

Part A: Generic

DCUSA Change Proposal (DCP)		At what stage is this document in the process?
<h1>DCP: 309</h1> <h2>Reporting ETTOS Identified Theft to the TRAS Service Provider</h2> <p>Date raised: <i>12 September 2017</i></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 Proposal seeks to amend the Supplier process for reporting theft identified through the Energy Theft Tip-Off Service (ETTOS) to the TRAS Service Provider.</p>		
	<p>Governance:</p> <p>The Proposer recommends that this Change Proposal should be:</p> <ul style="list-style-type: none"> • Treated as a Part 2 Matter • Treated as a Standard Change • Proceed to Change Report <p>This Change Proposal will be presented to the DCUSA Panel on 20 September 2017. The Panel will consider the proposer's recommendation and determine the appropriate route.</p>	
	<p>Impacted Parties: Suppliers</p>	
	<p>Impacted Clauses: Schedule 26, Clause 8.7</p>	

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8	Implementation	6	Opus Energy Ltd (Supplier)
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			philip.hayward@opusenergy.com
Indicative Timeline			
			0845 4379406
The Secretariat recommends the following timetable:			
Initial Assessment Report Issued to Panel		13 September 2017	
Change Report Approved by Panel		18 October 2017	
Change Report issued for Voting		20 October 2017	
Party Voting Closes		10 November 2017	
Change Declaration Issued to Parties		14 November 2017	
Implementation Date		February 2018	

1 Summary

During a review of the TRAS Programming Manual data submission processes, the TRAS Expert Group (TEG) identified that some Suppliers are making duplicate submissions to the Programming Manual Outcome File. Contract Change Notification (CCN) TRAS080 was raised to clarify the data submission process. The CCN adds guidance notes to the TRAS Programming Manual clarifying that Suppliers should report only one line entry, per instance of theft and that only the initial "Theft Lead Source" is used when reporting the outcome. Where a report is made via multiple sources, the initial source should be used when reporting the outcome. It is noted that the TRAS validation process will reject line items where the MPRN/MPAN and the Supplier Investigation ID has been duplicated.

The TEG noted that duplication may be due to the reporting of ETTOS reports which may have already been identified by a TRAS Qualified Outlier. It was highlighted that a change may be required to the SPAA and DCUSA codes to ensure consistency when submitting ETTOS identified reports. Thus, the issue was referred to the Theft Issues Group (TIG) for further consideration.

The TIG noted that under the ETTOS schedule requirements, Suppliers should report every identified theft to the TRAS Service provider, however the SPAA and DCUSA codes need to clarify that if a theft

has already been reported via other sources only the initial report will be counted. Information indicating that a report was picked by another theft lead source should then be added to that initial report.

The TIG proposes that clause 8.7 of the ETTOS Schedule be updated as follows:

8.7 The results of any tip-off investigations initiated by Suppliers where the ETTOS was the initial theft lead source should be fed into the TRAS Service Provider in accordance with Schedule 34 (Theft Risk Assessment Arrangements).

The legal text is provided as Attachment 1.

2 Governance

Justification for Part 1 and Part 2 Matter

This Change Proposal has no material impact on DCUSA Parties and therefore has been classed as a Part 2 Matter.

Requested Next Steps

This Change Proposal should:

- Be treated as a Part 2 Matter
- Be treated as a Standard Change
- Proceed to the Change Report phase

3 Why Change?

The change is required to clarify data submission process to the TRAS Programming Manual. For consistency, Suppliers should report only one line entry, per instance of theft and only the initial "Theft Lead Source" should be used when reporting the outcome. The proposed change is to ensure no duplicate submissions are made to the Programming Manual Outcome reporting file.

TRAS080 is being progressed to clarify Programming Manual data submission processes. Guidance notes will be added to the Programming Manual clarifying that when a duplicate is identified within the same submission, the record that has the earliest tamper report date will be accepted (where populated) otherwise the earliest date investigation closed (where populated) and if all fields are identical there will be no prioritisation.

The change to the SPAA and DCUSA codes clarifies submission processes for any tip offs where ETTOS is the initial theft lead source.

Part B: Code Specific Details

4 Solution and Legal Text

The updated legal text is provided as Attachment 1. The below update will be made to SPAA Schedule 37 and DCUSA Schedule 26, clause 8.7:

- 8.7 The results of any tip-off investigations initiated by Suppliers where the ETTOS was the initial theft lead source should be fed into the TRAS Service Provider in accordance with Schedule 34 (Theft Risk Assessment Arrangements).

5 Code Specific Matters

none

6 Relevant Objectives

DCUSA Charging Objectives	Identified impact
<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	
<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
<input type="checkbox"/> 6 that compliance with the Charging Methodologies promotes efficiency in its own implementation and administration.	

DCUSA General Objectives	Identified impact
<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 impact
<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 proposal better facilitates the DCUSA General Objective 4 as this change will help to ensure the effective operation of ETTOS arrangements and clarify TRAS data submission processes.	

7 Impacts & Other Considerations

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?

Consideration of Wider Industry Impacts

- BSC N/A
- CUSC
- Grid Code
- MRA
- SEC
- Other
- SPAA
- None

Confidentiality

N/A

8 Implementation

Proposed Implementation Date

Next scheduled release after approval (Febryuary 2018 Release)

9 Recommendations

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> <ul style="list-style-type: none"> a) it is likely to have a significant impact on the interests of electricity consumers; b) it is likely to have a significant impact on competition in one or more of: <ul style="list-style-type: none"> i. the generation of electricity; ii. the distribution of electricity; iii. the supply of electricity; and iv. any commercial activities connected with the generation, distribution or supply of electricity; c) it is likely to discriminate in its effects between one Party (or class of Parties) and another Party (or class of Parties); <ul style="list-style-type: none"> i. it is directly related to the safety or security of the Distribution Network; and ii. it concerns the governance or the change control arrangements applying to the DCUSA; and iii. 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>Part 2 Matter</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.
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.

<p>10</p>	<p>Detailed Rationale for DCUSA Objectives</p>	<p>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.</p>
<p>11</p>	<p>DCUSA Charging Objectives</p>	<p>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.</p>
<p>12</p>	<p>Defining ‘Material’ for Charging Methodology Changes</p>	<p>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.</p>