### **DCUSA Change Proposal Form**

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

Completed forms should be returned to <a href="mailto:dcusa@electralink.co.uk">dcusa@electralink.co.uk</a> 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

Document Control				
CP Status	Standard / Urgent			
CP Number	[Assigned by the Panel Secretary]			
Date of submission	sion			
Attachments	[See Guidance Note 1]			
Originator Details				
Company Name	Eastern Power Networks plc			
Originator Name	Peter Waymont			
Category	<del>DG</del> / DNO / <del>IDNO / OTSO / SUPPLIER / OTHER</del>			
Email Address	Peter.waymont@ukpowernetworks.co.uk			
Phone Number	07875112757			
Change Proposal Details				
CP Title	Publication of RP CoP			
Impacted parties	All			
Impacted Clause(s)	Clause 5.3, Schedule 14 & New RP CoP Schedule (as yet unnumbered			
	but probably 23)			
Part 1 / Part 2 Matter	Part 1			
Related Change Proposals	DCP054			
Change Bronecal Intent				

**Change Proposal Intent** 

To prevent the permit the non-publication of the RP COP on the public facing part of the DCUSA website but to make it available to Parties and Interested Industry Participants on the protected part.

### **Business Justification and Market Benefits**

There is concern that making the RP CoP generally available could give potential thieves an inside track that could enable them to avoid detection.

It is Part 1 because the Distribution Licenses require that the DCUSA must be supplied to any person who requests it. This would therefore require Ofgem to permit that this schedule is not so supplied.

#### **Proposed Solution and Draft Legal Text**

Amend Clause 5.3.10 as follows;

5.3.10 make an accurate and up-to-date copy of this Agreement, excluding the Revenue Protection Code of Practice, available on the Public Pages of the Website, make an accurate and up-to-date copy of this

Agreement available on the Password Controlled Pages of the Website and arrange (in return for a charge not exceeding the reasonable cost of so doing) for an accurate and up-to-date copy of this Agreement, excluding the Revenue Protection Code of Practice, to be supplied to any person requesting a copy of the same;				
Amend Schedule 14 as follows;				
3. This Agreement excluding the Revenue Protection Code of Practice, a list of the Parties and				
a copy of the Change Register shall be accessible through the Public Pages. The full text of				
this Agreement, minutes of (and papers associated with) the meetings of the Panel, Working				
Groups and the DCUSA Ltd board of directors shall only be accessible through the Password				
Controlled Pages, as shall the contact details for Contract Managers and holders of Web				
Accounts.				
Amend New RP Schedule [23] as follows when published on the public website only;				
SCHEDULE [23 – REVENUE PROTECTION CODE OF PRACTICE]				
[This Schedule is only available to DCUSA Parties and Interested Industry Participants]				
Proposed Implementation Date				
As soon as practicable but preferably before 7 November (when I believe DCP054 is released into DCUSA).				
Impact on Other Codes				
Please tick the relevant boxes and provide any supporting information.  BSC				
If other please specify				
Consideration of Wider Industry Impacts				

None
Environmental Impact
None
Confidentiality
None
PART B - MANDATORY FOR NON CHARGING METHODOLOGIES CHANGE PROPOSALS
DCUSA Objectives
General Objectives:
Please tick the relevant boxes. [See Guidance Note 9]
$\boxtimes$ 1 The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks
$\boxtimes$ 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
$\square$ 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.
Rationale for better facilitation of the DCUSA Objectives identified above
Objective 1 is better met as theft may be better prevented. Objective 2 is better met as theft may be better prevented. Objective 4 is better met as the success of the RP CoP is less able to be undermined.

## 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			
$\square$ 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:			
$\ \square$ 1 The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, 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			
$\ \square$ 3 The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences			
$\ \square$ 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.			
Rationale for better facilitation of the DCUSA Objectives identified above			
[See Guidance Note 10]			
<u>Charging Objectives</u> :			
General Objectives:			
Has this issue been discussed at any other industry forums? If so please specify and provide supporting documentation			
DCUSA Panel, 16 October			

### 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
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 include the changes or additions to existing DCUSA Clauses (including Clause numbers).  Insert proposed legal drafting (change marked against any existing DCUSA drafting).
5	Proposed Implementation Date	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.  • Submission of Company indicative tariffs is 31 December of each year.  • Final tariffs are published on 1 April of each year.  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.  Contact the DCUSA helpdesk for any further information on the releases dcusa@electralink.co.uk.
6	Consideration of Wider Industry Impacts	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.
7	Environmental Impact	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 <a href="Ofgem Guidance">Ofgem Guidance</a> .
8	Confidentiality	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
9	DCUSA General Objectives	Indicate which of the DCUSA Objectives will be better facilitated by the Change Proposal.
10	Rationale for DCUSA Objectives	Provide 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.
11	DCUSA Charging Objectives	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 General objectives.