

## DCP 459

### ‘DNO invoices to Embedded DNO’

#### COLLATED CONSULTATION RESPONSES WITH WORKING GROUP COMMENTS

Company	Confidential/ Anonymous	1. Do you understand the intent of DCP 459?	Working Group Comments
BUUK	Non-Confidential	Yes.	
IDCSL	Non-Confidential	Yes	
SP Electricity North West Limited	Non-Confidential	Yes	
NPg	Non-Confidential	Yes	
Stark	Non-Confidential	Yes, we understand the intent.	
SSEN	Non-Confidential	Yes	
UKPN	Non-Confidential	No.	

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Working Group Conclusions: Please note that there was 1 confidential respondent to this consultation and the Working Groups conclusions to the confidential responses are included within the conclusions to all the questions.

All respondents understood the intent of the CP.

Company	Confidential/ Anonymous	2. Are you supportive of the principles of DCP 459?	Working Group Comments
BUUK	Non-Confidential	Yes – we believe that this is a much needed change to reduce delays in processing.	
IDCSL	Non-Confidential	Yes	
SP Electricity North West Limited	Non-Confidential	We understand the need for an efficient invoice loading process that reduces risk of error. However we have reservations because the proposed solution will involve DNOs in manual process and/or automation costs.	
NPg	Non-Confidential	Yes.	
Stark	Non-Confidential	Yes	

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SSEN	Non-Confidential	We are happy to support the principle of DCP 459, if the process implemented is automated.	
UKPN	Non-Confidential	Yes but there should also be an incentive on EDNOs to actually comply with Clauses 3.3 and 3.5 of Schedule 19. That way we can <u>all</u> avoid manually reworking data to get it into systems.	
<p>Working Group Conclusions: The majority of respondents (six) were supportive of the principles of this CP.</p> <p>One respondent who stated they were supportive of this CP did note that this was conditional on the solution being automated. Another supportive respondent stated that there should also be an incentive on EDNOs to comply with Clauses 3.3 and 3.5 of Schedule 19, meaning all parties avoid manually reworking data.</p> <p>Respondents that were not supportive of this CP stated that the proposed solution will involve a manual process for DNOs, with a suggestion that the solution should sit with IDNOs.</p>			

Company	Confidential/Anonymous	3. Do you agree that the backing should be issued in Excel format? If not, please provide rationale.	Working Group Comments
BUUK	Non-Confidential	Yes. We also agree with the data items included.	
IDCSL	Non-Confidential	Yes, it's consistent with the reporting format required for Schedule 19 Portfolio Billing.	

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SP Electricity North West Limited	Non-Confidential	That would be consistent with current process for those who request it.	
NPg	Non-Confidential	Yes.	
Stark	Non-Confidential	Yes	
SSEN	Non-Confidential	Yes.	
UKPN	Non-Confidential	Excel tends to be preferred by users but system developers often seem to favour csv, possibly as it is easier to codify and less subject to change. If Excel do we need to specify a version? For example, by "excel" do we mean xls or xlsx and if a new version/extension is introduced am I compliant in using it to send reports that not all IDNOs may be able to open if they still use an older version.	
<p>Working Group Conclusions: The majority of respondents (six) agreed that the backing should be issued in Excel format.</p> <p>One respondent suggested that using the REP900 flow (flow sent to Suppliers for DUoS billing) within the final solution should be considered as this would remove the need for the DNO to generate pdf invoices and any related reports. It was agreed that this is a useful suggestion.</p>			

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One Working Group member stated that there have been previous discussions around integrating IDNO half-hourly billing into the automated process whereby DNOs would send them a REP900 rather than the current pdf used, in the future. This was originally deemed out of scope; however, this may need to be reconsidered down the line.

Another respondent noted that although Excel is preferred by Users, there are developers that do prefer CSV format. Members agreed that this is a fair comment.

Company	Confidential/ Anonymous	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?	Working Group Comments
BUUK	Non-Confidential	As an IDNO, we do receive backing data in .xls format from all DNOs, however we do need to request this each time from some DNOs rather than it being standard practice.	
IDCSL	Non-Confidential	Yes, as an IDNO we provide the ‘Site Specific Data’ and ‘MPAN Report’ necessary to support Schedule 19 Portfolio Billing’s reporting requirements i.e. Excel format.	
SP Electricity North West Limited	Non-Confidential	Yes, to those IDNOs (1/3rd of those we bill) who have requested such backing data, in Excel format containing volumes, capacity, RAG, standing charges, invoice details, units, etc. The other 12 have not asked for such backing data	

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NPg	Non-Confidential	Yes we provide the backing data in Excel format.	
Stark	Non-Confidential	No comment	
SSEN	Non-Confidential	Yes, we do provide backing data to a small number of IDNOs via CSV.	
UKPN	Non-Confidential	Yes. Excel.  We provide most of the data requested in the DCP, but not billing period from/to (see Q 7) and in addition we break down the charge lines e.g. red units & charge / amber units & charge etc.	
<p>Working Group Conclusions: The majority of respondents (seven) provide backing data to other parties, however, there were mixed formats provided (i.e., Excel, CSV, and pdf).</p> <p>One respondent stated that within the legal text, some of the information they provide is not required. A Working Group member confirmed that the legal text states the minimum required and that more information can be provided.</p> <p>ADNO Working Group member stated that around 2/3 of IDNOs do not request/require backing data and there must be a balancing act when it comes to mandating and creating obligations on DNOs to provide this to all IDNOs. It suggested asking IDNOs (via an RFI) who would like this data to request it and see what happens prior to putting in obligations.</p>			

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Another DNO Working Group member noted that currently, only a small number of IDNOs are requesting this data which is manageable; however, if the number of requests were to suddenly increase, the significant manual process would become an issue.

It was noted that DNOs may want to automate something to reduce the manual overhead, however, this is not an argument to create an obligation.

Company	Confidential/ Anonymous	5. What system updates are required and what value do you estimate any system changes to be?	Working Group Comments
BUUK	Non-Confidential	N/A	
IDCSL	Non-Confidential	IDCSL will not require any system changes to support this CP if it is implemented.	
SP Electricity North West Limited	Non-Confidential	The underlying data is already available in the system. However the process to extract that in the form of invoice backing data is manual. Automation of this process would incur a cost.	
NPg	Non-Confidential	Given NPg already provides this data then no system changes are required.	
Stark	Non-Confidential	No comment	

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SSEN	Non-Confidential	Our billing system vendor has provided a High-Level Impact Analysis (HLIA). To change the default report format from CSV to XLS and to automatically email the reports alongside the PDF invoices, the total cost shared between all DNOs would be £15k.	
UKPN	Non-Confidential	None are mandatory as we do this already. Any system changes would be designed to remove the manual aspects of the process and add efficiency.	
<p>Working Group Conclusions: A number of respondents would not require a system change as they do everything that is required already; however, respondents did not that there would be a cost for automation.</p> <p>A DNO Working Group member highlighte dthat there is a button that can be pressed to create a pdf invoice in the DNO's billing system, however creating the Excel file of backing data would be a manual process (cannot produce both versions via the click of a button currently). The button could be changed to create the Excel file, but then the pdf invoice would need to be manual.</p> <p>Another DNO Working Group member noted that at some point in 2026, there will be a piece of work to bring across IDNO half-hourly invoices into market-wide – automated REPs would be able to be attained at this point. It was stated that this most likely could not be accommodated until 2027 which does not align with the current proposed implementation date.</p>			

Company	Confidential/ Anonymous	6. What would be the implementation period for any potential system changes?	Working Group Comments
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BUUK	Non-Confidential	N/A	
IDCSL	Non-Confidential	It is usual for any CP that has a need for system changes to have a minimum of 6 months lead time to implement. It is also important that the implementation does not impact the DNO’s MHHS migration processes.	
SP Electricity North West Limited	Non-Confidential	The IT service provider advises that such system development for the minimum automation solution would require at least 4 weeks notice. This solution would need to be replaced at some point. Their proposed enduring solution (to use ‘REP-900’) would cost	
NPg	Non-Confidential	N/A	
Stark	Non-Confidential	Minimal changes anticipated, so standard period would be appropriate.	
SSEN	Non-Confidential	Our billing system vendor would require at least 4 weeks’ notice before delivering these changes for customer testing. They have added that this work could be accommodated within the 2026 change budget.	
UKPN	Non-Confidential	Unknown. 6 months seems reasonable.	

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Working Group Conclusions: Respondents preferred implementation period for any potential system changes varied from 4 weeks to 8 months.

The Working Group noted that the implementation date may need to be re-considered for a later date but acknowledged that the BAU lead time for system changes usually start at a minimum of months.

Company	Confidential/ Anonymous	7. Do you have any comments on the draft legal text?	Working Group Comments
BUUK	Non-Confidential	We agree that this meets the requirements of the proposal.	
IDCSL	Non-Confidential	No.	
SP Electricity North West Limited	Non-Confidential	No.	
NPg	Non-Confidential	None.	
Stark	Non-Confidential	We agree with the draft legal text but suggest emphasising the mandatory data items and consistent file naming conventions.	

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SSEN	Non-Confidential	No	
UKPN	Non-Confidential	<p>The items required to be reported on includes “(e) Billing Period From (dd/mm/yyyy)” and “(f) Billing Period To (dd/mm/yyyy)”, however we cannot provide those as in the existing Schedule 19, clause 3.3 we are only given “g. the month and year of the consumption/production covered by the invoice” by the IDNOs.</p> <p>The output needs to be no more detailed than the inputs allow.</p> <p>In addition we would suggest the following amendment -</p> <p>The DNO Party shall invoice the EDNO in respect of a half-hourly-settled Connectee through a document that meets the necessary accounting requirement. <b>Where the EDNO has complied with Clauses 3.3 and 3.5 of this Schedule, it</b> 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</p>	
<p>Working Group Conclusions: The majority of respondents (6) did not have any further comments in regard to the draft legal text.</p> <p>One respondent suggested emphasising the mandatory data items and consistent file naming conventions. Another respondent suggested that the outputs need to be more detailed than the inputs allow. They also suggested addition wording to the draft legal text</p>			

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- The DNO Party shall invoice the EDNO in respect of a half-hourly-settled Connectee through a document that meets the necessary accounting requirement. **Where the EDNO has complied with Clauses 3.3 and 3.5 of this Schedule, 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.

Company	Confidential/ Anonymous	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.	Working Group Comments
BUUK	Non-Confidential	<p>We support the Proposer’s view that General Objectives 2 and 4 are better facilitated by this Change Proposal.</p> <p>It will allow us as an IDNO to process the data more efficiently and ensure that this is done within the agreed timescales. Moving away from copying data from a pdf will also reduce the risk of human error.</p> <p>Unifying the process will also reduce efforts in requesting the backing data in the required formats each month.</p>	
IDCSL	Non-Confidential	<p>We believe that if implemented, this CP will better facilitate DCUSA General Objectives 2 and 4.</p>	

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SP Electricity North West Limited	Non-Confidential	<p>We agree that the proposal could, in theory have a very marginal benefit to competition (General Objective 2) on the basis that it would level the playing field for IDNOs.</p> <p>We agree that General Objective 4 might (in theory) be better facilitated by an overall marginal improvement in efficiency, but noting that DNOs will incur administrative and development costs to produce the additional invoice format, a cost that would be absorbed across all DUoS charges.</p> <p>However we believe the case is not yet made that there are net benefits. Therefore we cannot say the proposal better facilitates. With the information we have we believe the impact is neutral.</p>	
NPg	Non-Confidential	<p>Yes General Objective No2 - The promotion of efficiency in the implementation and administration of the DCUSA: This will provide the following;</p> <ul style="list-style-type: none"> <li>• Gained efficiency in EDNO's accounts payables processes,</li> <li>• A reduced risk of errors,</li> <li>• Improved ability to pay within the 14 days timeframe; and</li> <li>• A clear and unified approach being utilised by all parties involved.</li> </ul>	
Stark	Non-Confidential	<p>We agree with the working group that General Objectives 2 &amp; 4 are better facilitated by the proposal as it would deliver streamlined accounts payable processes for EDNOs, reduce error risk, enable</p>	

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		timely payments, and establish a consistent, unified invoicing approach across all parties.	
SSEN	Non-Confidential	We believe that this proposal better facilitates the DCUSA General Objectives 2 and 4.	
UKPN	Non-Confidential	It is not clear how competition is facilitated by moving from one level playing field to another. Efficiency is really concerned with net efficiency as it may be slightly inefficient for the DNOs but more efficient for IDNOs	
<p>Working Group Conclusions: The majority of respondents (6) believe DCUSA General Objective 2 will be better facilitated by this CP, and 5 respondents believe DCUSA General Objective 4 will be better facilitated by this CP.</p> <p>Two respondents do not believe that any of the DCUSA General Objectives will be better facilitated by this CP.</p>			

Company	Confidential/Anonymous	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.	Working Group Comments
BUUK	Non-Confidential	Yes.	
IDCSL	Non-Confidential	Yes, we agree with the benefits listed in 6.3.	

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SP Electricity North West Limited	Non-Confidential	<p>We broadly agree the benefit <b>types</b>, but believe the Proposer has not provided evidence of a net benefit to the industry <b>overall</b> of their proposed solution.</p> <p>Regarding the wording “improved ability to pay within the 14 days”, our view is that should be more specific. We infer it’s intended to mean “reduced risk of EDNO non-compliance with payment obligations”, which we agree would constitute a benefit to the EDNO. Albeit at a cost to the DNO, as noted above.</p>	
NPg	Non-Confidential	Yes	
Stark	Non-Confidential	Yes.	
SSEN	Non-Confidential	Yes. If automated, it will improve DNO efficiency as we won’t need to provide this manually.	
UKPN	Non-Confidential	Yes, but those seem to better support the efficiency argument than the competition one.	
Working Group Conclusions: Most respondents (7) agreed with the listed benefits in paragraph 6.3.			

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Although one of the respondents agreed, they did suggest that the Proposer had not provided evidence of a net benefit to the industry overall of their proposed solution. Another respondent stated that they agreed, however, noted that those seem to better support the efficiency argument than the competition one.

The confidential respondent stated they did not agree as they believe that IDNO should be developing their own systems to process pdf invoices or investigate the use of electronic data format that will be used for MHH.

It was agreed within the Working Group that the responses received stated that a technical solution could help them gain efficiency. A DNO Working Group member noted that the obligation is not to implement a technical solution and reiterated the suggestion to ask DNOs whether they can meet the needs of the IDNOs without creating an obligation first.

Company	Confidential/ Anonymous	10. Are you aware of any wider industry developments that may impact upon or be impacted by this CP?	Working Group Comments
BUUK	Non-Confidential	No.	
IDCSL	Non-Confidential	No.	
SP Electricity North West Limited	Non-Confidential	No.	



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NPg	Non-Confidential	No.	
Stark	Non-Confidential	No	
SSEN	Non-Confidential	We are not aware of any wider industry developments that may impact or be impacted by this Change Proposal.	
UKPN	Non-Confidential	No.	
<p>Working Group Conclusions: Most respondents (7) were not aware of any wider industry impacts of this CP.</p> <p>One respondent suggested that the implementation of MHH means that workload of the billing teams will continue to increase and the removal of the manual process of providing HH invoices could be necessary.</p> <p>A Working Group member highlighted that the St. Clements billing system moving to REP900 is missing from the responses to wider industry impacts – the Working Group agreed that this is an impact.</p>			

Company	Confidential/Anonymous	11. How are you impacted by the outcome of this CP?	Working Group Comments
BUUK	Non-Confidential	We are positively impacted by the outcome of this CP.	

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IDCSL	Non-Confidential	As an IDNO, we would be able to reduce the admin and resource required to manually enter the site specific DUoS invoices we receive from LDNOs each month. An automated process will reduce the risk of manual input errors and assist with meeting the 14 day payment terms.	
SP Electricity North West Limited	Non-Confidential	This will impose additional manual effort or automation costs for the running of a duplicate invoice in the excel format.	
NPg	Non-Confidential	Northern Powergrid is not impacted as we are already proving the required additional information in the required format.	
Stark	Non-Confidential	An increase in billing efficiency would have a positive impact.	
SSEN	Non-Confidential	As a DNO, development to our billing system will be required to automate the provision of separate invoice backing data when issuing invoices to EDNOs.	
UKPN	Non-Confidential	We would continue sending the backing data as we do now.	
Working Group Conclusions: 3 respondents stated that they would be positively impacted by this CP due to billing efficiency. 2 respondents stated that they would not be impacted by this CP as they already providing the required information.			

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2 respondents stated that this CP will impose either additional manual labour or automation costs, whilst 1 other respondent stated that the change would need to be agreed by the DNOs and implemented via a testing process (the DNOs would not be able to recover these additional costs).

Company	Confidential/ Anonymous	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?	Working Group Comments
BUUK	Non-Confidential	We understand that MHHS work takes priority, we would like to see this implemented as soon as it is achievable, taking into account timescales with MHHS and DNO system impacts.	
IDCSL	Non-Confidential	A minimum of 6 months after the MHHS migration phase has completed – we would suggest the November 2026 standard release.	
SP Electricity North West Limited	Non-Confidential	Refer response to Question 6. The fully automated and MHHS-based solution could not be delivered before 2027.	
NPg	Non-Confidential	N/A	
Stark	Non-Confidential	Following the working group logic June 2026.	

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SSEN	Non-Confidential	We believe that a reasonable implementation date if this Change Proposal would potentially be three/four months from when development starts.	
UKPN	Non-Confidential	At least 6 months lead time after decision seems reasonable.	
<p>Working Group Conclusions: 2 respondents believe that this CP could not be implemented until 2027, 2 respondents suggesting a minimum of 6 months lead time, 1 respondent suggesting June 2026, 1 respondent suggesting a 3/4 month lead time, and 1 respondent stating that they would like to see this change implemented as soon as possible.</p> <p>One respondent didn't offer any comment.</p>			

Company	Confidential/Anonymous	13. Do you have any other comments on DCP 459?	Working Group Comments
BUUK	Non-Confidential	No	
IDCSL	Non-Confidential	No.	
SP Electricity North West Limited	Non-Confidential	We believe that the receipt of data and issue of IDNO invoices across the industry could be reviewed because the current processes are not	

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		consistent with other invoicing processes and unlikely to be sustainable given the expected growth in IDNO longer term.	
NPg	Non-Confidential	No.	
Stark	Non-Confidential	None	
SSEN	Non-Confidential	No.	
UKPN	Non-Confidential	A longer term solution would be for DNOs to send the REP-900 to IDNOs, which would require some change to the rooting, event codes and either adding or renaming of data items, and to introduce a new DIP-messge for IDNOs to send the billing data required under para 3.2 of Schedule 19.	
<p>Working Group Conclusions: 6 respondents did not have any other comments on this CP.</p> <p>One respondent stated that they believe that the receipt of data and issue of IDNO invoices across the industry could be reviewed because the current processes are not consistent with other invoicing processes and unlikely to be sustainable given the expected growth in IDNO longer term.</p> <p>Another respondent stated that a longer-term solution would be for DNOs to send the REP-900 to IDNOs, and to introduce a new DIP-message for IDNOs to send the billing data required under paragraph 3.2 of Schedule 19.</p> <p>The Working Group noted that it appears that not all DNOs acknowledge the ability to produce these reports does exist within their systems. DNOs are producing different reports, with some saying it's a long manual process and others saying it's a click of a button.</p>			

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