










DCUSA Change Report		At what stage is this document in the process?
<h1>DCP 309</h1> <h2>DCP Title: Reporting ETTOS Identified Theft to the TRAS Service Provider</h2> <p>Date raised: 12 September 2017</p> <p>Status of Change: Standard</p>		01 – Change Proposal
		02 – Consultation
		03 – Change Report
		04 – Change Declaration
Purpose of Change Proposal: 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.		
	This document is issued in accordance with Clause 11.20 of the DCUSA, and details DCP 309 'Reporting ETTOS Identified Theft to the TRAS Service Provider'.	
	Parties are invited to consider the proposed amendment (Attachment 1) and submit their votes using the Voting form (Attachment 2) to dcusa@electralink.co.uk by 10 November 2017 .	
	The voting process for the proposed variation and the timetable of the progression of the Change Proposal (CP) through the DCUSA Change Control Process is set out in this document.	
	If you have any questions about this paper or the DCUSA Change Process, please contact the DCUSA by email to dcusa@electralink.co.uk or telephone 020 7432 3008.	
	Parties Impacted: Suppliers	
	Impacted Clauses: DCUSA Schedule 26, Clause 8.7	

Contents		 Any questions?														
1	Executive Summary	3														
2	Governance	3														
3	Why Change?	4														
4	Solution	4														
5	Relevant Objectives	5														
6	Impacts & Other Considerations	5														
7	Implementation	5														
8	Legal Text	6														
9	Recommendations	6														
Timetable		 Contact: Fungai Madzivadondo														
<p>The timetable for the progression of the CP is as follows:</p> <p>Change Proposal timetable</p> <table><tr><th>Activity</th><th>Date</th></tr><tr><td>Initial Assessment Report Approved by Panel</td><td>13 September 2017</td></tr><tr><td>Change Report Approved by Panel</td><td>18 October 2017</td></tr><tr><td>Change Report issued for Voting</td><td>20 October 2017</td></tr><tr><td>Party Voting Closes</td><td>10 November 2017</td></tr><tr><td>Change Declaration Issued to Parties</td><td>14 November 2017</td></tr><tr><td>Implementation</td><td>22 February 2018¹</td></tr></table>		Activity	Date	Initial Assessment Report Approved by 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	22 February 2018 ¹	 DCUSA@electralink.co.uk
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 0207 432 3008																
Proposer: Opus Energy Ltd (Supplier)																
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 0845 4379406																

¹ To align with SPAA CP17 404

1 Executive 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 This Change Proposal has been raised to amend the Supplier process for reporting theft identified through the Energy Theft Tip-Off Service (ETTOS) to the TRAS Service Provider.
- 1.3 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 by the TEG 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.
- 1.4 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.
- 1.5 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 identified by another theft lead source should then be added to that initial report.

How?

- 1.6 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 Supplier Parties should be fed into the TRAS Service Provider in accordance with Schedule 25 (Theft Risk Assessment Arrangements), but (for the avoidance of doubt) the Energy Theft Tip-Off Service shall only be listed as the source of the theft lead where the tip-off was the initial source which led to the investigation.

2 Governance

Justification for Part 2 Matter

- 2.1 DCP 309 has been classed as a Part 2 Matter therefore, Authority consent is not required.

Requested Next Steps

- 2.2 The Panel considered that the Theft Issues Group (TIG) has carried out the level of analysis required to enable Parties to understand the impact of the proposed amendment and to vote on DCP 309.
- 2.3 The DCUSA Panel recommends that this CP:
- Be issued to Parties for Voting

3 Why Change?

- 3.1 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.
- 3.2 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.
- 3.3 The change to the SPAA and DCUSA codes clarifies submission processes for any tip offs where ETTOS is the initial theft lead source.

4 Solution

DCP 309 Working Group Assessment

- 4.1 With recommendation from the Theft Issues Group (TIG), the DCP 309 Change Proposal was raised by Opus Energy to amend the Supplier process for reporting theft identified through the Energy Theft Tip-Off Service (ETTOS) to the TRAS Service Provider.
- 4.2 The CP has been raised to clarify the TRAS data submission process. The SPAA and DCUSA codes will be updated 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 identified by another theft lead source should then be added to that initial report.

- 4.3 The DCUSA legal text has been updated with the proposed changes to ensure consistency in TRAS data submission.

5 Relevant Objectives

Evaluation 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 six Charging Objectives. The full list of objectives is documented in the CP form provided as Attachment 3.

- 5.2 The Theft Issues Group and DCP 309 proposer consider that the following DCUSA Objective is better facilitated by DCP309:

General Objective four - The promotion of efficiency in the implementation and administration of the DCUSA

- 5.3 General Objective 4 is better facilitated as this change will help to ensure the effective operation of ETTOS arrangements and clarify TRAS data submission processes.

6 Impacts & Other Considerations

Consumer Impacts

- 6.1 The Working Group did not identify any material impact on consumers from the implementation of this CP.

Environmental Impacts

- 6.2 In accordance with DCUSA Clause 11.14.6, the proposer assessed whether there would be a material impact on greenhouse gas emissions if DCP 309 were implemented. The proposer did not identify any material impact on greenhouse gas emissions from the implementation of this CP.

7 Implementation

- 7.1 Subject to Party approval, the DCP 309 change will be implemented in 22 February 2018 to align with the equivalent SPAA CP17 404.
- 7.2 DCP 309 is classified as a Part 2 matter and therefore Authority determination is not required.

8 Legal Text

- 8.1 The proposed legal text acts as Attachment 1. In respect of Schedule 26, a reporting requirement has been added to clause 8.7 as follows:
- 8.7 The results of any tip-off investigations initiated by Supplier Parties should be fed into the TRAS Service Provider in accordance with Schedule 25 (Theft Risk Assessment Arrangements), but (for the avoidance of doubt) the Energy Theft Tip-Off Service shall only be listed as the source of the theft lead where the tip-off was the initial source which led to the investigation.
- 8.2 The proposed legal text was reviewed by the TIG who agreed that the amended text met the intent of the CP.

9 Recommendations

Panel's Recommendation

- 9.1 The Panel approved this Change Report on **18 October 2017**. The Panel considered that a sufficient level of analysis had been carried out to enable Parties to understand the impact of the proposed amendment and to vote on DCP 309.
- 9.2 The DCUSA Panel recommends that this CP:
- Be issued to Parties for Voting and DCUSA Parties should consider whether they wish to submit views regarding this Change Proposal.

Attachments

- Attachment 1 – DCP 309 Proposed Legal Text
- Attachment 2 – DCP 309 Voting Form
- Attachment 3 – DCP 309 Change Proposal Form