 3.6 The Working Group noted that the new dip flow would be within the governance of the DCUSA. The Working Group agreed that the legal text would need to change if the dip flow becomes mandatory.

Question 3

- 3.7 A variety of responses were received regarding feedback on the strawman flow structure and the Working Group reviewed and noted each comment provided.
- 3.8 One suggestion provided was to include an indicator to say that the site is a ‘mis-aligned’ multi-PAN site, as this is likely to assist Suppliers in validating invoices and suggested it would be simple to include. The Working Group discussed this and agreed that this would be useful to include.
- 3.9 Following on from the comments provided, the Working Group agreed that the strawman flow structure will need further updates and the Working Group agreed to take an action to make the necessary amendments.

ACTION 02/01: The Working Group to review the strawman flow structure and make the necessary updates.

3.10

Question 4

- 3.11 The majority of responders agreed that the new dip flow could be expanded to other processes, specifically NHHSC, IDNO and DUoS. One responder was not supportive of expanding e-billing to other invoices, and one responder remained neutral dependant on the cost-benefit analysis.
- 3.12 The one responder who was not supportive of expanding e-billing to other invoices stated that it should not be included without a robust cost-benefit analysis and stated that it would also depend on the timelines for new invoices to be considered as part of this change due to the current volume of industry change.
- 3.13 One member queried how this change would impact DCP 415 *'Replacement of D0242/D0315 for MHHS'* that if this change proposes to add NHH invoicing – PW stated that both DCP 415 and DCP 416 are related, but there is not an overlap, and no impacts should occur.

Question 5

- 3.14 All bar one responder were supportive of the e-billing being mandatory.
- 3.15 The one responder who was not supportive stated that the system costs incurred to produce the e-billing format, and potential for additional administration in implementing this change are unrecoverable by INDOs. They also stated that it would not be appropriate for DCUSA to mandate a party to make a commercial decision to procure the e-billing system.
- 3.16 Reflecting on these comments, the Working Group confirmed that the intent of this change is not to mandate the e-billing service offered by ElectraLink but create a new service within open governance. Following this information, the responder advised that they would be supportive of mandatory e-billing so long as robust cost-benefit analysis and additional impact assessment were to be carried out initially.
- 3.17 Following this discussion, the Working Group agreed that the intent to create a new e-billing service within open governance should be made clear within the change report.
- 3.18 One responder stated that some parties (i.e., small Suppliers and CVA Registrants) would not find it cost effective to develop a system to load such a file. The Working Group discussed this and noted that having a caveat to exclude CVA Registrants within the legal text would be preferable.

Question 6

- 3.19 The majority of responders preferred a lead time for any potential e-billing changes to align with the implementation of MHHS. One responder did not have a lead time preference, and another responder suggested a minimum of 6 months lead time.
- 3.20 The Working Group noted that billing in respect to MHHS Customers is intended to be within the DIP.

Question 7

- 3.21 The majority of responders supported running both parallel processes during the transition period as opposed to a cut over date. One responder did not have a preference.
- 3.22 The Working Group noted that a current billing provider has confirmed that both parallel process can run during the transition period.

Question 8

- 3.23 The majority of responders confirmed that they do not currently use the D2026 flow; however, it was noted and agreed by the Working Group that a remittance flow would not be needed within the dip.

Question 9

- 3.24 The majority of responders were supportive that this change better facilitates DCUSA General Objectives 1 and 4.
- 3.25 One responder raise a concern that it may create a barrier for new industry parties – the Working Group discussed this, and re-iterated that the intent of this change is not to use the ElectraLink e-billing service and therefore no additional costs would be applicable.
- 3.26 One responder did originally state that they were not supportive that this change better facilitates DCUSA Objectives 1 and 4; however, following discussions held during this meeting, the responder confirmed that they are now supportive.

Question 10

- 3.27 All bar one responder stated that they were not aware of any wider industry developments that may impact upon or be impacted by this CP (other than what has been stated within the CP).
- 3.28 One responder stated that changes in tariff structure may impact the data structure required for this dip flow structure. The Working Group discussed this and stated that the new dip flow will include DUoS tariff IDs. The view of the Working Group is that if there are no changes to tariff structures within changes (i.e., DUoS SCR) then they would have to be accommodated within the flows.

Question 11

- 3.29 A number of amendments to the draft legal text were suggested by one responder.
- 3.30 The Working Group reviewed the suggested amendments and both the proposer, and the Working Group were happy for the suggested amendments to be made.
- 3.31 The Secretariat agreed to take an action to make the necessary amendments to the draft legal text.

ACTION 02/02: The Secretariat to make the necessary amendments to the draft legal text following the Consultation responses.

3.32

Question 12

- 3.33 A number of responders stated that further amendments to the current definition of ‘electronic invoice’ may be required if the legal text is changed to include other invoice types.
- 3.34 One responder suggested amending the current legal text definition to:
- “electronic invoice” means, an account providing the data items set out in the [REP-ebill] sent using the DIP, save that for non-MHHS customers invoiced pursuant to Clause 20.2B it shall mean data flow D2021 (as amended from time to time) sent using the Data Transfer Network.
- 3.35 The Working Group noted this suggestion and stated that if other invoices were brought in scope, then changes to the electronic clauses definition may be needed, alongside changes to additional clauses (such as 20.4B and 22.2B).

Question 13

- 3.36 The majority of responders had no further comments on this change. One responder stated that their response may be subject to change following an impact assessment, and another responder suggested that it would be more beneficial if the change was mandatory for migrated sites as his would remove the need to retain the PDF option for these Customers.

- 3.37 The Working Group noted both comments and agreed that it would be more beneficial to mandate the process as it would mitigate the need for numerous processes.

Discussion

- 3.38 The Working Group discussed the next steps for developing the solution for this change.
- 3.39 The proposer suggested putting forward an alternate solution for this change to include NHH Customers, however it was noted that by doing this, a second Consultation may be needed to seek views from wider industry.
- 3.40 The Working Group agreed that it would be beneficial to review the strawman flow structure at the next Working Group meeting and a potential second Consultation can then be agreed.

4. DCP 416 Workplan

- 4.1 The Working Group reviewed the workplan for DCP 416 and agreed with the proposed dates. The updated workplan can be found as **Attachment 2**.
- 4.2 The workplan will be updated after each meeting.

5. Agenda Items for Next Meeting

- 5.1 The Working Group discussed the next steps, and the following items were captured:
1. The Secretariat to make the necessary amendments to the draft legal text.
 2. The Working Group to review and update the strawman flow structure during the next meeting.

6. Any Other Business

- 6.1 The Chair asked the group whether there were any other items of business to discuss.
- 6.2 There were no other items raised.

7. Date of Next Meeting

- 7.1 The next Working Group meeting will be held on 07 February 2023 at 10am.

8. Attachments

- Attachment 1_DCP 416 Collated Consultation Responses_WG Comments
- Attachment 2_DCP 416 Workplan

APPENDIX A

New and Open Actions

Action Ref.	Action	Owner	Update
01/01	The DTS representative [AA] to carry out a gap analysis that shows the key differences between the current d-flow and the proposed DIP flow and share with the Working Group.	DTS Rep [AA]	Ongoing. AA will update WG when completed.
02/01	The Working Group to review the strawman flow structure and make the necessary updates.	Working Group	Ongoing.
02/02	The Secretariat to make the necessary amendments to the draft legal text following the Consultation responses.	Secretariat	Ongoing.

Closed Actions

Action Ref.	Action	Owner	Update
01/02	The Secretariat to draft the DCP 416 Consultation and circulate to the Working Group for review/approval.	Secretariat	Closed.
01/03	The Secretariat to finalise the Consultation and circulate to wider industry with a response deadline of 20 January 2023.	Secretariat	Closed.