DCUSA Change Proposal (DCP)	At what stage is this document in the process?
DCP 484: **REP-900 Processing** **Date Raised:** 07 September 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 ensure suppliers can process the REP-900.

Impacted Parties:

☒ Suppliers | ☒ DNOs | ☒ IDNOs | ☐ CVA Registrants | ☐ OTSO Party

☐ Gas Suppliers | ☐SIP Parties

Impacted Clauses:

Section/Schedule	Clause/Paragraph
Section 2A	21.2B

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Indicative Timeline

The Secretariat recommends the following timetable:	
Initial Assessment Report	16 September 2026
Consultation Issued to Industry Participants	N/A
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 / the Authority	16 November 2026

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1 Summary

What?

1.1 To ensure that suppliers can process the REP-900 messages (REC Market Message MM20064)

Why?

1.2 REP-900 was developed under MHHS. The concept behind it was to standardise all Site-Specific DUoS invoicing to be done via electronic data messages. For legacy billing, a mix of e-billing and pdf copies is used. The intent here was to standardise one single approach for all. This would remove the need for emailed copies of invoices and promote e-billing.

1.3 This concept and the structure of the message was first formally raised as DCP416, in November 2022, following discussions with the programme. It was subsequently included in the legal text developed for DCP445, which had been raised by Ofgem in September 2024, and which had 100% supplier support.

1.4 Ofgem ratified the text by their final decision, supporting the move to standardising e-billing for all.

1.5 The message structure of the REP-900 was included in the MHHS documentation and the SWAGGER and subsequently in the REC's EMDS.

1.6 As MHHS migration is underway, all this seems to be coming as a complete surprise to a number of suppliers. They have told us they cannot process this message (although they are receiving it via the DIP).

1.7 Elexon has confirmed that, as the message is not owned by them, it does not fall within the scope of MHHS qualification. However they did confirm a general requirement to be able to process DIP messages.

1.8 At present new suppliers could also start registering customers without there being any check that they can process electronic DUoS invoices (although we are in discussion with the REC as to whether this could be changed).

1.9 For some reason, probably because the current focus has been on qualification, which ignores this message, some suppliers seem to have no visibility of this message or the requirement to deal with it.

1.10 There needs to be clarity of this requirement, both for existing and new entrant suppliers.

How?

1.11 By strengthening the text within Clause 21.2B.

Who?

1.12 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.

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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: *The CP strongly supports key government energy policy actions that require immediate progress and aligns with SDS priorities under the Act Now category.*	No
Complexity: *The CP is highly complex, with a fast-approaching deadline, significant implementation challenges, and a requirement for extensive stakeholder engagement.*	No
Importance: *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.*	Yes
Priority Category: *(To be considered High priority all 3 Criteria must be High Impact.)*	Standard

2.6 Without this change, distributors are likely to need to enact work arounds for invoicing of Site Specific DUoS charges, such as issuing PDF invoices in place of electronic invoices via the REP-900 DIP data flow.

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 1 Matter;
- Be treated as an Urgent Change; and
- Proceed to the Change Report phase.

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3 Reasons for raising the Change Proposal

3.1 To ensure that Suppliers better understand their obligations when it comes to receiving and processing the REP-900 Site Specific invoicing data flows sent to them by distributors and to give distributors the ability to enforce this obligation.

4 Solution and Legal Text

Solution Overview

4.1 The proposed solution is to make the requirement for Suppliers to process invoices related to site specific DUoS charges sent to them using the REP-900 DIP data flow clearer and to include the non-processing of invoices received via the REP-900 DIP data flow a material breach of the DCUSA and thus allowing distributors to enact the provisions to suspend registration services in accordance with Clause 54.2.1 in Section 3 of the DCUSA.

Legal Text

4.2 Amend Clause 21.2B as follows:

21.2B For MHHS Metering Points, for Settlement Periods whilst they are under MHHS arrangements, the Company shall submit, and the User agrees to receive and process, accounts by sending an electronic invoice using the REP-900 for all the User's accounts (including revised accounts and credit-notes). Where the User's systems are unable to process REP-900 messages, following receipt via the DIP, this shall be a material breach of this Agreement by the User for the purposes of Clause 54.1.1, and the Company shall be entitled to suspend registration services in accordance with Clause 54.2.1. For non-MHHS Metering Points, and for MHHS Metering Points for Settlement Periods whilst they are not under MHHS arrangements, where the Company submits, and the User agrees to receive, accounts by sending an electronic invoice it shall use an electronic invoice for all of that User's accounts (including revised accounts and credit-notes). For the avoidance of doubt, where this Clause 21.2B applies, Clause 59.4 shall apply to the sending of accounts during any period in which the Data Transfer Network or (for MHHS) the DIP is unavailable.

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

5.2 DCUSA General Objective 4 will be better facilitated by ensuring manual workarounds are unnecessary.

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.

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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 do not believe that this CP will require a change to a data flow/market 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 I don't believe there to be a need to allow for the lead in time for this change as it is simply designed to reinforce existing requirements.

Proposed Implementation Date

7.2 Next release after approval.

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.

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