


DCUSA Change Proposal (DCP)		At what stage is this document in the process?					
<h2>DCP 459:</h2> <h3>DNO invoices to Embedded DNO</h3> <p>Date Raised: 01/08/2025</p> <p>Proposer Name: Anne-Claire Leydier</p> <p>Company Name: UK Power Distribution</p> <p>Party Category: IDNO</p>		01 – Change Proposal					
		02 – Consultation					
		03 – Change Report					
		04 – Change Declaration					
<p>Purpose of Change Proposal:</p> <p>The intent of the Change Proposal is to require invoice backing data to be provided by DNO Parties when issuing invoices to EDNOs</p>							
	<p>Impacted Parties:</p> <p> <input type="checkbox"/> Suppliers <input checked="" type="checkbox"/> DNOs <input checked="" type="checkbox"/> IDNOs <input type="checkbox"/> CVA Registrants <input type="checkbox"/> OTSO Party <input type="checkbox"/> Gas Suppliers <input type="checkbox"/> SIP Parties </p>						
	<p>Impacted Clauses:</p> <table border="1"> <thead> <tr> <th>Section/Schedule</th> <th>Clause/Paragraph</th> </tr> </thead> <tbody> <tr> <td>Schedule 19</td> <td>Paragraph 3</td> </tr> <tr> <td colspan="2"> </td> </tr> </tbody> </table>		Section/Schedule	Clause/Paragraph	Schedule 19	Paragraph 3	
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Schedule 19	Paragraph 3						

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Indicative Timeline

The Secretariat recommends the following timetable:

Initial Assessment Report	13 August 2025
Consultation Issued to Industry Participants	October 2025
Change Report Approved by Panel	17 December 2025
Change Report issued for Voting	17 December 2025
Party Voting Closes	15 January 2026
Change Declaration Issued to Parties	19 January 2026

1 Summary

What?

- 1.1 The current Distribution Use of System (DUoS) invoicing process for non-aggregated Meter Point Administration Numbers (MPANs) from Distribution Network Operators (DNOs) to Embedded Distribution Network Operators (EDNOs) is fit for purpose but could be improved to remove inefficiencies.

Why?

- 1.2 It requires manual work which wastes time, and introduces the risk of error. The problem comes from the fact that the invoices are sent as a PDF document, which the EDNO need to then enter in their accounting system.

How?

- 1.3 Ideally, the invoices would be supported with a xls document that the EDNO can easily "load" into their accounting system. Clauses 43.6.2 and Schedule 19 describe how the charging and in part invoicing needs to be done, but are not specific on the format of the invoices. We suggest amending Schedule 19 to add a requirement to accompany the PDF format of an invoice for non-aggregated MPANs, with an excel spreadsheet that contains minimum fields to support the automatic "load".

Who?

- 1.4 We note that some DNOs may already be providing an equivalent to some EDNOs, in which case this change proposal intends not to change that arrangement but to bring every party to the same 'playing field' in an open manner, and bring the expected positive impacts to all.

2 Governance

Proposers view on items that impact the progression of the CP

- 2.1 ☐ Tick this box if you feel that you are raising this change to try to address a current or imminent issue that has significant adverse commercial or safety implications or which would otherwise place Parties in breach of relevant regulations.
- 2.2 Do you believe this Change Proposal will have a significant impact on any of the following? (Select all that apply)
- ☐ Electricity consumers
 - ☐ Supply
 - ☐ Distribution
 - ☐ Generation
 - ☐ Commercial activities connected with any of the above
 - ☒ None of the Above
- 2.3 Do you believe this Change Proposal will? *(Select all that apply)
- ☐ Have a significant commercial impact on any a Party or Party Category or on customers
 - ☐ Be likely to discriminate in its effects between at least one Party or another
 - ☐ Be the subject of controversy between Parties
 - ☐ Cause at least one Party to be in breach of this Agreement if not urgently addressed
 - ☐ Change the governance or the change control arrangements applying to the DCUSA
 - ☒ None of the Above

- 2.4 ☐ Tick this box if you either, haven't developed any proposed legal drafting or if you have, but you feel that further development will be required (i.e., via a Working Group)?

Code Admin view on progression route for this CP

- 2.5 Based the answers provided by the Proposer to the above questions the Code Administrator believes that this Change Proposal should:
- Be treated as a Part 2 Matter;
 - Be treated as a Standard Change; and
 - Proceed to the Definition phase via a Working Group for further development.
- 2.6 The Code Administrator's view with respect to this change is that it might be useful to be developed and/or discussed further as part of a Working Group, as it appears there is a need to determine how long a lead time the DNO's would need to implement the proposed solution. It might also be helpful to clarify the position and content of the suggested legal drafting.

3 Solution and Legal Text

Solution Overview

- 3.1 The change was discussed during Standing Issues Group meeting 168, as issue 82, further information can be found via: <https://www.dcusa.co.uk/event/standing-issues-group-sig-meeting-168/>
- 3.2 We propose adding an additional sub-paragraph to Paragraph 3 'Site Specific Data' of Schedule 19 'Portfolio Billing', that places an obligation on DNOs to provide backing data in Excel format alongside any invoice issued and the data items to be included in the backing data.

Legal Text Amendments

- 3.3 The Proposer has provided some draft legal text which they believe will achieve the solution specified above and this is set out below for ease of reference:.

3.8 The DNO Party shall invoice the EDNO in respect of a half-hourly-settled Connectee through a document that meets the necessary accounting requirement. It will accompany the invoices with a single supporting file, in a excel spreadsheet, with each data item recorded in a separate column and row of the spreadsheet, all within the same tab. The file will contain, at minimum, the following data items in the following sequence:

(a) Market Domain I.D. (of the DNO)

(b) Invoice Reference Number

(c) Lead MPAN

(d) Invoice Date (dd/mm/yyyy)

(e) Billing Period From (dd/mm/yyyy)

(f) Billing Period To (dd/mm/yyyy)

(g) Net amount (£)

(h) VAT amount (£)

(i) Total amount (£)

Legal Text Commentary

- 3.4 As noted above, we believe that a simple paragraph with an obligation on DNOs to provide backing data that also identifies the data items to be included in the backing data is sufficient for this change to be a success.

4 Relevant Objectives

- 4.1 The Proposer's view as to which of the DCUSA Objectives would be better facilitated by the implementation of this Change Proposal is set out below.

DCUSA General Objectives

1) The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks	Neutral
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	Positive
3) The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences	Neutral
4) The promotion of efficiency in the implementation and administration of the DCUSA	Neutral
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	Neutral

- 4.2 We believe that competition in the distribution of electricity will be improved by the implementation of this change as we expect the positive impacts to include:
- gained efficiency in EDNO's accounts payables processes,
 - a reduced risk of errors,
 - improved ability to pay within the 14 days timeframe; and
 - a clear and unified approach being utilised by all parties involved.
- 4.3 We acknowledge that there will be an additional step in the DNO's invoicing processes but are hoping this is mitigated by the automation functionalities of the DNO's billing tool(s).

5 Impacts & Other Considerations

Impacts on any Significant Code Review (SCR) or other significant industry change projects

- 5.1 The Proposer does not believe that this CP impacts upon any current SCR or other significant industry change projects, although notes that some of the text in Schedule 19 is being amended by DCP 445 'Implementation of Market-wide Half Hourly Settlement (MHHS) Arrangements' but that DCP 445 is set to be implemented on 22 September 2025 and so there should be no conflict between this change and those being introduced by DCP 445..

Impacts on Other Codes

5.2 The Proposer has considered whether any other industry codes might be impacted as a result of this Change Proposal is set out below.

Grid Code..... ☒ SEC... ☒ CUSC... ☒ None..... ☒
 Distribution Code... ☒ REC.... ☒ BSC..... ☒

Impacts on DCUSA Owned Data Flows

5.3 The Proposer does not believe that this change will require any amendments to DCUSA owned data flows or data items.

Consumer Impacts

5.4 The Proposer does not believe that this change will impact consumers.

Environmental Impacts

5.5 In accordance with DCUSA Clause 10.4.5A, the Proposer assessed whether there would be a material impact on greenhouse gas emissions if this CP were implemented. The Proposer did not identify any material impact on greenhouse gas emissions from the implementation of this CP.

6 Implementation

Lead Time for Implementation

6.1 We believe that a lead time for implementation is appropriate but how long that needs to be will depend on the time the DNOs need to add the step to their invoicing process

Proposed Implementation Date

6.2 We believe that a suitable implementation date to be the next standard DCUSA Release following Party approval which we note is likely to be 06 November 2025 or 26 February 2026.

7 Recommendations

The Code Administrator will provide a summary of any recommendations/determinations provided by the Panel in considering the initial Change Proposal. This will form part of a Final Change Report.