

**DCUSA DCP 225 'THEFT RISK ASSESSMENT SERVICE – PARTY OBLIGATIONS' CHANGE DECLARATION****VOTING END DATE:** 13 MAY 2015

DCP 225	WEIGHTED VOTING				
	DNO	IDNO	SUPPLIER	DISTRIBUTED GENERATOR	GAS SUPPLIER
<b>CHANGE SOLUTION</b>	Accept	n/a	Accept	n/a	n/a
<b>IMPLEMENTATION DATE</b>	Accept	n/a	Accept	n/a	n/a
<b>RECOMMENDATION</b>	<p><b>Change Solution – Accept.</b> In respect of each Party Category that was eligible to vote, the sum of the Weighted Votes of the Groups in that Party Category which voted to accept the change solution was more than 50% in all Categories.</p> <p><b>Implementation Date – Accept.</b> In respect of each Party Category that was eligible to vote, the sum of the Weighted Votes of the Groups in that Party Category which voted to accept the implementation date was more than 50% in all Categories.</p>				
<b>PART ONE / PART TWO</b>	<b>Part One</b> – Authority Determination Required				

PARTY	SOLUTION (A / R)	IMPLEMENTATION DATE (A / R)	WHICH DCUSA OBJECTIVE(S) IS BETTER FACILITATED?	COMMENTS
<b>DNO PARTIES</b>				
SP Distribution plc	Accept	Accept	We consider General Objectives one	None

SP Manweb plc	Accept	Accept	and two are better facilitated	
Electricity North West	Accept	Accept	General Objective 1 and 2	n/a
Eastern Power Networks	Abstain	Abstain	n/a	n/a
London Power Networks	Abstain	Abstain	n/a	n/a
South Eastern Networks	Abstain	Abstain	n/a	n/a
<b>IDNO PARTIES</b>				
n/a	n/a	n/a	n/a	n/a
<b>SUPPLIER PARTIES</b>				
British Gas	Accept	Accept	<p>We agree with the change report that general objective one is better facilitated by DCP 225 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.</p> <p>We also agree that general objective two is better facilitated as the establishment of a TRAS service enables a more efficient and targeted approach to tackling theft of electricity. This more efficient action in</p>	<p>Legal Drafting</p> <p>With regard to Data Protection issues raised by this modification we believe the question of the roles of SPAA and DCUSA (whether data controller or data processors) needs to be placed before the ICO for a definitive answer as this will remove any lasting concerns in respect of potential risk that the end of end process is not fully compliant. This should form part of the implementation stage of the TRAS project.</p> <p>We believe Clause 8.5 (b) below needs</p>

			<p>tackling theft should reduce costs and therefore help facilitate competition in the supply of electricity.</p>	<p>to be more specific</p> <p>“the Supplier Party's updates to the data in the Theft Investigation File populated with updates to the end of the 5th calendar day of the month (to either be provided via the secure STS service agreed between that Supplier Party and the TRAS Service Provider, or via the system provided for that purpose by the TRAS Service Provider).”</p> <p>There should be an absolute obligation on all Suppliers to provide details of all theft investigations to the TRAS. This should be a requirement regardless of whether the lead has been generated by the TRAS or by some other means.</p> <p>Other Comments</p> <p>We also believe that the TRAS Tip-off line should be fully implemented as soon as possible including a full publicity campaign. It is our experience that leads from tip-off lines are the most reliable and therefore from an economic efficiency perspective provide the most value for money when compared to expenditure on data driven leads.</p> <p>With regard to the provision of data we</p>
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				believe that we can provide the majority of the data items that have been requested for the initial data set and where certain items are not available we can provide an alternative data item which we believe will be suitable.
Co-Operative Energy Ltd	Abstain  Defer the submission date to the end of July for the first tranche of data.	Reject End of July as suggested in the working groups.	Relevant objective 4 - The promotion of efficiency in the implementation and administration of this Agreement and the arrangements under it.  We agree with the main objectives of the TRAS but we do have concerns around the proposed timetable for providing the initial tranche of data in the specified format. We need sufficient time to allow for the capabilities of extracting the relevant reports from our systems in the specified format.	n/a
EDF Energy	Accept	Accept	Objectives 1 & 2	Our comments in relation to this change have been attached to this response as Appendix 1. These comments mirror those sent in the corresponding gas SPAA change.
E.ON	Accept	Accept	We believe this facilitates the following objectives General Objective One - 'the development, maintenance and	n/a

			operation by the DNO parties and IDNO parties of efficient, co-ordinated and economical Distribution Network' General Objective Two - "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'	
GDF Suez	Reject	Reject	We do not believe the DCUSA objectives are better facilitated by this change	<p>GDF SUEZ would like to echo the concerns raised by other suppliers during the consultation process on this modification, and does not believe that these concerns have been sufficiently addressed by the resulting changes made to the proposal.</p> <p>In particular, we believe that the amended proposal as submitted for voting still:</p> <ul style="list-style-type: none"> <li>• Places an undue burden on suppliers (particularly smaller non-domestic suppliers) in respect of the volume and complexity of data being requested</li> <li>• Puts forward an unreasonably short timescale for the provision of data</li> </ul>

				<ul style="list-style-type: none"><li>• Raises significant concerns about the level of security and commercial confidentiality which will be applied to data provided to the TRAS Service Provider</li></ul> <p>The depth of these requirements only became known when the TRAS preferred bidder was identified at the end of February. We therefore feel that at a time of intense industry change (EMR, P272, Project Nexus, Microbusiness Licence Changes) the fast tracking of this modification has not allowed enough time for a considered industry input from a sufficiently broad number of participants.</p> <p>It does not seem reasonable that this timetable appears to be driven not by an in depth assessment of stakeholder capability and readiness, but rather by a regulatory imperative to contract with the TRAS Service Provider by the end of May 2015.</p> <p>We have sympathy with the view expressed during the consultation process that the supplier data element should be removed from this CP and pursued as a separate change.</p>
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				<p>Finally it will be difficult to extract and provide the required data in the specified formats from our current systems, meaning we will have to seek alternative approaches with the Service Provider, as permitted under the current legal drafting. This will add time into the process and make meeting the proposed deadlines very challenging, particularly as the Service Provider has not yet been formally appointed.</p> <p>For the above reasons, although we support the principle of the implementation of the TRAS Service Provider as a means for suppliers to collectively fulfil the relevant Licence Obligation we are unable to support this modification in its current form and are concerned that a rushed implementation will put at risk the establishment of an effective TRAS.</p>
Haven Power Ltd	Reject	Reject	General objective 1 – We believe the TRAS would provide a more proactive and structured approach to tackling electricity theft, which should in turn enable DNOs to better manage the network in an economical and efficient manner.	<p>While we are keen to support a more efficient, structured approach to tackling electricity theft, we have a number of concerns with this change proposal. We note the working group has successfully reduced the number of mandatory data items, but we remain seriously concerned about the volume and frequency of data required. Smaller</p>

				suppliers are already under considerable pressure due to the current pace of regulatory change. Dropping system changes into an already congested timetable in order to build and automate these reports is something we would struggle to achieve. It would require considerable resource to procure and submit the data in addition to complying with the obligation to follow up TRAS leads. The frequency with which we are required to provide the data is a challenge in itself, and also allows limited opportunity to ensure validity and data quality. We have concerns about the data protection implications as we would be providing unprecedented volumes of personal data to a third party if this change were to go ahead.
RWE npower	Accept	Accept	2	<p>The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent with that) the promotion of such competition in the sale, distribution and purchase of electricity.</p> <p>We support the TRAS implementation and believe it should progress as proposed, however there are outstanding data protection matters that must be addressed to avoid future issues.</p>
Opus Energy LTD	Reject	Accept	n/a	Opus Energy engaged with the data workshops held on the 26th March and



			<p>1st April which were arranged by the working group in response to concerns highlighted by a number of respondents to the working group consultation issued in March. We provided written feedback twice in response to requests for feedback, detailing our concerns regarding the data provision requirements. We are disappointed that our second response dated 13th April, in which we proposed an alternative solution for the working group to consider, was not received by ElectraLink due to their provision of an incorrect response email link within their email requesting feedback. This was discovered late afternoon on the day the working group met to discuss the responses received and was therefore too late to be considered. After discussing next steps with ElectraLink they advised that the only option is for us to include our comments in the voting forms as appropriate. Therefore, the comments below are a direct copy of our response dated 13th April 2015.</p> <p>We would like to take this opportunity to re-iterate our belief that providing data for our whole portfolio on a monthly basis is entirely inappropriate.</p>
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				<p>Given the quantity of sites in our ownership and how resource-heavy the requirements are, we have continued concerns about the practicality of exchanging data for all supply points each month.</p> <p>Having reviewed v.1.0 of the TRAS Request for Proposal (RfP), there are two clauses that we would like to highlight:</p> <p>Clause 10.1.b: The services must be economic, efficient and will be subject to continuous review and improvement. This is especially important given that the TRAS is a new service and there is an expectation that the successful service provider will be able to adapt and refine its approach to advance intelligence on theft detection on an on-going basis.</p> <p>Clause 21.4: The Service Provider will need to work with the Recipients to ensure the number of Leads reported to a Recipient as part of the TRAS Services is not disproportionate to the number of Leads that a Recipient may reasonably be expected to investigate in a Service Period.</p> <p>We feel it would be unnecessary for</p>
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			<p>suppliers to transfer data for all of their live sites on such a frequent basis as the quantity of leads generated would be disproportionate for what we are realistically able to investigate each month (clause 21.4). Given the importance that has been placed on the economic demands and efficiency of the service (clause 10.1.b), we believe as a result that the current approach is counter-productive as it neither minimises the amount of data required nor takes into account the time and resource required from suppliers to investigate each of the leads.</p> <p>We appreciate that there has been a great deal of effort through the facilitation of two data workshops to reduce the volume of data items suppliers are required to submit to the TRAS provider. However, our serious concerns about the submission deadlines proposed, in particular the initial data due between 30th June 2015 and 31st July 2015, remain.</p> <p>We are continuing to deal with an unprecedented level of RFI's in preparation for other industry projects such as Project Nexus and Elexon's P272 as well as numerous adhoc requests from Ofgem and the CMA. Whilst the</p>
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				<p>current timescales may enable the elected provider to complete their contracted obligation to deliver an operating TRAS Solution for the implementation date, the limited time allowed for data preparation by suppliers is uncharacteristically short for data collection of this magnitude. We'd like to highlight that the data items requested go above and beyond any current requirements on suppliers to provide and validate information on their customer portfolio and will require significant resource to ensure compliance.</p> <p>We believe that this requirement is wholly unmanageable and unjustified and loads unfair risk onto the supplier. Given Ofgem have confirmed that they are flexible about what day 1 of TRAS looks like on 29 February 2016, provided the required number of theft leads are produced by February 2017, it is our belief that the TRAS provider has been afforded noteworthy leeway allowing a phased approach which doesn't appear to have been passed on to support the industry. We would like to strongly re-iterate our request that we are given a fair amount of time to meet the submission deadline given the industry</p>
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				average time for IT and data preparation related to the implementation of code changes is typically in the order of 6 months.
OVO Electricity Ltd	Accept	Reject	As DCUAS has stated, the success of this programme is reliant on suppliers. This reflects their ability to provide the baseline information requested by June 30 <sup>th</sup> . This is an impossibly tight deadline. We have only been made aware of the scale of the information requested in the past day, and the amount of information required is considerable. We are also facing huge pressures to meet many Ofgem, CMA and DECC RFIS and industry changes. Many require significant tech, BI and database support. We are happy to provide this information, but would like to push back the deadline until October. It is likely that other independent suppliers are also facing other such constraints and find it difficult to keep track of all industry changes.	n/a
Scottish Power Energy Retail Ltd	Accept	Accept	<p>We consider that Objectives 1 and 2 are better facilitated.</p> <p>Objective 1 – as more data is collected on actual theft which is being committed, together with more</p>	While the timescales for preparation and submission of the initial data extract are extremely challenging, we offer our overall support for the intention of this Change Proposal.

			<p>realistic estimates of stolen energy units, this information can be used by DNO and IDNO Parties to manage their networks more efficiently. As a consequence, DNO and IDNO Parties will have a more accurate picture of offtake quantities. They will also be able to target their resources at other elements which may be contributing to network losses.</p> <p>Objective 2 – The involvement of all Suppliers in the TRAS solution will ensure a more targeted approach to theft investigation and detection. The proposed TRAS Solution ensures that all Suppliers are treated equally. The generation of consumption “Outliers” by the TRAS solution will provide Suppliers with the opportunity to investigate specific customers who have been identified as having consumption peculiarities which may indicate a propensity to commit theft. As a consequence individual Suppliers can focus their resources on these “outliers” providing opportunities to reduce their overall cost exposure in managing theft leads and to increase theft detection rates.</p> <p>In terms of the promotion of effective</p>	<p>The regular provision of data of this scale and magnitude to the TRAS Service Provider places an enormous burden on Supplier systems in terms of effort, resource and cost. In addition the provision of “sensitive personal data” relating to our customers has the potential to expose Suppliers to non-compliance with the terms of the Data Protection Act. It is extremely important therefore that the DCUSA Panel continues to proactively engage with the ICO in terms of the proposed TRAS solution including the justification for provision of sensitive personal data and progress on the development of a Privacy Impact Assessment. Individual Suppliers are obliged to ensure that they have the appropriate Privacy Notices in place to support the release of personal data to the TRAS Service Provider.</p> <p>In terms of wider communication of the introduction and implementation of the TRAS, the principles supporting the proposed solution and the potential benefits of this service on detection and deterrent to commit theft, we believe that a considered and coordinated communication approach is required.</p>
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			<p>competition in the sale, distribution and purchase of electricity, we believe that the collective engagement of all Suppliers in the use of the TRAS solution will bring overall benefits with regard to the number of suspected theft cases being investigated and an upward trend in detection rates. In the longer term this will contribute to a reduced risk of cost exposure from unaccounted for theft units and an improvement in settlement accuracy.</p> <p>The TRAS Solution together with introduction of a theft Tip-Off service will ensure that all Suppliers have the opportunity to proactively participate and contribute in the deterrent of theft. As awareness increases, consumers will recognise that transferring to another Supplier will no longer result in them avoiding being detected.</p>	
SSE Energy Supply	Abstain	Abstain	n/a	Due to the short time span we have not had time to complete a full analysis that would enable us to come to a conclusion in regards to accepting or rejecting this proposal and therefore we choose to abstain from voting.
The Renewable Energy Company	Reject	Reject	Whilst we accept that the implementation of the TRAS may be a	The sheer amount of data requested per meter point is unreasonable, and we

			<p>positive move for the industry, and that this proposed solution may facilitate the DCUSA objectives in theory, the reality does not agree. We have set out our reasoning in the following section.</p>	<p>have not received any satisfactory explanations of why so much information is required. We are also concerned by the nature of the information we are having to provide. Much of the information requested is commercially sensitive and we do not see the reason for it having to be included. Furthermore, we do not feel that there is sufficient surety provided to us relating to the security of the data relating to our customers.</p> <p>The timescales of having to complete a historical data dump by June/July this year is not manageable, especially for small suppliers who do not have the resources to be able to collate so much information in such a short time. It also coincides with work on project Nexus, which means that what resources we do have, will be greatly reduced.</p> <p>Whilst we accept that TRAS is coming into place, we recommend a review of the information required, and a substantial delay in the timeframes in which the information has to be provided. This is both in terms of the historical data submission in June/July, and in the necessity of having to provide updates on a monthly rather than quarterly (or less frequent) basis. We appreciate this opportunity to</p>
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				respond, and would welcome any questions on the matter.
<b>DISTRIBUTED GENERATOR PARTIES</b>				
n/a	n/a	n/a	n/a	n/a
<b>GAS SUPPLIER PARTIES</b>				
n/a	n/a	n/a	n/a	n/a