

## 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](mailto: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

Document Control	
CP Status	Standard
CP Number	DCP 267
Date of submission	09 March 2016
Attachments	Attachment 1
Originator Details	
Company Name	British Gas
Originator Name	Graham Wood
Category	SUPPLIER
Email Address	Graham.Wood@britishgas.co.uk
Phone Number	07979 567686
Change Proposal Details	
CP Title	Introduction of a new definition for 'Confirmed Theft'
Impacted parties	Suppliers and DNOs
Impacted Clause(s)	Definitions, Schedule 23, 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	It does not meet the criteria for Part 1 matters
Related Change Proposals	N/A
Change Proposal Intent	
To introduce a definition for Confirmed Theft under DCUSA to ensure consistency across Suppliers in submitting confirmed theft detections under TRAS.	
Business Justification and Market Benefits	
<p>This CP proposes to introduce a new definition for 'Confirmed Theft' to ensure consistency across Suppliers in submitting a theft as confirmed under TRAS arrangements, this followed a Working Group under SPAA highlighting the current lack of a definition as part of the introduction of the 'Gas Theft Detection Incentive Scheme'. A change is also being raised under SPAA to ensure consistency across TRAS arrangements under gas and electricity governance.</p> <p>The introduction of a definition for 'Confirmed Theft' under SPAA and DCUSA was subject to initial consideration by the TRAS Working Group in February 2016 ahead of being reviewed by the SPAA Gas Theft Detection Incentive Scheme (GTDIS) Sub-Committee on 23<sup>rd</sup> February 2016. Upon SPAA Party feedback, a definition under SPAA has</p>	

been subject to legal review by SPAA legal advisers. Using the principals for developing a SPAA definition for 'Confirmed Theft', a definition has been developed for DCUSA.

### Proposed Solution and Draft Legal Text

The proposed definition to be included within DCUSA is as follows:

**"Confirmed Theft"** means that a Supplier, Distributor or Revenue Protection Agent (as applicable) reasonably determines that, on the balance of probabilities and taking into account all of the evidence then available, one or more instances of Theft of Electricity has occurred. A Party may not make such a determination unless it has sufficient evidence to substantiate the occurrence of Theft of Electricity. Such evidence must include (as a minimum): (a) an indication of theft via a desktop review of consumption levels; and (b) a report of a site visit where access was successful; and (c) photographic evidence of the theft including any illegal connection/bypass or meter tamper; and (d) a determination of the value of electricity stolen; and (e) (only where the occurrence in question is a criminal offence and if available) a police report or crime reference number.

Please note, a number of additional changes are proposed to the current DCUSA legal drafting in respect to confirmed thefts under TRAS arrangements (Schedule 23, Schedule 25) in order to link to the proposed definition for 'Confirmed Theft'.

A complete set of proposed amendments are included within Attachment 1.

### Proposed Implementation Date

Next release after approval.

### Impact on Other Codes

Please tick the relevant boxes and provide any supporting information.

BSC	<input type="checkbox"/>
CUSC	<input type="checkbox"/>
Grid Code	<input type="checkbox"/>
MRA	<input type="checkbox"/>
SEC	<input type="checkbox"/>
Other	<input type="checkbox"/>
None	<input type="checkbox"/>

If other please specify

### Consideration of Wider Industry Impacts

A definition for 'Confirmed Theft' under the SPAA has been developed by the industry in conjunction with SPAA legal advisers with an aim to ensure consistency across Suppliers in submitting confirmed theft detections as part of TRAS arrangements. To ensure consistency across codes, it is felt the DCUSA should also be amended to guarantee Suppliers adopt a uniform process for submitting theft detections as part of TRAS.

### Environmental Impact

N/A

### Confidentiality

[See Guidance Note 8]

## PART B – MANDATORY FOR NON CHARGING METHODOLOGIES CHANGE PROPOSALS

### DCUSA Objectives

#### General Objectives:

Please tick the relevant boxes. [See Guidance Note 9]

- ☐ 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
- ☐ 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

The proposal better facilitates the DCUSA general objective 4 as this change will help to ensure the effective operation of TRAS arrangements through providing Suppliers with a consistent definition of what constitutes as a confirmed theft detection.

## 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, 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**

[See Guidance Note 10]

Charging Objectives:

General Objectives:

**Has this issue been discussed at any other industry forums? If so please specify and provide supporting documentation**

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](http://www.dcusa.co.uk)

Ref	Data Field	Guidance
1	<b>Attachments</b>	Append any proposed legal text or supporting documentation in order to better support / explain the CP.
2	<b>Part 1 / Part 2 Matter</b>	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	<b>Related Change Proposals</b>	Indicate if the CP is related to or impacts any CP already in the DCUSA or other industry change process.
4	<b>Proposed Solution and Draft Legal Text</b>	<p>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).</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	<b>Proposed Implementation Date</b>	<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"> <li>• Submission of Company indicative tariffs is 31 December of each year.</li> <li>• Final tariffs are published on 1 April of each year.</li> </ul> <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 <a href="mailto:dcusa@electralink.co.uk">dcusa@electralink.co.uk</a>.</p>
6	<b>Consideration of Wider Industry Impacts</b>	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.
<b>7</b>	<b>Environmental Impact</b>	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</a> .
<b>8</b>	<b>Confidentiality</b>	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.
<b>9</b>	<b>DCUSA General Objectives</b>	Indicate which of the DCUSA Objectives will be better facilitated by the Change Proposal.
<b>10</b>	<b>Detailed Rationale for DCUSA Objectives</b>	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.
<b>11</b>	<b>DCUSA Charging Objectives</b>	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.