



DCUSA Change Report

DCP 191 - Publication of the Revenue
Protection Code of Practice

1 PURPOSE

- 1.1 This document is issued in accordance with Clause 11.20 of the DCUSA and details DCP 191 – Publication of the Revenue Protection Code of Practice (Attachment 1).
- 1.2 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.
- 1.3 Parties are invited to consider the proposed amendments (Attachment 2) and submit their votes using the form attached as Attachment Three to dcusa@electralink.co.uk no later than 29 October 2013.

2 INTENT OF DCP 191 – PUBLICATION OF RPU COP

- 2.1 DCP 191 has been raised by UK Power Networks, following discussion by the DCUSA Panel, as a Part 1 matter¹ to permit the non-publication of the Revenue Protection Code of Practice (RP COP) on the public facing part of the DCUSA website but to make it available to Parties and Interested Industry Participants on the password protected part.
- 2.2 DCP 054 'Revenue Protection / Unrecorded Units into settlements' introduces the RP COP for detecting and reporting illegal abstraction of electricity in to the DCUSA and is due to be implemented in the 07 November 2013 DCUSA release.
- 2.3 A concern has been raised that making the RP CoP generally available provides an opportunity for thieves to monitor the way in which electricity theft is being detected and reported upon thus enabling them to avoid detection.
- 2.4 The DCUSA Panel have directed that this change be designated as an urgent change as it relates to an imminent issue (the next release of DCUSA) and if not addressed may have an adverse impact on DCUSA Parties (Suppliers' ability to prevent and detect theft) and hence the safety and security of the Distribution Network.
- 2.5 The Proposer highlights that the change will only prevent the publication of the newly approved Schedule 23 Revenue Protection Code Of Practice on the

¹ DCP 191 has been classified as a Part 1 matter in accordance with Clause 9.5.as it is proposed to amend Section 1B Governance Clause 5.3.10 and Schedule 14 Website Requirements paragraph 3.

external part of the website and does not affect DCUSA's content as published to Parties.

- 2.6 It has been noted that a RP COP exists which addresses issues on theft of gas which was approved and implemented in to the Supply Point Administration Agreement (SPAA) v9.3 on the 28 February 2013 and is only available on the password protected section of the website. Therefore, confining the electricity RP COP to the password protected section of the DCUSA website would not be setting a precedent.

3 PROPOSED LEGAL TEXT

- 3.1 The draft legal text has been reviewed by the DCUSA Legal Advisor and is attached as Attachment Two.

The changes to the DCUSA legal text proposed under DCP 191 amend:

- **Schedule 14 Website Requirements, paragraph 3** has been modified to allow the Revenue Protection Code of Practice to be excluded from being published on the public section of the website. The full DCUSA including the Revenue Protection Code of Practice would be made available on the password controlled pages of the DCUSA website only.
- Consequentially, **Section 1B Governance Clause 5.3.10** has been modified to stipulate that the DCUSA should be published on the website in accordance with Schedule 14.

- 3.2 Copies of the DCUSA that are made available on request to any person will still include the Revenue Protection Code of Practice in accordance with Clause 5.3.10. This is because Appendix 1 of Condition 22 of the Distribution Licence requires DCUSA to include provision for a copy of DCUSA to be made available to any person who requests it. In practice few requests have been received.

4 EVALUATION AGAINST THE DCUSA OBJECTIVES

- 4.1 DCP 191 has been assessed against the DCUSA Objectives:

- Objective 1² – Better Facilitated.
- Objective 2³ – Better Facilitated.
- Objective 3⁴ – No Impact.
- Objective 4⁵ – Better Facilitated.
- Objective 5⁶ – No Impact.

4.2 The Proposer explains that DCP 191 will ensure the maintenance and operation of the distribution system by preventing the development of new methods of stealing electricity based on an understanding of the reporting and detection methods used by industry parties, thus better facilitating Objective 1.

4.3 The prevention of these new methods will help to protect the market from becoming impacted by increased theft activities and as a result better facilitates Objective two in helping to maintain effective competition in the generation and supply of electricity.

4.4 Objective four is better facilitated as through the introduction of this change the Revenue Protection CoP is less able to be undermined thus ensuring the efficient implementation and administration of the DCUSA.

5 IMPACT ON GREENHOUSE GAS OMISSIONS

5.1 It is not believed that there is any material impact on greenhouse gas emissions from the implementation of this Change Proposal.

6 IMPLEMENTATION

6.1 Subject to Party approval, DCP 191 will be implemented in the next DCUSA release following Authority Consent.

² The development, maintenance and operation by each of the DNO Parties and IDNO Parties of an efficient, co-ordinated, and economical Distribution System

³ 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

⁴ The efficient discharge by each of the DNO Parties and IDNO Parties of the obligations imposed upon them by their Distribution Licences.

⁵ The promotion of efficiency in the implementation and administration of this Agreement and the arrangements under it.

⁶ 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.

7 PANEL RECOMMENDATION

7.1 The DCUSA Panel approved the DCP 191 Change Report on 23 October 2013. The timetable for the progression of the CP is set out below:

Activity	Target Date
Initial Assessment Report	18 October 2013
Change Report Agreed	22 October 2013
Party Voting Ends	29 October 2013
Change Declaration Issued	30 October 2013
Authority Decision	asap
Implementation	Next DCUSA Release Following Authority Consent

8 ATTACHMENTS:

- Attachment 1 – DCP 191 Change Proposal
- Attachment 2 – DCP 191 Legal Text
- Attachment 3 – DCP 191 Voting Form