




DCUSA Consultation		At what stage is this document in the process?
<h2>DCP 459:</h2> <h2>DNO invoices to Embedded DNO</h2> <p><b>Date Raised:</b> 01/08/2025</p> <p><b>Proposer Name:</b> Anne-Claire Leydier</p> <p><b>Company Name:</b> UK Power Distribution</p> <p><b>Party Category:</b> IDNO</p>		01 – Change Proposal
		02 – Consultation
		03 – Change Report
		04 – Change Declaration
<p><b>Purpose of Change Proposal:</b></p> <p>The intent of the Change Proposal is to require separate invoice backing data to be provided by DNO Parties when issuing invoices to EDNOs.</p>		
	<p>This document is a Consultation issued to DCUSA Parties and any other interested Parties in accordance with Clause 11.14 of the DCUSA seeking industry views on DCP 459</p> <p>Parties are invited to consider the questions set in section 10 and submit comments using the form attached as Attachment 1 to <a href="mailto:dcusa@electralink.co.uk">dcusa@electralink.co.uk</a> by <b>21 November 2025</b>.</p> <p>The Working Group will consider the consultation responses and determine the appropriate next steps for the progression of the Change Proposal (CP) to the Change Report phase.</p>	
	<p><b>Governance:</b></p> <p>The Proposer recommends that this Change Proposal should be:</p> <ul style="list-style-type: none"> <li>• Treated as a Part 2 Matter</li> <li>• Treated as a Standard Change</li> <li>• Progressed to the Working Group phase.</li> </ul>	
	<p><b>Impacted Clauses:</b></p> <p>Schedule 19 Paragraph 3</p>	

## Contents

<b>1</b>	<b>Summary</b>	<b>3</b>
<b>2</b>	<b>Governance</b>	<b>3</b>
<b>3</b>	<b>Why Change?</b>	<b>4</b>
<b>4</b>	<b>Working Group Assessment</b>	<b>4</b>
<b>5</b>	<b>Legal Text</b>	<b>5</b>
<b>6</b>	<b>Relevant Objectives</b>	<b>6</b>
<b>7</b>	<b>Impacts &amp; Other Considerations</b>	<b>7</b>
<b>8</b>	<b>Implementation</b>	<b>8</b>
<b>9</b>	<b>Code Specific Matters</b>	<b>8</b>
<b>10</b>	<b>Consultation Questions</b>	<b>8</b>
<b>11</b>	<b>Attachments</b>	<b>9</b>

## Timetable

**The Secretariat recommends the following timetable:**

Initial Assessment Report	13 August 2025
Consultation Issued to Industry Participants	31 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 inefficient.

### 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 to bring every party to the same playing field in an open manner, and bring the expected positive impacts to all

## 2 Governance

### Justification for Part 2 Matter

2.1 This change will not have any material impact to customers or industry parties as it is only seeking for backing data to be issued with the PDF Invoices.

### Current Next Steps

2.2 Based on 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.

## 3 Why Change?

### Background of DCP 459

- 3.1 The change was discussed during Standing Issues Group meeting 168, as issue 82, further information can be found via: [Standing Issues Group \(SIG\) Meeting 168](#).
- 3.2 The proposer advised that the intent of the Change Proposal is to require separate invoice backing data to be provided by DNO Parties when issuing invoices to EDNOs.
- 3.3 The Proposer stated that 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 inefficient.
- 3.4 The Proposer noted that the current process requires manual work which takes a lot of 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.

**Q1: Do you understand the intent of DCP 459?**

**Q2: Are you supportive of the principles of DCP 459?**

## 4 Working Group Assessment

### Working Group Assessment

- 4.1 The DCUSA Panel established a Working Group to assess DCP 459. This Working Group consists of Supplier, DNO, IDNO representatives and other interested industry participants. Meetings were held in open session and the minutes and papers of each meeting are available on the DCUSA website – [www.dcusa.co.uk](http://www.dcusa.co.uk)
- 4.2 The Proposer outlined that the proposal is for invoices to be supported with an xls document that the EDNO can easily "load" into their accounting system.
- 4.3 The Proposer advised that 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. The Proposal suggests 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".
- 4.4 The Proposer noted that some DNOs are already providing an equivalent to some EDNOs, and this change intends to ensure consistency.
- 4.5 It was also noted that most of the current reports in the DNOs billing systems are in Excel format and that moving away from this could lead to more work being needed to automate the process. The Working Group noted that whilst the current DUoS billing system only exports reports to Excel, the new system for Market Wide will output to CSV as well.

4.6 One DNO Working Group member advised that they already provide the backing data and noted that they get it from the current billing engine. Therefore, the report already exists but the functionality to automatically send it doesn't. Members agreed to ask the following question in the consultation.

**Q3: Do you agree that the legal text should prescribe that the backing data be issued in Excel format? If not, please provide rationale.**

**Q4: Do you already provide backing data to other parties? If so, what format is this shared in i.e. Excel, CVS etc. And what data items do you share?**

4.7 It was raised that billing days are busy and therefore DNOs would need the vendors of the billing system to automate this process. Other members agreed.

4.8 Members discussed the necessary system changes and the magnitude of these. It was noted that to establish the potential costs and associated timelines, the vendor would need to run an impact analysis.

4.9 The Working Group agreed that the system changes would be considered as part of the consultation and with this in mind, the Working Group is interested in party views on this matter.

**Q5: What system updates are required to produce the report/backing data and to automate the sending of the report/backing data? What value do you estimate any system changes to be?**

**Q6: What would be the implementation period for any potential system changes?**

4.10 Regarding implementation, following a DNO confirming that the current billing software does allow for such a report to be produced, the Working Group agreed that it should be made clear in the consultation that there are two aspects to this change, producing the report and sending the report.

4.11 It was acknowledged that DNOs will be implementing new billing systems for Market Wide Half Hourly Settlement and questioned whether this would mean doing two different things in two different systems unless the implementation date was post migration. The Working Group noted that the implementation date would be considered during the consultation but that system changes usually require 6 months' notice.

## 5 Legal Text

### Solution Overview

5.1 The Working Group 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

5.2 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 an 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

5.3 As noted above, the Working Group 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.

**Q10: Do you have any comments on the draft legal text?**

## 6 Relevant Objectives

6.1 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.

6.2 The Working Group agreed that this CP would be assessed against the General Objectives.

	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 checked="" 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	Positive
<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
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6.3 The proposer believes 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.

6.4 The proposer acknowledged that there will be an additional step in the DNO's invoicing processes, but they believe this is mitigated by the automation functionalities of the DNO's billing tool(s).

6.5 The Working Groups view is that DCUSA General Objective 2 is better facilitated and also that DCUSA General Objective 4 (The promotion of efficiency in the implementation and administration of the DCUSA) is better facilitated by this proposal as it means the information in the PDF invoices wouldn't need to be manually input creating efficiencies in the process.

**Q11: 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.

**Q12: 'Do you agree with the listed benefits in paragraph 6.3. If not, why not? Are there any other benefits that haven't been listed. If so, please provide supporting reasons.**

## 7 Impacts & Other Considerations

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

7.1 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 446 '[MHHS Incremental Changes for Go Live](#)' but that DCP 446 was implemented on 22 September 2025 and so there should be no conflict between this change and those being introduced by DCP 446.

7.2 The Working Group agreed with this view.

### Impacts on Other Codes

7.3 The Working Group 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

- 7.4 The Working Group does not believe that this change will require any amendments to DCUSA owned data flows or data items.

## Consumer Impacts

- 7.5 The Working Group does not believe that this change will impact consumers.

## Environmental Impacts

- 7.6 In accordance with DCUSA Clause 10.4.5A, the Working Group assessed whether there would be a material impact on greenhouse gas emissions if this CP were implemented.

- 7.7 The Working Group did not identify any material impact on greenhouse gas emissions from the implementation of this CP

**Q13: Are you aware of any wider industry developments that may impact upon or be impacted by this CP?**

**Q14: How are you impacted by the outcome of this CP?**

# 8 Implementation

## Lead Time for Implementation

- 8.1 The Working Group believe that a lead time for implementation will need to consider the amount of time any potential system changes would take to develop, test and released.
- 8.2 It was noted that system changes would generally take a minimum of 6 months to deliver in full.

## Proposed Implementation Date

- 8.3 Regarding the implementation date, Working Group members raised that the migration to MHHS will be the priority for billing system providers and DUoS billing teams between October 2025 and April 2026; and the Proposer had no wish to interfere with that.
- 8.4 Based on the above no implementation date for this change has been agreed yet and the Working Group would like party views on the most appropriate date for implementation.

**Q15: With other programmes of work having an impact on billing system providers i.e. MHHS, what would be a reasonable implementation date if this CP was approved by industry?**

**Q16: Do you have any other comments on DCP 459?**

# 9 Code Specific Matters

- 9.1 N/A.

# 10 Consultation Questions

- 10.1 The Working Group is seeking industry views on the following consultation questions:

Number	Questions
1	Do you understand the intent of DCP 459?
2	Are you supportive of the principles of DCP 459?
3	Do you agree that the backing should be issued in Excel format? If not, please provide rationale.
4	Do you already provide backing data to other parties? If so, what format is this shared in i.e. Excel, CVS etc. And what data item do you share?
5	What system updates are required and what value do you estimate any system changes to be?
6	What would be the implementation period for any potential system changes?
7	Do you have any comments on the draft legal text?
8	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.
9	Do you agree with the listed benefits in paragraph 6.3. If not, why? Are there any other benefits that haven't been listed. If so, please provide supporting reasons.
10	Are you aware of any wider industry developments that may impact upon or be impacted by this CP?
11	How are you impacted by the outcome of this CP?
12	With other programmes of work having an impact on billing system providers i.e. MHHS, what would be a reasonable implementation date if this CP was approved by industry?
13	Do you have any other comments on DCP 459?

## 11 Attachments

- Attachment 1 – DCP 459 Consultation Response Form
- Attachment 2 – DCP 459 Change Proposal Form
- Attachment 3 – DCP 459 Draft Legal Text

