




Part A: Generic

DCUSA Change Proposal (DCP)		At what stage is this document in the process?
<h1>DCP 327</h1> <h2>Requirement to Provide Supplier Theft Contacts</h2> <p>Date raised: <i>11 July 2018</i></p>		01 – Change Proposal
		02 – Consultation
		03 – Change Report
		04 – Change Declaration
<p>Purpose of Change Proposal:</p> <p>This Change Proposal seeks to add a requirement for Suppliers to provide and maintain theft contacts on the DCUSA Website.</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 18 July 2018.</p> <p>The Panel will consider the proposer's recommendation and determine the appropriate route.</p>	
	<p>Impacted Parties: Suppliers</p>	
	<p>Impacted Clauses: DCUSA Schedule 23</p>	

Contents

1

Summary

2

2

Governance

2

3

Why Change?

4

4

Solution and Legal Text

4

5

Code Specific Matters

4

6

Relevant Objectives

4

7

Impacts & Other Considerations

5

8

Implementation

6

9

Recommendations

6

Indicative Timeline

The Secretariat recommends the following timetable:

Initial Assessment Report Issued to 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 Date

01 November 2018

?

Any questions?

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1 Summary

What

During a review of the Theft Code of Practice schedule, 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.

Prior to implementing the online theft contacts register, a requirement for Suppliers to provide theft contacts should be added to the DCUSA. Currently Parties provide Contract Manager information to the DCUSA Secretariat and ensure that it is up to date. Suppliers will be required to keep the theft contacts register up to date by notifying the DCUSA Secretariat and/or updating the DCUSA Website. It is noted the proposed register will be separate from the TRAS and ETTOS Single Point of Contacts (SPOCs) maintained by the

TRAS and ETTOS Service Provider. The formalised structure of theft contacts will be maintained by the DCUSA Panel and ensure that they are consistent and readily accessible to Parties.

In addition to providing Distributors with Supplier contacts the register will also help Supplier meet their licence obligation to 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

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

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 the 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
- Add what part of the business the contact is from
- Carry annual review of theft contacts
- Ensure the register is up to date

The Secretariat will add a single, separate register for theft contacts to the members area of the DCUSA website, containing company name, contact name (if applicable) and contact details (preferably both telephone and email).

The proposed 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

3 Why Change?

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 and resolved in a timely manner.

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 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	None
<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 provide Parties with the correct Supplier theft contacts. The register will also help Supplier meet their licence obligation to inform the gaining Supplier of suspected theft of electricity where a Change of Supply takes place.	

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 to update Schedule 33 of the SPAA (Electricity Code of Practice).

Confidentiality

N/A

8 Implementation

Proposed Implementation Date

The proposed Implementation date is November 2018.

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

		<p>one or more directions in relation to it in accordance with Clause 11.9A.</p> <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>
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.
10	Detailed Rationale for DCUSA Objectives	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.
11	DCUSA Charging Objectives	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.
12	Defining 'Material' for Charging Methodology Changes	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.