

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

Document Control	
CP Status	Standard
CP Number	DCP 277
Date of submission	11 July 2016
Attachments	Attachment 1 – Proposed Data Item Conditionality Attachment 2 – Schedule 25 Legal Text Amendments
Originator Details	
Company Name	E.ON UK
Originator Name	Helen Fosberry
Category	SUPPLIER
Email Address	Helen.Fosberry@eonenergy.com
Phone Number	07753897699
Change Proposal Details	
CP Title	Schedule 25 – Amendment to Appendix 2 - Conditionality
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	It does not meet the criteria for Part 1 matters
Related Change Proposals	An equivalent SPAA CP will be raised.
Change Proposal Intent	
Following on from the changes in DCP272 the TRAS Expert Group has reviewed the conditionality for data items within the TRAS Service Providers Programming Manual and seeks to update some of the data items conditional/mandatory status because the current conditionality cannot be always met. Additionally, some JCode/RGMA Codes also require back population as they were missed on the original drafting.	
Business Justification and Market Benefits	
The TRAS service Provider is currently states data item completion as mandatory/preferred but there are scenarios where data items cannot always be completed. There is some guidance within the descriptions to leave some items 'null' if the data is not available however this would make the data conditional rather than mandatory. Examples include: Example 1 – Consumption File. The Installation Data is mandatory yet for some registered supplies	

there may not be a meter attached at the point of the data cut so the cell cannot be populated

Example 2 – Outcome File – The assessed losses dates and kWh are all mandatory completion yet if there is not a confirmed theft at site these cannot be completed.

Example 3 – Consumption/Outcome File. All address lines are M, however, from an address perspective not every address will require every line to be populated.

Example 4 – Outcome File. Type of Theft is a mandatory item but cannot be completed if it is still under investigation or no theft.

Example 5 – Outcome File. Tampering Report Source is mandatory but cannot be completed if it is still under investigation or no theft.

The current terms of mandatory/preferred can be confusing for new entrants trying to build the file extract because preferred is not an option it is more a condition that if you have it you should share it. The historic data extract is listed in code and should be removed.

Additionally there were some Jcode/RGMA codes which have been provided through the work which has been completed through Electralink's work with the TWG. It is proposed to amend the conditionality and complete the back population in one change rather than 2.

Proposed Solution and Draft Legal Text

The proposed solution will only amend the data item conditionality within SPAA (and DCUSA) based on the templates within CP16/339 & DCP272 (Attachment 1). The majority of the required information would be found within the TRAS Service Providers programming manual.

Additionally, we would suggest amendments to DCUSA Schedule 25 and SPAA Schedule 34 to amend the terms from the unique Mandatory/Preferred to the more industry recognised Mandatory/Conditional.

We would also suggest removing the sunset clause from code which obligated parties to provide data in July 2015 as this has now passed and it would be good code governance to remove it and just have the enduring solution within the DCUSA/SPAA. (Attachment 2).

Also within attachment 1 are the Jcodes and RGMA codes provided which require population.

Proposed Implementation Date

November 2016 (aligned with the SPAA delivery date)

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	X
SEC	<input type="checkbox"/>
Other	X
None	<input type="checkbox"/>

If other please specify
SPAA

Consideration of Wider Industry Impacts

The proposed amendments are to facilitate improved governance in how the data items for TRAS are presented; the layout does reference information which comes from MRA J Code items and SPAA RGMA information so the consideration is for information only.

Environmental Impact

No environmental impacts.

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 clear data definition for data item population.

PART C – MANDATORY FOR CHARGING METHODOLOGIES CHANGE PROPOSALS

Charging Methodology Change Proposals should only be assessed against the DCUSA Charging Methodology Objectives and the General Change Proposals should be assessed on DCUSA General Objectives.

Only Change Proposals impacted by both Charging and General objectives are to be assessed on both General and Charging Objectives.

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.

Detailed rationale for better facilitation of the DCUSA Objectives identified above

[See Guidance Note 10]

Charging Objectives:

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

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	<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	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	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 Ofgem Guidance .
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	Detailed Rationale for DCUSA Objectives	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.
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.