








DCUSA Change Declaration		At what stage is this document in the process?
<div>DCP 327</div> <div>Requirement to Provide Supplier Theft Contacts</div> <div>Date Raised: 11 July 2018</div> <div>CP Status: Standard Change</div>	01 – Change Proposal	
	02 – Consultation	
	03 – Change Report	
	04 – Change Declaration	
<div>Purpose of Change Proposal:</div> <div>This Change Proposal seeks to add a requirement for Suppliers to provide and maintain theft contacts on the DCUSA Website.</div>		
<div></div>	<div>DCUSA Parties voted on the Change Report and recommend:</div> <div><ul style="list-style-type: none">that the change solution is acceptedthat the implementation date is accepted</div> <div>The consolidated party votes are provided as Attachment 1.</div>	
<div></div>	<div>DCUSA Parties voted to accept the implementation of</div> <div><ul style="list-style-type: none">DCP 327</div>	
<div></div>	<div>Impacted Parties: Suppliers</div>	
<div></div>	<div>Impacted Clauses: Schedule 14 and Schedule 23</div>	

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<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>11 July 2018</td></tr><tr><td>Change Report Approved by Panel</td><td>15 August 2018</td></tr><tr><td>Change Report issued for Voting</td><td>17 August 2018</td></tr><tr><td>Party Voting Closes</td><td>10 September 2018</td></tr><tr><td>Change Declaration Issued to Parties</td><td>12 September 2018</td></tr><tr><td>Implementation</td><td>01 November 2018</td></tr></table>			Activity	Date	Initial Assessment Report Approved by Panel	11 July 2018	Change Report Approved by Panel	15 August 2018	Change Report issued for Voting	17 August 2018	Party Voting Closes	10 September 2018	Change Declaration Issued to Parties	12 September 2018	Implementation	01 November 2018
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		Contact: Austin Gash														
		 DCUSA@electralink.co.uk														
		 0207 432 3008														
		Proposer: Opus Energy														
		 Marvin.clare@opusenergy.com														
																

Any questions?

Contact:
Austin Gash



DCUSA@electralink.
co.uk



0207 432 3008

Proposer:
Opus Energy



Marvin.clare@opuse
nergy.com



1 Summary

What?

- 1.1 During a review of the Theft Code of Practice schedule (DCUSA Schedule 23), the Theft Issues Group (TIG) identified that there is no clear communication channel for engineers to contact Suppliers regarding suspected or confirmed instances of theft. Currently Distributors have individual processes for communicating with Suppliers however, this is not the most practical way for the industry to work. The TIG proposed for a theft contacts register to be added to the DCUSA Website providing a centralised register of Supplier theft contacts.
- 1.2 It was noted that prior to implementing the online theft contacts register, a requirement for Suppliers to provide theft contacts should be added to the DCUSA. Suppliers will be required to keep the theft contacts register up to date by notifying the DCUSA Secretariat and/or updating the DCUSA Website. The proposed register will be separate from the Theft Risk Assessment Service (TRAS) and Energy Theft Tip Off Service (ETTOS) Contacts maintained by the TRAS and ETTOS Service Providers. The formalised structure of theft contacts will be maintained by the DCUSA Secretariat ensuring they are consistent and readily accessible to Parties.
- 1.3 In addition to providing the industry with Supplier contacts the register will also help Suppliers inform the gaining Supplier of suspected theft of electricity where a Change of Supply takes place. Suppliers have advised that currently they have difficulty finding theft contacts in other Supplier organisations.

Why?

- 1.4 An obligation for Suppliers to provide theft contacts should be added to give a clear communication channel for Parties. The TIG notes that currently there is no clear communication channel for engineers or debt collectors who identify theft. There is no obligation for Parties to share theft contacts within the Theft Code of Practice Schedules. Under gas arrangements engineers contact Gas Safe however this is not the same for electricity. The availability of contacts enables Parties to investigate, resolve and prevent suspected instance of theft in a timely manner

How?

- 1.5 It is proposed that a requirement for Suppliers to provide theft contacts be added to DCUSA Schedule 23 with a clear process for providing and maintaining a theft contacts register. As part of the theft arrangements the Supplier Contract Managers will be required to provide and carry out the following:
 - Provide a primary and an escalation contact
 - Provide a group or individual inbox and contact number
 - Provide two or more contacts per Supplier Market Participant ID (MPID)

- Provide named Supplier contact and not the third-Party Revenue Protection or external company
- Personnel's position within the company
- Carry annual review of theft contacts
- Ensure the register is up to date by keeping the Secretariat informed of any contacts changes

1.6 The Secretariat will add a single, separate register for theft contacts to the members area of the DCUSA website allowing access to all DCUSA Parties.

1.7 The proposed legal text is provided as Attachment 2.

2 Governance

Justification for consideration as either a Part 1 or Part 2 Matter

2.1 This Change Proposal should be classed as a Part 2 Matter as it does not have a material impact on DCUSA Parties and does not meet the criteria that would require the Authority to make a decision.

3 Why Change?

Background of DCP 327

3.1 This change will provide a clear communication channel for theft matters. Currently Parties do not have a clear line of communication with Supplier theft and revenue protection representatives. A theft register will ensure instances of suspected theft are communicated, investigated and resolved in a timely manner.

4 Solution

Theft Issues Group Assessment

4.1 With recommendation from the Theft Issues Group (TIG), the DCP 327 Change Proposal (CP) was raised by Opus Energy to amend DCUSA Schedule 23 to add a requirement for suppliers to provide and maintain theft/revenue protection contacts on the DCUSA Website.

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.

5.2 The Working Group considers that the following DCUSA General Objective is better facilitated by DCP 327:

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

5.3 The proposal better facilitates DCUSA General Objective 4 as this change will help to provide Parties with the correct Supplier theft contacts. The register will also help Suppliers meet their licence obligation to inform the gaining Supplier of suspected theft of electricity where a Change of Supply takes place.

6 Impacts & Other Considerations

Consumer Impacts

6.1 The TIG 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 TIG assessed whether there would be a material impact on greenhouse gas emissions if DCP 327 were implemented. The TIG did not identify any material impact on greenhouse gas emissions from the implementation of this CP.

Engagement with the Authority

6.3 Ofgem has been fully engaged throughout the development of DCP 327 as a member of the TIG.

7 Implementation

7.1 It is intended that this Change Proposal will be implemented in the next applicable DCUSA release following approval, which is expected to be 01 November 2018.

7.2 DCP 327 is classified as a Part 2 Matter and therefore Authority determination is not required.

8 Legal Text

8.1 The proposed amendments to the legal text in Schedule 14 and 23 are set out within Attachment 2 and are detailed below for reference:

Amend paragraph 3A of Schedule 14 as follows:

3A. Subject to Paragraph 6, the following shall only be accessible through the Password Controlled Pages:

- a) the full text of this Agreement (including the Revenue Protection Code of Practice);
- b) minutes of (and papers associated with) the meetings of the Panel, Working Groups and the DCUSA Ltd board of directors that are not made accessible under Paragraph 3;
- c) the contact details for Contract Managers and holders of Web Accounts; and
- d) the theft contacts register provided by each Supplier Party under paragraph 6.7 of the Revenue Protection Code of Practice.

Amend paragraph 6.7 of Schedule 23 as follows:

8.2 Exchange of information between Suppliers

OBLIGATION

Each Supplier shall populate the template theft contacts register set out below with the Supplier's relevant [details and](#) shall provide the populated register to the DCUSA Secretariat. Each Supplier shall include the exact details outlined in the template [below and](#) shall provide updates to the DCUSA Secretariat as the Supplier's personnel or their contact details change.

Supplier name	Registration Number	MPID	Contact Level Primary/Escalation	Contact Name	Department	Telephone	Email

[Each Supplier shall carry out an annual review of the information contained in its theft contacts register and shall ensure that its register remains accurate and up to date.](#)

[The DCUSA Secretariat shall publish the theft contacts register on the DCUSA Website in accordance with Schedule 14 of the DCUSA and shall update the published register with the information received from Suppliers from time to time.](#)

[Suppliers and Distributors shall use the relevant contact details set out in the published theft contacts register when there are no other applicable avenues to report matters relating to the identification of theft and/or revenue protection activities.](#)

[Where any incorrect information is identified in the published theft contacts register, this may be notified to the DCUSA Secretariat or the relevant Supplier's Contract Manager under the DCUSA. Where the DCUSA Secretariat receives any such notification, it shall notify the relevant Supplier. Each Supplier shall ensure that updated information is provided to the DCUSA Secretariat within 10 Working Days of the Supplier correctly being notified of an error.](#)

BEST PRACTICE

In the event of a change of Supplier part way through a live Theft of Electricity investigation, the outgoing Supplier should endeavour to provide the incoming Supplier with information relevant to that investigation.

9 Code Specific Matters

Modelling Specification Documents

9.1 Not applicable.

10 Voting

10.1 DCP 327 change report was issued to DCUSA Parties for Voting on 17 August 2018.

Part 2 Matter: Authority Decision is not Required

DCP 327 Proposed Variation (Solution) Decision

10.2 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 proposed variation 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 proposed variation was more than 65%

10.3 DCUSA Parties have voted to **accept** the proposed variation (solution) of DCP 327.

DCP 327 Implementation Date Decision

10.4 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%.

10.5 DCUSA Parties have voted to **accept** the implementation date of DCP 327.

The table below sets out the outcome of the votes that were received in respect of the DCP 327 Change Report that was issued on 17 August 2018 for a period of 15 working days.

DCP 327	WEIGHTED VOTING				
	DNO	IDNO	SUPPLIER	DISTRIBUTED GENERATOR	GAS SUPPLIER
CHANGE SOLUTION	Accept	n/a	Accept	n/a	n/a
IMPLEMENTATION DATE	Accept	n/a	Accept	n/a	n/a

11 Recommendations

DCUSA Parties

11.1 DCUSA Parties have voted on DCP 327, with the outcome being a decision to be accept the Change Proposal and thus the proposed variation to the DCUSA will be made accordingly.

Attachments

- Attachment 1 – DCP 327 Consolidated Party Votes
- Attachment 2 – DCP 327 Legal Text