

Part A: Generic

DCUSA Change Proposal (DCP)		At what stage is this document in the process?
<h1>DCP: 299</h1> <h2>Clarify Distributor reporting requirement to the ETTOS Service Provider</h2> <p>Date raised: 10 May 2017</p> <p>Proposer Name: Peter Waymont</p> <p>Company Name: Eastern Power Networks</p> <p>Company Category: DNO</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>The intent of this Change Proposal is to add a requirement for Electricity Distributors to notify the ETTOS Service Provider of instances where tip-offs cannot be linked with a currently traded MPAN.</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>The Panel will consider the proposer’s recommendation and determine the appropriate route.</p>	
	<p>Impacted Parties: DCUSA Parties</p>	
	<p>Impacted Clauses: Schedule 26</p>	

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Indicative Timeline		 Contact: Code Administrator
The Secretariat recommends the following timetable:		 DCUSA@electralink.co.uk
Initial Assessment Report	17 May 2017	 02074323000
Change Report Approved by Panel	21 June 2017	Proposer: Peter Waymont
Change Report issued for Voting	23 June 2017	 peter.waymont@ukpowernetworks.co.uk
Party Voting Closes	14 July 2017	 07875 112757
Change Declaration Issued to Parties	18 July 2017	

1 Summary

During a review of the Energy Theft Tip Off Service (ETTOS) reporting process, the Theft Issues Group (TIG) identified that the ETTOS process does not place an obligation on Distributors to inform the ETTOS Service Provider when tip-offs cannot be linked with a currently traded MPAN. Where the Distributor is unable to identify the Supplier, due to the absence of a currently traded MPAN the ETTOS Service Provider should be informed accordingly. The TIG has recommended that Schedule 26 of the DCUSA be updated to clarify the Distributors' reporting requirements.

Paragraph 8.5c of the DCUSA Schedule 26 should be updated to add a further requirement stating that Distributors notify the ETTOS Service Provider when a tip-off cannot be linked with a currently traded MPAN.

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
- Proceed to the Change Report phase

3 Why Change?

The change is required to clarify the ETTOS service reporting requirements. DNO/IDNO Parties should inform the ETTOS Service Provider that a tip-off cannot be linked to a currently traded MPAN.

Part B: Code Specific Details

4 Solution and Legal Text

Amend Schedule 26 as follows;

- 8.5 Where a DNO/IDNO Party receives a tip-off for a premises for which it is the electricity distributor, the DNO/IDNO Party shall:
- (a) identify the full address and notify this to the ETTOS Service Provider;
 - (b) identify the electricity supplier and notify this to the ETTOS Service Provider;
 - (c) identify there is no currently traded MPAN and notify the ETTOS Service Provider;
 - ~~(e)~~ (d) (where applicable) comply with its obligations under the Revenue Protection Code of Practice;
 - ~~(d)~~ (e) if none of the above apply, then feed back to the ETTOS Service Provider that no action can be taken, with the reason the tip-off could not be matched, so that the tip-off can be logged as unmatched.

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) <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
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 the effective operation of ETOS arrangements and provide Parties with clear reporting processes.	

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 | <input type="checkbox"/> | N/A |
| CUSC | <input type="checkbox"/> | |
| Grid Code | <input type="checkbox"/> | |
| MRA | <input type="checkbox"/> | |
| SEC | <input type="checkbox"/> | |
| Other | <input type="checkbox"/> | |
| SPAA | <input type="checkbox"/> | |
| None | <input checked="" type="checkbox"/> | |

Confidentiality

N/A

8 Implementation

Proposed Implementation Date

Next scheduled 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> <p>i. the generation of electricity;</p>

		<ul style="list-style-type: none"> 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>