

DCP 459 Working Group Meeting 01

01 October 2025 at 10:00 - Web-Conference

Attendee	Company
Working Group Members	
Alistair Johnson [AJ]	UK Power Distribution
Anne-Claire Leydier [AL] (Proposer)	UK Power Distribution
Donna Jamieson [DJ]	IDCSL
Donna-Marie Butcher [DB]	UKPN
Jo Brown [JB]	National Grid
Monique Pereira [MP]	Indigo Networks
Morven Hunter [MH]	Last Mile
Philip Mark [PM]	SSE
Code Administrator	
Andy Green [AG]	Chair
Hannah Proffitt [HP]	Secretariat
Apologies	
Mark Bellman [MB]	ENWL

1. Administration

Recording

- 1.1 The Chair asked members if they were comfortable for this Working Group to be recorded. No members objected to this request. The purpose of this recording is purely to aid the Technical Secretariat in producing an accurate report of the meeting.

Apologies

- 1.2 Apologies are noted in the table above.

Competition Law Guidance and Terms of Reference

- 1.3 The Working Group reviewed the “Competition Law Guidance” and “Terms of Reference”. All Working Group members agreed to be bound by the Competition Law Guidance for the duration of the meeting and agreed to the Terms of Reference.

2. Purpose of the Meeting

- 2.1 The Chair advised that the purpose of the meeting was to review DCP 459 and to consider the next steps.

3. Overview of DCP 459 ‘DNO invoices to Embedded DNO’

- 3.1 The Proposer provided background information on the proposal, advising 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.
- 3.2 The Proposer advised 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.
- 3.3 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.
- 3.4 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.
- 3.5 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".
- 3.6 The Proposer noted that some DNOs are already providing an equivalent to some EDNOs, and this change intends to ensure consistency.

4. Review and Discussion of Change Proposal

- 4.1 The Chair advised that this matter was discussed at the August DCUSA Standing Issues Group (SIG) and members broadly supported the intent. SIG members asked that the format is consistent so that they do not have to send different formats and data items to different EDNOs as this would be inefficient.
- 4.2 MP raised that billing days are busy and therefore they would need the vendors of the billing system to automate this process. Other members agreed. The Chair advised that the system changes would be considered as part of the consultation.

- 4.3 The Chair 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 Chair noted that the implementation date would be considered during the consultation but that system changes usually require 6 months' notice.
- 4.4 DJ suggested that DCUSA General Objective 4 (The promotion of efficiency in the implementation and administration of the DCUSA) is also better facilitated by this proposal. The Working Group agreed and the Chair agreed to include this in the consultation document.
- 4.5 Members discussed that some DNOs already provide backing data and suggested that asking about this in the consultation could be beneficial to seek information on how they do this. DB advised that they are one of the DNOs that already provide the backing data and noted that they get it from the current billing engine. Therefore the report already exists, it just does not send it out automatically. Members agreed to ask the following question in the consultation.

'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?'

- 4.6 The Proposer noted that the CP states the data should be issued in excel spreadsheet format and questioned whether specifying excel could make implementation more difficult instead of allowing for other tabular formats (csv).
- 4.7 PM noted that most of their current reports are in Excel format and that moving away from this could lead to more work being needed to automate the process. JB noted that their current DUoS billing system only exports reports to Excel, but that their new system for Market Wide will output to CSV as well. Members agreed to ask the following question.

'Do you agree that the backing data should be issued in Excel format? If not, please provide rationale.'

- 4.8 Members discussed including a question in the consultation regarding the necessary system changes and the magnitude of these. PM noted that to establish the potential costs and associated timelines, the vendor would need to run an impact analysis. Members agreed to ask the following question.

'What system updates are required and what size do you estimate any system changes to be?'

- 4.9 DJ asked if it would be possible to find out whether DNOs use the same billing system as it could be easier to implement if so. Members agreed to ask this question in a separate Request For Information (RFI) to DNOs and IDNOs.

Action 01/01 – The Chair to issue an RFI to DNOs and IDNOs asking which billing system they use.

- 4.10 Regarding implementation, following a DNO confirming that the current billing software does allow for such a report to be produced, the Proposer noted that it should be made clear in the consultation document that there are two aspects: producing the report and sending the report. The Proposer noted that the system changes may be focused on automating the sending of the report rather than

producing the report as initially thought. The Chair agreed to include this in the text leading to the billing questions.

4.11 Members reviewed the legal text and agreed to ask the following question.

‘Does the legal text capture the correct data items for invoicing. Should any additional items be included or are there items captured in the legal text that are not required? Please provide rationale.’

4.12 DJ asked about future proofing the change and the nested network schedule. DJ questioned whether Schedule 21 would need to be amended or updated. The Working Group discussed and agreed that this would be out of scope of the CP. The Chair suggested that they could add to the consultation document that it was decided the matter was out of scope and that a further change could be raised in future if needed.

4.13 Regarding the implementation date, members discussed 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. The Working Group agreed to leave the implementation date as to be confirmed for now and to ask the following questions in the consultation.

‘What would be the implementation period for any potential system changes?’

‘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?’

4.14 The Proposer suggested that a question is included regarding whether parties agree with the benefits listed in the CP. Members agreed to ask the following.

‘Do you agree with the listed benefits in paragraph 4.2. If not, why? Are there any other benefits that haven’t been listed. If so, please provide.’

5. Next Steps and Work Plan

5.1 The Working Group agreed the following next steps.

- The Chair to issue an RFI to DNOs and IDNOs asking which billing systems they use.
- The Chair to draft the consultation and send to members for review. If possible, the consultation will be finalised over email and issued next week.

6. Any Other Business

6.1 No other business was raised.

New and Open Actions

Action Ref.	Action	Owner	Update
01/01	The Chair to issue an RFI to DNOs and IDNOs asking which billing system they use.	The Chair	New action.

Closed Actions

Action Ref.			Update