

Part A: Generic

| DCUSA Change Proposal (DCP) | | At what stage is this document in the process? |
|---|--|--|
| <h1>DCP 330</h1> <h2>TRAS Escalation Process</h2> <p>Date raised: <i>21 November 2018</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 add the TRAS escalation process to the TRAS Schedule. The TRAS escalation process has been implemented to help administer the TRAS requirements, it does not change or update the obligations within the DCUSA.</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 17 October 2018. The Panel will consider the proposer’s recommendation and determine the appropriate route.</p> | |
|  | <p>Impacted Parties: Suppliers</p> | |
|  | <p>Impacted Clauses: DCUSA Schedule 25</p> | |

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| Indicative Timeline | | |
| The Secretariat recommends the following timetable: | | |
| Initial Assessment Report Issued to Panel | 10 October 2018 | |
| Change Report Approved by Panel | 21 November 2018 | |
| Change Report issued for Voting | 23 November 2018 | |
| Party Voting Closes | 14 December 2018 | |
| Change Declaration Issued to Parties | 18 December 2018 | |
| Implementation Date | February 2019 | |
| | | |

 Any questions?

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1 Summary

What?

- 1.1 As part of monitoring Supplier engagement with the Theft Risk Assessment Service (TRAS) the TRAS Expert Group (TEG) identified that a number of Suppliers were not yet signed up to TRAS and as a result not submitting files as required under the TRAS obligations. It was also highlighted that although signed up to TRAS some Suppliers are failing to submit files to the TRAS Service Provider (Experian).
- 1.2 As result the TRAS Expert Group (TEG) agreed to develop the TRAS escalation process to help suppliers fulfil their License Obligations. The process will help administer already existing TRAS

obligations, promote file submission and theft reporting into the TRAS Service Provider. No changes are to be made to the DCUSA code as a result of the escalation process.

Why?

- 1.3 Suppliers are required by the SPAA and DCUSA codes to submit defined data items, split by residential and commercial, to the TRAS Provider monthly. This does not place any additional obligations on Suppliers but adds a step for the escalation process to be triggered where Suppliers fail to meet their obligations.
- 1.4 The TRAS Escalation Process has been designed to help ensure all parties require are participating successfully. The TRAS Expert Group (TEG) developed the escalation process to promote file submission and theft reporting into the TRAS Provider.
- 1.5 The SPAA and DCUSA Secretariat will work with the TRAS Service Provider to help with the effective administration of the service. The escalation process will be triggered for Suppliers in the undermentioned categories:
 - Non – Participating Parties
 - Failed file submissions
 - Rejected Files
 - Missed File submissions

How?

- 1.6 The escalation process was implemented in June 2018. The Escalation Process diagram is provided as Attachment 1.
- 1.7 Add new paragraph 8.9 as follows:

Where a Supplier fails to meet their TRAS obligations to submit defined data items, split by residential and commercial, to the TRAS Provider on a monthly basis the TRAS escalation process will be triggered. See Appendix 3 for the TRAS escalation Process.

2 Governance

Justification for a Part 2 Matter

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

3 Why Change?

3.1 This change will ensure effective administration of the TRAS service.

Part B: Code Specific Details

4 Solution and Legal Text

The proposed legal text is provided as attachment 1.

5 Code Specific Matters

None

6 Relevant Objectives

| 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 effective administration of the TRAS service and help Suppliers meet their licence conditions. | |

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

Consideration of Wider Industry Impacts

A similar change is being progressed to update Schedule 33 of the SPAA (Theft of Gas Code of Practice).

Confidentiality

N/A

8 Implementation

Proposed Implementation Date

The proposed Implementation date is the first release after approval.

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> |

| | | |
|-----------------|--|---|
| | | <p>a) it is likely to have a significant impact on the interests of electricity consumers;</p> <p>b) it is likely to have a significant impact on competition in one or more of:</p> <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; <p>c) it is likely to discriminate in its effects between one Party (or class of Parties) and another Party (or class of Parties);</p> <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> <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> |
| <p>3</p> | <p>Related Change Proposals</p> | <p>Indicate if the CP is related to or impacts any CP already in the DCUSA or other industry change process.</p> |
| <p>4</p> | <p>Proposed Solution and Draft Legal Text</p> | <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 | <p>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.</p> |
| 7 | Environmental Impact | <p>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.</p> |
| 8 | Confidentiality | <p>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</p> |
| 9 | DCUSA General Objectives | <p>Indicate which of the DCUSA Objectives will be better facilitated by the Change Proposal.</p> |
| 10 | Detailed Rationale for DCUSA Objectives | <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> |
| 11 | DCUSA Charging Objectives | <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> |
| 12 | Defining 'Material' for Charging Methodology Changes | <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> |