

DCUSA Change Proposal Form

This form is issued in accordance with Clause 10.5 of the DCUSA.

Completed forms should be returned to dcusa@electralink.co.uk for assessment by the DCUSA Panel. Failure to complete all parts of the form may result in it being rejected by the DCUSA Panel.

PART A – Mandatory for all Change Proposals

PART B – Mandatory for Non Charging Methodologies Proposals

PART C – Mandatory for Charging Methodologies Proposals

PART D – Guidance Notes

PART A - MANDATORY FOR ALL CHANGE PROPOSALS

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| Document Control | |
| CP Status | Standard |
| CP Number | DCP 260 |
| Date of submission | 09/12/2015 |
| Attachments | Attachment 1 Final Legal Text |
| Originator Details | |
| Company Name | E.ON UK |
| Originator Name | Helen Fosberry |
| Category | |
| Email Address | helen.fosberry@eonenergy.com |
| Phone Number | 07753897699 |
| Change Proposal Details | |
| CP Title | TRAS Incident Single Point of Contact |
| Impacted parties | Suppliers |
| Impacted Clause(s) | Schedule 25 |
| Part 1 / Part 2 Matter | Part 2 |
| Provide your rationale why you consider this change is a Part 1 or Part 2 Matter | This CP does not require Authority Consent as it is not a material change |
| Related Change Proposals | An equivalent SPAA CP is being progressed |
| Change Proposal Intent | |
| <p>The TRAS Schedules include an obligation on Suppliers to provide details of a single point of contact for the TRAS Service Provider to manage day to day interactions.</p> <p>It is proposed that an additional clause be added to introduce an obligation of Suppliers to provide an 'incident' single point of contact available on a 24hr basis to deal with issues with the TRAS arrangements e.g. security breach.</p> | |
| Business Justification and Market Benefits | |
| <p>During discussions at the TRAS Security Sub-group Suppliers and the TRAS Service Provider has identified a requirement for a single point of contact for each Supplier to deal with TRAS information security related incidents. For example, if a breach occurs which impacts Supplier supplied TRAS data. There is already a requirement in the SPAA to provide details of an operational single point of contact, therefore it is proposed that this additional requirement be added alongside it to allow Suppliers to be notified promptly and directly in the event of an incident occurring either during or outside standard business hours.</p> | |

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| Proposed Solution and Draft Legal Text |
| <p>It is proposed that a new paragraph be added to Schedule 25 introducing an obligation on Suppliers to provide an incident single point of contact. In addition a tweak will be made to the wording in paragraph 8.8 of Schedule 25 to clarify the distinction between the operational single point of contact and the incident single point of contact.</p> <p>Draft legal text has been provided as Attachment 1.</p> |
| Proposed Implementation Date |
| ASAP |
| Impact on Other Codes |
| <p>Please tick the relevant boxes and provide any supporting information.</p> <p> BSC <input type="checkbox"/> CUSC <input type="checkbox"/> Grid Code <input type="checkbox"/> MRA <input type="checkbox"/> SEC <input type="checkbox"/> Other <input checked="" type="checkbox"/> None <input type="checkbox"/> </p> <p>If other please specify</p> <p>An equivalent Change Proposal is being progressed under the SPAA.</p> |
| Consideration of Wider Industry Impacts |
| N/A |
| Environmental Impact |
| N/A |
| Confidentiality |
| N/A |

PART B – MANDATORY FOR NON CHARGING METHODOLOGIES CHANGE PROPOSALS

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| DCUSA Objectives |
| <p><u>General Objectives:</u></p> <p>Please tick the relevant boxes. [See Guidance Note 9]</p> <p><input type="checkbox"/> 1 The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient,</p> |

co-ordinated, and economical Distribution Networks

- ☐ 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
- ☐ 3 The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences
- ☒ 4 The promotion of efficiency in the implementation and administration of this Agreement
- ☐ 5 Compliance with the Regulation on Cross-Border Exchange in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.

Detailed rationale for better facilitation of the DCUSA Objectives identified above

General Objective 4 is better facilitated as the CP will ensure that the TRAS Service Provider can contact each Supplier if an incident occurs outside standard business hours, which affects the TRAS arrangements.

PART C – MANDATORY FOR CHARGING METHODOLOGIES CHANGE PROPOSALS

DCUSA Charging Objectives

Please tick the relevant boxes. [See Guidance Note 11]

Charging Objectives:

- ☐ 1 that compliance by each DNO Party with the Charging Methodologies facilitates the discharge by the DNO Party of the obligations imposed on it under the Act and by its Distribution Licence
- ☐ 2 that compliance by each DNO Party with the Charging Methodologies facilitates competition in the generation and supply of electricity and will not restrict, distort, or prevent competition in the transmission or distribution of electricity or in participation in the operation of an Interconnector (as defined in the Distribution Licences)
- ☐ 3 that compliance by each DNO Party with the Charging Methodologies results in charges which, so far as is reasonably practicable after taking account of implementation costs, reflect the costs incurred, or reasonably expected to be incurred, by the DNO Party in its Distribution Business
- ☐ 4 that, so far as is consistent with Clauses 3.2.1 to 3.2.3, the Charging Methodologies, so far as is reasonably practicable, properly take account of developments in each DNO Party's Distribution Business
- ☐ 5 that compliance by each DNO Party with the Charging Methodologies facilitates compliance with the Regulation on Cross-Border Exchange in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.

General Objectives:

- ☐ 1 The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient,

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| <p>co-ordinated, and economical Distribution Networks</p> <p><input type="checkbox"/> 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</p> <p><input type="checkbox"/> 3 The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences</p> <p><input type="checkbox"/> 4 The promotion of efficiency in the implementation and administration of this Agreement</p> <p><input type="checkbox"/> 5 Compliance with the Regulation on Cross-Border Exchange in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.</p> |
| <p>Detailed rationale for better facilitation of the DCUSA Objectives identified above</p> <p>[See Guidance Note 10]</p> <p><u>Charging Objectives:</u></p> <p><u>General Objectives:</u></p> |
| <p>Has this issue been discussed at any other industry forums? If so please specify and provide supporting documentation</p> |

PART D – GUIDANCE NOTES FOR COMPLETING THE FORM

Guidelines for Working Group Members and Working Group Terms of Reference are available on the DCUSA Website and provide more information about the progression of the Change Process. www.dcusa.co.uk

| Ref | Data Field | Guidance |
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| 1 | Attachments | Append any proposed legal text or supporting documentation in order to better support / explain the CP. |
| 2 | Part 1 / Part 2 Matter | A CP must be categorised as a Part 1 or Part 2 matter in accordance with Clause 10.4.7 of the DCUSA. All Part 1 matters require Authority Consent. |
| 3 | Related Change Proposals | Indicate if the CP is related to or impacts any CP already in the DCUSA or other industry change process. |
| 4 | Proposed Solution and Draft Legal Text | Outline the proposed solution for addressing the stated intent of the CP. The Change Proposal Intent will take precedence in the event of any inconsistency. A DCUSA Working Group may develop alternative solutions. The plain English description of the proposed solution should |

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| | | <p>include the changes or additions to existing DCUSA Clauses (including Clause numbers).</p> <p>Insert proposed legal drafting (change marked against any existing DCUSA drafting) which enacts the intent of the solution. The legal text will be reviewed by the Working Group (if convened) and is likely to be subject to legal review as part of its progress through the DCUSA change process.</p> |
| 5 | Proposed Implementation Date | <p>The Change can be implemented in February, June, and November of each year or as an extraordinary release. For Charging Methodology CPs, select an implementation date which takes in to consideration the deadlines for publishing indicative tariffs.</p> <ul style="list-style-type: none"> • Submission of Company indicative tariffs is 31 December of each year. • Final tariffs are published on 1 April of each year. <p>Please select an implementation date that provides sufficient time for the change to be incorporated into the appropriate charging model and the DCUSA in order to be reflected within the December indicative tariffs.</p> <p>Contact the DCUSA helpdesk for any further information on the releases dcusa@electralink.co.uk.</p> |
| 6 | Consideration of Wider Industry Impacts | <p>Indicate whether this Change Proposal will be impacted by or have an impact upon wider industry developments. If an impact is identified, explain why the benefit of the Change Proposal may outweigh the potential impact and indicate the likely duration of the Change.</p> |
| 7 | Environmental Impact | <p>Indicate whether it is likely that there would be a material impact on greenhouse gas emissions as a result of the proposed variation being made. Please see Ofgem Guidance.</p> |
| 8 | Confidentiality | <p>Clearly indicate if any parts of this Change Proposal Form are to remain confidential to DCUSA Panel (and any subsequent DCUSA Working Group) and Ofgem.</p> |
| 9 | DCUSA General Objectives | <p>Indicate which of the DCUSA Objectives will be better facilitated by the Change Proposal.</p> |
| 10 | Detailed Rationale for DCUSA Objectives | <p>Provide detailed supporting reasons and information (including any initial analysis that supports your views) to demonstrate why the CP will better facilitate each of the DCUSA Objectives identified.</p> |
| 11 | DCUSA Charging Objectives | <p>Indicate which of the DCUSA Charging Objectives will be better facilitated by the Change Proposal. Please note that a CDCM or EDCM change may also facilitate the DCUSA</p> |

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| | | General objectives. |
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