

## DCP 459 Working Group Meeting 03

09 March 2025 at 10:00 - Web-Conference

Attendee	Company
<b>Working Group Members</b>	
Alexander Pentecost [AP]	Eclipse Power
Anne-Claire Leydier [AL] (Proposer)	Matrix Group
Donna-Marie Butcher [DB]	UKPN
Jo Brown [JB]	National Grid
Philip Mark [PM]	SSE
<b>Code Administrator</b>	
Andy Green [AG] (Chair)	ElectraLink
Hannah Proffitt [HP] (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 No apologies were received.

#### Competition Law Guidance and Terms of Reference

- 1.3 The Working Group agreed to the Terms of Reference and 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 Action updates can be found in the Appendix.

## 2. Purpose of the Meeting

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

## 3. Review RFI Responses

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- 3.1 The Chair advised that 7 responses had been received, one of which was confidential so asked members not to share the collated responses document outside of the group.

*Question 1 – For IDNOs-Would you see benefit in receiving the backing data that the proposal is seeking to mandate?*

- 3.2 Two IDNOs had responded to this question, both agreeing they see a benefit.
- 3.3 One confirmed they could use the backing data to upload the invoice details into their accounting system, rather than manually entering pdf invoices.
- 3.4 The other agreed they would see significant benefit in receiving the backing data automatically without needing to request it. The response outlined that the information is essential for efficiently validating the invoices they receive and believe mandating the provision of this data would streamline the invoicing process, reduce delays, and enhance accuracy.
- 3.5 AP confirmed that Eclipse Power (an IDNO) had not submitted a response due to annual leave but echoed what the previous two responses had stated.

*Question 2 – For IDNOs-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?*

- 3.6 Two IDNOs had responded to this question, both agreeing that they recognised the issues described in the CP.
- 3.7 One clarified however that their organisation is a new entrant and therefore they do not currently have any issues. The respondent noted however that in their previous industry experience, they had encountered issues with the manual data entry of hundreds/thousands of individual PDF invoices. The response stated this was labour intensive and open to manual data entry errors.
- 3.8 The second respondent agreed that the issues are familiar and ongoing. The respondent also agreed that manually extracting data from PDF invoices is both time consuming and prone to human error. The response noted that to mitigate this, they routinely request backing data to ensure invoices can be validated efficiently.
- 3.9 AL and AP (both IDNO representatives) echoed these comments.

*Question 3 – For IDNOs-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?*

- 3.10 Two IDNOs had responded to this question.

- 3.11 One respondent noted that they had not asked for backing data to date but noted that some DNOs already provide a level of backing data in spreadsheet form that accompanies their PDF invoices. The response suggested that if DNOs are all using the same billing engine, they assume all DNOs can provide the same backing data without the need for a system change.
- 3.12 The other respondent advised they have not experienced any instances where DNOs have refused to provide the requested backing data. The response noted that obtaining it often requires chasing, and they have been told they need to request it each time. The respondent noted this is inefficient.
- 3.13 AL (an IDNO representative) agreed and noted that they have a payment term of two weeks, and that once they have requested the backing data and chased it, time is often running out.

*Question 4 – For DNOs-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.*

- 3.14 Five DNOs responded to the question. Responses are summarised below.
- No, we already carry out this task.
  - We could live with it knowing that it will eventually cease in approx. 18mths once all MPANs have been migrated to MHHS and moved into the MHHS billing regime.
  - We currently receive backing data requests from 2/3 IDNOs which is manageable. If we had to provide backing data to all 15 IDNOs, this would present a significant operational challenge at an already very busy period of the month as the process is manual. The number of IDNOs will likely continue to grow in the future also.
  - The provision of this information adds additional processing and resource time to the billing process. This is due to the increasing number of IDNOs, and the manual element to the process of obtaining and sending this report via email.
  - Yes, as based on our current system functionality, the backing data would have to be manually run for each IDNO and emailed separately. Automation of this process would mean a system change with the associated costs.
- 3.15 AL clarified that they believe DNOs can currently produce the excel spreadsheet automatically but have to manually create an email and attach the document. AL noted that the automation needed would be for the billing system to generate and attach the document to the same e-mail to which the PDF invoice is attached to.
- 3.16 PM noted that currently they have to go into the reporting suite in the billing system, select the report they want to run with a number of parameters, then they need to run that report, save it and attach it to an email. PM noted that this needs to be done for each IDNO twice (for the two distribution areas they operate in).
- 3.17 Regarding the response outlining that in 18 months all MPANs will be migrated to MHHS and moved to the MHHS billing regime, AL noted that their providers were not aware of this.

3.18 PM noted that they do not believe St Clements (the DNO billing provider) have clearly stated how the process will work but that they believe they will still have to load the data into the system. *This is discussed further later in the meeting.*

3.19 AP asked if CVA billing is included in the change. The Chair confirmed it had been excluded.

*Question 5 – For IDNOs and DNOs-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.*

3.20 Five DNO and two IDNOs responded to this question.

3.21 Two respondents noted that bilateral agreements should suffice and three noted that they would prefer a DCUSA obligation to ensure consistency. AP and AL (IDNO representatives) both agreed they would prefer a DCUSA obligation. Two respondents did not provide a clear indication either way.

3.22 One of these respondents noted that a standard report layout would need to be agreed by the Working Group.

3.23 The Chair noted that the draft legal text included in the CP and consultation included a list of data items. AL noted that the Working Group had agreed that there should be list of minimum fields, and that if DNOs provided extra ones they could.

3.24 The other respondent questioned what would happen if a bilateral agreement cannot be reached and the DNO refused to provide the data. The Chair agreed, noting that a DCUSA obligation future proofs the change. The Chair asked DB for their position on the question. DB noted that they would support a clear obligation in DCUSA.

3.25 AP advised they have not used the backing data yet because of the inconsistency. AP noted that if the reports were consistent and were received each month without chasing, they would be able to use them and appreciate the benefits.

3.26 AL added that they have been waiting to request the data until the process has been automated, as they know it is an administrative burden on DNO billing teams.

3.27 PM noted that they currently only receive backing data requests from a couple of IDNOs, and therefore putting bilateral agreements in place to continue what they are currently doing would be easier than having an obligation to provide it to all IDNOs.

3.28 Members discussed the system automation. PM noted that the proposal is that when the invoices are generated and the email process is triggered, the report will get attached to that same email. Therefore there would be no change to the DNOs process.

3.29 AL noted that the Working Group had previously agreed not to ask St Clements to start carrying out any changes before the end of April 2026 due to the MHHS transition period.

*Question 6 – For IDNOs and DNOs-Do you have any other comments?*

3.30 Two respondents noted that they have no additional comments.

- 3.31 One respondent stated they are supportive of the change and believe it will improve operational efficiency and transparency across the industry.
- 3.32 One respondent noted that if IDNOs do not send their data in the correct format then DNOs should not be obligated to send the backing data. AL suggested that DB could attend the next Independent Networks Association (INA) Charging Subcommittee to provide some education on the correct format. AL confirmed the next meeting will be on 14 April 10:30 to 11:30.
- 3.33 DB questioned whether IDNOs are aware of the template within Schedule 19 that they should be using, as most are not using it. DB noted that this adds to the manual aspect of their process as they have to reformat the data before they can put it in their billing system.
- 3.34 Another respondent noted that they have historically pushed back when IDNOs request backing data due to it being too manually intensive however more recently they have been sending it as it benefits both parties as it helps to facilitate payment.
- 3.35 One respondent advised that they are only supportive of the change if the process is automated. The response acknowledged there would be an associated cost to DNOs for the changes to their billing systems.
- 3.36 The Chair noted that the DCUSA legal text would not state that the process has to be automated. The obligation would be introduced and then it would be up to the DNO how they adhere to it.
- 3.37 Another response stated that some IDNOs may be using scan software to process PDF invoices so may not wish to receive backing data. The response also outlined that they believe when MHHS is implemented fully, there will be the alternative of using REP 900 electronic invoice instead of the current PDF invoice. This electronic invoice would remove the need for PDF invoices and related backing data.
- 3.38 AL asked if the REP 900 process is included in the MHHS programme design, as their billing provider CNC are not aware of it. AL noted that IDNOs would have to change their systems to be able to ingest the REP 900s. Therefore, IDNOs will need to be informed and consulted on the process, which they have not been yet.
- 3.39 The Chair questioned whether DCP 459 is needed if in the future the REP 900 process is going to be in place. AL noted that they cannot see confirmation of it included anywhere. The group agreed that this should be explored further.
- 3.40 Members discussed the possibility of inviting a representative from St Clements and one from the MHHS programme to the next Working Group meeting to discuss this further. AL noted that the MHHS programme had previously stated that DUoS billing is not included.
- 3.41 AL took an action to circulate a process flow of what DUoS billing will look like before and after MHHS.

Action 03/01 – AL to provide the process flow demonstrating what DUoS billing will look like before and after MHHS, for the Chair to circulate to WG members.

- 3.42 Members agreed the Chair would contact St Clements seek advice on what basis are they proposing the Rep 900 as an alternative and if its included in any design documents or something that needs to be requested as an enhancement.. PM sent the Chair a contact for St Clements.

Action 03/02 – The Chair to contact St Clements to seek advice on what basis are they proposing the Rep 900 as an alternative and if it's included in any design documents or something that needs to be requested as an enhancement.

## 4. Next Steps and Work Plan

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- 4.1 The Working Group agreed the following next steps:

- The Chair to contact St Clements to seek advice on what basis are they proposing the Rep 900 as an alternative.
- Members to also discuss the process flow for DNO/IDNO DUoS billing and the legal text at that meeting.

## 5. Any Other Business

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- 5.1 The Chair asked the group whether there were any other items of business to discuss, to which nothing was raised.

## 6. Date of Next Meeting – Friday 20 March 2:00 – 3:30

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- 6.1 The next Working Group meeting will be held on Friday 20 March 2026, at 2:00.

## 7. Attachments

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- N/A

## New and Open Actions

Action Ref.	Action	Owner	Update
03/01	AL to provide the process flow demonstrating what DUoS billing will look like before and after MHHS, for the Chair to circulate to WG members.	AL	<b>New Action.</b>
03/02	The Chair to contact St Clements to seek advice on what basis are they proposing the Rep 900 as an alternative and if it's included in any design documents or something that needs to be requested as an enhancement.	The Chair	<b>New Action.</b>

## Closed Actions

Action Ref.			Update
01/01	The Chair to issue an RFI to DNOs and IDNOs asking which billing system they use.	Secretariat	<b>Action closed.</b> <i>Complete.</i>
02/01	The Secretariat to circulate the DCP 416 Collated Consultation Responses document to the Working Group post-meeting for review.	Secretariat	<b>Action closed.</b> <i>Complete.</i>
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	<b>Action closed.</b> <i>Complete.</i>
02/03	The Secretariat to produce an RFI and circulate to the Working Group for review offline.	Secretariat	<b>Action closed.</b> <i>Complete.</i>

# DCUSA

<b>02/04</b>	The Secretariat to issue the RFI to wider industry for further feedback.	Secretariat	<b>Action closed.</b> <i>Complete.</i>
<b>02/05</b>	The Secretariat to issue a doodle poll to the Working Group for the next meeting in due course.	Secretariat	<b>Action closed.</b> <i>Complete.</i>

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