

DCP 459 Working Group Meeting 04

22 March 2026 at 14:00 - Web-Conference

Attendee	Company
Working Group Members	
Alexander Pentecost [AP]	Eclipse Power
Anne-Claire Leydier [AL] (Proposer)	Matrix Group
Donna-Marie Butcher [DB]	UKPN
Peter Waymont [PW]	UKPN
Philip Mark [PM]	SSE
Tom Perryman [TP]	St Clements
Code Administrator	
Andy Green [AG] (Chair)	ElectraLink
Hannah Proffitt [HP] (Technical Secretariat)	ElectraLink
Apologies	
Jo Brown [JB]	National Grid
Mark Bellman [MB]	SP ENW

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 apologies from Mark Bellman and Jo Brown.

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

- 2.1 The Chair advised that the purpose of the meeting was to review the potential alternative solution of using the REP-900 DIP flow, the legal text for the current drafted solution (using Excel or another format) and to consider next steps.

3. Review the Alternate REP-900 solution

- 3.1 TP advised that that as part of a high-level impact assessment for this CP, they reviewed the Excel option and provided DNOs with details for that process. As part of their assessment, they also highlighted that a longer-term solution could be to utilise the REP-900 flow as part of the MHHS transition, seeing as this was the direction the industry was heading towards.
- 3.2 TP made it clear that utilising the REP-900 for these type of invoices was currently not in scope and that there are no planned changes as part of the MHHS program to cater for invoicing IDNOs via the REP-900 process.
- 3.3 It was also made clear that the use of the REP-900 flow would require a new CP., as this would entail a complete change of intent for DCP 459, which was only seeking to make an obligation for backing data to be issued with the PDF invoices.
- 3.4 It was highlighted that whilst the REP-900 process could be utilised in the future, other billing system providers would need to be engaged should this alternative be taken forwards as an approach in the future.
- 3.5 It was confirmed by PW that the process would be agnostic to whether MPANs had migrated as part of MHHS or not for both the REP-900 solution or the Excel solution.
- 3.6 TP advised from their perspective if the REP-900 solution was taken forwards it would purely be done on the basis of purely using the technology available to issue the invoices electronically.
- 3.7 PW drew attention that the change proposal that introduced electronic billing and the REP-900 ([DCP 416 'Electronic Invoicing Post MHHS'](#)) was drafted in such a way that this was agnostic to billing type, meaning it could be expanded to other types of billing.
- 3.8 It was again noted that this CP was specifically looking at providing backing data whereas utilising the REP-900 flow would be a change to DNOs invoicing processes. This meant the question posed to the Working Group was currently whether the Working Group wanted to continue with the current intent of DNOs providing backing data via a spreadsheet or if this change was to be withdrawn until such a time that the REP-900 process could be utilised, and a new CP raised.

- 3.9 PW highlighted that in the future if a CP is raised to introduce the Rep-900 for the this type of invoicing, that would need to be accompanied by a new dip message for the billing data that the IDNO sent to the DNOs, so the efficiencies are recognised by all Parties.
- 3.10 AC advised that they would like this CP to progress as the alternative of using the REP-900 had a potential delivery timeline of up to 24 months in the future.
- 3.11 AC also noted that there is an IDNO forum scheduled for Monday 23 March 2026 and that whilst the assumption is that the option of the backing data being sent in Excel was something they still wanted to pursue, they would check in with the other IDNOs to firm that assumption up.

Post meeting note

- 3.12 It was confirmed that IDNOs still wanting to pursue the current intent of DCP 459 which was to obligate DNOs to send backing data via spreadsheet, alongside the PDF invoices.

4. Legal text Review

- 4.1 Based on the consultation responses, it was agreed that the obligation should be captured within the DCUSA otherwise there was no recourse if a DNO refused to send the backing data.,
- 4.2 It was also confirmed that the format the backing data should be issued in was Excel and that the legal text would capture that.
- 4.3 TP confirmed that the impact assessment they'd carried out covered both processes where the report is manually run and then the email to the IDNO is manually sent, and also the process where the report is ran automatically and then attached to the emails with the PDF invoices automatically as well.
- 4.4 It was also noted that the impact assessment covered both scenarios where the file is csv of xls.
- 4.5 It was highlighted that the legal text would state what data items should be included and also that it should be in an Excel spreadsheet or a CSV file.
- 4.6 It was also highlighted that the legal text could not obligate Parties on having an automated process meaning if this change was approved, it would then be down to DNO Parties as to how the satisfied the obligation.
- 4.7 It was noted that the legal text would specifically refer to 'Site Specific Invoices'.
- 4.8 PW noted a concern that schedule 19 is centred all around sending data for portfolio billing purposes, and that Section 2B that defines how billing and payment works and as such, the legal text needed to be written in a way that clarified that DCP 459 was only obligating the sending of an accounting document and not an invoicing process/document.
- 4.9 The legal text was updated to be clear that the obligation was just the sending of backing data and not changing billing processes.
- 4.10 Data items were changed to column headings in the legal text.

- 4.11 It was noted that the legal text currently stated that the data items needed to be sent in sequence so that was amended to allow for the items to be sent in any order, as it was the items that were important, not the sequence they're sent in.
- 4.12 TP agreed that this was helpful, especially as the legal text stated 'as a minimum', meaning that some DNOs may want to send or some IDNOs receive more data items.
- 4.13 The Chair agreed to create a draft change report and share this with the Working Group and that he'd also issue the draft legal text to Gowlings for a legal review post AC confirming that the IDNO community still wanted the CP to progress.
- 4.14 The Working Group agreed to review the documents and a meeting was scheduled to take place at 10am on Friday 10 April 2026. It was agreed that if the review of the Change Report and Legal text gets completed over email before the meeting, the meeting could be cancelled.

Action 04/01 – The Chair to share the legal text with the legal advisors at Gowlings once AC has confirmed the IDNO community want to progress the change.

Action 04/02 – The Chair to create a draft Change Report and share with the Working Group.

5. Next Steps and Work Plan

- 5.1 The Working Group agreed the following next steps:
- The to create and share a change report.
 - The legal text to be issued to Gowlings post AC confirm the IDNO community want the CP to progress.

6. Any Other Business

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

7. Date of Next Meeting – Friday 10 April 10:00 – 12:00

- 7.1 The next Working Group meeting will be held on Friday 10 April 2026, at 12:00.

8. Attachments

- Attachment 1 DCP 459 Draft Legal Text

New and Open Actions

Action Ref.	Action	Owner	Update
04/01	The Chair to share the legal text with the legal advisors at Gowlings once AC has confirmed the IDNO community want to progress the change.	AL	New Action.
04/02	The Chair to create a draft Change Report and share with the Working Group.	The Chair	New Action.

Closed Actions

Action Ref.			Update
01/01	The Chair to issue an RFI to DNOs and IDNOs asking which billing system they use.	Secretariat	Action closed. <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	Action closed. <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	Action closed. <i>Complete.</i>
02/03	The Secretariat to produce an RFI and circulate to the Working Group for review offline.	Secretariat	Action closed. <i>Complete.</i>
02/04	The Secretariat to issue the RFI to wider industry for further feedback.	Secretariat	Action closed.

DCUSA

			<i>Complete.</i>
02/05	The Secretariat to issue a doodle poll to the Working Group for the next meeting in due course.	Secretariat	Action closed. <i>Complete.</i>
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	Ann-Claire Leydier	Action closed. <i>Complete.</i>
03/02	The Chair to contact St Clements 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.	Action closed. <i>Complete.</i>