



DCUSA CONSULTATION

DCP 278 - Allocation of Users to the ETTOS Secure Email Service

Executive Summary

DCP 278 seeks to include the rules for allocation of user accounts for the ETTOS secure email service in the DCUSA.

This change proposes to add an appendix to the new ETTOS Schedule which sets out the rules for allocation of users to the ETTOS secure email service.

This consultation is seeking views from Distributors and Suppliers regarding the rules for allocating user accounts for the ETTOS secure email service. Parties are invited to provide their responses by **01 September 2016**.

1 PURPOSE

- 1.1 The Distribution Connection and Use of System Agreement (DCUSA) is a multi-party contract between electricity Distributors and electricity Suppliers and large Generators. Parties to the DCUSA can raise Change Proposals (CPs) to amend the Agreement with the consent of other Parties and (where applicable) the Authority.
- 1.2 This document is a consultation issued to DNOs, IDNOs, Suppliers, any other interested Parties and the Authority in accordance with Clause 11.14 of the DCUSA seeking industry views on DCP 278 '*Allocation of Users to the ETTOS Secure Email Service*'. Parties are invited to consider the questions set out below and submit comments using the form attached as Attachment 1 to dcusa@electralink.co.uk by **Thursday, 01 September 2016**.

2 BACKGROUND OF DCP 278

- 2.1 The new Energy Theft Tip Off Service (ETTOS) schedule will introduce provisions relating to the ETTOS into the DCUSA and set out ETTOS obligations for Suppliers and Network Operators. As part of the original ETTOS contractual discussions it was noted that recipients should request a reasonable number of user permissions.
- 2.2 The ETTOS Working Group identified that the ETTOS contract should reflect the requirement for additional user permissions and raised a Contract Change Notification (CCN ETTOS 002¹) to define the user allocation rules within section 4 of the ETTOS Operating Model. Under the proposed change, licences would be purchased and therefore charged based on the actual number of users set up on the secure email service, up to the maximum allocation set out in the CCN.
- 2.3 The DCUSA Panel and SPAA EC considered the proposed change and agreed to the following allocation rules:
- Large Suppliers, Large Gas Transporters (GTs) and Distribution Network Operators (DNOs) should be given 5 licences; and
 - Small Suppliers, Small GTs and Independent DNOs (IDNOs) should be given 2 licences.

¹ Increase Number of User Permissions

- 2.4 The DCUSA Panel and SPAA EC agreed that the licence costs together with the overall cap of 450 user permissions should be added to the ETTOS contract however, the user allocation obligations should be added to the DCUSA and SPAA ETTOS schedules.
- 2.5 DCP 278 was raised by RWE npower and seeks to include the rules for the allocation of user accounts for the ETTOS secure email service in the DCUSA (Attachment 3). An equivalent SPAA CP has been raised (draft SPAA CPD 16/346).
- 2.6 DCP 278 is a Part 2 Matter, therefore it will not require Authority consent.

3 WORKING GROUP ASSESSMENT

- 3.1 The DCUSA Panel acknowledged that the ETTOS Working Group has already been established to oversee the implementation of the ETTOS. Therefore, it would be more efficient to use the ETTOS Working Group to assess the DCP 278, rather than creating a new working group. DCUSA Parties were provided with information regarding DCP 278 and the relevant Working Group meetings were held in open session so DCUSA Parties not represented on the ETTOS Working Group could attend.
- 3.2 Prior to DCP 278 being raised the DCUSA Panel and SPAA EC reviewed the CCN raised to address the allocation of user permissions and recommended that Suppliers and Network Operator obligations should be added to the DCUSA and SPAA codes. During their discussions the ETTOS Working Group reviewed the proposed legal text and agreed the following:
- **Metering Point Numbers** – Supplier Parties with 1 million or more metering point registrations are allowed up to 5 user accounts. It was agreed that the metering point numbers should be combined across gas and electricity.
 - **User Allocation** – The Secretariat should use the data already provided by distributors in accordance with clause 27.6 of the MRA to determine how many users each Supplier is allowed.

- **Network Operators** – Large GTs and DNOs should be allocated up to 5 user permissions, whilst small GTs and IDNOs should be allocated up to 2 user permissions.

4 ASSESSMENT AGAINST THE DCUSA OBJECTIVES

- 4.1 The Working Group considers that the following DCUSA Objectives are better facilitated by DCP278:

General Objective One - The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks

- 4.2 General Objective 1 is better facilitated as reduced theft enables more accurate data consumption to be utilised by DNOs and gives more opportunity to manage their network in an efficient and economic manner. ETTOS plays a significant role in managing theft and to utilise the full benefit adequate access rights are required by DNO, IDNO and Supplier Parties.

General Objective Three - The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences

- 4.3 General Objective 3 is better facilitated as the provision of information relating to suspected theft to distributors may assist distributors in detecting theft in conveyance and meeting their requirements in Standard Licence Condition 27.

5 DCP 278 – LEGAL DRAFTING

- 5.1 The main elements of the legal text are:

- ETTOS user allocation rules;
- ETTOS Recipient allocation; and
- The process to request further user allocation

- 5.2 The DCP 278 legal text is provided as Attachment 2.

6 DCP 278 – IMPLEMENTATION

- 6.1 The proposed implementation date for DCP 278 is 23 February 2017,

7 DCP 278 – CONSULTATION QUESTIONS

7.1 The Working Group is seeking industry views on the following consultation questions:

Question Number	Question
1	Do you understand the intent of the CP?
2	Are you supportive of the principles of the CP?
3	Do you have any comments on the draft legal text?
4	Do you consider that the proposal better facilitates the DCUSA objectives? Please give supporting reasons.
5	Are you supportive of the proposed implementation date of 23 February 2017?
6	Do you have any other comments on the CP278?
7	Are you aware of any wider industry developments that may impact upon or be impacted by this CP?

7.2 Responses should be submitted using Attachment 1 to dcusa@electralink.co.uk no later than **01 September 2016**.

7.3 Responses, or any part thereof, can be provided in confidence. Parties are asked to clearly indicate any parts of a response that are to be treated confidentially.

8 NEXT STEPS

8.1 Responses to the consultation will be reviewed by the Working Group. The CP will then be progressed through the change process agreed by the DCUSA Panel as set out below:

No.	Event	Target Date
1	Working Group meeting to review consultation responses, update legal text and agree Change Report	13 September 2016
2	Issue Change Report to DCUSA Panel.	12 October 2016
3	DCUSA Panel approves Change Report and Change Report issued for	19 October 2016

	voting.	
4	DCUSA Voting Closes.	16 November 2016
5	Implementation Date.	23 February 2017

8.2 If you have any questions about this paper or the DCUSA Change Process, please contact the DCUSA helpdesk by email to dcusa@electralink.co.uk or telephone 020 7432 3008.

9 ATTACHMENTS

Attachment 1 – Response Form

Attachment 2 – DCP 278 Legal Text

Attachment 3– DCP 278 Change Proposal