

DCUSA Change Proposal Form

This form is issued in accordance with Clause 10.5 of the DCUSA.

Completed forms should be returned to dcusa@electralink.co.uk for assessment by the DCUSA Panel. Failure to complete all parts of the form may result in it being rejected by the DCUSA Panel.

PART A – Mandatory for all Change Proposals

PART B – Mandatory for Non Charging Methodologies Proposals

PART C – Mandatory for Charging Methodologies Proposals

PART D – Guidance Notes

PART A - MANDATORY FOR ALL CHANGE PROPOSALS

Document Control	
CP Status	Standard
CP Number	DCP 280
Date of submission	18 August 2016
Attachments	Attachment 1 – Schedule 25 Redlined Text Attachment 2 – DCUSA Main Body – Draft Legal Text
Originator Details	
Company Name	British Gas
Originator Name	Kevin Woollard
Category	Supplier
Email Address	kevin.woollard@britishgas.co.uk
Phone Number	07979 563 580
Change Proposal Details	
CP Title	Clarification of TRAS Accession Process
Impacted parties	Suppliers
Impacted Clause(s)	Schedule 25
Part 1 / Part 2 Matter	Part 2
Provide your rationale why you consider this change is a Part 1 or Part 2 Matter	It does not meet the criteria for Part 1 matters
Related Change Proposals	An equivalent SPAA CP will be raised.
Change Proposal Intent	
<p>This CP proposes to amend the TRAS Schedules to clarify the TRAS accession process. It has been assessed that there is a three-month time lag between a new Supplier starting to register metering systems and actually submitting data into TRAS. This time lag has not been reflected within the current TRAS Schedule and a change is required to explicitly reference the time lag so new parties are clear when they need to provide their initial data submission. The three month time lag will also ensure that the new Supplier has time to work with the Service Provider to start submitting data.</p> <p>This CP further proposes to amend the TRAS Schedules to facilitate the administration of the TRAS by enabling the Secretariat to monitor the number of metering points so that it can be established whether a Supplier should be participating in TRAS, and to determine its TRAS arrangements (for instance the number of Hunter licences a Supplier receives will depend on the number of its metering points).</p>	

In addition, now that TRAS is in live operation, there are a number of elements that have been identified in the TRAS Schedules, specifically within clause 8 and 6 and the definitions section of the DCUSA Main Body that are out of date or that could be amended to better facilitate the TRAS.

Business Justification and Market Benefits

Now that TRAS is in live operation, there are a number of elements that have been identified in the TRAS Schedules, specifically within clause 8, that should be clarified, amended or included. This CP proposes to amend Schedule 25 to allow the following:

- use of data to monitor the number of supply points;
- 3-month time lag between Supplier registration and providing data to TRAS;
- ensure that terms referenced in the TRAS Schedules are defined according to what they are defined as in the TRAS Contract.
- various minor housekeeping amendments.

CP 15/316 and DCP 254 'Introduction of a minimum MPRN threshold for participation in the Theft Risk Assessment Service (TRAS)' were rejected by the Authority and the Change Board. Along with the introduction for a minimum threshold, these CPs would have allowed the use of Supplier data to monitor the number of supply points and introduced a 3-month time lag between Supplier registration and providing data to the TRAS. The TRAS Expert Group have determined that as CP 15/315 and DCP 254 have been rejected, a new CP should be raised to incorporate the amendments noted above.

1. Use of data to monitor the number of supply points

This CP proposes to introduce legal drafting to ensure that the Secretariat can monitor the number of Metering Points and Supply Points for which each Supplier is Registered based on the data received in Clause 21.2 in SPAA and the data received pursuant to the provision of 12.12.1 in DCUSA. This is to enable the Secretariat to establish whether a Supplier should be participating in TRAS and to monitor the number of Metering Points which will determine its TRAS arrangements (e.g. the number of Hunter licences).

2. 3-month time lag between Supplier registration and providing data to TRAS

CP 15 316 and DCP 254 included the provision for a 3-month time lag between Supplier registration and providing data to the TRAS. These CPs were assessed by the TRAS Governance Subgroup who considered the end to end TRAS accession process, noting that there is a three month time lag between the Supplier starting to register metering systems/supply points and actually submitting data into TRAS.

This time lag has not been reflected within the TRAS Schedule. The Subgroup considered that if the de minimis CPs are not approved, then a change is required to explicitly reference the time lag so new parties are clear when they need to provide their initial data submission.

The three month time lag will also ensure that the new Supplier has time to work with the Service Provider to start submitting data. The level of support new Suppliers can expect from the Service Provider upon accession will be defined in a later CCN, as will the proposal to introduce a charge after three months if a Supplier is still not submitting data or if that data is consistently failing validation.

3. Ensure that terms referenced in the TRAS Schedules are defined according to what they are defined as in the TRAS Contract.

On reviewing the TRAS Schedules, it has become clear that the following terms are defined in the TRAS Contract, but are not defined in the DCUSA Main Body:

- "Data Centre Sites"
- "Hosting Services Specification"
- "Management Information"
- "Personal Data"
- "Process"
- "Qualified Outliers"
- "Service Level"
- "Theft Risk Assessment Methodology"
- "Theft Target"

The definitions of these terms will be linked back to the TRAS Contract.

4. Various housekeeping amendments

On reviewing the TRAS Schedules it was determined that there are a few minor housekeeping amendments that should be made:

(a) the definition of TRAS Contract Manager should be moved from the TRAS Schedules to Section 1 of the Main Body.

(b) The definition of TRAS Service Provider should be amended as follows – 'means the person or persons with which DCUSA Ltd contracts from time to time for provision of the Theft Risk Assessment Service Arrangements (but excluding the Secretariat in its role as Secretariat and excluding the TRAS Contract Manager).'

(c) 6.4 (confidentiality) of the TRAS Schedule should be amended to refer to the TRAS Contract Manager (as well as the Secretariat), so that it is clear that DCUSA/SPAA can disclose information to the contract manager. Paragraph 6 is a Key TRAS Provision, and so Experian will need to be notified of this amendment.

Proposed Solution and Draft Legal Text

The CP proposes to add an additional clause to paragraph 8 of Schedule 24 (Theft Risk Assessment Arrangements) to state:

'The Secretariat will monitor the number of registered Metering Points per each Supplier based on the data received pursuant to 12.12.1. When a Supplier first becomes registered to a supply point the Secretariat will notify the Supplier and the TRAS Service Provider. The Supplier will be required to comply with the requirements in Section 8 'Supplier Data' within 3 months of the date of this notification.'

The CP further seeks to provide definitions for those terms not defined in the DCUSA Main Body or within the TRAS Schedules. This has been included as Attachment 2.

There are various housekeeping amendments to Schedule 25 and are listed in the sections above and included in the legal text.

Proposed Implementation Date

Next scheduled release after approval, to be aligned with SPAA

Impact on Other Codes

Please tick the relevant boxes and provide any supporting information.

BSC	<input type="checkbox"/>
CUSC	<input type="checkbox"/>
Grid Code	<input type="checkbox"/>
MRA	<input type="checkbox"/>
SEC	<input type="checkbox"/>
Other	<input type="checkbox"/>
None	X
	<input type="checkbox"/>

If other please specify
SPAA

Consideration of Wider Industry Impacts

The proposed amendments are to facilitate the efficiency of the TRAS Schedules.

Environmental Impact

No environmental impacts.

Confidentiality

[See Guidance Note 8]

PART B – MANDATORY FOR NON CHARGING METHODOLOGIES CHANGE PROPOSALS

DCUSA Objectives

General Objectives:

Please tick the relevant boxes. [See Guidance Note 9]

- ☐ 1 The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks
- ☐ 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
- ☐ 3 The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences
- X 4 The promotion of efficiency in the implementation and administration of this Agreement

- ☐ 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.

Detailed rationale for better facilitation of the DCUSA Objectives identified above

The use of data will ensure the Secretariat can establish whether a Supplier should be participating in TRAS and determine which TRAS arrangements (e.g. the number of Hunter licenses) the Supplier should have.

PART C – MANDATORY FOR CHARGING METHODOLOGIES CHANGE PROPOSALS

DCUSA Charging Objectives

Please tick the relevant boxes. [See Guidance Note 11]

Charging Objectives:

- ☐ 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
- ☐ 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)
- ☐ 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
- ☐ 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
- ☐ 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.

General Objectives:

- ☐ 1 The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks
- ☐ 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
- ☐ 3 The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences

<input type="checkbox"/> 4 The promotion of efficiency in the implementation and administration of this Agreement <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.
Detailed rationale for better facilitation of the DCUSA Objectives identified above
<p>[See Guidance Note 10]</p> <p><u>Charging Objectives:</u></p> <p><u>General Objectives:</u></p>
<p>Has this issue been discussed at any other industry forums? If so please specify and provide supporting documentation</p> <p>This CP has been discussed and developed in the TRAS Expert Group</p>

PART D – GUIDANCE NOTES FOR COMPLETING THE FORM

Guidelines for Working Group Members and Working Group Terms of Reference are available on the DCUSA Website and provide more information about the progression of the Change Process. www.dcusa.co.uk

Ref	Data Field	Guidance
1	Attachments	Append any proposed legal text or supporting documentation in order to better support / explain the CP.
2	Part 1 / Part 2 Matter	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.
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 in to consideration the deadlines for publishing indicative tariffs.</p> <ul style="list-style-type: none"> • Submission of Company indicative tariffs is 31 December of each year. • Final tariffs are published on 1 April of each year. <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 within the December indicative tariffs.</p> <p>Contact the DCUSA helpdesk for any further information on the releases dcusa@electralink.co.uk.</p>
6	Consideration of Wider Industry Impacts	<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>