

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 264
Date of submission	15 February 2016
Attachments	N/A
Originator Details	
Company Name	E.ON UK
Originator Name	Helen Fosberry
Category	Supplier
Email Address	helen.fosberry@eonenergy.com
Phone Number	07753 897 699
Change Proposal Details	
CP Title	Introduction of Energy Theft Tip Off Line Service
Impacted parties	Suppliers and Distributors
Impacted Clause(s)	Contents Table 1 Definitions 8 'Costs' Schedule 23 Schedule 25 New Schedule [XX]
Part 1 / Part 2 Matter	Part 1
Provide your rationale why you consider this change is a Part 1 or Part 2 Matter	This CP requires Authority Consent as it introduces a new mandatory Schedule.
Related Change Proposals	An equivalent SPAA CP will be progressed
Change Proposal Intent	
This CP seeks to include provisions relating to the Energy Theft Tip Off Line Service in the DCUSA.	
Business Justification and Market Benefits	
Standard Licence Condition 12 of the Supply Licence and Standard Licence Condition 27 in the Distribution Licence place obligations on Suppliers and Distributors to detect and investigate theft. These are facilitated within the DCUSA via the Theft Code of Practice (Schedule 23) which sets out specific obligations on Suppliers and Distributors regarding theft.	
As part of industry discussions regarding the introduction of a Theft Risk Assessment Service (TRAS), parties identified a requirement for a tip off line to enable members of the public to report suspected theft. Delivery of an	

Energy Theft Tip Off Line Service (ETTOLS) was initially included in the scope of the TRAS and introduced into the DCUSA through DCP201. When the TRAS Service Provider was appointed, SPAA and DCUSA requested that the TRAS Service Provider should work with the preferred ETTOLS Service Provider to agree an operating model and sign a contract for services.

However in November 2015, SPAA and DCUSA determined that an acceptable contract could not be implemented between the TRAS Service Provider and the preferred ETTOLS Service Provider. Therefore a project was initiated to facilitate delivery of the ETTOLS via a direct tripartite contract between SPAA, DCUSA and the ETTOLS Service Provider.

This CP has been raised to remove references to the ETTOLS from the TRAS Schedule (25), explicitly refer to the ETTOLS as a source of suspected theft information in the Theft Code Of Practice (23) and introduce a new DCUSA Schedule which will include details of the service to be provided by the ETTOLS Service Provider; and the rights and obligations of DCUSA Parties in relation to the service.

Proposed Solution and Draft Legal Text

It is proposed that details of the service to be provided by the ETTOLS Service Provider and the rights and obligations on Suppliers and Distributors in relation to the ETTOLS will be incorporated in a single ETTOLS Schedule. This requires a change to the Contents Table to add Schedule [XX] ETTOLS Schedule to the list. Additional definitions will also be required to reference ETTOLS within the relevant Schedules

It is proposed that the costs of the ETTOLS will be shared between all Suppliers based on market share of Metering Points as per the TRAS arrangements. Market share on this basis is already used in DCUSA for recovering TRAS costs, therefore the methodology for determining each Supplier's market share will be based on the method already set out in Clause 8.9A of the DCUSA. It is proposed that Clause 8.9 be amended to refer to the ETTOLS.

Finally, it is proposed that the current references to the Tip Off Line Service within Schedule 25 are removed and references to the ETTOLS are incorporated within Schedule 23 to clarify that the ETTOLS is a source of suspected theft information.

The legal text will be developed by the Tip Off Line Working Group.

Proposed Implementation Date

5 Working Days following Authority approval

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	<input checked="" type="checkbox"/>

If other please specify

An equivalent Change Proposal is being progressed under the SPAA.

Consideration of Wider Industry Impacts

[See Guidance Note 6] None

Environmental Impact

[See Guidance Note 7] None

Confidentiality

[See Guidance Note 8] No

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
- ☐ 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

General Objective 2 is better facilitated as the establishment of an ETTOLS enables a more efficient and targeted approach to tackling theft of electricity. This more efficient action in tackling theft reduces costs and therefore helps facilitate competition in the supply of electricity.

General Objective 1 is better facilitated as reduced theft enables more accurate data about consumption to be utilised by DNOs. More accurate data gives DNOs more opportunity to

manage their network in an efficient and economic manner.

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.

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
- ☐ 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

[See Guidance Note 10]

Charging Objectives:

General Objectives:

Has this issue been discussed at any other industry forums? If so please specify and provide supporting documentation

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. 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

		<p>December of each year.</p> <ul style="list-style-type: none"> 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	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.
7	Environmental Impact	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 .
8	Confidentiality	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.
9	DCUSA General Objectives	Indicate which of the DCUSA Objectives will be better facilitated by the Change Proposal.
10	Detailed Rationale for DCUSA Objectives	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.
11	DCUSA Charging Objectives	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.