

DCUSA CHANGE DECLARATION**DCP 201 - Provisions for the Theft Risk Assessment Service (TRAS)****VOTING END DATE: 19 February 2014**

DCP 201 - Provisions for the Theft Risk Assessment Service (TRAS)	WEIGHTED VOTING				
	DNO	IDNO	SUPPLIER	DISTRIBUTED GENERATOR	GAS SUPPLIER
CHANGE SOLUTION	Accept	n/a	Accept	n/a	n/a
IMPLEMENTATION DATE	Accept	n/a	Accept	n/a	n/a
RECOMMENDATION	<p>Change Solution – ACCEPT 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>Implementation Date – ACCEPT 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>				
PART ONE / PART TWO	Part One – Authority Determination Required				

PARTY	SOLUTION (A / R)	IMPLEMENTATION DATE (A/R)	WHICH DCUSA OBJECTIVE(S) IS BETTER FACILITATED?	COMMENTS
DNO PARTIES				
Electricity North West Ltd	Accept	Accept	<p>General Objective 1 – this objective is better facilitated because the identification of theft by the TRAS will improve the settlement data that Distributors receive and use, amongst other things, to manage their networks and make it more efficient.</p> <p>General Objective 2 – this objective is better facilitated by providing a service to all suppliers in detecting theft so should reduce costs to all thereby better facilitating competition in the supply of electricity.</p> <p>General Objective 4 – this objective is better facilitated by introducing a change to DCUSA that allows for a future Supply Licence Obligation (intimated by Ofgem in their Tackling Electricity Theft consultation in July 2013 and the recent DCUSA/SPAA cross code meeting with Ofgem) covering the development and management of a Theft Risk Assessment Service (TRAS). This change will ensure that we can show flexibility and pragmatism in order to meet a challenging timetable.</p>	<p>This change proposal also introduces a change to the cost allocation to support the DCUSA. A similar change proposal (DCP 57 – Flexible Funding Model) sought to amend the DCUSA to permit the DCUSA Panel to alter the share of costs recovered from DCUSA parties for any project or activity where the Panel felt it was appropriate or where a change process outlines it. The Authority was concerned that this gives the Panel broad discretion to allocate costs to parties without any checks or balances and as such rejected the change proposal.</p> <p>In this change proposal the cost allocation has been amended to facilitate separate recovery of costs from a specific party who is obliged by the future licence change to introduce and manage the TRAS. This is specific to this service and this service only and as such can be judged on its own merits, and does not introduce any broad discretion to the DCUSA Panel.</p> <p>Market Participants have been criticised for the slow pace of change and lack of cross code engagement. This is the first joint code work between Electricity and Gas to deliver a service covering both</p>

			The other objectives are neutral in their effect.	codes. This change proposal is a positive step to ensure that both codes can work together at the earliest opportunity rather than waiting for Licence changes with the resultant delay in the delivery of the TRAS.
Scottish Power - Manweb	Accept	Accept	n/a	n/a
Scottish Power - Distribution	Accept	Accept		
UKPN - Eastern Power Networks	Accept	Accept	We agree with the proposer that this betters General Objective 1 and General Objective 2 by helping to identify potential risk of theft.	n/a
UKPN - London Power Networks	Accept	Accept		
UKPN - South Eastern Power Networks	Accept	Accept		
IDNO PARTIES				
N/A				
SUPPLIER PARTIES				
British Gas Retail	Accept	Accept	<p>We agree that DCUSA objectives 1 and 2 would be better facilitated for the following reasons:</p> <p>General objective 1 is also better facilitated in so far as reduced theft enables more accurate data about consumption to be utilised by DNOs. More accurate data gives the DNO more opportunity to manage their network in an efficient and economic manner.</p>	<p>We note that the Change Report to DCP 201 states that DCP 201 has been raised by E.ON as a Part 1 Matter and seeks to introduce a duty on the DCUSA Panel to work with the SPAA EC to facilitate:</p> <ol style="list-style-type: none"> 1. a project to define and procure a joint electricity and gas Theft Risk Assessment Service 2. the funding mechanism for the project 3. the on-going governance of the

			<p>General Objective 2 is better facilitated in so far that theft of Electricity will tackled under DCUSA via the Theft code of Practice. The establishment of a TRAS service enables a more efficient and targeted approach to tackling theft of electricity. More efficient action in tackling theft reduces costs and therefore helps facilitate competition in the Supply of Electricity.</p>	<p>established TRAS insofar as it applies to DCUSA parties, under DCUSA</p> <p>4. the inclusion within DCUSA of details of the TRAS service provided, its governance, change control and funding, insofar as it applies to DCUSA parties</p> <p>5. the inclusion within DCUSA of reference to the final contractual arrangement with SPAA and the service provider.</p> <p>This CP appears to only address points 1 and 2 above and we expect further modifications in future to incorporate points 3, 4 and 5 into the DCUSA.</p> <p>We would not expect the DCUSA Panel to authorise any further funding for the TRAS project than has already been included within the DCUSA budget until industry parties have been consulted further as defined within the DCUSA governance arrangements.</p>
<p>EON</p>	<p>Accept</p>	<p>Accept</p>	<p>General Objective 2 is better facilitated in so far that theft of Electricity will tackled under DCUSA via the Theft code of Practice. The establishment of a TRAS service enables a more efficient and targeted approach to tackling theft of electricity. More efficient action in tackling theft reduces costs and therefore helps facilitate competition</p>	<p>n/a</p>

			in the Supply of Electricity. General objective 1 is also better facilitated in so far as reduced theft enables more accurate data about consumption to be utilised by DNOs. More accurate data gives the DNO more opportunity to manage their network in an efficient and economic manner.	
Npower	Accept	Accept	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. The promotion of efficiency in the implementation and administration of this Agreement and the arrangements under it.	<ul style="list-style-type: none"> • A required first step to bring a Dual Fuel Theft Risk Assessment Service in to existence. • Delays to this proposal may impact industry timelines. • Subsequent changes to the DUCSA will be required.
Scottish Power Energy Retail Ltd	Accept	Accept	Objectives 1 & 2 – as per the CP form.	Accepted on the assumption that the TRAS will be a licence condition on electricity suppliers only.
SSE Energy Supply Ltd	Accept	Accept	n/a	No
DISTRIBUTED GENERATOR PARTIES				
N/A				
GAS SUPPLIER PARTIES				
N/A				