

DCUSA Change Proposal (DCP)		At what stage is this document in the process?			
DCP 482: REP-900 Splitting Date Raised: 11 August 2026 Proposer Name: Peter Waymont Company Name: Eastern Power Networks Party Category: DNO		01 – Change Proposal			
		02 – Consultation			
		03 – Change Report			
		04 – Change Declaration			
Purpose of Change Proposal: To describe how the REP-900 should be split if it exceeds the DIP limitation of 1MB.					
	Impacted Parties: ☒ Suppliers ☒ DNOs ☒ IDNOs ☐ CVA Registrants ☐ OTSO Party ☐ Gas Suppliers ☐ SIP Parties				
	Impacted Clauses: <table border="1"> <thead> <tr> <th>Section/Schedule</th> <th>Clause/Paragraph</th> </tr> </thead> <tbody> <tr> <td>REP-900 messages (REC Market Message MM20064)</td> <td>N/A</td> </tr> </tbody> </table>		Section/Schedule	Clause/Paragraph	REP-900 messages (REC Market Message MM20064)
Section/Schedule	Clause/Paragraph				
REP-900 messages (REC Market Message MM20064)	N/A				

Contents

1	Summary	3
2	Governance	3
3	Reasons for raising the Change Proposal	4
4	Solution and Legal Text	5
5	Relevant Objectives	5
6	Impacts & Other Considerations	5
7	Implementation	6
8	Recommendations	6

Indicative Timeline

The Secretariat recommends the following timetable:

Initial Assessment Report	19 August 2026
Consultation Issued to Industry Participants	September 2026
Change Report Approved by Panel	18 November 2026
Change Report issued for Voting	19 November 2026
Party Voting Closes	10 December 2026
Change Declaration Issued to Parties	14 December 2026

1 Summary

What?

- 1.1 To ensure REP-900 messages (REC Market Message MM20064) can be sent if they are too big for the Data Integration Platform (DIP).

Why?

- 1.2 For messages sent under MHHS, Elexon introduced the DIP and the json format. The DIP turns out to have a limitation of 1MB file size and, as the json format largely contains data describing each field, some messages can become too big for the DIP.

How?

- 1.3 By adding a mandatory block into the REP-900 message that describes whether the message has been split. If the message is not split, the block would be populated with 1 of 1. Otherwise it would be populated with 1 of x, 2 of x..... x of x etc.
- 1.4 The REP-900 should be split after a given number of invoices (to be determined) rather than having to make an assessment of message size each time.
- 1.5 Consequently the Partition Block is set to R900-04 LDSO Billing Invoice Data

Who?

- 1.6 DNOs, IDNOs, Suppliers.

2 Governance

Proposers view on items that impact the progression of the CP

- 2.1 ☒ Tick this box if you feel that you are raising this change to try to address a current or imminent issue that has significant adverse commercial or safety implications or which would otherwise place Parties in breach of relevant regulations.
- 2.2 Do you believe this Change Proposal will have a significant impact on any of the following?
- ☐ Electricity consumers
 - ☐ Supply
 - ☐ Distribution
 - ☐ Generation
 - ☒ Commercial activities connected with any of the above
 - ☐ None of the Above
- 2.3 Do you believe this Change Proposal will?
- ☒ Have a significant commercial impact on any a Party or Party Category or on customers
 - ☐ Be likely to discriminate in its effects between at least one Party or another
 - ☐ Be the subject of controversy between Parties
 - ☐ Cause at least one Party to be in breach of this Agreement if not urgently addressed
 - ☐ Change the governance or the change control arrangements applying to the DCUSA
 - ☐ None of the Above

2.4 ☐ Tick this box if you either, haven't developed any proposed legal drafting or if you have, but you feel that further development will be required (i.e., via a Working Group)?

2.5 Proposer's view on prioritisation

Prioritisation Criteria	High Impact
Strategic Direction Statement Alignment: <i>The CP strongly supports key government energy policy actions that require immediate progress and aligns with SDS priorities under the Act Now category.</i>	No
Complexity: <i>The CP is highly complex, with a fast-approaching deadline, significant implementation challenges, and a requirement for extensive stakeholder engagement.</i>	Yes
Importance: <i>The CP addresses a high-risk or critical issue, making timely action important for stakeholders as it is anticipated to deliver substantial benefits and value.</i>	Yes
Priority Category: <i>(To be considered High priority all 3 Criteria must be High Impact.)</i>	High

2.6 Without this change the distributors may be unable to send electronic invoices.

Code Admin view on progression route for this CP

2.7 Based the answers provided by the Proposer to the above questions the Code Administrator believes that this Change Proposal should:

- Be treated as a Part 2 Matter;
- Be treated as an Urgent Change; and
- Proceed to the Definition phase via a Working Group for further development.

3 Reasons for raising the Change Proposal

- 3.1 Elexon (presumably) have raised CP1648 to facilitate splitting of messages owned by them and have mentioned that REP-900 may need to be split but that this is outside of their governance. DNOs had previously identified the risk to REP-900 to Elexon.
- 3.2 This DCP therefore seeks to align the REP-900 to the other messages by adding in the same proposed block.
- 3.3 Rather than assess the message size of each REP-900 it is proposed to split the message every X invoices (X tbc) such that it can be more easily codified.
- 3.4 Similarly, it is proposed to make the splitting information mandatory rather than optional so that it is always clear whether the message is split or not.
- 3.5 Splitting will be done at the invoice level within the message. Messages should always contain whole invoices.

4 Solution and Legal Text

Solution Overview

- 4.1 There is no impact currently identified with respect to the legal text of the DCUSA, and it is expected that this Change Proposal relates only to the updating of the REP-900 messages in the REC maintained Data Specification.

Addition/Amendment to DCUSA Owned Market Message (Data Flow) or Data Item

- 4.2 Add note and new block to the REP-900 data flow as shown in attachment 1.

Market Message (Data Flow) / Data Item Commentary

- 4.3 This mirrors Elexon's proposal under CP1648 but should be mandatory and have defined splitting.

5 Relevant Objectives

- 5.1 My view as to which of the DCUSA Objectives would be better facilitated by the implementation of this Change Proposal is set out below.

DCUSA General Objectives

- | | |
|--|-----------------|
| 1) The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks | None |
| 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 | None |
| 3) The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences | None |
| 4) The promotion of efficiency in the implementation and administration of the DCUSA | Positive |
| 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 |
- 5.2 By describing the splitting of the message in a clear and consistent way, Parties will be better able to manage the invoicing process more efficiently and without the potential for the REP-900 message to fail to send due to exceeding the 1MB limit imposed on messages sent via the DIP.

6 Impacts & Other Considerations

Impacts on any Significant Code Review (SCR) or other significant industry change projects

- 6.1 I do not believe that this CP impacts upon any current SCR or other significant industry change projects.

Impacts on Other Codes

6.2 I have considered whether any other industry codes might be impacted as a result of this Change Proposal, and our initial view is set out below.

Grid Code..... ☒ SEC... ☒ CUSC... ☒ None..... ☒
 Distribution Code... ☒ REC.... ☒ BSC..... ☒

Impacts on DCUSA Owned Data Flows

6.3 I believe that this CP will require a change to the message.

Consumer Impacts

6.4 I do not believe that this change will impact consumers.

Environmental Impacts

6.5 In accordance with DCUSA Clause 10.4.5A, I have assessed whether there would be a material impact on greenhouse gas emissions if this CP were implemented. I have not identified any material impact on greenhouse gas emissions from the implementation of this CP.

7 Implementation

Lead Time for Implementation

7.1 With CP1648

Proposed Implementation Date

7.2 With CP1648

8 Recommendations

The Code Administrator will provide a summary of any recommendations/determinations provided by the Panel in considering the initial Change Proposal. This will form part of a Final Change Report.