1DCUSA Issues Form (DIF)

This form should be used by parties to submit matters for consideration to DCUSA Standing Issues Group (SIG). The completed form should be issued to DCUSA@electralink.co.uk

Document Control	
Date Submitted:	13 October 2026
Issue Title:	Inconsistent population of the REP-900.
Attachments:	
Issue Number*:	DIF 92
Meeting Reference*:	SIG 185

**Assigned by DCUSA Secretariat*

Originator Details	
Party Name:	Npower Commercial Gas Ltd.
Originator Name:	Lee Stone
Party Category:	Supplier
Email Address:	Lee.stone@eonenergy.com
Telephone Number:	07971-474426

Nature of Issue

Npower Commercial Gas limited completed MHHS qualification activities in May 2026 and subsequently commenced its MHHS migration from June 2026, in accordance DCUSA section 2 A 21.2B this means that only the use of REP-900 for the purposes of provisioning DUoS invoices to suppliers for settlement periods relating to migrated MHHS Metering Points, unless there is central system outages (EG the Data integration Platform is offline).

As we continue through our required MHHS migration activities more sites are becoming MHHS enabled which is increasing the type sites to be invoiced to us by the provision of theREP-900, at the same time we are receiving have an ever increasing number REP-900s from (mostly received from IDNOs) that are populated in way that our systems will not process, along with poor quality of data populated within them (eg Mpans not registered to NATP) all of which is resulting in an increased exceptions management in order to process the REP-900 through and in turn make payments or dispute invoices received. We have collated these issues and wish to set these out as part of this issue groups consideration:

1. Whole Current Metering Systems Billed as Legacy D2021 Rather Than MHHS Aggregated

We have identified instances where Whole Current metering systems that have migrated to MHHS continue to be billed under the legacy D2021 arrangements rather than being billed as MHHS Aggregated. We believe this may be inconsistent with the intent of the Market-wide Half-Hourly Settlement (MHHS) migration arrangements and the charging and billing provisions contained within Section 2A of the Distribution Connection and Use of System Agreement (DCUSA), including the provisions relating to Distribution Use of System Charges and billing.

2. Migrated Site-Specific MPANs Being Billed by Under Legacy Arrangements

Where sites have migrated to MHHS and are being billed as Site Specific, we are seeing several IDNO/DNOs continuing to bill these MPANs using the D2021 legacy billing methodology rather than the REP-900 invoicing format as we would expect. This appears inconsistent with the intended MHHS arrangements and causes us incorrect internal allocation of charges.

3. Duplicate Billing Streams Following Site-Specific Migration

We have also identified cases where:

- the site is being correctly billed under the MHHS Site Specific methodology; and
- an additional legacy-format invoice continues to be produced, albeit with a zero value.

Although the duplicate invoice does not currently create a financial impact, it creates unnecessary reconciliation effort, confusion for invoice validation processes, and potential audit concerns.

4. Mid-Month MHHS Migrations Billed Entirely as Legacy

For sites that migrate during a particular billing month, some DNOs appear to be billing the entire invoicing period using legacy arrangements rather than apportioning charges between pre- and post-migration methodologies.

This creates concerns regarding the accuracy of charge calculation and the application of the appropriate charging methodology during the migration period.

5. REB (Rebill) Invoices Issued as New Invoices

We are seeing REB invoice transactions being issued as entirely new invoices rather than clearly identified rebills.

This creates difficulties in invoice matching, dispute management and audit trails. As DCUSA contains provisions for billing disputes and invoice reconciliation, clear identification of rebill transactions is essential to support efficient processing and accurate settlement.

6. Newly Gained MPANs Already Migrated to MHHS Being Billed in Legacy Format

We have identified newly acquired MPANs that were already MHHS-migrated at the point of registration, yet these are being billed using legacy invoice formats and methodologies. This suggests that the migration status of the MPAN may not be being correctly reflected within billing systems and increases the risk of incorrect charging.

7. Lack of Unique Invoice Numbers

A further concern is the absence of unique invoice identifiers, including multiple instances of the same invoice number being used for different invoices.

This creates significant operational difficulties in respect of:

- invoice validation

- reconciliation
- dispute tracking
- audit requirements; and
- payment processing.

8. Multiple Credits and Rebills Against the Same Original Invoice

We have identified instances where IDNOs are issuing multiple credit and rebill invoices against a single original invoice. This creates significant challenges during invoice validation and reconciliation processes, making it difficult to establish the correct financial position and increasing the risk of duplicate adjustments being processed. The volume of credits and rebills also increases manual intervention requirements and complicates audit trails.

9. Incorrect Invoice Dates on Cancellation (CAN) Invoices

Cancellation invoices are being issued using invoice dates that do not match the original invoice being cancelled. Our validation processes rely on both the invoice number and invoice date recorded within the REP-900 file. Where the cancellation invoice contains a different invoice date, the transaction fails validation and must be manually reviewed and reprocessed. In many cases, the date shown on the cancellation invoice appears to precede the original invoice date by several days, creating further uncertainty regarding the validity of the transaction and increasing operational processing effort.

10. Invalid MPANs on REP-900 Files

We have identified instances where MPANs included within REP-900 invoice submissions cannot be located within recognised industry data sources. As these MPANs do not appear to exist within industry systems, they cannot be validated or processed through our standard billing controls. This results in invoice exceptions requiring manual investigation and creates uncertainty regarding the validity of the charges being presented.

11. MPANs Billed Using Default NHH Tariffs Rather Than Published Charges

We have identified instances where MPANs are being billed using the default LLF 999 tariff, which represents an unknown Non-Half-Hourly charging arrangement, However, ECOES identifies these MPANs as Half-Hourly customers, and the applicable charging statements published by the relevant distributor specifies the DUoS tariff ID which should apply to HH and NHH customers respectively.

As a result, the charges applied do not appear to align with the published charging schedules and may result in customers being billed incorrectly.

12. REP-900 Invoices Received for Non-Migrated MPANs

We have identified instances where REP-900 invoice files have been received for MPANs that have not migrated to MHHS. These MPANs are recorded within our billing systems as non-migrated and this status is consistent with the relevant industry data sources. Despite this, the associated charges have been submitted via the REP-900 process as though the MPANs had migrated to MHHS. This creates uncertainty regarding the correct billing treatment and payment obligations for the affected charges. As the MPANs are not recognised as MHHS-migrated, we are unable to validate or process these invoices under the MHHS billing arrangements. This results in invoice exceptions, increased manual investigation and a risk of delayed payment whilst the correct billing methodology is established.

Solution Overview – If Known	
Solution Description	We consider that the issues we are seeing stems from a lack of REP-900 file completion and population rules, so we are seeking to solve this problem by: • Agreeing consistent REP-900 population rules across DNO/IDNOs • Binding all parties bound by the REP-900 to those rules by a DCUSA change (either in the main body or in EMDS) through an informed DCUSA Change Proposal. We believe that binding, codified rules are required to remove any ambiguity due to inconsistencies that stem from REP-900 production and in turn supplier processing of them for validation and in turn payment of the invoice, so ensures a consistent single set of rules for suppliers, DNOs & IDNOs alike
Lead Time For Implementation	