

DIF 67 'USE OF "REP-242" IN AGGREGATED BILLING

COLLATED CONSULTATION RESPONSES WITH STANDING ISSUES GROUP COMMENTS

Company	Confidential/ Anonymous	1. Considering the issues raised in DIF 67, do you have a preference from the four options stated in paragraph 2.6?	Working Group Comments
UKPN	Non-confidential	Send REP-242 to all suppliers in the REP-002.	Option 1
NGED	Non-confidential	Opt A most closely mimics what we currently do now so would incur less costs & least complexity. It would also satisfy auditors that all statements created have been sent..	Option 1
Northern Powergrid	Non-confidential	NPg's preference would be option 1. Send REP-242 to all suppliers in the REP-002. Creating a statement for all suppliers in the REP-002 gives NPg the ability to view and check whether all data has been received and processed. This approach would provide lower development and testing costs by sending all created statements regardless of value. There may also be benefits when assisting auditors in providing an assurance that all statements created have been sent to suppliers.	Option 1
SPEN	Non-confidential	Send REP-242 to non-blank suppliers only.	Option 2
EDF	Non-confidential	<p>EDF/St Clements can accommodate either of the first 3 potential solutions, assuming one solution is selected for all market participants. The preference is for option 1; send REP-242 to all suppliers in the REP-002.</p> <p><i>1. Send REP-242 to all suppliers in the REP-002</i></p> <ul style="list-style-type: none"> • Receiving an equivalent REP-242 for every distributor and GSP Group in the REP-002 means that it is very simple to predict what is expected and 	Option 1

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		<p>therefore to identify any missing messages. This is the option that we prefer.</p> <p><i>2. Send REP-242 to non-blank suppliers only</i></p> <ul style="list-style-type: none"> Receiving REP-242 messages for non-blank distributor and GSP groups only increases the complexity of predicting what's expected and makes it more difficult to identify missing messages. This also means that if a supplier is charged for an MPAN at SF but has no MPANs at R1, the supplier will not be refunded as there will be no REP-242 to invoice. <p><i>3. Send REP-242 to non-blank suppliers and any placeholder suppliers that were populated on a previous run</i></p> <ul style="list-style-type: none"> This option would treat a placeholder supplier as a zero-volume read if the supplier was populated on a previous run. As with the solution above, it does add more complexity compared to solution 1 but does have the advantage that it enables the 'cancelling' out of previously billed records. <p><i>4. Lobby to change REP-002</i></p> <ul style="list-style-type: none"> Any change to the REP-002 would need to be accommodated into the SONET MHHS roadmap. It's unlikely that this would have a significant impact on the delivery of functionality. 	
Electricity North West Ltd	Non-confidential	Our preference would be the option to send the REP-242 to non-blank suppliers only as per the current process	Option 2
British Gas	Non-confidential	Send REP-242 to all suppliers in the REP-002. This prevents issues around 'missing flows'.	Option 1

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BU-UK	Non-confidential	Send REP-242 to all suppliers in the REP-002	It was noted in the SIG meeting that this responder had changed preference since the response was issued to option 3 which was to send REP-242 to non-blank suppliers and any blank suppliers that were populated on a previous run.
<p>Working Group Conclusions: A majority of 5 out of 8 responders preferred option 1, 2 responded stating that option 2 was their preferred option and 1 responder supported option 3.</p>			

Company	Confidential/ Anonymous	2. Do you have any other solution/s that the SIG have not considered?	Working Group Comments
UKPN	Non-confidential	No.	Noted
NGED	Non-confidential	No.	Noted
Northern Powergrid	Non-confidential	No	Noted

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SPEN	Non-confidential	No other solutions.	Noted
EDF	Non-confidential	No	Noted
Electricity North West Ltd	Non-confidential	No.	Noted
British Gas	Non-confidential	No	Noted
BU-UK	Non-confidential	No	Noted
Working Group Conclusions: There were no additional solution noted.			

Company	Confidential/ Anonymous	3. If a blank REP-242 is to be sent, where there was not data in the previous reconciliation, should a zero invoice be raised?	Working Group Comments
UKPN	Non-confidential	No	No

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NGED	Non-confidential	It would be clearer to see what has or hasn't been billed but we would need to factor in if zero value invoices with zero value statements should be treated differently to zero value invs with non-billable statements (eg where R2 canx out R1). We could suppress 0.00 value invoices from being sent if the supplier so desired or where the supplier had or has no MPANs.	Yes
Northern Powergrid	Non-confidential	NPg believes that producing a blank REP-242 and subsequent zero value invoices to all suppliers in the REP-002 would make it clearer to view what has and hasn't been billed.	Yes
SPEN	Non-confidential	Where the value on the REP-242 is blank then no, an invoice should not be raised.	No
EDF	Non-confidential	EDF and SCS believe that receiving a blank REP-242 and subsequent zero value invoices from all distributors in the REP-002 would make it clearer to view what has and hasn't been billed, and to identify missing invoices.	Yes
Electricity North West Ltd	Non-confidential	We do not believe a zero invoice should be required but this is more relevant to suppliers.	No
British Gas	Non-confidential	Yes – zero invoice should be raised. A zero invoice is a positive confirmation of a nil invoice. Not receiving an invoice could potentially be a comms failure. Having a zero invoice is a good control check.	Yes
BU-UK	Non-confidential	No	No

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Working Group Conclusions: Four respondents believed that no zero invoice should be raised, and four respondents believed that zero invoices should be sent. It was agreed that whilst there wasn't much supplier engagement (2 suppliers have responded), and none from smaller or new suppliers, raising a new DCUSA change proposal to develop a solution would encourage wider engagement to the issue.

Company	Confidential/ Anonymous	4. Any other comments?	Working Group Comments
UKPN	Non-confidential	<p>Option "1" maintains a degree of control by sending a response for everything received.</p> <p>Zero invoices should not be created/sent.</p> <p>It really comes down to what suppliers wish to receive.</p> <p>For example Tunbridge Wells Energy serves 5000 customers in Kent (hypothetically). Do they wish to receive blank REP-002 data for 13 DNOs and XX IDNOs and then to receive numerous REP-242 in respect of all that blank data, for every reconciliation?</p> <p>Subject to supplier responses therefore, we may wish to talk to the MHHS programme about the content of the REP-02 but maintaining the principle of what comes in should go out.</p>	Noted

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NGED	Non-confidential	Have you considered the IDNO equivalent (current D0315) IF-120	It agreed to raise a new DCUSA change proposal and that the Working Group would take the IDNO equivalent process into consideration.
Northern Powergrid	Non-confidential	No	Noted
SPEN	Non-confidential	Where the values on the REP-242 net off to equal zero on the invoice, an invoice should be sent for information purposes, as this shows billing information.	Noted
EDF	Non-confidential	Solution options 1-3 can be accommodated in our MHHS delivery without impact to planned timelines.	Noted
Electricity North West Ltd	Non-confidential	We believe the current D0242 process is well established and works well so are not clear on the rationale for sending blank messages to suppliers as per the current MHHS design.	Noted
British Gas	Non-confidential	No	Noted
BU-UK	Non-confidential	If the sending of blank REP-242 as standard has a risk of creating excessive data volumes between parties (in comparison with the current D0242 data volume issued), then option 3 "Send REP-242 to non-blank suppliers and any blank suppliers that were populated on a previous run" would be preferred.	Noted

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Working Group Conclusions: The SIG agreed to raise a new DCUSA change proposal to resolve the issue and that the Working Group that is set up would need to consider the equivalent IDNO process and also seek to encourage engagement from the supplier community, particularly smaller and new suppliers.