





DCUSA Change Report		At what stage is this document in the process?
<h1>DCP 278</h1> <h2>DCP Title: Allocation of Users to the ETTOS Secure Email Service</h2> <p>Date raised: <b>12 July 2016</b></p> <p>Status of Change: <b>Standard</b></p>		01 – Change Proposal
		02 – Consultation
		03 – Change Report
		04 – Change Declaration
<p><b>Purpose of Change Proposal:</b></p> <p>DCP 278 seeks to include the rules for allocation of user accounts for the ETTOS secure email service in the DCUSA.</p>		
	<p>This document is issued in accordance with Clause 11.20 of the DCUSA, and details DCP 278 'Allocation of Users to the ETTOS Secure Email Service'.</p> <p>Parties are invited to consider the proposed amendment (Attachment 1) and submit their votes using the Voting form (Attachment 2) to <a href="mailto:dcusa@electralink.co.uk">dcusa@electralink.co.uk</a> by <b>13 December 2016</b>.</p> <p>The voting process for the proposed variation and the timetable of the progression of the Change Proposal (CP) through the DCUSA Change Control Process is set out in this document.</p> <p>If you have any questions about this paper or the DCUSA Change Process, please contact the DCUSA by email to <a href="mailto:dcusa@electralink.co.uk">dcusa@electralink.co.uk</a> or telephone 020 7432 3011.</p>	
	 Parties Impacted: <b>All DCUSA Parties</b>	
	 Impacted Clauses: <b>DCUSA Schedule 26</b>	

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Timetable		 Contact: <b>Fungai Madzivadondo</b>
The timetable for the progression of the CP is as follows:		 <b>DCUSA@electralink.co.uk</b>
<b>Change Proposal timetable</b>		 <b>0207 432 3008</b>
Activity	Date	Proposer: <b>Maitrayee Bhowmick-Jewkes (npower)</b>
Initial Assessment Report Approved by Panel	20 July 2016	 <a href="mailto:Maitrayee.Bhowmick-Jewkes@npower.com">Maitrayee.Bhowmick-Jewkes@npower.com</a>
Consultation Issued to Industry Participants	10 August 2016	 <b>07468715176</b>
Change Report Approved by Panel	16 November 2016	
Change Report issued for Voting	18 November 2016	
Party Voting Closes	13 December 2016 <sup>1</sup>	
Change Declaration Issued to Parties	15 December 2016	
Implementation	23 February 2017 <sup>2</sup>	

<sup>1</sup> To align with the equivalent SPAA CP (CP 16/346)

<sup>2</sup> To align with the equivalent SPAA CP

## 1 Executive Summary

### What

- 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.

### Why

- 1.1 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).

### How

- 1.2 It is proposed that an appendix be added to the new ETTOS Schedule which sets out the rules for allocation of users to the ETTOS secure email service as follows:
- Supplier Parties with a combined total of 1 million or more electricity Metering Point and gas Supply Point registrations may have up to 5 user accounts
  - DNO Parties may have up to 5 user accounts
  - All other ETTOS Recipients may have up to 2 user accounts

## 2 Governance

### Justification Part 2 Matter

- 2.1 DCP 278 has been classed as a Part 2 Matter therefore, Authority consent is not required.

### Requested Next Steps

- 2.2 The Panel considered that the Working Group has carried out the level of analysis required to enable Parties to understand the impact of the proposed amendment and to vote on DCP 278.
- 2.3 The DCUSA Panel recommends that this CP:
- Be issued to Parties for Voting

## 3 Why Change?

## Background of DCP 278

- 3.1 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.
- 3.2 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 002<sup>3</sup>) 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.
- 3.3 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.
- 3.4 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.

## 4 Solution

### DCP 278 Working Group Assessment

- 4.1 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.
- 4.2 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

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<sup>3</sup> Increase Number of User Permissions

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.
- **Additional Users** – Recipients who require more than their initial allocation can purchase these in accordance with the charges set out in the ETTOS Contract and ETTOS Schedules.

## DCP 278 Consultation

4.3 One consultation was issued in relation to DCP 278. The DCP 278 consultation was issued to DCUSA Parties on 10 August 2016. There were six responses received with three Suppliers and three DNOs responding to the consultation.

4.4 A summary of the responses received, and the Working Group's conclusions are set out below. The full set of responses and the Working Group's comments are provided in Attachment 4.

### Question 1 - Do you understand the intent of the CP?

4.5 All the respondents understood the intent of the CP.

4.6 A respondent noted that the CP will ensure that additional user permissions to the ETTOS secure email service can be added if required. The proposed change will be used to let licences be purchased and therefore charged based on the actual number of users set up on the secure email service, up to the maximum allocation.

### Question 2 - Are you supportive of the principles of the CP?

4.7 All of respondents were supportive of the principles of the CP.

### Question 3 - Do you have any comments on the draft legal text?

4.8 The majority of the respondents agreed with the legal text for DCP 278. One respondent raised concerns regarding the reference to logins for independent Gas Transporters noting that post

Nexus implementation it is envisaged iGTs will participate in the service so will require logins as well, this needs to be clarified in the legal text.

4.9 In their review of the legal text responses the Working Group noted that iGTs are covered by ‘any other ETTOS recipient’ in the same way that iDNOs are covered under DCUSA.

4.10 The Working Group approved the legal text as drafted, no changes were made to the legal text.

**Question 4 - Do you consider that the proposal better facilitates the DCUSA objectives? Please give supporting reasons.**

4.11 The majority of respondents agreed that the following DCUSA General Objectives are better facilitated by DCP 278:

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

4.12 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**

4.13 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.

**Question 5 - Are you supportive of the proposed implementation date of 23 February 2017?**

4.14 All of the respondents were supportive of the proposed implementation date of 23 February 2017 to align with the equivalent SPAA CP.

**Question 6 - Do you have any other comments on the CP278?**

4.15 No further comments were received.

**Question 7 - Are you aware of any wider industry developments that may impact upon or be impacted by this CP?**

4.16 All the respondents confirmed that they are not aware on any industry developments that may impact the CP at this time.

## Working Group Assessment Following Industry Consultation

4.17 After reviewing the consultation responses, the Working Group discussed the Change Proposal.

4.18 Members of the Working Group agreed with the Change Proposal solution and the legal text.

## 5 Relevant Objectives

### Evaluation Against the DCUSA Objectives

5.1 For a DCUSA Change Proposal to be approved it must be demonstrated that it better meets the DCUSA Objectives. There are five General DCUSA Objectives and five Charging Objectives. The full list of objectives is documented in the CP form provided as Attachment 3.

5.2 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**

5.3 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**

5.4 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.

## 6 Impacts & Other Considerations

### Consumer Impacts

6.1 The Working Group did not identify any material impact on consumers from the implementation of this CP.

### Environmental Impacts

6.2 In accordance with DCUSA Clause 11.14.6, the Working Group assessed whether there would be a material impact on greenhouse gas emissions if DCP 278 were implemented. The Working Group

did not identify any material impact on greenhouse gas emissions from the implementation of this CP.

## Engagement with the Authority

- 6.3 Ofgem has been fully engaged throughout the development of DCP 278 as a member of the Working Group.

## 7 Implementation

- 7.1 Subject to Party approval, the DCP 278 change will be implemented on 23 February 2017.

## 8 Legal Text

- 8.1 Draft legal text was included in the DCP278 consultation document. This included the rules for the allocation of Supplier and Network Operator user permissions and the cost for additional user permissions.
- 8.2 Following the industry consultation, the legal text was issued for external legal review. The legal advisors suggested that an additional paragraph 9 be added to clarify the process for recipients to purchase additional user permissions, and also changes to paragraph 2.3 to require parties to pay for these additional user permissions. The proposed drafting reflected the legal text for DCP271 'Process and Costs of Providing Additional Hunter Facilities' which was seeking to introduce a similar process into Schedule 25 for the Theft Risk Assessment Service (TRAS).
- 8.3 The proposed amendments were reviewed by the Working Group who agreed that the amended text met the initial intent of the CP to *'include the rules for allocation of user accounts for the ETTOS secure email service'*.
- 8.4 The final legal text is provided as Attachment 1.



## 9 Recommendations

### Panel's Recommendation

- 9.1 The Panel approved this Change Report on **16 November 2016**. The Panel considered that the Working Group has carried out the level of analysis required to enable Parties to understand the impact of the proposed amendment and to vote on DCP 278.
- 9.2 The Panel have recommended that this report is issued for Voting and DCUSA Parties should consider whether they wish to submit views regarding this Change Proposal.

### Attachments

- Attachment 1 – DCP 278 Legal Text
- Attachment 2 – DCP 278 Voting Form
- Attachment 3 – DCP 278 CP Form
- Attachment 4 – DCP 278 Consultation