

# Request for DCUSA Party feedback by 27 February 2026

## DCP 459

### 'DNO invoices to Embedded DNO'

---

#### 1. Purpose of this Document

- 1.1 The purpose of this document is to seek Party feedback from industry participants on DCP 459 'DNO invoices to Embedded DNO' in order to support the Working Group and proposer on determining next steps
- 1.2 To respond to the questions posed in Section 3.1 of this document, please complete the RFI response form found in **Attachment 1**.

#### 2. Summary

- 2.1 DCP 459 is seeking to require that separate invoice backing data is provided by DNO Parties when issuing invoices to EDNOs. The intent is for the backing data to be issued alongside the PDF invoices.
- 2.2 For the avoidance of doubt, should DCP 459 be taken forwards and approved, the PDF invoices would still be required to be issued as well as the backing data.
- 2.3 DCP 459 was issued for consultation on 30 October 2025 and the details for this change, including its consultation can be found on the DCUSA website [here](#).
- 2.4 The responses to the consultation, and the working groups conclusions to the responses can be found within attachment **2 DCP 459 Collated Consultation Responses-Non-Confidential**.
- 2.5 After reviewing the consultation responses, the Working Group would like additional views from DNOs and IDNOs on the below questions to support them in deciding next steps.

##### **For IDNOs**

1. Would you see benefit in receiving the backing data that the proposal is seeking to mandate?
2. Do you recognise the issues described in the CP as something that has caused your organisation challenges i.e., having to manual input data from PDF invoices?
3. Have you asked for the backing data described within the proposal in the past from DNOs but did not get it? If you did ask, and did not receive the data, what was the DNO's rationale?

##### **For DNOs**

4. Do you believe that sending the backing data explained within the consultation presents a significant operational/resourcing challenge? If it does, please provide your rationale.

**For IDNOs and DNOs**

5. Do you believe that this issue should be addressed by creating obligations within the DCUSA or can the backing data be provided as a bi lateral agreement between IDNOs who want the data, and DNOs who are being requested to provide it.
6. Do you have any other comments?

### **3. Feedback Request**

---

- 3.1 The DCUSA is keen to seek DUSA Party views on the following:

**For IDNOs**

1. Would you see benefit in receiving the backing data that the proposal is seeking to mandate?
2. Do you recognise the issues described in the CP as something that has caused your organisation challenges i.e., having to manual input data from PDF invoices?
3. Have you asked for the backing data described within the proposal in the past from DNOs but did not get it? If you did ask, and did not receive the data, what was the DNO's rationale?

**For DNOs**

4. Do you believe that sending the backing data explained within the consultation presents a significant operational/resourcing challenge? If it does, please provide rationale.

**For IDNOs and DNOs**

5. Do you believe that this issue should be addressed by creating obligations within the DCUSA, or can the backing data be provided as a bi lateral agreement between IDNOs who want the data, and DNOs who are being requested to provide it.
6. Do you have any other comments?

- 3.2 Please respond to the above questions by completing the consultation response form found in Attachment 1.