





DCUSA Change Declaration		At what stage is this document in the process?
<h2>DCP 277</h2> <p><b>DCP Title:</b> Schedule 25 – Amendment to Appendix 2 – Conditionality’</p> <p>Date raised: <b>20 July 2016</b></p> <p>Status of Change: <b>Standard Change</b></p>		01 – Change Proposal
		02 – Consultation
		03 – Change Report
		04 – Change Declaration
<p><b>Purpose of Change Proposal:</b></p> <p>Following on from the changes in DCP 272, DCP 277 seeks to update the conditional/mandatory status of some of the data items in the TRAS Service Providers Programming Manual because the current conditionality cannot be always met. Additionally, some JCode/RGMA Codes in the Programming Manual require back population as they were not included in the original Programming Manual and have been identified in subsequent work.</p>		
	<p>DCUSA Parties voted on the Change Report and recommend:</p> <ul style="list-style-type: none"> <li>• that the change solution is accepted</li> <li>• that the implementation date is accepted</li> </ul> <p>The DCUSA Parties consolidated votes are provided as Attachment 1.</p>	
	<p><b>DCUSA Parties voted to accept the implementation of</b></p> <ul style="list-style-type: none"> <li>• <b>DCP 277</b></li> </ul>	
	<p>Impacted Parties: <b>Suppliers</b></p>	
	<p>Impacted Clauses: <b>TRAS Schedule 25, Appendix 2</b></p>	

Contents		 Any questions?
1	Summary	3
2	Governance	3
3	Why Change?	3
4	Solution	4
5	Relevant Objectives	5
6	Impacts & Other Considerations	6
7	Implementation	6
8	Legal Text	6
9	Voting	7
10	Recommendations	7
Timeline		 Any questions?
The timetable for the progression of the CP is as follows:		Contact: Fungai Madzivadondo
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## 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.

### Why .

- 1.2 DCP 277 was raised by E.ON on the 20 July 2016 and seeks to update the conditional/mandatory status of some of the data items in the TRAS Service Providers Programming Manual because the current conditionality cannot be always met. Additionally, some JCode/RGMA Codes in the Programming Manual also require back population as they this was not included in the original Programming Manual. CP 16/345 has been raised as an equivalent SPAA change.
- 1.3 This change follows on from the changes made in DCP 272 which sought to replace the spreadsheet contained within Schedule 25 Appendix 2 with a data items table. It also introduced a reference to the most current version of the Service Provider's Programming Manual within section 8 of Schedule 25.

### How

- 1.4 DCP 277 proposes to update the conditionality/mandatory status of some of the data items in the TRAS programming manual to ensure that the conditionality can always be met.

## 2 Governance

### Justification Part 2 Matter

- 2.1 DCP 277 has been classed as a Part 2 Matter as it does not affect any DCUSA clauses that require Authority consent.
- 2.2 DCP 277 has been classed as a Part 2 Matter therefore, Authority consent is not required

## 3 Why Change?

### Background of DCP 277

- 3.1 Now that TRAS is in live operation, the TEG has begun a wholesale assessment of the TRAS programming manual to ensure that it is up to date. The changes proposed under DCP 277 are stage 2 of a series of programming manual changes, beginning with DCP 272.

- 3.2 DCUSA Schedule 25 set out the provisions relating to TRAS. Specifically, Appendix 2 includes details of the data to be provided by Suppliers to the TRAS Service Provider on a monthly basis.
- 3.3 During discussions at the TRAS Working Group (now the TRAS Expert Group), members agreed the conditionality status of some data items contained within Schedule 25 Appendix 2 requires updating because the current conditionality cannot be always met. The Programming Manual currently states data item completion as requiring a 'mandatory' or 'preferred' status, however there are scenarios where data items cannot always be completed. There is guidance within the descriptions to leave some items as 'null' if the data is not available, however this would make the data conditional rather than mandatory. The current terms of 'mandatory' and 'preferred' could therefore be confusing for new entrants.
- 3.4 Additionally, some JCode/RGMA Codes in the Programming Manual require back population as they were not included in the original Programming Manual and have been identified in subsequent work. It is proposed to complete the back population of Jcode/RGMA codes as part of this change.

## 4 Solution

### DCP 277 Working Group Assessment

- 4.1 The DCUSA Panel recommended that the CP be progressed to the Definition Phase.
- 4.2 The TEG assessed DCP 277 and have proposed to amend the conditionality within DCUSA (and SPAA) based on the templates within CP16/339 & DCP 272. The majority of the required information would be found within the TRAS Service Providers programming manual.
- 4.3 Additionally, the TEG suggest amendments to DCUSA Schedule 25 (and SPAA Schedule 34) to amend the terms from the unique 'Mandatory' and 'Preferred' to the more industry recognised 'Mandatory' and 'Conditional'.
- 4.4 The TEG also suggest removing the sunset clause from code which obligated parties to provide data in July 2015 as this has now passed and is not relevant to be included in code.
- 4.5 DCP 277 was formally raised at the July 2016 DCUSA Panel.

### DCP 277 Consultation

- 4.6 The DCP 277 consultation was issued on 01 August and there were 3 responses received.
- 4.7 There was one comment on the implementation date. The TEG agreed to keep the implementation date of February 2017 noting that parties can implement sooner if they wish to do so.

#### **Question 1 - Do you understand the intent of the CP?**

- 4.8 All respondents understood the intent of the CP.

#### **Question 2 – Are you supportive of the principles of the DCP 277 change?**

- 4.9 All respondents were supportive of the principles of the CP.

**Question 3: Do you have any comments on the draft legal text?**

4.12 There were no comments on the draft legal text.

**Question 4: Do you consider that the proposal better facilitates the DCUSA objectives? Please give supporting reasons.**

4.13 All respondents agreed that the CP better facilitates DCUSA Objective 4 as it supports Suppliers ability to provide data where applicable and promotes an efficient and effective code using common wording and removes old clauses, and facilitates the delivery of SLC 12A.

**Question 5: Are you supportive of the proposed implementation date?**

4.14 All respondents answered that they were supportive of the proposed implementation date of February 2017. Two respondents answered that while they were supportive of the implementation date as it allows suppliers time to amend their systems, an earlier date would have been preferred.

**Question 6: Do you have any other comments on the DCP 277?**

4.15 There were no further comments on DCP 277.

## TRAS Expert Group Conclusions

4.16 With regard to question 5, the TEG determined to keep the implementation date of February 2017 to ensure suppliers have the necessary time to update their systems.

4.17 Therefore, there were no aspects of the CP that required updating after the consultation.

## 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 General DCUSA Objectives and five Charging Objectives.

5.2 The TRAS Expert Group considers that the following DCUSA Objectives are better facilitated by DCP 277.

#### Impact of the Change Proposal on the Relevant Objectives:

Relevant Objective	Identified impact
DCUSA General Objective Four - The promotion of efficiency in the implementation and administration of this Agreement	Positive

5.3 General Objective four is better facilitated by DCP 277 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.

## 6 Impacts & Other Considerations

- 6.1 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.
- 6.2 DCP 277 will impact suppliers.

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

- 6.3 This Change Proposal will not impact a Significant Code Review or other significant industry change project.

### Consumer Impacts

- 6.4 There are no consumer impacts from this change.

### Environmental Impacts

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 277 were implemented. The TRAS Expert Group did not identify any material impact on greenhouse gas emissions from the implementation of this CP.

## 7 Implementation

- 7.1 DCP 277 will be implemented on 23 February 2017.

## 8 Legal Text

- 8.1 The legal text for DCP 277 is provided as Attachment 2.
- 8.2 The legal text sets out that the data fields which constitute the Consumption File and Outcome File are described in Appendix 2 as 'mandatory' or 'conditional'. When a Supplier Party populates data fields under Paragraph 8.5 'mandatory' data fields must be populated), whereas, in the case of 'conditional' data fields then, the Supplier Party:
  - (a) must use all reasonable endeavours to provide the data it holds in respect of those data fields (but need not provide the data where it does not hold the required data in a readily accessible and extractable electronic format);
  - (b) must, where the Supplier Party does not hold the required data in a readily accessible and extractable electronic format, use all reasonable endeavours to provide any comparable alternative data that the Supplier Party does hold in such format; and
  - (c) is not otherwise obliged to provide the data.

8.3 The TRAS Expert Group has considered the Legal Text and is satisfied that it meets the intent of the Solution.

## 9 Voting

9.1 DCP 277 was issued to DCUSA Supplier Parties for Voting on 21 October 2016

### DCP 277 – Recommendation

**Part 2 Matter:** Authority Determination Not Required

**Change Solution** – Accept

9.2 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 proposal 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 proposal was more than 65%.

**Implementation Date** – Accept

9.3 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 Recommendations

### DCUSA Parties Recommendation

DCUSA Parties recommend:

- that DCP 277 should be implemented
- that DCP 277 better facilitates the Relevant Objectives

### Attachments

- Attachment 1 – DCP 277 Consolidated Responses
- Attachment 2 – DCP 277 Legal Text