

DCP 416 Working Group Meeting 04

17 March 2023 at 10:00 - Web-Conference

Attendee	Company
Working Group Members	
Laura Quinn [LQ]	SPEN
Laurie Harman [LH]	British Gas
Robert Short [RS]	MHHS Programme
Tim Porter [TP]	SSE
Tom Perryman [TP]	St. Clements
Tracey Dunne [TD]	ENWL
Code Administrator	
Andy Green [AG] (Chair)	ElectraLink
Craig Booth [CB] (Technical Secretariat)	ElectraLink
Alysson Peña [AP]	ElectraLink
Apologies	
Peter Waymont [PW]	UKPN
Donna Jamieson [DJ]	Energy Assets

1. Administration

- 1.1 The Chair welcomed attendees to the fourth DCP 416 Working Group (WG) meeting.
- 1.2 The group reviewed the “Competition Law Guidance”. All members agreed to be bound by the Competition Law Guidance for the duration of the meeting.
- 1.3 The group reviewed the minutes from the previous meeting.
- 1.4 The group reviewed the actions:
 - 1.4.1 01/01 – The Chair said no updates had been received and would chase up an update on this action.
 - 1.4.2 03/01 – The Chair presented the strawman flow structure for DCP 415 for the Working Group to review. It was confirmed the header was present. The action was closed.
 - 1.4.3 03/02 – The Chair confirmed the consultation had been circulated, the responses for which were being reviewed at this meeting. The action was closed.
 - 1.4.4 03/03 – The Chair explained it was not yet possible to draft the Change Report, so this action remains open.
 - 1.4.5 03/04 – The Chair confirmed the legal text had been updated and circulated. This action was closed.

2. Purpose of the Meeting

- 2.1 The Chair set out that the purpose of the meeting was for the Working Group to review the consultation responses.

3. Review Consultation Responses

Question 1

- 3.1 Five respondents supported the inclusion of these whilst three respondents did not. One respondent, the MHHS Programme, was neutral.
- 3.2 The MHHS Programme response suggested to just focus on the “must haves” and consider delivering the “nice to haves” later.
- 3.3 TP asked where the WG was thinking that it includes just HH or would include NHH.
- 3.4 The Chair explained the CP allows for all invoices to be considered and that it was still not decided whether to include NHH.
- 3.5 Conclusion: Whilst there is benefit in taking this wider, it’s not the right time to do it when taking into account the amount of change underway in the industry.

- 3.6 TD asked for clarity on what is meant by DUoS invoices and what this includes, e.g., supercustomer, IDNO, etc.
- 3.7 The Chair recalled that the WG had discussed taking supercustomers out of the change but could not recall anything specific to IDNOs.

Action 04/01: Chair to speak to Peter to clarify what is meant by keeping the change specific to DUoS.

Question 2

- 3.8 Two respondents did not support the inclusion of the identifier. Three respondents supported the inclusion of the identifier. It was noted that it was a nice to have and no reason not to have this, as long as it's an easy thing to include.

Question 3

- 3.9 Three respondents stated there were costs related to system changes.
- 3.10 Two respondents stated there would be impacts to the MHHS Programme in the development of any new DIP flow.
- 3.11 One respondent stated the change would save costs from a DNO perspective.
- 3.12 One respondent noted there would be wider system changes, but that it was the right option for future proofing.
- 3.13 One respondent stated it had not fully assessed the costs, but sought clarity on whether there would be any additional costs, since it already paid for what goes via the DTN and for MPAN costs.
- 3.14 The Chair said there would be no additional costs from an ElectraLink point of view, as the provider of the DTN.
- 3.15 One respondent noted there would be increased costs if the scope is widened to include additional invoices and it therefore did not support this. It noted that if the scope remains inline with D2021 but made it market wide compatible, then it did not foresee a substantial change.
- 3.16 The same respondent noted that moving the IDNO DUoS costs into this process would result in significant savings, by moving away from manual processes.
- 3.17 LH noted that effectively the respondent is suggesting that if producing a DIP flow in same format as D2021, then it's relatively easy, as instead of this being sent via ElectraLink, it would instead be picked up via the DIP.
- 3.18 LH asked what would happen with the existing flow.
- 3.19 The Chair said it would continue until such a time as the DIP takes over. It was noted the proposal was to have a bedding in period, where either flow could be used, but the DTN would cease to exist when the DIP takes over.

3.20 TP clarified that any DUoS charges in market wide environment would use the DIP flow and any charges in legacy would be via the DTN.

3.21 Conclusion: If the change is specific to DUoS then some smaller system changes however if the proposal is taken wider this could create significant changes across numerous systems.

Question 4

3.22 One respondent stated it was a benefit to make it mandatory to send HH invoices by electronic flows, as long as it is under open governance. It noted the other invoice types would likely not be included.

3.23 One respondent noted the implementation date would need to be agreed through the MHHS Programme.

3.24 One respondent stated it would not support making it a mandatory flow for all bill types. It noted it would support the inclusion of HH DUoS and SCDUoS, however it would only support the HH DUoS being mandatory. It stated that making non-DUoS bill types mandatory would be complex and costly. It also noted that different parties would have different processes and including non-DUoS types and making them optional would create confusion.

3.25 The Chair noted that additional clarity was needed on the NPg response as it could be read as “the respondent supporting HH DUoS as mandatory, with others optional”.

Action 04/02: Chair to clarify NPGs response to question 4.

3.26 One respondent supported most bill types being mandatory, but noted CVA types would be an issue as the customer may not have the ability to process the flow. It was noted in the WG by the respondent that it should be mandatory for HH DUoS, but it does not support the optional approach as it could cause confusion.

3.27 One respondent supported HH DUoS being mandatory, but highlighted there were potential unintended consequences in its response to question 6.

3.28 One respondent stated it supporting the mandating of networks to have an option for electronic invoices for all types, but that suppliers should have the ability to choose its preferences (as it stated currently exists in HH DUoS invoicing). The respondent stated in the WG that it agreed with the suggestion to either mandate it or not, as an optional approach could cause confusion.

3.29 RS sought clarification that it was being suggested to mandate the HH DUoS, but that anything outside of that would not have the optionality to do this, as it appeared to not be required and would cause confusion (as some DNOs may be doing it and others may not). The Chair agreed with this and that to bring in other invoice types might be for a future change proposal.

3.30 RS asked if there could be multiple CPs, but this one for minimum viable is to mandate the HH DUoS. The Chair confirmed this was correct.

3.31 One respondent referred to its answer to question 1. The Chair noted that response did not refer to mandating or optionality.

- 3.32 Conclusion: The Working Group agrees that mandating for HH DUoS is the right approach. It does not support any form of optionality for any invoice types as this could cause confusion within the industry and create significant costs for distributors as they would be required to run multiple processes to support.

Question 5

- 3.33 One respondent stated the legal text needed to take heed of responses to question 4, if there is a desire to make HH DUoS mandatory.
- 3.34 One respondent stated the implementation date would need to be agreed.
- 3.35 One respondent stated Clause 22B should not be included in the legal text.
- 3.36 The Chair noted that if the approach is to only mandate HH DUoS, Clause 22.4B would not be needed.
- 3.37 LQ stated they felt the Proposer was needed for the review of the legal text. The Chair agreed another WG would be needed.

Question 6

- 3.38 One respondent stated the MHHS programme would require a clear statement of why this is required and suggests using learnings from CR019 (DCP 415).
- 3.39 One respondent stated it was supportive of moving the NHHSC charges to a DIP flow, but noted the benefit was less and there was an argument that the NHHSC DIP flow should be optional.
- 3.40 One respondent noted the terms between DUoS invoices and MAP and transactional invoices do not have the same terms. It stated it did not believe the intent of the CP was to force all invoices into this.
- 3.41 One respondent stated it was unclear how queries for MPANs crossing over processes would be approached. It also noted missing items and clarity required on the strawman flow structure.

Action 04/03: Chair to check the items listed in the response against the strawman flow structure and make changes/corrections as appropriate.

4. Next Steps & Work Plan

- 4.1 The Working Group discussed the next steps, and the following items were captured:
- Chair to issue a Doodle Poll for the next meeting.

5. Any Other Business

- 5.1 The Chair asked the group whether there were any other items of business to discuss, to which nothing was raised.

6. Date of Next Meeting

- 6.1 The Chair noted the Proposer's calendar is challenging, so would speak to him regarding his availability and then issue a Doodle Poll for the next meeting.

7. Attachments

- Attachment 1 - DCP 416 Consultation 2 Responses

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 <i>AA will update WG when completed.</i>
03/03	Draft the Change Report for the Working Group to review at the next meeting.	Secretariat	Ongoing
04/01	Speak to Peter to clarify what is meant by keeping the change specific to DUoS.	Chair	New
04/02	Clarify NPGs response to question 4.	Chair	New
04/03	Check the items listed in the response against the strawman flow structure and make changes/corrections as appropriate.	Chair	New

Closed Actions

Action Ref.	Action	Owner	Update
02/01	The Working Group to review the strawman flow structure and make the necessary updates.	Working Group	Closed
02/02	The Secretariat to make the necessary amendments to the draft legal text following the Consultation responses.	Secretariat	Closed
03/01	The Chair to speak with the Chair of DCP 415 to seek further information around whether there is a header/footer on the current dip flow, and if so, what are the requirements.	Chair	Closed
03/02	The Secretariat to finalise the Consultation v2 and circulate to wider industry on 15 February 2023, with a response deadline of 01 March 2023.	Secretariat	Closed
03/04	The Secretariat to make the necessary updates to the draft legal text and circulate to the Working Group post-meeting for review.	Secretariat	Closed