

DCUSA Consultation		At what stage is this document in the process?
DCP 482: REP-900 Splitting Date Raised: 28 July 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.		
	This document is a Consultation issued to DCUSA Parties and any other interested Parties in accordance with Clause 11.14 of the DCUSA seeking industry views on DCP 482. The Working Group recommends that this Change Proposal should proceed to Consultation. Parties are invited to consider the questions set in section 10 and submit comments using the form attached as Attachment 2 to dcusa@electralink.co.uk by 08 October 2026.	
	Impacted Parties Suppliers/DNOs/IDNOs	
	Impacted Clauses REP-900 messages (REC Market Message MM20064)	

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Any questions?

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Timetable

Activity	Date
Initial Assessment Report	19 August 2026
Consultation Issued to Industry Participants	24 September 2026
Change Report Approved by Panel	21 October 2026
Change Report issued for Voting	22 October 2026
Party Voting Closes	12 November 2026
Change Declaration Issued to Parties/Authority	16 November 2026
Authority Decision	N/A

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 This change impacts suppliers and distributors.

2 Governance

Requested Next Steps

- 2.1 This Change Proposal should:
 - Be treated as a Part 2 Matter;
 - Be treated as an Urgent Change; and
 - Proceed to the Working Group phase.
- 2.2 Without this change the distributors may be unable to send electronic invoices.
- 2.3 Due to the status of this change being urgent, the consultation is issued for a period of 10 working days. The Working Group will review the responses after this period.

3 Why Change?

- 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.

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

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

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.
- 4.2 The Working Group reviewed DCP 482, which seeks to introduce a defined approach for splitting REP-900 messages where message sizes exceed the Data Integration Platform (DIP) limit of 1MB. The proposer noted that the CP had been raised to align the REP-900 with the approach being developed under the related Elexon change ([CP1648](#)), whilst recognising that REP-900 sits under DCUSA governance. The Working Group agreed that addressing this issue proactively would reduce the risk of message failures as invoice volumes increase.
- 4.3 The Working Group discussed the principle of introducing a partition block within the REP-900 to identify whether a message forms part of a larger set of split messages. Members considered the proposer's view that the partition information should be mandatory and included within all REP-900 messages, including where a message has not been split, for example by identifying a message as "1 of 1". The Working Group considered that this approach could provide greater certainty to message recipients and reduce ambiguity when processing REP-900 files.
- 4.4 The Working Group also considered how message splitting should be undertaken. Working Group members noted the proposal that REP-900 messages should only be split at invoice boundaries and

that individual invoices should never be divided across multiple files. It was recognised that maintaining invoice integrity would simplify message reconstruction and reduce the likelihood of processing errors for receiving parties.

- 4.5 Consideration was also given to whether message splitting should be based upon a fixed invoice threshold or whether message size should be assessed dynamically before transmission. The proposer's view was that a fixed threshold would provide a more straightforward and consistent implementation approach, although the Working Group agreed that industry feedback should be sought on whether alternative methodologies may be preferable.
- 4.6 The Working Group identified implementation considerations as a key area for the consultation. In particular, it was agreed that further information should be obtained regarding any billing system changes that may be required by distributors, IDNOs and suppliers, together with the lead times associated with implementing those changes. The Working Group agreed that consultation responses would assist in determining an appropriate implementation approach and whether alignment with the corresponding Elexon implementation timetable would be beneficial.
- 4.7 As the proposal relates to amendments to a DCUSA-owned market message, the Working Group noted that no changes to the legal text of the DCUSA are currently proposed.
- 4.8 In summary, the Working Group agreed that consultation should focus on testing support for the proposed REP-900 splitting methodology, identifying implementation impacts and confirming whether the proposed solution provides a practical and consistent means of managing messages that exceed the DIP file size limitation.

Q3: Do you agree that the splitting information block should be mandatory and always populated, even where no split has occurred, for example "1 of 1"?

Q4: Do you agree that REP-900 messages should only be split at invoice boundaries and that invoices should never be split across multiple files?

Q5: Do you agree that messages should be split according to a defined invoice-volume threshold rather than dynamically calculating file size for each message?

Q6: What billing system changes would be required to support REP-900 message splitting?

Q7: What lead time would be required to implement any necessary billing system changes?

Q8: Do you foresee any issues for recipients in reconstructing and processing split REP-900 messages?

5 Solution and Legal Text

Solution Overview

- 5.1 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

- 5.2 Add note and new block to the REP-900 data flow as shown in attachment 3.

Market Message (Data Flow) / Data Item Commentary

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

6 Relevant Objectives

- 6.1 Thee Working Groups 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	Identified impact
☐	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

- 6.2 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.

Q9: Do you consider the solution better facilitates the DCUSA objectives? Please give supporting reasons.

7 Implamentation

- 7.1 This Change Proposal should be implemented in line with CP1648, which is currently 27 February 2027.

Q10: Do you agree with the proposed implementation date?

8 Impacts & Other Considerations

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

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

Consumer Impacts

- 8.2 There are no consumer impacts as a result of this CP.

Does this Change Proposal Impact Other Codes?

- 8.3 As noted earlier in this consultation, it is believed that there was potential impacts with the BSC and REC.

Grid Code..... ☒ SEC... ☒ CUSC... ☒ None.....

Distribution Code... ☒ REC.... **R** BSC..... **R**

Environmental Impacts

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

Q11: Are you aware of any wider industry developments that may impact upon or be impacted by this CP?

Q12: Do you have any other questions?

9 Consultation Questions

- 9.1 The Working Group is seeking industry views on the following consultation questions:

No.	Questions
1	Do you understand the intent of DCP?
2	Do you support the principles of DCP?

3	Do you agree that the splitting information block should be mandatory and always populated, even where no split has occurred, for example "1 of 1"?
4	Do you agree that REP-900 messages should only be split at invoice boundaries and that invoices should never be split across multiple files?
5	Do you agree that messages should be split according to a defined invoice-volume threshold rather than dynamically calculating file size for each message?
6	What billing system changes would be required to support REP-900 message splitting?
7	What lead time would be required to implement any necessary billing system changes?
8	Do you foresee any issues for recipients in reconstructing and processing split REP-900 messages?
9	Do you consider the solution better facilitates the DCUSA objectives? Please give supporting reasons.
10	Do you agree with the proposed implementation date?
11	Are you aware of any wider industry developments that may impact upon or be impacted by this CP?
12	Do you have any other questions?

9.2 Responses should be submitted using Attachment 2 to dcusa@electralink.co.uk no later than 08 October 2026

9.3 Responses, or any part thereof, can be provided in confidence. Parties are asked to clearly indicate any parts of a response that are to be treated confidentially.

10 Attachments

- Attachment 1 - DCP 482 Consultation Response Form
- Attachment 2 - DCP 482 Change Proposal Form
- Attachment 3 - DCP 482 Proposed Amendment to REP-900/MM20064

