|  |  |  |  |
| --- | --- | --- | --- |
| Company | Confidential/  Anonymous | 1. Would you support the inclusion of the following invoice types-meter asset provision, transactional charges under the DCUSA and late payment charges? | Working Group Comments |
| UKPN |  | While we support this, we recognise that the impact may be too great if distributors use different billing systems for different charge types. We note that there doesn’t seem to be sufficient support within the working group for invoices other than HH. | Suggests could be beneficial but would require some effort(system changes) to and may delay this changes implementation. |
| **MHHS Programme** |  | Whilst we are neutral on this point it may be preferable to focus on the “must-have” for start of MHHS migration, and look at “nice to have” at a later date | States to stick to the ‘must have’ deliverable and consider additional requirements in a later CP. |
| ENWL |  | No, we would not support this change as we do not currently use the same system to trigger all our invoices, and this would require us to make changes in multiple systems. This would be costly and complex with a lack of benefit to ourselves. MHHS aims to improve settlement accuracy, we do not believe that non-DUoS charges should be included in this change as they have no impact on settlement, therefore are not in line with the intent of MHHS. We have previously raised concerns around increasing the scope and costs of MHHS in our response to Consultation 1. | Raises similar concerns to UKPN re system changes and costs. Similar to MHHS believes delivering the must requirement first is the approach the wg should take. |
| NPg |  | No. | Does not support taking wider. |
| SPEN |  | Yes, there is no reason these invoices should be treated any different than DUoS | Supports taking this wider although raised within the WG that has no strong preference and acknowledges the challenges that taking this CP to other invoice could have. |
| Scottish Power |  | Yes for DUoS however, we are still reviewing for MAP and Transactional as per our response to Q6. | Yes to DUoS only. |
| British Gas |  | Yes, we are supportive of the principal. Preference is for suppliers to be able to opt in or out of electronic invoicing. (covered in Q4). | Supports in principle but similar to SPEN acknowledging the challenges including other invoice types could have. |
| E.ON |  | We do not support the addition of all the listed invoice types e.g. MAP charges. Although we recognise why this has been suggested we believe it widens the scope too much. Not all businesses are structured where a single team pays all of these so to combine would heavily influence how people work which concerns us.  We would support the late payment fees relating to these invoices being included but not any of the others currently. These could be looked at later and separate to MHHSP developments, but we believe this is too greater change and complexity for the invoicing process at this time.  We would also support the inclusion of the follow DUoS costs into this template as we believe that bringing in a consistent approach for this invoicing would be beneficial not only to us but other parties.  • HH (Site Specific) billing  • HH (Site Specific) IDNO billing  • Aggregated DUoS billing (NHHSC) – supplier and IDNO | Does not support taking this wider to all suggested invoice types, Also believes that the WG should focus on the ‘must have requirement at this time ie keeping the change specific to DUoS. |
| **Working Group Conclusions:** The Working Group concluded that whilst there is appetite to include other invoicing types, this would be appropriate to be done at a later stage and to focus on the must have requirement. The Working Group agreed that the process should only be for HH billing. | | | |

|  |  |  |  |
| --- | --- | --- | --- |
| Company | Confidential/  Anonymous | 1. Would it be useful to include an identifier for misaligned multi-site MPANs? |  |
| **UKPN** |  | We see no benefit to us in doing so. | No |
| **MHHS Programme** |  | No comment | No comment |
| **ENWL** |  | Yes, as this would be an additional way of highlighting to suppliers that there are additional MPANS associated to the MPAN they supply that they need to register against. | Yes but happy to go with WGs conclusions. |
| **NPg** |  | No, | No |
| **SPEN** |  | Yes this would be useful, currently SPEN do not have any within SPOW and Manweb licence area | Yes but similar to ENWL happy to go with WGs conclusions. |
| **Scottish Power** |  | No Comment | No comment |
| **British Gas** |  | Yes, | Yes but similar to ENWL happy to go with WGs conclusions. |
| **E.ON** |  | We do not have a preference we are happy to support the majority on this topic. | happy to go with WGs conclusions. |
| **Working Group Conclusions:** No strong feeling towards having the identifier however it was noted this wouldn’t be difficult to deliver so potentially better to include the identifier to future proof. | | | |

|  |  |  |  |
| --- | --- | --- | --- |
| Company | Confidential/  Anonymous | 1. Are there any wider system changes, costs or resourcing impacts as a result of this change being approved? | Working Group Comments |
| **UKPN** |  | We believe the only costs are to billing systems that generate the flow. There will also be impacts in the MHHS programme re the DIP flow and changes to the programme to build that in. | Notes as with Q1 that this will involve system changes and will need to be reviewed by the MHHS programme. |
| **MHHS Programme** |  | Any change to the baselined MHHS design, in this case a new DIP flow, will need to be assessed by the MHHS programme. As with the DCP415, an agreed solution with any rationale for a proposed implementation date should be presented in MHHS Change Request so it can be impact assessed against the current baselined design and any impact on the delivery milestones of the programme. | Notes would like to review the solution before its taken further. |
| **ENWL** |  | Yes, we would need to make multiple system changes as mentioned above, including to SAP. | As with the response to Q1, notes changes across several systems would be required which could carry significant costs. |
| **NPg** |  | From a DNO Perspective, this will save costs. | Notes it could save DNOs costs. |
| **SPEN** |  | There will be wider system charges, but we believe this is the right option for future proofing | Notes system changes as with other respondents. |
| **Scottish Power** |  | We have not fully impacted assessed what cost or impacts this change will have, however, we would like to note we currently pay for what goes across the DTN and MPAN costs for DUoS, are we correct to assume there would be no additional costs? | No additional cost would be incurred. |
| **British Gas** |  | Yes, this would be required to go through our change process as part of system changes for MHHS programme. | Notes system changes as with other respondents. |
| **E.ON** |  | If the scope is widened to cover the additional invoice types then this greatly increases the costs and complexity of this delivery, which is why we do not support it at this time. If the scope remains in line with the D2021 set up of today but making it Market Wide compatible then we do not foresee a substantial change today, other than during the dual running of the processes (which is expected until all sites are MWHH).  Should the IDNO DUoS costs move into this process there would be a significant saving of manual effort from today because of the replacement of the PDF documents into a consistent invoicing format. | States if this CP is to include other invoice types the costs and system would be high, If only looking to replace the D2021 flow function then would be relativity easy to deliver.  Notes that if IDNOs are included then this could create a significant saving. |
| **Working Group Conclusions:** 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. | | | |

|  |  |  |  |
| --- | --- | --- | --- |
| Company | Confidential/  Anonymous | 1. Would you support making this flow mandatory for all bill types mentioned in Q1? If no, do you support HH DUoS being mandatory and if so, should the other invoice types be optional or not included? | Working Group Comments |
| **UKPN** |  | We believe it is a benefit to the industry for sending HH invoices by electronic flows to be mandatory so long as this is under open governance.  The other invoice types will likely not be included, given feedback within the working group, and so we see less benefit in making those mandatory or even billed by flow. The volumes of these invoices is very few and insignificant when compared to HH DUoS. | Agrees with mandating for HH invoice only as long as these are under open governance. States that the volumes of the other invoice types are fairly low. |
| **MHHS Programme** |  | No comment on the content, but the implementation date will need to be agreed through MHHS Programme governance. | N/A but raised that the implementation date needs to be agreed with the MHHS programme. |
| **ENWL** |  | No, we would not support making this flow mandatory for all bill types, as we do not agree that non-DUoS bill types should be included as part of this change.  If the change is to progress, we would only support the inclusion of HH DUoS and SCDUoS being included, as we recognise that the current barriers to all suppliers using the D2021 would be removed by moving to a DIP flow. We would however only support the HH DUoS flow being made mandatory, as expect many suppliers would still prefer to receive PDF bills for SCDUoS.  We believe non-DUoS bill types should not be made mandatory as the cost and complexity of the changes required to implement this far outweigh any benefit. It would cause unnecessary confusion if a flow was made optional for these bill types, as different parties would have different processes. This, in addition to the fact non-DUoS flows have no impact on settlement - and are therefore outside of the scope of MHHS - is why we do not believe they should be included in the change. | Similar to UKPN supports the HH invoices being mandated but not any others due to the size of system changes verses the volume of these bill types.  Also doesn’t support making any invoice types optional as this could cause confusion within the industry. |
| **NPg** |  | This should not be mandatory, but optional for all billing types other than HH DUoS. | Seems to suggest having the HH DUoS invoices mandated and other optional but action taken to confirm this is what the response is saying. |
| **SPEN** |  | Yes this flow should be mandatory for most billing types- For SPEN CVA types will be an issue as the customer may not have the technology/systems to process flow | Stated within the WG it should definitely be mandated for HH DUoS. Doesn’t support an optional approach as could cause confusion as has been highlighted by another respondent. |
| **Scottish Power** |  | We would support HH DUoS being mandatory as it would remove any manual handling. However, please also see our comments in Q6 as there may be unintended consequences. | Supports HH DUoS being mandated, suggests unintended consequences raised in Q6 |
| **British Gas** |  | We are supportive of the principal to mandate networks to have an option produce electronic invoicing for all invoice types. However, suppliers should have the flexibility to choose invoicing preferences (as currently exists for HH DUoS invoicing). | Supportive of the principle of optional but understands this might not be practical for distributors to deliver. Noted within the WG would support all or nothing ie mandating or not |
| **E.ON** |  | See Q1. | Noted |
| **Working Group Conclusions: WG agree that mandating for HH DUoS is the right approach. Doesn’t support any form of optionality for any invoices as this could cause confusion within the industry and create significant costs for distributors as they would be required to run several processes to support.** | | | |

|  |  |  |  |
| --- | --- | --- | --- |
| Company | Confidential/  Anonymous | 1. Do you have any comments on the drafted legal text? | Working Group Comments |
| **UKPN** |  | The legal text needs to take heed of responses to Q4 if there is a desire to make post MHHS flows mandatory. | Needs to consider how we draft the legal to mandate MHHS |
| **MHHS Programme** |  | No comment on the content, but the implementation date will need to be agreed through MHHS Programme governance. | N/A |
| **ENWL** |  | As explained above, we do not agree that Clause 22B should be included in the legal text. | Notes that clause 22B is no longer required |
| **NPg** |  | No |  |
| **SPEN** |  | No comment. |  |
| **Scottish Power** |  | We do not have comments at this time but will update if we subsequently do. |  |
| **British Gas** |  | No |  |
| **E.ON** |  | No comments. |  |
| **Working Group Conclusions:** The Working Group agreed that clause 22B wasn’t needed anymore and the legal text was amended to cater for the change being mandatory for MHHS. | | | |

|  |  |  |  |
| --- | --- | --- | --- |
| Company | Confidential/  Anonymous | 1. Do you have any further comments? | Working Group Comments |
| **UKPN** |  | No |  |
| **MHHS Programme** |  | The development of DIP flows sits under the MHHS Programme and will be assessed for its impact on delivery of the Programme. It is important therefore that there is a clear statement of why this flow is required and the rationale for any proposed implementation date in order to deliver the outcomes of the MHHS Programme.  We suggest that the content of the proposed MHHS Change Request draws on the content of CR019 that was raised from DCUSA DCP415 and particularly learns from the additional text that was requested to further set out the context of the change, i.e. the DCP416 version of the below:  “Replacement of D0242/D0315  The proposed new DIP flows will be required from Transition Go-Live M10 and these DIP flows will become the enduring DUoS Charging Statements for whole current customers.  The existing flows D0242/D0315 map to the D0030/ D0314. The aggregated consumption data is presented on the D0030/ D0314 flows by Standard Settlement Configurations (SSCs) and Time Pattern Regimes. This structure is picked up in the D0242/D0315. The aggregated consumption is converted to DUoS charges which are presented on these flows to Suppliers and Embedded Networks.  From the point of Transition Go-Live the Distributors will continue to receive the D0030/ D0314 from the SVAA for non-migrated NHH MPANs and customers in Measurement Class F and G. They will also receive the ELX-REP-002 ‘LDSO or Supplier report for DUoS – aggregated data’ and the ELX-REP-002A ‘Embedded Network report for DUoS – aggregated data’ over the DIP, for whole current MPANs, from the SVAA. The replacement flow(s) proposed will provide the equivalent charging data to the D0242/D0315. Suppliers and Embedded Networks will need to aggregate the DUoS charges on the DTN and DIP flows to understand their total charges until all MPANs on the Network have been migrated.” | Note |
| **ENWL** |  | For consistency, we are supportive of moving the NHHSC charges to a DIP flow. However, as there is generally only one invoice per supplier each month, this does not provide the same level of benefit to suppliers as electronic HH invoices do and there is therefore an argument to suggest that a NHHSC DIP flow should be optional | No additional comments that haven’t been recorded earlier in the response doc. |
| **NPg** |  | No |  |
| **SPEN** |  | No additional comments |  |
| **Scottish Power** |  | Yes, the DUoS invoices have very clear obligations for payment terms, credit cover and interest payments. However, MAP and transactional invoices do not have the same terms. We have concerns that following the same process for all would force all invoices into the DUoS obligations and we do not believe that is the intention of the DCP. As such, we would recommend these are sent in three separate invoices rather than one based on the above. | No additional comments that haven’t been recorded earlier in the response doc. |
| **British Gas** |  | No |  |
| **E.ON** |  | It is unclear how queries relating invoices for MPANs crossing over processes will be approached, it would be beneficial to have this clearly articulated so a consistent process is followed.  Comments for Attachment 4  • Canceled Invoice Date / Canceled Invoice Number – typo, believe this should be Cancelled  • Canceled Invoice Number – missing date description like other date fields  • Number of Days Billed – We would like mandatory guidance that this should only relate to a single billing month for invoicing and any subsequent rebilling.  • Quantity – the description doesn’t match the population of NUM(13,3)  • Transactional Charge Code – would benefit from an example  • Charge Code Description – would benefit from an example and clarity on the optionality completion to ensure parties fill this in consistently |  |
| **Working Group Conclusions:** The Working Group noted that with the exception of the comment from E.ON, all the additional comments had been responded to within earlier questions.  The Working Group reviewed the strawman flow structure and changes were made to address the first two points raised by E.ON. Additional guidance was added to Number of Days Billed as per the suggestion by E.ON.  There were no changes required to Transactional Charge Code and Charge Code Description as these rows would be deleted as these items were no longer in the scope of the change. | | | |