



DCUSA CHANGE REPORT

DCP 269 – Revenue Protection Service Withdrawal Period

Executive Summary

DCP 269 seeks to require 3 months' notice to be given by a DNO in the event that they wish to withdraw the Revenue Protection service they provide under DCUSA.

This document presents the Change Report for DCP 269 and invites DNOs and Suppliers to vote on the following:

- whether to accept or reject DCP 269, noting whether or not DCP 269 better facilitates the DCUSA Objectives; and
- the implementation date for DCP 269.

The voting deadline for DCP 269 is **08 July 2016**.

1 PURPOSE

- 1.1 This document is issued in accordance with Paragraph 11.20 of the DCUSA, and details DCP 269 - '*Revenue Protection Service Withdrawal Period*'. 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.
- 1.2 Parties are invited to consider the proposed amendment (Attachment 2) and submit their votes using the Voting form (Attachment 1) to dcusa@electralink.co.uk by **08 July 2016**.

2 BACKGROUND TO THE DCP 269 CHANGE PROPOSAL

- 2.1 DCP 054 '*Revenue Protection/ Unrecorded Units into Settlements*' introduced the Revenue Protection Code of Practice in November 2013. Under Section 2A Clause 32, Distributors and Suppliers are obliged to comply with Schedule 23 '*Revenue Protection Code of Practice*' or to procure an external Revenue Protection Agent to comply with their respective obligations as a Distributor or a Supplier.

3 INTENT OF THE DCP 269 CHANGE PROPOSAL

- 3.1 DCP 269 was raised as a Part 2 Matter by npower to require 3 months' notice to be given by a DNO in the event that they wish to withdraw the Revenue Protection service they provide under DCUSA.
- 3.2 The need for this change is due to a number of Distributors choosing to stop providing their Revenue Protection Services to Suppliers with little notice. For Supplier Parties who have chosen to procure an external Revenue Protection Agent to comply with their respective obligations under Section 2A Clause 32, this change provides the Supplier with a sufficient notice period to procure and implement a replacement Revenue Protection Service. Thus allowing the Supplier to meet their licence

obligations under SLC 12¹, 12A², 13³, 26⁴ and 27⁵ and provide continuity of service to their customers.

- 3.3 This 3-month notice period will allow for the implementation of a safe and efficient replacement service for managing instances of suspected theft of electricity. This will also maintain the safety and security of the distribution network.
- 3.4 The DCUSA Panel directed that this change be designated as a Part 2 Matter on the basis that the CPs proposed legal text containing the wording “*by a method agreed*” be amended, as this choice of wording did not clarify what happens if Parties could not agree a method. The proposer agreed to amend the wording as set out in Section 4.

4 DCP 269 - LEGAL DRAFTING

- 4.1 The proposed legal text has been considered by the proposer and reviewed by the DCUSA legal advisor and acts as Attachment 2. It is proposed to amend DCUSA Section 2A Clause 32.3 as follows:

“32.3 Where the Company provides a Revenue Protection Service to the User under this Agreement, it shall do so in accordance with the obligations of the ‘Supplier’ under the Revenue Protection Code of Practice. Charges for the services so provided shall be calculated in accordance with those specified as applicable to such services in the Relevant Charging Statement and shall be paid for as Transactional Charges in accordance with Clause 22. **The Company may cease providing the Revenue Protection Service to the User under this Agreement, provided that the Company gives the User at least three months' advance notice of the date on which the Company will cease providing the Revenue Protection Service.**”

5 ASSESSMENT AGAINST THE DCUSA OBJECTIVES

- 5.1 The proposer considers that the following DCUSA Objectives are better facilitated by

¹ SLC 12 Matters Relating to Electricity Meters

² SLC 12A Matters Relating to Theft of Electricity

³ SLC 13 Arrangements for Site Access

⁴ SLC 26 Service for Specific Domestic Customer Groups

⁵ SLC 27 Payments, Security Deposits, Disconnection and final Bills

DCP 269:

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

General Objective one is better facilitated by DCP 269 as it ensures clarity and the continuity of Revenue Protection Service being provided so that theft will continue to be prevented.

- **General Objective Four - The promotion of efficiency in the implementation and administration of this Agreement**

General Objective 4 is better facilitated by DCP 269 as this CP defines the withdrawal period so all parties are prepared and have time to implement an enduring solution to continue to provide the best service to the customer.

6 ENVIRONMENTAL IMPACT

- 6.1 In accordance with DCUSA Clause 11.14.6, the proposer assessed whether there would be a material impact on greenhouse gas emissions if DCP 269 were implemented. The proposer did not identify any material impact on greenhouse gas emissions from the implementation of this Change Proposal.

7 IMPLEMENTATION

- 7.1 Subject to Party approval, the DCP 269 change will be implemented in the first DCUSA release following approval.

8 PANEL RECOMMENDATION

- 8.1 The Panel approved this Change Report at its meeting on **15 June 2016**. The Panel considered that a sufficient level of analysis had been carried out to enable Parties to understand the impact of the proposed amendment and to vote on DCP 269.
- 8.2 The timetable for the progression of the CP is as follows:

Activity	Date
Change Report approved by DCUSA Panel	15 June 2016
Change Report Issued for Voting	17 June 2016

Party Voting Closes	08 July 2016
Change Declaration Issued	12 July 2016
Implementation ⁶	First DCUSA Release following Approval

9 NEXT STEPS

- 9.1 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 **08 July 2016**.
- 9.2 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.

ATTACHMENTS

- Attachment 1 – DCP 269 Voting Form
- Attachment 2 – DCP 269 Draft Legal Text
- Attachment 3 – DCP 269 Change Proposal

⁶ The next DCUSA release is scheduled for the 01 September 2016.