

DCP 416 'Electronic Invoicing Post MHHS'

COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

Company	Confidential/ Anonymous	1. Do you understand the intent of DCP 416?	Working Group Comments
UKPN		Yes.	Yes
SPEN		Yes.	Yes
BUUK		We believe so however there is a level of ambiguity about the scope. It is our understanding that under MHHS we would still be able to continue with the current site-specific billing process – as such, the queries relating to making e-billing mandatory are somewhat confusing.	Yes
Energy Assets		Yes.	Yes
British Gas		Yes.	Yes
ENWL		Yes.	Yes
NGED		Yes.	Yes
NPg		Yes.	Yes
Working Group Conclusions: All respondents stated they understood the intent of the change			

Company	Confidential/	2. Are you supportive of the principles of DCP 416?	Working Group Comments
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	Anonymous		
UKPN		Yes.	Yes
SPEN		Yes.	Yes
BUUK		<p>Yes, we support the principles of DCP-416, i.e. the introduction of the new DIP-flow to support half-hourly e-billing processes subject to:</p> <ul style="list-style-type: none"> - This flow being under DCUSA/BSC governance and open to public scrutiny - As a result of being in governance, subject to oversight by appropriate governing bodies, i.e. OFGEM., <p>We do not currently use electralink e-billing, as such we cannot comment on something which is not currently part of our internal processes. However, we would highlight some concerns that should this become mandatory, the legal text as drafted would require us to adopt the D2021, which we would not support.</p> <p>Therefore, we are not prepared to support mandatory e-billing without further review.</p>	<p>The new DIP flow would be within DCUSA there would oversight. Agree with the comments that the legal text would need to change if the flow becomes mandatory.</p>
Energy Assets		Only for the introduction of a new site-specific electronic billing flow in the post MHHS environment.	Yes
British Gas		Yes.	Yes

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ENWL		Although we understand the benefits of moving to a DIP flow, we would support additional work being undertaken to see if the existing D2021 could be modified and retained rather than introducing a new DIP flow.	
NGED		Yes.	Yes
NPg		Yes.	Yes
Working Group Conclusions: All respondents support the principles of the change.			

Company	Confidential/ Anonymous	3. Do you have any comments on the strawman flow structure for site specific billing? Are there any other data items that you would add or remove?	Working Group Comments
UKPN		For the purpose of site-specific billing only, we would suggest changing [Primary] MPAN to a Site ID (that may be the same) and including all MPANs being billed in the next row rather than as "other" MPANs. We also suggest adding Site Capacity into the R3 block in case it differs from the charged capacity within the invoice lines.	Noted
SPEN		Declared Supply Capacity with effective date, this flow would need to support IDNO HH invoices, so IDNO would need to be include. For this flow to be able to support NHHSC and MAP invoices then we would need to include the contents of these invoices. The settlement run with dates. The MAP invoices will also require different details.	Noted

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BUUK		The strawman is missing an entry for the agreed supply capacity, which is an on-going requirement in calculation of the chargeable amount on a site-specific MPAN for a period.	Noted
Energy Assets		No.	No comment
British Gas		The strawman flow structure looks to be consistent with the existing flow D2021 structure. It would be useful to compare against a redlined document of the existing flow to fully analyse the impact proposed change. Headers for credits/rebills with details of original document look to be missing, which is required for audit/tracking purposes.	Noted
ENWL		Before introducing a brand-new DiP flow, St Clements as the Durabill vendor for DNO's should be approached to determine whether the changes could reasonably be accommodated by a modification to the existing D2021 data flow rather than introduce a brand-new DiP flow.	Noted
NGED		<p>Please find below our software Provider – St Clements response on a record by record basis</p> <p>An overall flow (batch) invoice total record may be helpful. An overall identifier for the flow data, along with a version number would be helpful. We would suggest that DURABILL populates this with the batch number. This field is unique for the instance of DURABILL (e.g. UKPN will only ever have a single batch number but the same number may also be used by SSE). The version number would be set to 001 for the first time that the flow is sent and if a replacement file is required it would be set to version 002 etc.</p>	Noted

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		<p>St Clements recommends that the MIC / MEC and its associated effective date is included in addition to the capacity units charged (R5 Invoice Lines). Our suggestion would be that this could be included in the Site Info (R3) or Invoice Data (R4) record. This is because sometimes the charged capacity does not reflect the MIC / MEC, for example:</p> <ul style="list-style-type: none">• Sites where some MPANs have moved to a new supplier while others have retained their previous registration (known as mis-aligned multi-MPAN sites) – in such a situation the capacity is typically split between the two suppliers. <p>3.3.2 R1 – Distributor Info All data items are held in DURABILL and can be made available on the new output flow.</p> <p>3.3.3 R2 – Supplier Info Minor changes may be required to support the requirement to populate the 'Supplier VAT additional text', however SCS are supportive of including this field in place of the existing D2021 process whereby such information is written to an address field. All other data items are held in DURABILL and can be made available on the new output flow.</p> <p>3.3.4 R3 - Site Info All data items are held in DURABILL and can be made available on the new output flow.</p> <p>St Clements is currently planning on moving away from using Lead MPANs and using a Site ID in its place. We there recommend that the Primary MPAN</p>	
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		<p>field is replaced with a Site Identifier. This could contain the primary (or Lead) MPAN if non-DURABILL LDSOs wish to. We suggest that the datatype for the Site Identifier field is Char(30) which will allow for a range of Site ID naming conventions to be used by different LDSOs.</p> <p>An indicator to say that the site is a 'mis-aligned' multi-MPAN site is likely to assist suppliers in validating invoices and would be simple to include.</p> <p>3.3.5 R4 – Invoice Data All data items are held in DURABILL and can be made available on the new output flow.</p> <p>St Clements does not see a need for including the maximum demand in the invoice period or the date and time of the maximum demand as these aren't used in the calculation of the bill. The data is recorded against the invoice record in DURABILL and therefore can be included if useful (e.g. to reduce the number of queries from suppliers). If it is to be included, St Clements would recommend additional guidance is provided regarding how this should be populated in the following scenarios:</p> <ul style="list-style-type: none">• Capacity is not being charged• No reads have been received by the DNO• All reads received by the DNO have a zero value <p>St Clements recommends that the VAT Rate is included in the invoice data record in addition to the VAT Rate Code. The VAT Rate is stored against the invoice record in DURABILL and therefore it would not add any cost or complexity to the solution and is likely to assist supplier in validating and processing the flows.</p>	
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		<p>3.3.6 R5 – Invoice Lines</p> <p>All data items are held in DURABILL and can be made available on the new output flow.</p> <p>St Clements recommends that more guidance is included for the 'Units Billed' field. We have previously seen differences in the ways that these are reported, for example with capacity units the units billed could be populated with either:</p> <ul style="list-style-type: none"> • The kVA charged • The kVA charged multiplied by the number of days. <p>Our recommendation is that it should be populated with the kVA charged.</p>	
NPg		No.	No comment
<p>Working Group Conclusions: The Working Group noted the comments above and agreed as there is appetite to include other invoice types that a further review of the new strawman flow structure provided by UKPN would be required by the Working Group.</p>			

Company	Confidential/ Anonymous	4. Would you support expanding E-Billing to other invoice types? If so, which invoice types?	Working Group Comments
UKPN		<p>Yes. The flow could be expanded to make it fit for all invoices under Clauses 20, 21 and 22 of DCUSA and late payment interest on those.</p> <p>See attached for expanded straw man to accommodate all invoice types (that does include some relabelling of the site specific data items). We have not included the suggestions in Q3 above.</p>	Yes

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SPEN		Yes, DNO NHHSC and MAP invoices including IDNO HH and NHHSC invoices.	Yes
BUUK		In principle we would support extending a new DIP e-billing flow to non-site-specific MPANs with the caveat that we would require: - the ability to undertake robust validation prior to releasing the DIP flow - a detailed costs-benefit analysis on the impact of this, in addition to the criteria outlined in our response to question 2.	Yes
Energy Assets		Neutral.	No preference
British Gas		No.	no
ENWL		Yes, HH IDNO billing and NHHSC billing could be considered but due to current levels of industry change this may be something for future consideration.	Yes
NGED		<p>We would envisage that extending E-Billing to other DUoS invoicing types would be of benefit.</p> <p>A very similar format could be used for the invoicing of HH portfolio sites. The only changes required are likely to be:</p> <ul style="list-style-type: none"> • The Supplier Info and associated fields may require relabelling • Some fields in other groups (e.g. maximum demand in the invoice period) currently showing as mandatory on the straw man may need to be made optional for these invoices. 	Yes

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		Were E-Billing to be used for DUoS aggregated invoicing, we would suggest that a separate flow is defined. This would reduce the complexity of a single file format having different record groups which are only used for one type of billing. It would also assist recipients of the flows in routing them to different systems if required.	
NPg		Yes, NHHSC.	Yes
<p>Working Group Conclusions: The majority of the respondents (6) agreed that the DIP flow could be expanded to other processes, specially NHHSC, IDNO DUoS. Others mentioned MAP and transactional and late payment. It was also noted that expanding the use of the flow could be a second step for this change as parties would need to understand the impacts of expanding the flow to other invoicing processes.</p> <p>The respondent who stated no did go on to say that they wouldn't be supportive of other processes being included without a robust cost/benefit analysis and did note that it would also depend on timelines for new invoices to be brought into this change due to a lot of other industry change at this time.</p>			

Company	Confidential/ Anonymous	5. Would you be supportive of E-Billing being mandatory? Please provide your rationale.	Working Group Comments
UKPN		Yes. It makes sense to have one process. It removes risks around emailing or posting invoices.	Support
SPEN		Yes as a DNO we would be support E-billing being mandatory for SVA suppliers although we are aware that some suppliers and CVA registrants may not be able to process EDI files	Support
BUUK		We can see the benefits of a uniform approach – on consideration of previously mentioned caveats, we would only support DIP e-billing on an all-	Support

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		<p>or-nothing basis. i.e., All parties undertaking DIP e-billing only, i.e., not a mixture of DIP flow and the existing D2021/D2026.</p> <p>We would not support this if the associated DIP flow was not in governance, please refer to question 2 response.</p>	
Energy Assets		<p>No. The systems costs incurred to produce the e-billing format, and potential for additional administration in implementing this change, are unrecoverable by IDNOS – so too are the commercial costs of contracting with Electralink for the E-billing service. It is wholly inappropriate for the DCUSA to mandate a party to make a commercial decision to procure the E-billing system – especially as Electralink own the IPR for the D2021/2026 file structure and parties will not be able to contract with an alternative provider.</p>	<p>The intent is not to mandate the E-Billing service offered by Electralink. The responder advised they would be supportive of mandating as long as robust cost/benefit analysis and impact assessments had been carried out.</p>
British Gas		<p>Yes – It has previously raised under DCP344 and DCP307 to mandate e-billing. The working group would need to consider how this change would better facilitate this requirement against previous proposals. Would use of the DIP potentially move a previous blocker due to the cost associated for the provision of service by Electralink?</p>	<p>As above, the intent is not to mandate the E-billing Electralink service but instead to bring this into a new service which is open in governance.</p>
ENWL		<p>Yes, if we were to move to a DIP flow as this should hopefully remove some of the cost challenges for smaller suppliers linked to using the current D2021.</p>	<p>Support</p>
NGED		<p>There is no reason why E-Billing being mandatory would cause a problem in the system. It may be a less costly option for DNOs as the assumption would be that PDF invoice prints would no longer be required. We would assume</p>	<p>It was noted that having a caveat to exclude CVA registrants in the legal text would be preferable.</p>

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		that some parties (e.g. small suppliers and CVA registrants) would not find it cost effective to develop a system to load such a file.	
NPg		Yes, this increases efficiency and reduces long term cost.	Support
Working Group Conclusions: After further discussions all respondents stated they did support mandating the DIP flow although it was noted that exclude CVA registrants form the process would be preferable.			

Company	Confidential/ Anonymous	6. Do you have any preferred lead time to implement any of the potential E-Billing changes and what would that lead time be?	Working Group Comments
UKPN		The changes would need to be concurrent with raising site specific invoices for MHHS migrated customers. Other invoice types, if included, could have the same implementation date.	Noted
SPEN		Happy to be flexible but minimum 6 months	6 months
BUUK		<p>We would struggle to provide any indication of lead times as 'any of the potential ebilling changes' is too broad to consider as one concept. We would have to consider the timelines for:</p> <p>1) introduction of a new DIP flow, 2) mandating e-billing for all industry participants and 3) expanding e-billing to other invoice types as they all have quite different implications and potential lead times.</p> <p>Largely as a result of the multitude of systems which would require changes, we would not support a hybrid approach as noted in our Q5 response, due</p>	Billing in respect to MHHS customers is intended to be within the DIP. In transition processes are expected to be maintained for non MHHS customers.

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		to the burden of complexity associated with transitional changes in this context.	
Energy Assets		It is wholly inappropriate for the DCUSA to mandate a party to make a commercial decision to procure the E-billing system – especially as Electralink own the IPR for the D2021/2026 file structure and parties will not be able to contract with an alternative provider. Mandating the service was in scope for DCP344 which was rejected.	As per the comment to this response in Q5.
British Gas		Align to MHHS programme transition.	Aligned to MHHS
ENWL		Our preferred lead time would be in line with MHHS migration.	Aligned to MHHS
NGED		This flow is outside of the MHHS end-to-end design and therefore we understand that it will outside of the scope of SIT. We therefore believe that a go-live date in line with the start of MHHS migration is appropriate.	Aligned to MHHS
NPg		We do not have a preferred lead time at current due to the overall changes that we anticipate MHHS will bring.	No preference
<p>Working Group Conclusions: The majority of respondents stated that the go live date should be in line with MHHS migration.</p> <p>One respondent stating a lead time of 6 months.</p>			

Company	Confidential/ Anonymous	7. Would you be supportive of cutting over to the new flow at a point in time, or running both flows in parallel? Is there an impact from credit/re-bills?	Working Group Comments
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UKPN		We would support a transition period to mirror the MHHS migration, with a hard cut-off of the D2021 at the end of that. So for any periods that a site has been billed under the current arrangements, we would continue to send D2021s for subsequent cancel/rebills (but any periods where a site has been billed under MHHS, it would always get the REP-ebill) and then at a given date when everything's migrated, we would switch everything over to the REP-ebill.	Transition period
SPEN		We would prefer a cut over date, but we are aware that this may cause issues for receiving parties.	Cut over date
BUUK		Assuming that the ability to undertake credits remains within e-billing (which is essential), we would support a big-bang approach to the change.	Cut over date
Energy Assets		No comment.	No preference
British Gas		This would have a greater implication to network invoicing systems for generating invoices, so need to understand view of networks. Preference to cut over rather than a parallel run to minimise file volume/processing.	Cut over date
ENWL		We believe the D2021 would need to be retained to handle cancellation and rebilling of invoices produced pre MHHS so if implementation is prior to migration then they need to run in parallel.	Transition period

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NGED		We believe that the only practical option is for the new flow to be used for billing all sites which have migrated to MHHS while continuing to use the D2021 flow for those sites which haven't yet migrated. Cancellations and rebills would for periods prior to the point when a site has migrated would need to continue to be reported via the D2021.	Transition period
NPg		Both flows in parallel. The credit and rebill impact would mean a financial impact that at present is unknown.	Transition period
Working Group Conclusions: The majority of respondents supported running parallel processes rather than a hard cut off date. It was noted by a billing provider that it would be potentially possible to run both processes in parallel during migration, and the once the new process is bedded in, switching the current process off.			

Company	Confidential/ Anonymous	8. Do you currently use the D2026 flow? If so, is further consideration needed?	Working Group Comments
UKPN		We receive this flow from some suppliers but do not see a need for a replacement going forward. We do not receive these from all suppliers and our processes focus on what has been paid rather than what we are advised should be paid.	Received by suppliers but not used in any processes
SPEN		No, however we would be happy to explore this option to streamline the collection processes.	Not used and after discussion within the Work Group agreed that there is no need for a remittance flow within the DIP

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BUUK		Currently no, as do not use electralink e-billing. We would only support DIP e-billing where the associated flows are in governance, see answers to questions 2 & 5.	Not used.
Energy Assets		No.	Not used.
British Gas		We send D2026 flows and our payment system will also generate .PDF/.xlsx remittances. Working group to consider preference of networks.	
ENWL		No, we do not use the D2026, although we cannot see any reason why the D2026 would need to change at this point.	Not used.
NGED		Some suppliers send us D2026's though it is not necessary and rarely used	Received but not used.
NPg		No.	Not used.
Working Group Conclusions: The Working Groups conclusion is there is no need to have a remittance flow in the DIP.			

Company	Confidential/ Anonymous	<p>9. Do you consider that the proposal better facilitates the DCUSA General Objectives?</p> <p>If so, please detail which of the General Objectives you believe are better facilitated and provide supporting reasons.</p> <p>If not, please provide supporting reasons.</p>	Working Group Comments
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UKPN		Yes, as per our proposal.	In line with the CP
SPEN		We believe that E-billing for multiple invoices is future proofing and sense to explore and implement during the MHH project.	In line with the CP
BUUK		Yes – in the context of efficiency related objectives. Does it create a barrier for new industry parties – esp. smaller new suppliers – in terms of entering the market? If use of the D2021/D2026 is mandated for any parties not currently using Electralink e-billing, this may result in additional costs to use these flows which may impact newcomers to the market. However, in the event of a mandatory DIP e-billing flow(s) in all billing scenarios, we do not believe this would occur.	As below the intent is to not use the Electralink E billing services so no additional costs would be applicable.
Energy Assets		We do not agree with the WG in that General Objective 1 is better facilitated as IDNOs are unable to recover the costs of an E-billing service, and therefore not economical, if the intention is to widen the scope of DCP416 and mandate the service. We do agree that, if the scope isn't widened, then General Objective 4 is better facilitated.	Following previous comments to previous questions, Energy Assets confirmed they now believed that objectives 1 and 4 are better facilitated.
British Gas		Yes.	In line with the CP
ENWL		General objective 4 - The promotion of efficiency in the implementation and administration of the DCUSA.	Objective 4
NGED		We agree that the proposal facilitates DCUSA General Objectives 1 & 4	Objectives 1 & 4

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NPg		Yes. In line with comments as per the DCP.	In line with the CP
<p>Working Group Conclusions: Objective 1 and 4 were noted by the majority of respondents as objectives that would be positively impacted by this change.</p> <p>It was explained that this change would not be mandating the use of any Electralink E billing services.</p>			

Company	Confidential/ Anonymous	10. Are you aware of any wider industry developments that may impact upon or be impacted by this CP?	Working Group Comments
UKPN		No.	None
SPEN		No, we are not aware of any impact to wider industry	None
BUUK		Changes in tariff structure may impact the data structure required for this DIP flow structure – this change is still open even though recent progress/dialogue has been limited.	The new DIP flow will include DUoS tariff ids and the Working Groups view is that if there are changes to tariff structures within changes such DUoS SCR then they would have to be accommodated within the flows.
Energy Assets		We agree that this change may impact the REC and BSC.	Noted potential impacts to the REC and BSCP
British Gas		No, proposal raised due to impacts of changes for MHHS programme.	None

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ENWL		No.	None
NGED		No.	None
NPg		Yes. In line with comments as per the DCP.	Agree with the impact assessment within the proposal.
Working Group Conclusions: The Working Group agreed that there are no known impacts as a result of this change other than what is mentioned within the change proposal.			

Company	Confidential/ Anonymous	11. Do you have any comments on the proposed legal text?	Working Group Comments
UKPN		<p>The text will need to be updated in light of responses to this consultation. Particularly questions 4, 5 and 7.</p> <p>The definition provided needs updating as follows for site specific invoices –</p> <p>“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] sent using the DIP for MHHS customers.</p> <p>Also changes will be required to Clause 21.2B for example</p> <p>Where the The Company shall submits, and the User agrees to shall receive, accounts by sending an electronic invoice it shall use an electronic invoice</p>	<p>Add in <i>“THE COMPANY MUST HAVE FIRST OFFERED AND “ prior to the User within the red text</i></p>

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		for all of that User's accounts (including revised accounts and credit-notes) save that prior to [MHHS migration end date] for non-MHHS migrated customers the User must have first agreed to receive such electronic invoices. For the avoidance of doubt, where this Clause 21.2B applies, Clause 59.4 shall apply to the sending of accounts during any period in which the Date Transfer Network or the DIP is unavailable.	
SPEN		No comment.	No comment
BUUK		<p>We believe the legal text is not currently specific enough to define the extent of the proposed change and would recommend it be rewritten in greater detail – i.e. to specifically reference the contents of the D2021 and the proposed DIP flow.</p> <p>References to the D2021, although currently in the DCUSA, are problematic in that it is not universally used by all parties and should e-billing become mandatory the legal text would enforce use of the D2021.</p> <p>We would expect any legal text to refer to a flow fully defined under governance, unlike the D2021 as it currently stands.</p>	The Working Group agreed that this is the intent of the legal text.
Energy Assets		No.	No comment
British Gas		No.	No comment
ENWL		We have no comments on the proposed legal text.	No comment
NGED		No.	No comment

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NPg		No comments.	No comment
Working Group Conclusions: The Working Group consider the amendments to the legal text put forward by UKPN and were supportive of this with the inclusion of the text added into the comments.			

Company	Confidential/ Anonymous	12. How might the legal text need to be changed if other invoice types are included?	Working Group Comments
UKPN		<p>The definition of electronic invoice would need to be updated</p> <p>“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.</p> <p>Clauses similar to 21.2B will need to be added, for example as 20.4B and 22.2B.</p> <p>e.g. The Company shall submit, and the User shall receive, accounts by sending an electronic invoice. For the avoidance of doubt, where this Clause [XX.XXB] applies, Clause 59.4 shall apply to the sending of accounts during any period in which the DIP is unavailable.</p>	<p>Noted if other invoices were brought in scope then changes to the electronic clauses definition may be needed and then changes to other clauses such as 20.4B and 22.2B would be needed, similar to the changes to clause 21.2B</p>
SPEN		No comment.	No comment

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BUUK		We believe that there would be extensive legal text changes to incorporate this change and a significant review before these could be defined.	
Energy Assets		No comment.	No comment
British Gas		n/a - Preference to keep to DUoS invoicing.	No comment as preference to keep DUoS billing.
ENWL		This question could be addressed if the working group does decide to widen the scope of the solution identifying the other invoice types.	No comment at this stage. If the scope is widened to other invoice types then further legal text review may be needed
NGED		No comment.	No comment
NPg		"electronic invoice" means an account providing the data items set out in the relevant data flow that are specific to DUoS Billing, sent using the Data Transfer Network/Data Integration Platform. (as per DCP415).	Changes to the electronic invoice definition.
Working Group Conclusions:			

Company	Confidential/ Anonymous	13. Do you have any other comments on DCP 416?	Working Group Comments
UKPN		No.	No comment

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SPEN		No comment.	No comment
BUUK		Our responses are provided on this basis prior to any systems provider impact assessment being undertaken and may be subject to change following systems provider guidance.	Notes that the current view is subject to change if the change decides to take the change wider to other invoice types.
Energy Assets		No.	No comment
British Gas		No.	No comment
ENWL		We think it would be more beneficial if the change was mandatory for migrated sites as this would remove the need to retain the PDF option for these customers.	Notes that this would be beneficial if the process was mandated.
NGED		No.	No comment
NPg		No.	No comment
<p>Working Group Conclusions: 6 respondents had no further comment. One respondent noted their views could change if other invoice types were brought in scope.</p> <p>Another respondent noted that mandating the process would be more beneficial as it would mitigate the need for numerous professions.</p>			