




DCUSA Change Report		At what stage is this document in the process?
<h1>DCP 459:</h1> <h2>DNO invoices to Embedded DNO</h2> <p><b>Date Raised:</b> 01/08/2025</p> <p><b>Proposer Name:</b> Anne-Claire Leydier</p> <p><b>Company Name:</b> UK Power Distribution</p> <p><b>Party Category:</b> IDNO</p>		01 – Change Proposal
		02 – Consultation
		03 – Change Report
		04 – Change Declaration
<b>Purpose of Change Proposal:</b> The intent of the Change Proposal is to require separate invoice backing data to be provided by DNO Parties when issuing invoices to EDNOs.		
	This document is issued in accordance with Clause 11.20 of the DCUSA, and details DCP 459 'DNO invoices to Embedded DNO'.	
	Parties are invited to consider the proposed amendment (Attachment 2) and submit their votes using the Voting form (Attachment 1) to <a href="mailto:dcusa@electralink.co.uk">dcusa@electralink.co.uk</a> by 08 May 2026.	
	The voting process for the proposed variation and the timetable of the progression of the Change Proposal (CP) through the DCUSA Change Control Process is set out in this document.	
	If you have any questions about this paper or the DCUSA Change Process, please contact the DCUSA by email to <a href="mailto:dcusa@electralink.co.uk">dcusa@electralink.co.uk</a> or telephone 020 7432 3011.	
	Impacted Parties: DNOs & IDNOs	
	Impacted Clauses: Schedule 19 Paragraph 3	

## Contents

<b>1. Executive Summary</b>	<b>3</b>
<b>2. Governance</b>	<b>3</b>
<b>3. Why Change?</b>	<b>3</b>
<b>4. Working Group Assessment</b>	<b>4</b>
<b>5. Consultation</b>	<b>5</b>
<b>6 Working Group RFI</b>	<b>8</b>
<b>7 Working Groups Consultation and RFI Conclusions and Final Solution</b>	<b>11</b>
<b>8 Relevant Objectives</b>	<b>13</b>
<b>9 Impacts &amp; Other Considerations</b>	<b>14</b>
<b>10 Implementation</b>	<b>14</b>
<b>11 Legal Text</b>	<b>15</b>
<b>12 Code Specific Matters</b>	<b>15</b>
<b>13 Recommendations</b>	<b>15</b>
<b>14 Attachments</b>	<b>16</b>



**Any questions?**

Contact:

**Code Administrator**



**DCUSA@electralink.co.uk**



**02074323000**

Proposer:

**Anne-Claire leydier**



**anneclaireleydier@matrixgroup.co.uk**



**07842 310 055**

## Timetable

The timetable for the progression of the CP is as follows:

### Change Proposal timetable

Activity	Date
Initial Assessment Report	13 August 2025
Consultation Issued to Industry Participants	31 October 2025
Request for Information Issued to Industry Participants	27 February 2026
Change Report Approved by Panel	15 April 2026
Change Report issued for Voting	16 April 2026
Party Voting Closes	08 May 2026
Change Declaration Issued to Parties	11 May 2026

## 1. Executive Summary

### What?

- 1.1. The current Distribution Use of System (DUoS) invoicing process for non-aggregated Meter Point Administration Numbers (MPANs) from Distribution Network Operators (DNOs) to Embedded Distribution Network Operators (EDNOs) is fit for purpose but inefficient.

### Why?

- 1.2. It requires manual work which wastes time and introduces the risk of error. The problem comes from the fact that the invoices are sent as a PDF document, which the EDNO need to then enter in their accounting system.

### How?

- 1.3. Ideally, the invoices would be supported with a xls document that the EDNO can easily "load" into their accounting system. Clauses 43.6.2 and Schedule 19 describe how the charging and in part invoicing needs to be done but are not specific on the format of the invoices. We suggest amending Schedule 19 to add a requirement to accompany the PDF format of an invoice for non-aggregated MPANs, with an Excel spreadsheet that contains minimum fields to support the automatic "load".

### Who?

- 1.4. The prosper and Working Group notes that some DNOs may already be providing an equivalent to some EDNOs, in which case this change proposal intends to bring every party to the same playing field in an open manner, and bring the expected positive impacts to all.

## 2. Governance

### Justification for Part 2 Matter

- 2.1. This change will not have any material impact to customers or industry parties as it is only seeking for backing data to be issued with the PDF Invoices.

### Current Next Steps

- 2.2. This CP is to be treated as a standard change.

## 3. Why Change?

- 3.1. The change was discussed during Standing Issues Group meeting 168, as issue 82, further information can be found via: Standing Issues Group (SIG) Meeting 168.
- 3.2. The prosper advised that the intent of the Change Proposal is to require separate invoice backing data to be provided by DNO Parties when issuing invoices to EDNOs.

- 3.3. The Proposer stated that the current Distribution Use of System (DUoS) invoicing process for non-aggregated Meter Point Administration Numbers (MPANs) from Distribution Network Operators (DNOs) to Embedded Distribution Network Operators (EDNOs) is fit for purpose but inefficient.
- 3.4. The Proposer noted that the current process requires manual work which takes a lot of time, and introduces the risk of error. The problem comes from the fact that the invoices are sent as a PDF document, which the EDNO need to then enter in their accounting system.

## 4. Working Group Assessment

### Working Group Assessment

- 4.1 The DCUSA Panel established a Working Group to assess this CP. Meetings were held in open session and the minutes and papers of each meeting are available on the DCUSA website – [www.dcusa.co.uk](http://www.dcusa.co.uk).
- 4.2 The Proposer outlined that the proposal is for invoices to be supported with an xls document that the EDNO can easily "load" into their accounting system.
- 4.3 The Proposer advised that Clauses 43.6.2 and Schedule 19 describe how the charging, and in part invoicing, needs to be done but are not specific on the format of the invoices. The Proposal suggests amending Schedule 19 to add a requirement to accompany the PDF format of an invoice for non-aggregated MPANs, with an Excel spreadsheet that contains minimum fields to support the automatic "load".
- 4.4 The Proposer noted that some DNOs are already providing an equivalent to some EDNOs, and this change intends to ensure consistency.
- 4.5 It was also noted that most of the current reports in the DNOs billing systems are in Excel format and that moving away from this could lead to more work being needed to automate the process. The Working Group noted that whilst the current DUoS billing system only exports reports to Excel, the new system for Market Wide will output to CSV as well.
- 4.6 One DNO Working Group member advised that they already provide the backing data and noted that they get it from the current billing engine. Therefore, the report already exists but the functionality to automatically send it doesn't.
- 4.7 It was raised that billing days are busy and therefore DNOs would need the vendors of the billing system to automate this process. Other members agreed.
- 4.8 Members discussed the necessary system changes and the magnitude of these. It was noted that to establish the potential costs and associated timelines, the vendor would need to run an impact analysis.
- 4.9 The Working Group agreed that the system changes would be considered as part of the consultation and with this in mind, the Working Group was interested in gaining Party views on this matter.
- 4.10 Regarding implementation, following a DNO confirming that the current billing software does allow for such a report to be produced, the Working Group agreed that it should be made clear in any consultation that there are two aspects to this change, producing the report and sending the report.
- 4.11 It was acknowledged that DNOs will be implementing new billing systems for Market Wide Half Hourly Settlement which questioned whether this would mean doing two different things in two

different systems unless the implementation date was post migration. The Working Group noted that the implementation date would be considered during the consultation but that system changes usually require 6 months' notice.

## 5. Consultation

5.1. The Working Group undertook one consultation during the development of the change proposal.

### Consultation

5.2. The consultation was issued to parties on 20 February 2026. There were eight responses received to the consultation. The Working Group's conclusions can be found in **Attachment 4 DCP 459 Consolidated Consultation Responses**, with a summary of each shown below.

5.3. Please also note that one respondent marked their consultation responses as confidential and as such, the summary to each question will include their responses where appropriate but the responses have been removed from Attachment 4.

#### Q1: Do you understand the intent of the Change Proposal?

5.4. All respondents understood the intent of the CP.

#### Q2: Are you supportive of the principles of this Change Proposal?

5.5. The majority of respondents (six) were supportive of the principles of this CP.

5.6. 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.

5.7. 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.

#### Q3: Do you agree that the backing should be issued in Excel format? If not, please provide rationale.

5.8. The majority of respondents (six) agreed that the backing should be issued in Excel format.

5.9. 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.

5.10. Another respondent noted that although Excel is preferred by Users, there are developers that do prefer CSV format.

#### Q4: Do you already provide backing data to other parties? If so, what format is this shared in i.e. Excel, CSV etc. And what data items do you share?

5.11. The majority of respondents (seven) provide backing data to other parties, however, there were mixed formats provided (i.e., Excel, CSV, and PDF).

- 5.12. One respondent stated that within the legal text, some of the information they provide is not required.

**Q5 What system updates are required and what value do you estimate any system changes to be?**

- 5.13. A number of respondents stated that they would not require a system change as they do everything that is required already by manually creating the backing data and emailing it to the relevant IDNO.
- 5.14. Other respondents however did note that there would be a cost for automation if this change was to move away from manual processes.

**Q6: What would be the implementation period for any potential system changes?**

- 5.10 Respondents preferred implementation period for any potential system changes varied from 4 weeks to 8 months.

**Q7: Do you have any comments on the draft legal text?**

- 5.11 The majority of respondents (six) did not have any further comments in regard to the draft legal text.
- 5.12 One respondent suggested emphasising the mandatory data items and consistent file naming conventions.
- 5.13 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 which is below;

*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.***

**Q8: 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..**

- 5.14 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.
- 5.15 Two respondents did not believe that any of the DCUSA General Objectives will be better facilitated by this CP.

**Q9: 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.**

- 5.16 Most respondents (7) agreed with the listed benefits in paragraph 6.3.

- 5.17 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 the listed benefits seem to better support the efficiency argument than the competition one.
- 5.18 The confidential respondent stated they did not agree with the benefits listed as they believed 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.
- 5.19 One respondent also considered that the suggested benefit “improved ability to pay within the 14 days” should instead strictly read “reduced risk of EDNO non-compliance with payment obligations”.
- 5.20 The respondent agreed it would constitute a benefit to the EDNO (reduced risk of suspension of services for payment default), albeit at a cost to DNOs.
- 5.21 The same respondent has queried whether this ‘benefit’ to EDNOs represents an adequate return for the consumer on the DNO investment to automate the proposed solution.”

**Q10: Are you aware of any wider industry developments that may impact upon or be impacted by this CP?**

- 5.22 Most respondents (7) were not aware of any wider industry impacts of this CP.
- 5.23 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.

**Q11: How are you impacted by the outcome of this CP?**

- 5.24 Three respondents stated that they would be positively impacted by this CP due to billing efficiency.
- 5.25 Two respondents stated that they would not be impacted by this CP as they already providing the required information.
- 5.26 Two respondents stated that this CP will impose either additional manual labour or automation costs, whilst one 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).

**Q12: 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?**

- 5.27 Two respondents believe that this CP could not be implemented until 2027.
- 5.28 Two respondents suggesting a minimum of 6 months lead time.
- 5.29 One respondent suggesting June 2026.
- 5.30 One respondent suggesting a 3/4-month lead time, and one respondent stating that they would like to see this change implemented as soon as possible.
- 5.31 One respondent didn't offer any comment.

**Q13: Do you have any other comments on DCP 459?**

- 5.32 Six respondents did not have any other comments on this CP.

5.33 One respondent stated that they believed that the receipt of data and issuing 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.

5.34 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.

## 6 Working Group RFI

6.1 The main area the Working Group reviewed post the consultation review was whether there was support to make the sending of the backing data into a formal obligation in the DCUSA, or if it could be something that Parties could manage between themselves as part of a bi-lateral agreement.

6.2 The Working Group believed that it was sensible to send an RFI initially to answer the above point before drawing conclusions to the rest of the consultation.

### DCP 459 RFI?

6.3 With this in mind the Working Group agreed to send an RFI to DNOs and IDNOs to gain views on the below to understand the size of the issue for IDNOs, whether they'd come across challenges in the past when asking for backing data, what the challenges would be to DNOs to provide the data and finally whether it was believed that the sending of backing data would need a formal or informal process.

6.4 The responses to the RFI can be found within **Attachment 5 DCP 459 RFI Responses**

6.5 There were seven responses to the RFI however, one Parties response was confidential so whilst these responses may be referred to in the summary of the responses where appropriate, they have been removed from attachment 5.

#### For IDNOs

#### Q1: Would you see benefit in receiving the backing data that the proposal is seeking to mandate?

6.6 Two IDNOs had responded to this question, both agreed they see a benefit.

6.7 One confirmed they could use the backing data to upload the invoice details into their accounting system, rather than manually entering PDF invoices. The other agreed they would see significant benefit in receiving the backing data automatically without needing to request it.

6.8 One 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.

6.9 The proposer and another IDNO Party who didn't respond to the consultation but were at the Working Group both echoed what the previous two responses had stated.

#### Q2: 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?



- 6.10 Two IDNOs had responded to this question, both agreeing that they recognised the issues described in the CP.
- 6.11 One clarified that their organisation is a new entrant and therefore they do not currently have any issues. This 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.
- 6.12 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.
- 6.13 Similarly with question 1, the two IDNO Parties present at the Working Group meetings who had not responded to the RFI echoed these comments.

**Q3: 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?**

- 6.14 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.
- 6.15 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.
- 6.16 An IDNO representative in the Working Group agreed with this comment 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.

#### **For DNOs**

**Q4: 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.**

- 6.17 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.

6.18 A DNO Working Group member 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.

### **For IDNOs and DNOs**

**Q5: 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.**

- 6.19 Five DNO and two IDNOs responded to this question.
- 6.20 One respondent questioned what would happen if a bilateral agreement cannot be reached and the DNO refused to provide the data.
- 6.21 One of the respondents noted that a standard report layout would need to be agreed by the Working Group.
- 6.22 Two respondents noted that bilateral agreements should suffice and three noted that they would prefer a DCUSA obligation to ensure consistency.
- 6.23 The two IDNO representatives at the Working Group who didn't respond to the RFI both agreed they would prefer a DCUSA obligation.
- 6.24 Two respondents did not provide a clear indication either way.

### **Q6: Do you have any other comments?**

- 6.25 Two respondents noted that they have no additional comments.
- 6.26 One respondent stated they are supportive of the change and believe it will improve operational efficiency and transparency across the industry.
- 6.27 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.
- 6.28 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.
- 6.29 Another response stated that some IDNOs may be using scan software to process PDF invoices so may not wish to receive backing data.
- 6.30 The above 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.

## 7 Working Groups Consultation and RFI Conclusions and Final Solution

7.1 After the consultation and RFI responses were reviewed by the Working Group, the below areas were identified as requiring further consideration.

- The Use of the REP-900 Flow as an alternative process.
- Should the process be made into a formal obligation under the DCUSA or could the backing data be managed between Parties in the form of a Bi-Lateral agreement?
- Draft Legal text and data items.
- Format the data is to be issued in.
- Long term processing considerations.

### **The Use of the REP-900 Flow as an alternative process.**

7.2 The Working Group reviewed the alternative solution of utilising the REP-900 DIP flow to automate the processing for these types of invoices.

7.3 A Working Group member who represented a billing systems provider advised this could be done, however this was currently not in scope with the MHHS Programme, or anywhere else at this time.

7.4 It was also noted within the Working Group that whilst this may be useful to revisit in the future, it was out of scope of the intent of DCP 459 and that it could take potentially up to 24 months before the REP-900 flow could be used.

7.5 Due to the above the proposer stated that they would like to continue with the current intent of DNO's issuing backing data as waiting up to 2 years for the REP-900 flow to be utilised would mean manual processing in the meantime.

7.6 It was also noted within the Working Group by a DNO member that if in the future 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.

### **Should the process be made into a formal obligation under the DCUSA and if so, in what format should it be issued?**

7.7 Based on the consultation and RFI responses, it was agreed that the obligation should be captured within the DCUSA otherwise there would be no recourse for an IDNO if a DNO refused to send the backing data.

7.8 It was also confirmed that the format the backing data should be issued in was Excel spreadsheet or a CSV file and that the legal text would make that clear.

7.9 A Working Group member who represented a billing systems provider confirmed that the impact assessment they'd carried out covered both processes where the report is manually ran 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.

7.10 It was also noted that the impact assessment covered both scenarios where the file is CSV Or Excel.

### **Draft Legal text and data items**

- 7.11 It was highlighted that the legal text would state what data items should be included and also that it should be sent in Excel or CSV format, so the legal text is written to cater for both formats.
- 7.12 It was noted that the legal text would need to specifically refer to 'Site Specific Invoices'.
- 7.13 A Working Group member noted a concern that schedule 19 is centred all around the sending of data for portfolio billing purposes, and that Section 2B defines how billing and payment work, and as such, the legal text needed to be drafted in a way that clarified that DCP 459 was only obligating the sending of an administrative document and not altering a invoicing process/document.
- 7.14 The legal text was updated to be clear that the obligation was just the sending of backing data and not changing billing processes.
- 7.15 It was noted that the legal text needed 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.
- 7.16 A Working Group member who represented a billing systems provider agreed that this would be helpful, especially as the legal text stated, 'as a minimum', meaning that some DNOs could send additional data items.
- 7.17 The minimum data items the Working Group agreed would need to be captured within the backing data is below:
- (a) Market Domain I.D. (of the DNO)
  - (b) Invoice Reference Number
  - (c) Lead MPAN
  - (d) Invoice Date (dd/mm/yyyy)
  - (e) Billing Period From (dd/mm/yyyy)
  - (f) Billing Period To (dd/mm/yyyy)
  - (g) Net amount (£)
  - (h) VAT amount (£)
  - (i) Total amount (£)

### **Long term processing considerations**

- 7.18 The Working Group discussed the comments raised in both the consultation and RFI that the issuing of backing data could become a resource heavy exercise if more IDNOs were to enter the industry and request the data.
- 7.19 It was noted by a DNO Working Group member that there hadn't been many IDNOs enter the market recently and the growth for these Parties was relatively small.

- 7.20 Whilst it was believed that growth in the IDNO community would happen in the future, the process for new IDNO market entrants was quite long, so DNOs would have early visibility of these new IDNOs before they started to fully operate and need backing data.
- 7.21 It was also noted that most, if not all DNOs are already providing some for of backing data to most IDNOs and as such, the resource was already in place.
- 7.22 It was also noted that billing system providers could look to automate the process for DNOs, if that was something DNOs wanted to explore and that a billing systems provider had already issued DNOs with an impact assessment to automate the process.

## 8 Relevant Objectives

### Assessment Against the DCUSA Objectives

- 8.1 For a DCUSA Change Proposal to be approved it must be demonstrated that it better facilitates the DCUSA Objectives. There are five General Objectives and six Charging Objectives.
- 8.2 The Working Group agreed that this CP will be assessed against the DCUSA General Objectives.
- 8.3 The Working Group considers that the following DCUSA Objectives are better facilitated by this CP:

	DCUSA General Objectives	Identified impact
<input type="checkbox"/>	1. The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks	None
<input checked="" type="checkbox"/>	2. The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent therewith) the promotion of such competition in the sale, distribution and purchase of electricity	Positive
<input type="checkbox"/>	3. The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences	None
<input checked="" type="checkbox"/>	4. The promotion of efficiency in the implementation and administration of the DCUSA	Positive
<input type="checkbox"/>	5. Compliance with the EU Internal Market Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	None

- 8.4 The proposer believes that competition in the distribution of electricity will be improved by the implementation of this change as we expect the positive impacts to include:
- gained efficiency in EDNO's accounts payables processes,
  - a reduced risk of errors,
  - improved ability to pay within the 14 days' timeframe; and
  - a clear and unified approach being utilised by all parties involved.
- 8.5 The Working Group acknowledged that there will be an additional step in the DNO's invoicing processes, but they believe this is mitigated by the automation functionalities of the DNO's billing

tool(s), noting that the automation does not come free and is a non-trivial cost to DNOs and therefore to consumers.

- 8.6 The Working Groups view is that DCUSA General Objective 2 is better facilitated and also that DCUSA General Objective 4 (The promotion of efficiency in the implementation and administration of the DCUSA) is better facilitated by this proposal as it means the information in the PDF invoices wouldn't need to be manually input creating efficiencies in the process.

## 9 Impacts & Other Considerations

### Does this Change Proposal impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

- 9.1 The Proposer does not believe that this CP impacts upon any current SCR or other significant industry change projects.
- 9.2 The Working Group agreed with this view.

### Does this Change Proposal Impact Other Codes?

BSC.....	<input type="checkbox"/>	SEC.....	<input type="checkbox"/>
CUSC.....	<input type="checkbox"/>	REC.....	<input type="checkbox"/>
Grid Code.....	<input type="checkbox"/>	None.....	<input checked="" type="checkbox"/>
Distribution Code..	<input type="checkbox"/>		

### Consumer Impacts

- 9.3 There are no consumer impacts other than those that have already been mentioned in this CP.

### Environmental Impacts

- 9.4 In accordance with DCUSA Clause 11.14.6, the Working Group assessed whether there would be a material impact on greenhouse gas emissions if this CP was implemented. The Working Group did not identify any material impact on greenhouse gas emissions from the implementation of this CP.

## 10 Implementation

- 10.1 The Working Group believe that a lead time for implementation will need to consider the amount of time any potential system changes would take to develop, test and released.
- 10.2 It was noted that system changes would generally take a minimum of 6 months to deliver in full.
- 10.3 With the above in mind, the implementation date for this CP is 6 months after party approval.

## 11 Legal Text

- 11.1 The legal text for this CP is provided as Attachment 3 DCP 459 Legal Text.
- 11.2 The Working Group propose adding an additional sub-paragraph to Paragraph 3 ‘Site Specific Data’ of Schedule 19 ‘Portfolio Billing’, that places an obligation on DNOs to provide backing data in Excel format alongside any invoice issued and the data items to be included in the backing data.
- 11.3 The Working Group has produced the below draft legal text which it believes will achieve the solution specified above and this is set out below for ease of reference:

3.8 When invoicing the EDNO for Use of System Charges attributable to the EDNO’s site specific Connectees, the DNO Party shall send the EDNO a single supporting file, in Excel or CSV format, with each invoice recorded in a separate row, all within the same tab, and including data for (as a minimum) the following column headings::

(a) Market Domain I.D. (of the DNO)

(b) Invoice Reference Number

(c) Lead MPAN

(d) Invoice Date (dd/mm/yyyy)

(e) Billing Period From (dd/mm/yyyy)

(f) Billing Period To (dd/mm/yyyy)

(g) Net amount (£)

(h) VAT amount (£)

(i) Total amount (£)

### Text Commentary

- 11.4 As noted above, the Working Group believe that a simple paragraph with an obligation on DNOs to provide backing data that also identifies the data items to be included in the backing data is sufficient for this change to be a success.

## 12 Code Specific Matters

12.1N/A.

## 13 Recommendations

### Panel’s Recommendation

- 13.1 The Panel approved this Change Report on 15 April 2026. The Panel considered that the Working Group has carried out the level of analysis required to enable Parties to understand the impact of the proposed amendment and to vote on DCP 459.

13.2 The Panel have recommended that this report is issued for Voting and DCUSA Parties should consider whether they wish to submit views regarding this Change Proposal.

## 14 Attachments

- Attachment 1: DCP 459 Voting Response Form
- Attachment 2: DCP 459 Change Proposal Form
- Attachment 3: DCP 459 Legal Text
- Attachment 4: DCP 459 Consultation Responses
- Attachment 5: DCP 459 RFI Responses