

DCP 459 Working Group Meeting 02

05 December 2025 at 10:00 - Web-Conference

Attendee	Company
Working Group Members	
Anne-Claire Leydier [AL] (Proposer)	Matrix Group
Jo Brown [JB]	National Grid
Mark Bellman [MB]	ENWL
Philip Mark [PM]	SSE
Code Administrator	
Andy Green [AG] (Chair)	ElectraLink
Mel Kendal [MK] (Technical Secretariat)	ElectraLink

1. Administration

Recording

- 1.1 The Chair noted that the meeting is being recorded. The purpose of this recording is purely to aid the Technical Secretariat in producing an accurate report of the meeting.

Apologies

- 1.2 The Chair noted received apologies. These can be found in the attendees list above.

Competition Law Guidance and Terms of Reference

- 1.3 The Working Group agreed to be bound by the Competition Law Guidance for the duration of the meeting.

Previous Minutes

- 1.4 The Chair invited the Working Group to review the previous meeting minutes – no further feedback was received, and the minutes were approved.

Open Actions

- 1.5 The Chair confirmed that all actions captured within this meeting will be recorded within the action log; this can be found in the Appendix.

- 1.6 The Working Group discussed a number of open actions, and the key updates can be found below:

2. Purpose of the Meeting

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

3. Review Collated Consultation Responses

- 3.1 The Chair invited the Working Group to review and discuss the collated Consultation responses. This was presented live on screen.

3.2 Q1

- 3.3 The Chair confirmed that all eight respondents understood the intent of the CP.

3.4 Q2

- 3.5 The Chair confirmed that the majority of respondents (six) were supportive of the principles of this CP.

- 3.6 One respondent that 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.

- 3.7 Both respondents that were not supportive of this CP stated that the proposed solution will involve a manual process for DNOs, with one respondent suggesting this is an issue for IDNOs.

- 3.8 AL noted the points made by the respondents and suggested that offering potential training with the INA charging subcommittee, where parties can provide suggested improvements. The Chair suggested this mitigation could be included within the Change Report.

3.9 Q3

- 3.10 The Chair confirmed that the majority of respondents (six) agreed that the backing should be issued in Excel format.

- 3.11 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. AL agreed that this is a useful suggestion; PM 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.

- 3.12 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 and has been noted.

3.13 Q4

- 3.14 The Chair confirmed that the majority of respondents (seven) provide backing data to other parties, however, there were mixed formats provided (i.e., Excel, CSV, and pdf).
- 3.15 One respondent stated that within the legal text, some of the information they provide is not required. AL confirmed that the legal text states the *minimum* required and that more information that can be provided is fine.
- 3.16 MB 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. MB suggested asking IDNOs who would like this data to request it and see what happens prior to putting in obligations. The Chair also noted that putting in an obligation could lead to an auditable process.
- 3.17 PM stated 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.
- 3.18 MB mentioned that DNOs may want to automate something to reduce the manual overhead, however, this is not an argument to create an obligation.
- 3.19 **Q5**
- 3.20 The Chair confirmed that 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.
- 3.21 MB confirmed that there is a button that can be pressed to create a pdf invoice, however creating the Excel file of backing data would be a manual process (cannot produce both versions via the click of a button). The button could be changed to create the Excel file, but then the pdf invoice would need to be manual.
- 3.22 JB 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. MB stated that this most likely could not be accommodated until 2027 which does not align with the current proposed implementation date.
- 3.23 MB suggested it may be beneficial to issue an RFI to both IDNOs and DNOs (separately) to gain a better understanding of the issue and to better understand whether a temporary solution would be useful. The Chair suggested that the outcome of the RFIs could also be brought back to the Standing Issues Group (as well as within the Working Group) for further discussion due to the regular high attendance at the SIG with a mix of parties.
- 3.24 **Q6**
- 3.25 The Chair confirmed that respondents preferred implementation period for any potential system changes varied from 4 weeks to 8 months.
- 3.26 The Working Group noted that the implementation date may need to be re-considered for a later date.

3.27 Q7

3.28 The Chair confirmed that the majority of respondents (6) did not have any further comments in regard to the draft legal text.

3.29 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:

- 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.

3.30 The suggestions were noted by the Working Group and mentioned that the output can only be produced on the input that has been received.

3.31 Q8

3.32 The Chair confirmed that 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.

3.33 Two respondents do not believe that any of the DCUSA General Objectives will be better facilitated by this CP, and one respondent only provided a rationale as to why DCUSA General Objective 2 would be better facilitated and not Objective 4.

3.34 Members considered whether any of the responses may have been changed now that they have received the cost analysis from St. Clements.

3.35 Q9

3.36 The Chair confirmed that almost all respondents (7) agreed with the listed benefits in paragraph 6.3.

3.37 Although one of the respondents agreed, they did suggest that the Proposer has 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.

3.38 One 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.

3.39 AL stated that the responses received that the technical solution could help them gain efficiency. MB stated that the obligation is not to implement a technical solution. MB reiterated the suggestion to ask DNOs whether they can meet the needs of the IDNOs without creating an obligation first.

3.40 This was noted by the Working Group.

3.41 **Q10**

- 3.42 The Chair confirmed that almost all respondents (7) were not aware of any wider industry impacts of this CP.
- 3.43 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.
- 3.44 AL suggested 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.
- 3.45 The Chair informed the group that electronic invoicing was previously discussed within the [DCP 416 Electronic Invoicing Post MHHS](#) Working Group, and agreed to take an action to circulate the Consultation responses to members post-meeting for review.

ACTION 02/01: The Secretariat to circulate the DCP 416 Collated Consultation Responses document to the Working Group post-meeting for review.

3.46 **Q11**

- 3.47 The Chair confirmed that 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.
- 3.48 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).
- 3.49 This was noted by the Working Group.

3.50 **Q12**

- 3.51 The Chair confirmed that 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.
- 3.52 1 respondent did not comment.
- 3.53 This was noted by the Working Group.

3.54 **Q13**

- 3.55 The Chair confirmed that 6 respondents did not have any other comments on this CP.
- 3.56 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.

- 3.57 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.
- 3.58 AL noted it appears that not all DNOs acknowledge their 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.
- 3.59 MB stated that the requirement is an Excel file containing the necessary data, and how this is done is for the DNOs. AL was concerned around the burden this may cause to DNOs, but members agreed this is for the DNOs to decide.
- 3.60 AL confirmed that there are a number of IDNOs who have requested the DNOs for data and they are not receiving this from them. MB suggested that AL brings a summary of those who have unmet needs to the next meeting for further discussion as this would act as supportive evidence for this CP. AL agreed to take this action.

ACTION 02/02: AL to have discussions at IDNO forums to gain a better understanding of IDNOs that are not receiving the data they need.

- 3.61 After further discussion, the Working Group agreed that the best next step for this change is to produce an RFI as discussed earlier. The Secretariat agreed to produce an RFI offline and send to the Working Group for review. Once finalised, the Secretariat will then issue the RFI to wider industry for further feedback.

ACTION 02/03: The Secretariat to produce an RFI and circulate to the Working Group for review offline.

ACTION 02/04: The Secretariat to issue the RFI to wider industry for further feedback.

- 3.62 Members also agreed that it may be beneficial to bring these discussions to the next SIG meeting to gain further feedback from other parties as this forum has regular high attendance. The Secretariat agreed to take this as an action.

ACTION 02/05: The secretariat to bring the DCP 459 discussions to the next SIG meeting for further feedback from other parties.

- 3.63 The Secretariat also agreed to issue a doodle poll to the Working Group in due course once the deadline for the RFI responses is known.

ACTION 02/06: The Secretariat to issue a doodle poll to the Working Group for the next meeting in due course.

3.64

4. Next Steps and Work Plan

- 4.1 The Working Group agreed the following next steps:

- AL to gather a better understanding of IDNOs that are not receiving their data and bring to the next Working Group for further discussion.
- The Secretariat to develop an RFI for the Working Group to review offline.

- The Secretariat to issue the RFI to wider industry for further feedback.
- The Secretariat to bring the DCP 459 discussions to the next SIG meeting.
- The Secretariat to issue a doodle poll for the next Working Group meeting in due course.

5. Any Other Business

- 5.1 The Chair asked the group whether there were any other items of business to discuss.
- 5.2 There were no other items raised.

6. Date of Next Meeting – TBC

- 6.1 The next Working Group meeting is TBC. A doodle poll will be issued in due course.

7. Attachments

- Attachment 1_DCP 459 Work Plan

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.	Secretariat	Ongoing.
02/01	The Secretariat to circulate the DCP 416 Collated Consultation Responses document to the Working Group post-meeting for review.	Secretariat	New Action.
02/02	AL to have discussions at IDNO forums to gain a better understanding of IDNOs that are not receiving the data they need.	AL	New Action.
02/03	The Secretariat to produce an RFI and circulate to the Working Group for review offline.	Secretariat	New Action.
02/04	The Secretariat to issue the RFI to wider industry for further feedback.	Secretariat	New Action.
02/05	The Secretariat to issue a doodle poll to the Working Group for the next meeting in due course.	Secretariat	New Action.
02/06	The secretariat to issue a doodle poll to the Working Group for the next meeting in due course.	Secretariat	New Action.

Closed Actions

Action Ref.			Update