

## DCP 459

### 'DNO invoices to Embedded DNO'

#### COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS

Company	Confidential/ Anonymous	1. For IDNOs-Would you see benefit in receiving the backing data that the proposal is seeking to mandate?	Working Group Comments
UKPN	Non-Confidential	N/A	
NGED	Non-Confidential	N/A	
IDCSL	Non-Confidential	Yes, we could use the backing data to upload the invoice details in our accounting system, rather than manually enter pdf invoices.	
SSE	Non-Confidential	N/A	
ENC	Non-Confidential	Yes, we would see significant benefit in receiving the backing data automatically without needing to request it. This information is essential for efficiently validating the invoices we receive. At present, for DNOs that do not provide backing data as standard, we must request it manually, which introduces unnecessary administrative effort and delays. We believe mandating the provision of this data would streamline the invoicing process, reduce delays, and enhance accuracy.	
SP ENW	Non-Confidential	N/A	
Working Group Conclusions: Two IDNOs had responded to this question, both agreed they see a benefit.			

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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.

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.

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.

Company	Confidential/ Anonymous	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?	Working Group Comments
UKPN	Non-Confidential	N/A	
NGED	Non-Confidential	N/A	
IDCSL	Non-Confidential	Yes – although for clarity, IDCSL does not have an issue at present due to being a new entrant but in my previous life working for other IDNOs, the manual data entry of hundreds/thousands of individual pdf invoices was labour intensive and open to manual data entry errors.	
SSE	Non-Confidential	N/A	

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ENC	Non-Confidential	Yes, these issues are familiar and ongoing. Manually extracting data from PDF invoices is both time consuming and prone to human error. To mitigate this, we routinely request backing data to ensure invoices can be validated efficiently. The current reliance on manual input represents an avoidable operational burden.	
SP ENW	Non-Confidential	N/A	
<p>Working Group Conclusions: Two IDNOs had responded to this question, both agreeing that they recognised the issues described in the CP.</p> <p>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.</p> <p>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.</p> <p>Similarly with question 1, the two IDNO Parties present at the Working Group meetings who had not responded to the RFI echoed these comments.</p>			

Company	Confidential/Anonymous	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?	Working Group Comments
UKPN	Non-Confidential	N/A	

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NGED	Non-Confidential	N/A	
IDCSL	Non-Confidential	IDCSL has not asked for backing data to date but note that some DNOs already provide a level of backing data in spreadsheet form that accompanies their pdf invoices. If DNOs are all using the same billing engine, then one assumes that all DNOs can provide the same backing data already without the need for a system change. One for the working group to determine.	
SSE	Non-Confidential	N/A	
ENC	Non-Confidential	We have not experienced instances where DNOs refused to provide the requested backing data. However, obtaining it often requires chasing, and when we have asked for this data to be provided as standard, we have typically been told that it must be requested each time. This approach is inefficient and directly contributes to the challenges outlined in our answers to Questions 1 and 2.	
SP ENW	Non-Confidential	N/A	
Working Group Conclusions: 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.			

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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.

An IDNO representative in the Working Group 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.

Company	Confidential/ Anonymous	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.	Working Group Comments
UKPN	Non-Confidential	No, we already carry out this task.	
NGED	Non-Confidential	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.	
IDCSL	Non-Confidential	N/A	
SSE	Non-Confidential	At present we receive backing data requests from 2/3 IDNOs which is manageable. There are currently 15 IDNOs, 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.	

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ENC	Non-Confidential	N/A	
SP ENW	Non-Confidential	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.	
<p>Working Group Conclusions: Five DNOs responded to the question. Responses are summarised below.</p> <ul style="list-style-type: none"><li>• No, we already carry out this task.</li><li>• 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.</li><li>• 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.</li><li>• 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.</li><li>• 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.</li></ul> <p>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. PM noted that this needs to be done for each IDNO twice (for the two distribution areas they operate in).</p>			

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Company	Confidential/ Anonymous	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	Working Group Comments
UKPN	Non-Confidential	What happens if agreement cannot be reached, such that DNOs refuse to provide it to IDNOs that want it?	
NGED	Non-Confidential	Bi-lateral & goodwill.	
IDCSL	Non-Confidential	Creating obligations in the DCUSA would be the preferred option rather than negotiating individually with each DNO to set up bi-lateral agreements. It's a more efficient process.	
SSE	Non-Confidential	We believe a bi lateral agreement would be sufficient.	
ENC	Non-Confidential	We believe this requirement should be established within the DCUSA to ensure that backing data is consistently provided by all DNOs. This would remove any ambiguity around expectations and ensure fair and uniform treatment across all IDNOs. A mandated approach will enhance predictability and avoid the inefficiencies associated with ad-hoc or bilateral arrangements.	
SP ENW	Non-Confidential	We believe this should be addressed by creating clear obligations within DCUSA.	

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Working Group Conclusions: Five DNO and two IDNOs responded to this question.

One 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.

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

Two respondents noted that bilateral agreements should suffice and three noted that they would prefer a DCUSA obligation to ensure consistency. The two IDNO representatives at the Working Group who didn't respond to the RFI both agreed they would prefer a DCUSA obligation. Two respondents did not provide a clear indication either way.

Company	Confidential/ Anonymous	6. For IDNOs and DNOs-Do you have any other comments?	Working Group Comments
UKPN	Non- Confidential	If the IDNOs do not send in their data in the correct format then we should not be obliged to send the backing data.	
NGED	Non- Confidential	We have always pushed back whenever IDNOs requested backing data due to having 4 x DNO areas and it being too manually intensive however I know we have relented in recent times and sent them when requested to the benefit of both ourselves & the IDNO as it helps to facilitate payment	
IDCSL	Non- Confidential	Not at this time.	



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SSE	Non-Confidential	As per previous WG discussions, we are only supportive of DCP459 if the process implemented is automated. This would ease the manual strain on DNOs over an already busy period of the month. However, there would be costs associated to DNOs for this to be implemented within our billing system.	
ENC	Non-Confidential	We are supportive of this change proposal and believe it will improve operational efficiency and transparency across the industry.	
SP ENW	Non-Confidential	No.	
<p>Working Group Conclusions: Two respondents noted that they have no additional comments.</p> <p>One respondent stated they are supportive of the change and believe it will improve operational efficiency and transparency across the industry.</p> <p>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.</p> <p>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.</p> <p>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.</p>			

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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. The proposer suggested that DNO members could attend the next Independent Networks Association (INA) Charging Subcommittee to provide some education on the correct format. It was confirmed the next meeting will be on 14 April 10:30 to 11:30.