

DCUSA Change Declaration		At what stage is this document in the process?
<h1 data-bbox="124 353 550 443">DCP 346</h1> <h2 data-bbox="124 504 1029 645">Amendment to Code of Practice Confirmed Theft Definition</h2> <p data-bbox="124 683 794 721"><i>Raised on 24 April 2019 as a Standard Change</i></p>		<div data-bbox="1189 347 1348 414">01 – Change Proposal</div> <div data-bbox="1189 470 1412 504">02 – Consultation</div> <div data-bbox="1189 560 1348 627">03 – Change Report</div> <div data-bbox="1189 672 1348 739">04 – Change Declaration</div>
<p data-bbox="124 817 571 855">Purpose of Change Proposal:</p> <p data-bbox="124 884 1428 967">The intent of DCP 346 is to update and align the Theft Code of Practice schedules to ensure the consistency in the definition of Confirmed Theft and investigation processes.</p>		
	<p data-bbox="239 996 1364 1115">DCUSA Parties have voted on DCUSA Change Proposal (DCP) 346 with the outcome being a decision on whether or not the Change Proposal (CP) is to be accepted and the proposed variation to the DCUSA made accordingly.</p> <p data-bbox="239 1176 1236 1214">The DCUSA Parties consolidated votes are provided as Attachment 1.</p>	
	<p data-bbox="239 1243 906 1281">For DCP 346, DCUSA Parties have voted to:</p> <ul data-bbox="295 1303 1013 1400" style="list-style-type: none"> • Accept the proposed variation (solution); and • Accept the implementation date of DCP 346 	
	<p data-bbox="239 1438 651 1476">Impacted Parties: Suppliers</p>	
	<p data-bbox="239 1561 1236 1599">Impacted Clauses: Schedule 23 ‘Theft of Electricity Code of Practice’</p>	

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Timeline			
The timetable for the progression of the CP is as follows:			
Change Proposal timetable			
Activity	Date		
Initial Assessment Report Approved by Panel	15 May 2019		
Change Report approved by Panel	17 July 2019		
Change Report issued for Voting	09 August 2019		
Party Voting Ends	02 September 2019		
Change Declaration issued to Authority	04 September 2019		
Implementation Date	First DCUSA Release following Party Approval		

1 Summary

What?

- 1.1 The Distribution Connection and Use of System Agreement (DCUSA) is a multi-party contract between electricity Distributors and electricity Suppliers and large Generators. Parties to the DCUSA can raise Change Proposals (CPs) to amend the Agreement with the consent of other Parties and (where applicable) the Authority.
- 1.2 During a review of the Theft Code of Practice schedules, a member of the Theft Best Practice Forum identified changes required to the definition of 'Confirmed Theft' in SPAA Schedule 33 and DCUSA Schedule 23. This CP has been raised to progress a change to the theft schedules to help ensure the schedules are consistent with actual investigation processes.

Why?

- 1.3 A member of the Theft Best Practice Forum requested a change to the definition of Confirmed Theft in DCUSA Schedule 23 as not all investigators require a review of the consumption levels prior to submitting a case. There are several scenarios where a review of the consumption levels would not be required to constitute a Confirmed Theft, for example, meter tampering.
- 1.4 It was also identified in the Electricity Theft Detection Incentive Scheme Audit Report Overall completed by BDO (Moore Stephens) that 25 of the compliant 99 investigations reviewed partially passed their assessment. All 25 of the investigations did not provide any specific details in respect of the desktop review that constitute 'an indication of theft via a desktop review of consumption levels'. Nonetheless, the 25 investigated files provided sufficient evidence satisfying the other elements of the offence, thus constituting a 'Confirmed Theft'.
- 1.5 The schedules should be updated to help provide clarity and consistency with investigating processes.

How?

- 1.6 The definition of Confirmed Theft in DCUSA Schedule 23 states "an indication of theft via desktop review of the consumption levels". Not every scenario will require a review of the consumption levels before raising a job. As this process is more applicable when analysing internal data, the code should not specify a review of consumption levels. The proposer is requesting that the legal text should be updated to remove references to consumption levels.
- 1.7 The proposed changes to DCUSA Schedule 23 are provided as attachment 2.

2 Governance

Justification for Part 2 Matter

- 2.1 DCP 346 is considered a Part 2 Matter as it does not have a material impact on DCUSA Parties and does not meet the criteria that would require the Authority to make a determination.

3 Why Change?

Background of DCP 346

- 3.1 This proposed amended will facilitate governance in how data items for the Theft Risk Assessment Service (TRAS) are presented and ensure consistency between the arrangements set out in Schedule 23 'Theft of Electricity Code of Practice' and the TRAS programming manual.

4 Solution

DCP 346 Assessment

- 4.1 With recommendation from the Theft Issues Group (TIG), the DCP 346 CP was raised by Npower to align the Theft Code of Practice schedules to ensure the consistency in the definition of Confirmed Theft and investigation processes.

5 Relevant Objectives

Assessment Against the DCUSA Objectives

- 5.1 For a DCUSA Change Proposal to be approved it must be demonstrated that it better meets the DCUSA Objectives. There are five DCUSA General Objectives and six DCUSA Charging Objectives.
- 5.2 The Proposer and the TIG consider that DCP 346 better facilitates DCUSA General Objective four.
- 5.3 DCUSA General Objective four is better facilitated as this change will help to ensure the effective operation of TRAS arrangements through providing Suppliers with clear process for populating data items.

DCUSA General Objectives	Identified impact
<input type="checkbox"/> 1 The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks.	None
<input type="checkbox"/> 2 The facilitation of effective competition in the generation and supply of electricity and (so far is consistent therewith) the promotion of such competition in the sale, distribution and purchase of electricity.	None
<input type="checkbox"/> 3 The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences.	None
<input checked="" type="checkbox"/> 4 The promotion of efficiency in the implementation and administration of the DCUSA.	Positive
<input type="checkbox"/> 5 Compliance with the Regulation on Cross-Border Exchange and Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	None

6 Impacts & Other Considerations

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

6.1 This CP does not have any impacts on any SCR currently in progress.

Consumer Impacts

6.2 This CP does not have any material impact on consumers.

Environmental Impacts

6.3 In accordance with DCUSA Clause 11.14.6, the Working Group assessed whether there would be a material impact on greenhouse gas emissions if DCP 346 were implemented. The Working Group did not identify any material impact on greenhouse gas emissions from the implementation of this CP.

7 Implementation

7.1 The proposed implementation date for DCP 346 was the first DCUSA Release following Party approval and as such DCP 346 will be implemented on 07 November 2019. As DCP 346 is classified as a Part 2 Matter, Authority determination is not required.

8 Legal Text

- 8.1 The DCP 346 proposed legal text acts as Attachment 2 to this Change Declaration.
- 8.2 The legal text for DCP 346 has been developed by the proposer and the TIG, who all agree with the amendments and agreed that the amendments meet the intent of the CP. The amendments to the legal text has also been reviewed by the DCUSA legal advisors.

9 Code Specific Matters

Modelling Specification Documents

- 9.1 Not applicable.

Reference Documents

- 9.2 Not applicable.

10 Voting

- 10.1 The DCP 346 Change Report was issued to DCUSA Parties for voting on 09 August 2019.

Part 2 Matter: Authority Decision not Required

DCP 346: Proposed Variation (Solution)

- 10.2 For the majority of the Party Categories that were eligible to vote:
- the number of groups in each Party Category which voted to accept the proposed variation was more than 65% of the total number of Groups in that Party Category which voted; and
 - the sum of the Weighted Votes of the Groups in each Party Category which voted to accept the proposed variation was more than 65%

- 10.3 DCUSA Parties have voted to accept the proposed variation (solution) of DCP 346.

DCP 346: Implementation Date

- 10.4 For the majority of the Party Categories that were eligible to vote:
- the number of groups in each Party Category which voted to accept the implementation date was more than 65% of the total number of groups in that Party Category which voted; and
 - the sum of the Weighted Votes of the Groups in each Party Category which voted to accept the implementation date was more than 65%.

- 10.5 DCUSA Parties have voted to **accept** the implementation date of DCP 346.

The table below sets out the outcome of the votes that were received in respect of the DCP 346 Change Report that was issued on 09 August 2019 for a period of 15 working days.

DCP 346	WEIGHTED VOTING				
	DNO	IDNO	SUPPLIER	CVA REGISTRANT	GAS SUPPLIER
CHANGE SOLUTION	n/a	n/a	Accept	n/a	n/a
IMPLEMENTATION DATE	n/a	n/a	Accept	n/a	n/a

11 Recommendations

DCUSA Parties Recommendation

11.1 DCUSA Parties have voted on DCP 346 and in accordance with Clause 13.5 of the DCUSA, determined that the Change Proposal be accepted and thus that the proposed variation to the DCUSA will be made.

12 Attachments

- Attachment 1 – DCP 346 Consolidated Party Votes
- Attachment 2 – DCP 346 Legal Text
- Attachment 3 – DCP 346 Change Proposal