

DCUSA Change Report		At what stage is this document in the process?
<h1>DCP 428</h1> <h2>Zero REP-002/A Data</h2> <p><i>Date raised: 25 August 2023</i></p> <p><i>Proposer Name: Peter Waymont</i></p> <p><i>Company Name: Eastern Power Networks</i></p> <p><i>Company Category: DNO</i></p>		<p>01 – Change Proposal</p> <hr/> <p>02 – Consultation</p> <hr/> <p>03 – Change Report</p> <hr/> <p>04 – Change Declaration</p>
<p><b>Purpose of Change Proposal:</b></p> <p>To specify how parties should deal with zero or blank data in the supercustomer/aggregated billing messages when sending daily statements or raising invoices.</p>		
	<p>This document is issued in accordance with Clause 11.20 of the DCUSA, and details DCP 428 ‘Zero REP-002/A Data’. Parties are invited to consider the proposed amendment (Attachment 1) and submit their votes using the Voting form (Attachment 2) to <a href="mailto:dcusa@electralink.co.uk">dcusa@electralink.co.uk</a> by <b>01 May 2024</b>.</p> <p>The voting process for the proposed variation and the timetable of the progression of the Change Proposal (CP) through the DCUSA Change Control Process is set out in this document.</p> <p>If you have any questions about this paper or the DCUSA Change Process, please contact the DCUSA by email to <a href="mailto:dcusa@electralink.co.uk">dcusa@electralink.co.uk</a> or telephone 020 7432 3011.</p>	
	<p>Parties Impacted: DNOs, IDNOs, Suppliers</p>	
	<p>Impacted Clauses:</p> <p><b>Clauses 20.2 - 20.5 and Paragraph 2 Schedule 19</b></p>	

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 Any questions?

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## Timetable

The timetable for the progression of the CP is as follows:

### Change Proposal timetable

Activity	Date
Initial Assessment Report	20 September 2023
Consultation Issued to Industry Participants	17 November 2023
Change Report Approved by Panel	03 April 2024
Change Report issued for Voting	04 April 2024
Party Voting Closes	25 April 2024
Change Declaration Issued to Parties	26 April 2024
Implementation	01 April 2025

## 1 Executive Summary

### What?

- 1.1 Clarification is required to be added to DCUSA to specify how Parties should deal with zero or blank data in the supercustomer/aggregated billing messages, including for site specific billed data when sending daily statements or raising invoices.

### Why?

- 1.2 The MHHS programme have stated that the REP002B/A messages (which are the equivalents of the current D0030 and D0314 flows) will contain zero values.

They have stated:

*“for settlement dates for which suppliers don’t have any registered and energised Whole Current MHHS MPANs, the supplier will be included on the LDSOs version of the REP-002 and any such suppliers will be issued an (empty) REP-002 where the supplier is a qualified participant with the correct role type”.*

*it would contain the following records:*

- *S0 – Transactional Info*
- *R027 Distributor Id*
- *R013 – GSP Group*
- *R007 Settlement Run Execution*
- *R002 – Settlement Run Info*
- *R009 – Supplier MPID (REP-002) or R006 – Embedded LDSO Id (REP-002A) [Note – these message numbers were subsequently changed by the programme]*

*but none of the following:*

- *R010 Tariff Characteristics*
- *R011 – Consumption data by Settlement Period*
- *R0105 – Daily volumes on Actuals or Estimates”*

- 1.3 Since DCP 428 has been raised, it has been noted that REP002B/A messages will also include site specific billed consumption data, bar a handful of EDCM customers that are on Line Loss Factors that are site specific. These site-specific customers are excluded from the current D0030, therefore DNOs would need to ensure that they do not double invoice.

### How?

- 1.4 By amending the DCUSA to clarify the resulting processes as they affect daily statements and invoices.

## 2 Governance

### Justification for Part 1 Or Part 2 Matter

- 2.1 This does not meet any of the Part 1 criteria as it is believed that this is a sensible change that just seeks to add clarity to DCUSA as to how to deal with supercustomer/aggregated billing data that is entirely blank or zero or where invoices for these result in a zero value.

### Requested Next Steps

- 2.2 The Panel considered that the Working Group has carried out the level of analysis required to enable Parties to understand the impact of the proposed amendment and to vote on DCP 428.
- 2.3 The DCUSA Panel recommends that this CP:
- Be issued to Parties for voting

## 3 Why Change?

### Background of DCP 428

- 3.1 To clarify how Distributors (DNOs/ IDNOs) should progress zero values arising from the REP-002B/A message. To clarify the actions Suppliers/IDNOs should take following receipt of zero value daily statements/invoices.

## 4 Initial Working Group Analysis – Pre-Consultation

### DCP 428 Working Group Assessment

- 4.1 The DCUSA Panel established a Working Group to assess this CP. This Working Group consists of Supplier, DNO, IDNO representatives. A meeting was held in open session and the minutes and papers are available on the DCUSA website – [www.dcusa.co.uk](http://www.dcusa.co.uk).
- 4.2 As stated above, clarification is required to be added to DCUSA to specify how Parties should deal with zero or blank data in the supercustomer/aggregated billing messages, including for site specific when sending daily statements or raising invoices.
- 4.3 It was originally proposed to amend the DCUSA to make it clear that zero value statements and invoices will be issued. It will also require the User to notify the Company that zero sum invoices should be cleared down. Where the User does not do this, the Company will incur costs in pursuing the User for clarity on next steps and so admin fees may be payable. It was noted Distributors being able to pursue the admin fee is an entitlement but is not mandatory.

#### Supercustomer/aggregated DUoS Reports

- 4.4 In order to address the above issue, it is proposed that in relation to Supercustomer DUoS reports, the legal text (Section 8) will state that Distributors will issue Daily Statements, Initial Accounts and Reconciliation Accounts to Suppliers even if these total zero.

- 4.5 It will then add a requirement on the Supplier to clear down all zero sums quoting the Initial Account or Reconciliation Account number to be cleared. The legal text will also state that the DNO shall be entitled to receive a reasonable administration charge for any zero sum invoice which it has not received notice to clear down. It was noted that this will be an entitlement but not mandatory.

## 5 DCP 428 Consultation and RFI

- 5.1 The [DCP 428 consultation](#) was issued on 17 November 2023 and there were 7 responses received. three responses received were from Supplier Parties, three were received from DNOs Parties, and one from an IDNO Party.
- 5.2 A summary of the responses received, and the Working Group's conclusions are set out below. The full set of responses and the Working Group's comments are provided in Attachment 3.

### Question 1 - Do you understand the intent of DCP 428?

- 5.3 The Working Group noted all respondents understood the intent of DCP 428.

### Question 2 – Are you supportive of the principles of DCP 428?

- 5.4 The Working Group noted that four respondents were supportive of the principles of DCP 428 and three were partially supportive and provided additional comments that needed to be considered.

### Question 3 - Do you agree with the Working Group's proposed solution? Please provide your rationale either way.

- 5.5 Two respondents agreed with the Working Group's proposed solution and four agreed that invoices should be sent but no further actions (i.e., obliging Suppliers to confirm clear down of zero value invoices). One respondent did not support invoices being sent for zero values and nor the further actions that would potentially be needed.

### Question 4 - Do you have any other solution proposal? Please provide your rationale

- 5.6 Three respondents did not have any other solutions and provided no additional comments. Three respondents said that issuing a zero-value invoice is acceptable, but any clear down should be done automatically by Distributors, but Working Group noted that 'automatically' would mean an admin burden and/or system cost for Distributors. Final respondent did not support invoices being sent nor the further actions that would potentially be needed.

## Question 5 - Do you consider that the proposal better facilitates the DCUSA General Objectives?

If so, please detail which of the General Objectives you believe are better facilitated and provide supporting reasons.

If not, please provide supporting reasons.

- 5.7 Three respondents were of the view that the change would better facilitate General Objective four, whilst two were of the view that the change would not better facilitate General Objective four. Two respondents noted that as currently proposed, the change would have a negative impact on General Objective four but that they that there would be a positive impact on General Objective four if the process for clearing down the zero value invoices was removed.

## Question 6 - Are you aware of any wider industry developments that may impact upon or be impacted by this CP?

- 5.8 Six respondents did not note any wider industry developments that may impact upon or be impacted by this change and one respondent noted that there was a key link to MHHS Programme, which the Working Group notes was the reason for this CP being required.

## Question 7 - Do you agree with the Working Group's proposed implementation date? Please provide your rationale.

- 5.9 All respondents were supportive of the proposed implementation date.

## Question 8 - Do you have any comments on the proposed legal text?

- 5.10 Three respondents did not have any further comments, and with respect to the four remaining respondents, they provided a number of comments related to the legal text and the Working Group agreed to take an action to review these once a decision is made on whether to issue zero value invoices.

## Question 9 - Do you have any other comments on DCP 428?

- 5.11 There were no additional comments from any respondents.

### Working Group Conclusions and Next Steps

- 5.12 Following the Working Group review of the consultation responses the Working Group came to realisation that it would be worth understanding whether Parties would support a process whereby no invoice is issued where the value would be zero. It was noted that this was an argument put forward in response to a number of comments made and essentially needs Suppliers to confirm that the receipt of Daily Statements is sufficient for Suppliers given the burden issuing a zero value invoice places on Distributors.
- 5.13 Further to the above, it was also considered beneficial to better understand and quantify the likely volume of any such invoices that will be created.
- 5.14 Therefore, the Working Group agreed to draft and then issue a short [RFI](#) to obtain responses to some questions which would help answer the two points above.

RFI

- 5.15 A summary of the responses received, and the Working Group's conclusions are set out below. The full set of responses and the Working Group's comments are provided in Attachment 4.

**Question 1 - For Suppliers, if an invoice were to total to £0, then in your view is there any point in an invoice being sent at all?**

- 5.16 Of the Supplier responses two stated they did not see any value of zero invoices being issued and one stated they would like to be alerted of zero statements for record keeping.

**Question 2 - For Distributors, if your system creates zero value invoices, then do you send them?**

**If so, how many zero value invoices have you issued in the last 12 months?**

- 5.17 Of the Distributors that responded to the RFI, three stated that they do send zero invoices and three stated that they do not.

**Question 3 - For Distributors, how many Supplier MPIDs currently get daily 'Supercustomer' statements compared to the total number of open Supplier MPIDs that exist in MDD?**

- 5.18 It is believed that there are 205 open Supplier MPIDs in MDD. The number of Supplier MPIDs receiving daily supercustomer statements varied across each Distributor ranging from 79-135.

## 6 Working Group Conclusions and Final Solution

- 6.1 After consideration of the consultation and RFI responses, the Working Group identified the following area for further consideration:
- Should zero invoices be issued or is the Daily Statement and Initial Account information sufficient?
- 6.2 The Working Group considered the above and after review concluded that the proposed solution should be that zero invoices should not be sent. This would also be the case should there be a combination of positive and negative values but overall, it nets to £0,
- 6.3 The rationale for this is that the Suppliers will have all the information available through the Daily Statements to calculate that no invoice will be issued as the total is £0. It is deemed that this is the most efficient approach and goes further to better facilitate DCUSA General Objective 4 as it reduces the admin burden.

## 7 Relevant Objectives

### Assessment Against the DCUSA Objectives

7.1 For a DCUSA CP to be approved it must be demonstrated that it better facilitates the DCUSA Objectives. There are five General Objectives and six Charging Objectives. DCP 428 will be measured against the DCUSA General Objectives, which are set out in the table below:

	DCUSA General Objectives	Identified impact
<input type="checkbox"/>	1. The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks	None
<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

7.2 By adding clarity to DCUSA that no invoices will be issued for supercustomer/aggregated billing data that is entirely blank or zero or where invoices for these result in a zero value, will ensure Distributors and Suppliers agree to the most efficient way of dealing with these scenarios.

## 8 Impacts & Other Considerations

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

8.1 This CP has been raised due to the MHHS programme introducing a new REP-002B/A messages, which will include zero values.

### Does this Change Proposal Impact Other Codes?

- BSC
- CUSC
- Grid Code
- DCode
- SEC

REC   
None

## Consideration of Wider Industry Impacts

8.2 This was discussed in the SIG initially and a consultation issued. [Consultation documents are available on the DCUSA website](#), and the responses can be found as Attachment 5. This change has been raised in light of those responses.

## Confidentiality

8.3 This Change is not confidential.

## 9 Implementation

9.1 The proposed implementation date of this CP is 01 April 2025.

## 10 Legal Text

10.1 The following clauses have been suggested to be either added or modified.

Amend Clauses 20.2-20.5 (Aggregated Billing and Payment) as follows:

### Initial Account

20.2 Following its receipt of each Supercustomer DUoS Report in accordance with the timetable for Settlement after each Settlement Run relating to each Settlement Day, the Company shall deliver Daily Statements to the User as soon as is reasonably practicable (including where these total zero).

20.3 The Company shall calculate in respect of~~submit to~~ the User, as soon as is reasonably practicable after the end of each charging period, an account or accounts (the Initial Account) specifying the Use of System Charges payable by or to the User in respect of each Initial Settlement Run in respect of which a Daily Statement has been produced and which has not previously been included in an Initial Account. Such Initial Accounts shall be based on the Daily Statements provided pursuant to Clause 20.2.

### Reconciliation Account

20.4 Where a subsequent Daily Statement for any Settlement Day indicates that, as a result of a subsequent Reconciliation Run or Post-Final Settlement Run, the User's Use of System Charges in respect of that Settlement Day are different from those included in an Initial Account, the Company shall calculate such difference and the interest thereon ~~and shall submit an account~~ (the Reconciliation Account) in respect of such difference to the User, as soon as is reasonably

practicable after the end of each charging period. Such interest shall be calculated in accordance with the provisions of Schedule 3.

Invoicing Initial Accounts & Reconciliation Accounts

20.4A As soon as is reasonably practicable after the end of each charging period, the Company shall submit an invoice (or credit note) to the User for the total aggregate amount owing by (or to) the User under the Initial Account for that charging period combined with any Reconciliation Accounts for previous charging periods. However, the Company shall not send the User an invoice (or credit note) for the charging period if the Initial Account is for zero and there are no Reconciliation Accounts.

20.5 Within 14 days of the date of an invoice (or credit note)~~Initial Account or Reconciliation Account~~ submitted in accordance with Clause ~~20.3 or~~ 20.4A, the Payor shall (subject to Clause 19.6) pay to the Payee the~~all sums due in respect of such Initial Account or Reconciliation Account,~~ in pounds sterling by electronic transfer of funds to such bank account (located in the United Kingdom) as is specified in the invoice~~Initial Account or Reconciliation Account~~ (or, where the Company is the Payor, such bank account as is notified to the Company by the User from time to time), quoting the invoice~~Initial Account or Reconciliation Account~~ number against which payment is made and/or such other details as the Payee may reasonably require.

Amend Paragraph 2 (Aggregated Demand Data) of Schedule 19 (Portfolio Billing) as follows:

2.1 In order to calculate the Use of System Charges attributable to the EDNO's aggregated settled demand Connectees, the DNO Party will use the data provided to it by the SVAA [pursuant to section S and BSCP508 of the BSC]<sup>1</sup>.

2.2 The DNO Party shall send Daily Statements to the EDNO (including where these total zero). The DNO Party shall calculate an initial account for the EDNO following the end of each charging period.

~~2.32~~ Where a subsequent Settlement Run indicates that, as a result of such Settlement Run, the Use of System Charges are different from those previously billed, the DNO Party shall calculate such difference and the interest thereon, ~~and shall submit an invoice for such difference and interest~~ as soon as is reasonably practicable after such Settlement Run. Such interest shall be calculated in accordance with the provisions of Schedule 3 (as if the invoice~~s~~ under this Paragraph 2.1 ~~was an were for~~ Initial Account~~s~~, and ~~as if the invoice under this Paragraph 2.2 was a~~ Reconciliation Account~~s~~ ~~under Clause 20.4~~).

<sup>1</sup> This wording is proposed for deletion by the MHHS amendments.

2.4 As soon as is reasonably practicable after the end of each charging period, the DNO Party shall submit an invoice (or credit note) to the EDNO for the total aggregate amount owing by (or to) the EDNO under the initial account (under Paragraph 2.2) for that charging period combined with any reconciliation accounts (under Paragraph 2.3) for previous charging periods. However, the DNO Party shall not send the EDNO an invoice (or credit note) for the charging period if the initial account is for zero and there are no reconciliation accounts.

2.53 The DNO Party shall identify to the EDNO the amount of each such invoice which relates to each Settlement Run, broken down by Settlement Code.

## 11 Code Specific Matters

### Modelling Specification Documents

11.1 N/a

### Reference Documents

11.2 N/A

## 12 Recommendations

### Panel's Recommendation

12.1 The Panel approved this Change Report on 3 April 2024. The Panel considered that the Working Group has carried out the level of analysis required to enable Parties to understand the impact of the proposed amendment and to vote on DCP 428.

12.2 The Panel have recommended that this report is issued for Voting and DCUSA Parties should consider whether they wish to submit views regarding this Change Proposal.

## 13 Attachments

- Attachment 1 - DCP 428 Legal Text
- Attachment 2 - DCP 428 Voting Form
- Attachment 3 - DCP 428 Collated Consultation Responses & WG Comments
- Attachment 4 - DCP 428 Collated RFI Responses & WG Comments
- Attachment 5 - DIF 67 Consultation Responses
- Attachment 6 - DCP 428 Change Proposal Form