




DCUSA Change Report		At what stage is this document in the process?
<h2>DCP 277</h2> <h3>DCP Title: Schedule 25 – Amendment to Appendix 2 – Conditionality’</h3> <p><i>DCP 277 was raised on 20/07/2016</i></p> <p><i>Standard Change</i></p>		01 – Change Proposal
		02 – Consultation
		03 – Change Report
		04 – Change Declaration
Purpose of Change Proposal: <p>Following on from the changes in DCP 272, DCP 277 seeks to update the conditional/mandatory status of some of the data items in the TRAS Service Providers Programming Manual because the current conditionality cannot be always met. Additionally, some JCode/RGMA Codes in the Programing Manual require back population as they were not included in the original Programming Manual and have been identified in subsequent work.</p>		
	<p>This document is issued in accordance with Clause 11.20 of the DCUSA, and details <i>DCP 277 – Schedule 25 – Amendment to Appendix 2 – Conditionality</i></p> <p>Parties are invited to consider the proposed amendment (Attachment 1) and submit their votes using the Voting form (Attachment 2) to dcusa@electralink.co.uk by <i>15 November 2016</i></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 dcusa@electralink.co.uk or telephone 020 7432 3011.</p>	
	 Parties Impacted: Suppliers	
	Impacted Clauses: Schedule 25, Appendix 2	

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Timetable		 Any questions?
The timetable for the progression of the CP is as follows:		Contact: Keavy Larkin
Change Proposal timetable		 Keavy.larkin@electralink.co.uk
		 07718 403 411
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		 Helen.Fosberry@eonenergy.com
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		 email address.
		 telephone
		Other: Insert name
		 email address.
		 telephone
		Other: Insert name
		 email address.
		 telephone

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 .

- 1.2 DCP 277 was raised by E.ON on the 20 July 2016 and seeks to update the conditional/mandatory status of some of the data items in the TRAS Service Providers Programming Manual because the current conditionality cannot be always met. Additionally, some JCode/RGMA Codes in the Programming Manual also require back population as they this was not included in the original Programming Manual. CP 16/345 has been raised as an equivalent SPAA change.
- 1.3 This change follows on from the changes made in DCP 272 which sought to replace the spreadsheet contained within Schedule 25 Appendix 2 with a data items table. It also introduced a reference to the most current version of the Service Provider's Programming Manual within section 8 of Schedule 25.

How

- 1.4 DCP 277 proposes to update the conditionality/mandatory status of some of the data items in the TRAS programming manual to ensure that the conditionality can always be met.

2 Governance

Justification for Part 1 Or Part 2 Matter

- 2.1 DCP 277 has been classed as a Part 2 Matter as it does not affect any DCUSA clauses that require Authority consent.

Requested Next Steps

- 2.2 The Panel considered that the TRAS Expert 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 277.
- 2.3 The DCUSA Panel recommends that this CP:
- Be issued to Parties for Voting

3 Why Change?

Background of DCP 277

- 3.1 Now that TRAS is in live operation, the TEG has begun a wholesale assessment of the TRAS programming manual to ensure that it is up to date. The changes proposed under DCP 277 are stage 2 of a series of programming manual changes, beginning with DCP 272.
- 3.2 DCUSA Schedule 25 set out the provisions relating to TRAS. Specifically, Appendix 2 includes details of the data to be provided by Suppliers to the TRAS Service Provider on a monthly basis.
- 3.3 During discussions at the TRAS Working Group (now the TRAS Expert Group), members agreed the conditionality status of some data items contained within Schedule 25 Appendix 2 requires updating because the current conditionality cannot be always met. The Programming Manual currently states data item completion as requiring a 'mandatory' or 'preferred' status, however there are scenarios where data items cannot always be completed. There is guidance within the descriptions to leave some items as 'null' if the data is not available, however this would make the data conditional rather than mandatory. The current terms of 'mandatory' and 'preferred' could therefore be confusing for new entrants.
- 3.4 Additionally, some JCode/RGMA Codes in the Programming Manual require back population as they were not included in the original Programming Manual and have been identified in subsequent work. It is proposed to complete the back population of Jcode/RGMA codes as part of this change.

4 Solution

DCP 277 Working Group Assessment

- 4.1 The DCUSA Panel recommended that the CP be progressed to the Definition Phase.
- 4.2 The TEG assessed DCP 277 and have proposed to amend the conditionality within DCUSA (and SPAA) based on the templates within CP16/339 & DCP 272 (see Attachment 3). The majority of the required information would be found within the TRAS Service Providers programming manual.
- 4.3 Additionally, the TEG suggest amendments to DCUSA Schedule 25 (and SPAA Schedule 34) to amend the terms from the unique 'Mandatory' and 'Preferred' to the more industry recognised 'Mandatory' and 'Conditional'.
- 4.4 The TEG also suggest removing the sunset clause from code which obligated parties to provide data in July 2015 as this has now passed and is not relevant to be included in code.
- 4.5 DCP 277 was formally raised at the July 2016 DCUSA Panel and is listed as Attachment 1.

DCP 277 Consultation

- 4.6 The DCP 277 consultation was issued on 01 August and there were 3 responses received.
- 4.7 There was one comment on the implementation date. The TEG agreed to keep the implementation date of February 2017 noting that parties can implement sooner if they wish to do so.
- 4.8 The full set of responses and the TRAS Expert Group's comments are provided in Attachment 4.

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

- 4.9 All respondents understood the intent of the CP.

Question 2 – Are you supportive of the principles of the DCP 277 change?

- 4.10 All respondents were supportive of the principles of the CP.

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

- 4.12 There were no comments on the draft legal text.

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

- 4.13 All respondents agreed that the CP better facilitates DCUSA Objective 4 as it supports Suppliers ability to provide data where applicable and promotes an efficient and effective code using common wording and removes old clauses, and facilitates the delivery of SLC 12A.

Question 5: Are you supportive of the proposed implementation date?

- 4.14 All respondents answered that they were supportive of the proposed implementation date of February 2017. Two respondents answered that while they were supportive of the implementation date as it allows suppliers time to amend their systems, an earlier date would have been preferred.

Question 6: Do you have any other comments on the DCP 277?

- 4.15 There were no further comments on DCP 277.

TRAS Expert Group Conclusions

- 4.16 With regard to question 5, the TEG determined to keep the implementation date of February 2017 to ensure suppliers have the necessary time to update their systems.
- 4.17 Therefore, there were no aspects of the CP that required updating after the consultation.

5 Relevant Objectives

Assessment 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 1.

- 5.2 The TRAS Expert Group considers that the following DCUSA Objectives are better facilitated by DCP 277.

Impact of the Change Proposal on the Relevant Objectives:	
Relevant Objective	Identified impact
DCUSA General Objective Four - The promotion of efficiency in the implementation and administration of this Agreement	Positive

- 5.3 General Objective four is better facilitated by DCP 277 as this change will help to ensure the effective operation of TRAS arrangements through providing Suppliers with a clear data definition for data item population.

6 Impacts & Other Considerations

- 6.1 The proposed amendments are to facilitate improved governance in how the data items for TRAS are presented; the layout does reference information which comes from MRA J Code items and SPAA RGMA information so the consideration is for information only.
- 6.2 DCP 277 will impact suppliers.

Does this Change Proposal impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

- 6.3 This Change Proposal will not impact a Significant Code Review or other significant industry change project.

Consumer Impacts

- 6.4 There are no consumer impacts from this change.

Environmental Impacts

- 6.5 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 277 were implemented. The TRAS Expert Group did not identify any material impact on greenhouse gas emissions from the implementation of this CP.

7 Implementation

- 7.1 The proposed implementation date for DCP 277 is 23 February 2017.

8 Legal Text

- 8.1 The legal text for DCP 277 is provided as Attachment 5.
- 8.2 The legal text sets out that the data fields which constitute the Consumption File and Outcome File are described in Appendix 2 as 'mandatory' or 'conditional'. When a Supplier Party populates data fields under Paragraph 8.5 'mandatory' data fields must be populated), whereas, in the case of 'conditional' data fields then, the Supplier Party:
- (a) must use all reasonable endeavours to provide the data it holds in respect of those data fields (but need not provide the data where it does not hold the required data in a readily accessible and extractable electronic format);
 - (b) must, where the Supplier Party does not hold the required data in a readily accessible and extractable electronic format, use all reasonable endeavours to provide any comparable alternative data that the Supplier Party does hold in such format; and
 - (c) is not otherwise obliged to provide the data.
- 8.3 The TRAS Expert Group has considered the Legal Text and is satisfied that it meets the intent of the Solution.

9 Recommendations

Panel's Recommendation

The Panel approved this Change Report on 19 October 2016. The Panel considered that the TRAS Expert 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 277.

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 277 Change Proposal
- Attachment 2 – Voting Form
- Attachment 3 – Proposed Data Item Conditionality
- Attachment 4 – TEG responses to DCP 277
- Attachment 5 – DCP 277 Legal Text