

DCUSA Change Report		At what stage is this document in the process?
<h1 data-bbox="167 347 598 436">DCP 346</h1> <h2 data-bbox="167 470 981 593">Amendment to Code of Practice Confirmed Theft Definition</h2> <p data-bbox="167 616 550 649">Date raised: 24 April 2019</p> <p data-bbox="167 672 574 705">Status of Change: Standard</p>	01 – Change Proposal	
	02 – Consultation	
	03 – Change Report	
	04 – Change Declaration	
<p>Purpose of Change Proposal:</p> <p>To update and align the Theft Code of Practice schedules to ensure the consistency in the definition of Confirmed Theft and investigation processes.</p>		
	<p>This document is issued in accordance with Clause 11.20 of the DCUSA, and details DCP 346 'Amendment to Code of Practice Confirmed Theft Definition'.</p> <p>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 02 September 2019.</p> <p>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.</p> <p>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.</p>	
	<p>Parties Impacted: Suppliers</p>	
	<p>Impacted Clauses: DCUSA Schedule 23 (Theft of Electricity Code of Practice)</p>	

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Timetable			
The timetable for the progression of the CP is as follows:			
Change Proposal timetable			
Activity	Date		
Initial Assessment Report Approved by Panel	15 May 2019		
Change Report Approved by Panel	17 July 2019		
Change Report issued for Voting	09 August 2019		
Party Voting Closes	02 September 2019		
Change Declaration Issued to Parties	04 September 2019		
Implementation	07 November 2019		

1 Executive Summary

What?

- 1.1 During a review of the Theft Code of Practice schedules, a member of the Theft Best practice Forum identified changes required to the definition of 'Confirmed Theft' in SPAA Schedule 33 and DCUSA Schedule 23. This Change proposal has been raised to progress a change to the theft schedules to help ensure the schedules are consistent with actual investigation processes.

Why?

- 1.2 A member of the Theft Best Practice Forum requested a change to the definition of Confirmed Theft in SPAA Schedule 33 as not all investigations require a review of the consumption levels prior to submitting a case. There are several scenarios where a review of the consumption levels would not be required to constitute a Confirmed Theft, for example, meter tampering.
- 1.3 It was also identified in the Gas Theft Detection Incentive Scheme Audit Report Overall completed by BDO (Moore Stephens) that 25 of the compliant 99 investigations reviewed partially passed their assessment. All 25 of the investigations did not provide any specific details in respect of the desktop review that constitute 'an indication of theft via a desktop review of consumption levels'. Nonetheless, the 25 investigation files provided sufficient evidence satisfying the other elements of the offence, thus constituting a 'Confirmed Theft'.
- 1.4 The schedules should be updated to help provide clarity and consistency with investigating processes.

How?

- 1.5 The definition of Confirmed Theft in DCUSA Schedule 23 states "an indication of theft via desktop review of the consumption levels". Not every scenario will require a review of the consumption levels before raising a job. As this process is more applicable when analysing internal data, the code should not specify a review of consumption levels. The proposer is requesting that the legal text should be updated to remove references to consumption levels.
- 1.6 The proposed changes to DCUSA Schedule 23 are provided as Attachment 1.

2 Governance

Justification 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.

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

2.2 The Change will need to be introduced on 07 November 2019.

3 Why Change?

Background of DCP 346

3.1 This proposed amendment will facilitate governance in how data items for TRAS are presented and ensure consistency between the DCUSA code and TRAS programming Manual.

4 Solution

DCP 346 Assessment

4.1 With recommendation from the TIG, the DCP 346 Change Proposal (CP) was raised by Npower to align the Theft Code of Practice schedules to ensure the consistency in the definition of Confirmed Theft and investigation processes.

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 Proposer and the TIG consider that DCP 346 better facilitates the following DCUSA General Objective: is better facilitated by DCP346:

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 General Objective 4 is better facilitated as this change will help to ensure the effective operation of TRAS arrangements through providing Suppliers with clear process for populating data items.

6 Impacts & Other Considerations

Consumer Impacts

6.1 The Proposer 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 346 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, DCP 346 will be implemented on 07 November 2019. As DCP 346 is classified as a Part 2 Matter, Authority determination is not required.

8 Legal Text

8.1 The proposed amendments to the legal text in Schedule 23 are set out within Attachment 1. The legal text has been reviewed by the TIG and the Proposer, who all agree that the amendments meet the intent of the CP.

9 Recommendations

Panel's Recommendation

- 9.1 The Panel approved this Change Report on 17 July 2019. 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 346.
- 9.2 The Panel have recommended that this report is issued for Voting and DCUSA Parties should consider whether they wish to submit views regarding this Change Proposal.

10 Attachments

- Attachment 1 – DCP 346 Legal Text
- Attachment 2 – DCP 346 Voting Form
- Attachment 3 – DCP 346 Change Proposal Form