











Part A: Generic

DCUSA Change Proposal (DCP)		At what stage is this document in the process?
<h1>DCP 286</h1> <h2>Formalising the Theft Steering Group</h2> <p>Date Raised: 09 November 2016</p> <p>Proposers Name: Helen Fosberry</p> <p>Company Name: E.ON</p> <p>Company Category: Supplier</p>		<p>01 – Change Proposal</p> <p>02 – Consultation</p> <p>03 – Change Report</p> <p>04 – Change Declaration</p>
<p>Purpose of Change Proposal:</p> <p>This change proposes to formally delegate the DCUSA Panel and DCUSA Ltd Board powers in relation to the Theft Risk Assessment Service (TRAS) and Energy Theft Tip Off Line Service (ETTOS) to the Theft Steering Group (TSG)</p>		
	<p>Governance:</p> <p>The Proposer recommends that this Change Proposal should be:</p> <ul style="list-style-type: none"> Part 1 Matter Treated as a Standard Change Proceed to Working Group <p>The Panel will consider the proposer’s recommendation and determine the appropriate route.</p>	
	<p>Impacted Parties: All DCUSA Parties</p>	
	<p>Impacted Clauses: Section 1B ‘Governance’, and Schedules 25 and 26</p>	

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Indicative Timeline	
The Secretariat recommends the following timetable:	
Initial Assessment Report	16 November 2016
Consultation Issued to Industry Participants	TBC
Change Report Approved by Panel	15 March 2016
Change Report issued for Voting	18 March 2017
Party Voting Closes	07 April 2017
Change Declaration Issued to Parties	11 April 2017
Change Declaration Issued to Authority	11 April 2017
Authority Decision	16 May 2017
Implementation	First DCUSA Release following Approval
	 Any questions?  Contact: Fungai Madzivadondo  email address: DCUSA@electralink.co.uk  telephone: 020 7432 3011  Proposer: Helen Fosberry  email address: Helen.Fosberry@eoenergy.com  telephone: 07753897699

1 Summary

The Theft Steering Group (TSG) has agreed both an ETTOS and TRAS Change Guideline which defined the process for progressing, approving and implementing ETTOS and TRAS CCNs respectively. With regards to the TRAS process, this is also reflected in the TRAS Contract with the TRAS Service Provider.

Currently, the decision on whether to approve a TRAS or ETTOS CCN sits with the SPAA Ltd Board and DCUSA Ltd Board. Joint SPAA and DCUSA meetings are held on a quarterly basis and referred to as Theft Steering Group (TSG) meetings. The joint working arrangements sets out the quoracy requirements for this group, which reflect the SPAA EC and DCUSA Panel arrangements.

It is proposed that the SPAA and DCUSA Codes should be amended to formally delegate decisions in relation to the TRAS and ETTOS Contracts to the TSG. As part of this change, Terms of Reference

(ToRs) for the TSG will be developed which will involve considering the decision making and quoracy requirements.

2 Governance

Justification for Part 1 and Part 2 Matter

This CP should be treated as a Part 1 Matter as it impacts the governance of the DCUSA

Requested Next Steps

This Change Proposal should:

- Be treated as a Part 1 Matter
- Be treated as a Standard Change
- Proceed to Working Group (TIG)

Whilst the CP refers to both the TRAS and ETTOS arrangements, it is proposed that the solution be considered by the Theft Issues Group. Information in relation to this change will be provided to the Theft Expert Group and members will be given the opportunity to feed in their views.

3 Why Change?

The SPAA EC and DCUSA Panel have overall responsibility for the TRAS and ETTOS arrangements. During the implementation of TRAS, the TSG was established to consider TRAS related issues and agree TRAS contract changes. The scope of the group was later extended to include all theft related business under SPAA and DCUSA.

TSG meetings are governed by joint working arrangements which set out the quoracy requirements for the group, which reflect the SPAA EC and DCUSA Panel arrangements. Under the joint working arrangements, separate decisions are required by the SPAA EC/SPAA Ltd Board and the DCUSA Panel/DCUSA Ltd Board. This introduces a risk that changes to the TRAS and ETTOS arrangements could be agreed under one code but rejected under the other. As the TRAS and ETTOS contracts are tri partite agreements between DCUSA Ltd, SPAA Ltd and the relevant service provider, it would not be appropriate for separate provisions to be agreed for the different codes.

The TSG therefore queried whether they should have formal powers to agree changes to the TRAS and ETTOS provisions rather than these decisions being separate SPAA and DCUSA decisions.

This CP proposes to amend the governance arrangements in section 1B of the DCUSA to formally delegate powers to the TSG in relation to TRAS and ETTOS Contract changes. Details of the TSG membership and decision making process will be included in the ETTOS and TRAS Schedules.

Part B: Code Specific Details

4 Solution and Legal Text

It is proposed that a change to Section 1B of the DCUSA will be required to formally delegate powers to the TSG. Schedules 25 and 26 will also be amended to include details of the TSG membership and decision making arrangements.

Legal Text

The legal text will be developed by the Theft Issues Group.

5 Code Specific Matters

Reference Documents

N/A

6 Relevant Objectives

DCUSA Charging Objectives	Identified impact
Please tick the relevant boxes. [See Guidance Note 10]	
<input type="checkbox"/> 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	None
<input type="checkbox"/> 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)	None
<input type="checkbox"/> 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	None
<input type="checkbox"/> 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	None
<input type="checkbox"/> 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.	None

DCUSA General Objectives	Identified impact
Please tick the relevant boxes. (See Guidance Note 9)	
<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 as 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 in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	None
The CP will better facilitate objective 4 as it will ensure that TRAS and ETOS contract changes are progressed in the most efficient manner. [See Guidance Note 10]	

7 Impacts & Other Considerations

An equivalent SPAA CP will be progressed in parallel to ensure that reciprocal arrangements are put in place within the SPAA.

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

No

Does this Change Proposal Impact Other Codes?

Please tick the relevant boxes and provide any supporting information. [\[See Guidance Note 6\]](#)

- BSC
- CUSC
- Grid Code
- MRA
- SEC
- Other
- None

Consideration of Wider Industry Impacts

None

Confidentiality

None

8 Implementation

Proposed Implementation Date

Next available DCUSA release – in line with the implementation of the equivalent SPAA CP

9 Recommendations

The Code Administrator will provide a summary of any recommendations/determinations provided by the Panel in considering the initial Change Proposal. This will form part of a Final Change Report.

Part C: Guidance Notes for Completing the Form

Ref	Section	Guidance
1	Attachments	Append any proposed legal text or supporting documentation in order to better support / explain the CP.
2	Governance	<p>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.</p> <p>Part 1 Matter</p> <p>A change Proposal is considered a Part 1 Matter if it satisfies one or more of the following criteria:</p> <p>it is likely to have a significant impact on the interests of electricity consumers;</p> <p>it is likely to have a significant impact on competition in one or more of:</p> <ul style="list-style-type: none"> a) the generation of electricity; b) the distribution of electricity; c) the supply of electricity; and d) any commercial activities connected with the generation, distribution or supply of electricity; <p>it is likely to discriminate in its effects between one Party (or class of Parties) and another Party (or class of Parties);</p> <p>it is directly related to the safety or security of the Distribution Network;</p> <p>and</p> <p>it concerns the governance or the change control arrangements applying</p>

		<p>to the DCUSA; and</p> <p>it has been raised by the Authority or a DNO/IDNO Party pursuant to Clause 10.2.5, and/or the Authority has made one or more directions in relation to it in accordance with Clause 11.9A.</p> <p>Part 2 Matter</p> <p>A CP is considered a Part 2 Matter if it is proposing to change any actual or potential provisions of the DCUSA which does not satisfy one or more of the criteria set out above.</p>
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.</p> <p>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 into consideration the minimum notice periods for publishing tariffs. These are:</p> <ul style="list-style-type: none"> • 15 months, for DNOs acting within their Distribution Services Areas; or • 14 months, for IDNOs and DNOs acting outside their Distribution Services Area. <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 in future tariffs.</p> <p>Contact the DCUSA helpdesk for any further information on the releases dcusa@electralink.co.uk.</p>
6	Impacts & Other Considerations	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.
12	Defining ‘Material’ for Charging Methodology Changes	In respect of proposals to vary one or more of the Charging Methodologies, such proposals shall be deemed to be “material” if they might reasonably be expected to have a significant impact on the tariffs calculated under one or more of the methodologies.