




DCUSA Change Report		At what stage is this document in the process?
<h1>DCP 357</h1> <h2>Sharing theft data between the TRAS and ELEXON</h2> <p>Date raised: 17 September 2019</p> <p>Status of Change: <b>Standard</b></p>		01 – Change Proposal
		02 – Consultation
		03 – Change Report
		04 – Change Declaration
<b>Purpose of Change Proposal:</b> To create data sharing permissions and a data template in Schedule 25 to share specific theft investigation data items between the Theft Risk Assessment Service (TRAS) and ELEXON.		
	This document is issued in accordance with Clause 11.20 of the DCUSA, and details DCP 357 'Sharing theft data between the TRAS and ELEXON'.  Parties are invited to consider the proposed amendment (Attachment 1) and submit their votes using the Voting form (Attachment 2) to <a href="mailto:dcusa@electralink.co.uk">dcusa@electralink.co.uk</a> by <b>13 March 2020</b> .  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.  If you have any questions about this paper or the DCUSA Change Process, please contact the DCUSA by email to <a href="mailto:dcusa@electralink.co.uk">dcusa@electralink.co.uk</a> or telephone 020 7432 3008.	
	 Parties Impacted: <b>Suppliers</b>	
	 Impacted Clauses: <b>DCUSA Schedule 25 (Theft Risk Assessment Service)</b>	

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Any questions?

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Timetable

The timetable for the progression of the CP is as follows:

Change Proposal timetable

Activity	Date
Initial Assessment Report Approved by Panel	18 December 2019
Change Report Approved by Panel	19 February 2020
Change Report issued for Voting	21 February 2020
Party Voting Closes	13 March 2020
Change Declaration Issued to Parties	17 March2020
Implementation	25 June 2020

## 1 Executive Summary

### What?

- 1.1 ELEXON are required to assess risk in the market, ELEXON have identified Revenue Protection and the correct settlement of Identified theft as a risk in focus for the 2019/20 Performance Assurance Operating Period (PAOP). ELEXON are seeking this change in order to provide more accurate assessment of the Risk, assess GB Energy Party performance of the reconciliation of Identified Theft, and provide reporting to GB Energy Parties. ELEXON does not currently have access to data of this nature.

### Why?

- 1.2 ELEXON requires the data in order to accurately assess the impact of Identified Theft and the reconciliation of theft as part of its Risk Evaluation Register.

### How?

The following table summarises all the fields requested and provides information on why the data is required. Data is required for all MPANs (residential and commercial). The requirement for all records, not just confirmed records, will allow the ELEXON to understand the rate of proportion of confirmed thefts against possible thefts and identify patterns and trends which could assist with the scoring of the Revenue Protection risk.

The following table summarises all the fields requested and provides information on why the data is required.

Data Block	Field Name	Reason
Supply Block	MPAN / MPRN	Used as an identifier to match between records
Meter Block	Meter Serial Number	Used as an identifier and validation to match between records
Investigation Outcome Block	Supplier Investigation ID No	Used as an identifier to match between records
	Theft lead source	to understand trends in theft for scoring
	Date Investigation Closed	support data flow matching
	Current_investigation_code	to understand trends in theft for scoring
	Type of theft	to understand trends in theft for scoring
	Assessed start date for theft	vital to match affected start date for reconciliation
	Assessed end date for theft	vital to match affected end date for reconciliation
	Assessed losses	vital to match the total volume of affected theft for

		reconciliation
	<b>Tampering Code</b>	to assess the methods of theft
	<b>Tampering Report Date</b>	to understand the periods for which theft is not reported
	<b>Tampering Report Source</b>	to assess the methods of theft reporting
	<b>Security devices fitted</b>	to understand the mitigation controls applied following theft identification

To facilitate an annual review of the TRAS data provided to ELEXON, it is proposed that DCUSA Schedule 25 be amended to place a requirement on the theft working group formed under the DCUSA (i.e. the Theft Issues Group) to carry out an annual review of the data provided to the ELEXON and ensure that only relevant data items are submitted in the following year. The legal text will also require that, as part of this review, an updated Privacy Impact Assessment from the ELEXON be reviewed, to ensure no changes have occurred that will impact how it securely manages the data.

The proposed legal text is provided as Attachment 1. ELEXON has also provided a Privacy Impact Assessment for this year's data request. This is provided as Attachment 4.

## 2 Governance

### Justification Part 2 Matter

2.1 This Change Proposal should be classed as a Part 2 Matter as it does not have a material impact on DCUSA Parties and does not meet the criteria that would require the Authority to make a decision.

### Requested Next Steps

This Change Proposal should:

- Be treated as a Part 2 Matter
- Be treated as a Standard Change
- Proceed to the Change Report phase

2.2 The Change will need to be introduced on 25 June 2020.

## 3 Why Change?

### Background of DCP 357

3.1 This Change is required to introduce permissions and requirements to share theft investigation data between the TRAS Service Provider and ELEXON.

3.2 The data is to enable ELEXON to have a full cross section of theft investigation data which is both inclusive of confirmed theft but also those investigations which are either ongoing or determined there was no theft.

- 3.3 This data set has no bias and is an accurate reflection of the activities Suppliers have been undertaking.
- 3.4 ELEXON requires this data to ensure they are accurately incorporating theft in their Risk Evaluation. ELEXON does not have access to this data, and therefore cannot accurately evaluate the reconciliation of identified theft. The change doesn't see any unnecessary data being shared but data which would ensure that ELEXONs evaluation is as accurate as possible.
- 3.5 The benefit to the market is, better evaluation of Revenue Protection risk, implementation of Identified theft reconciliation reporting, that should lead to improved reconciliation of theft volumes.

## 4 Solution

### DCP 357 Assessment

- 4.1 To deliver the following:
  - Create permissions in Schedule 25 to share data between the TRAS Service Provider and ELEXON
  - Create timings for the TRAS Service Provider and ELEXON to deliver the reports
  - Codify the data items from the Outcome File which are to be included in the report between the TRAS Service Provider and ELEXON

The proposed legal text is provided as Attachment 1.

It was advised by Gowlings to remove the below from the legal text as DCUSA cannot impose obligations on Elexon, as Elexon is not bound by DCUSA.

*[It is acknowledged that the BSCCo will reconcile instances of theft identified from the Theft Investigations Report with instances of theft identified from data flows via the Data Transfer Network, and also to evaluate the risk that energy theft poses to accurate settlement.]*

## 5 Relevant Objectives

### Evaluation Against the DCUSA Objectives

- 5.1 For a DCUSA Change Proposal to be approved, it must be demonstrated that it better meets the DCUSA Objectives. There are five General DCUSA Objectives and six Charging Objectives. The full list of objectives is documented in the CP form provided as Attachment 3.
- 5.2 The Proposer and the TIG consider that DCP 357 better facilitates the following DCUSA General Objective: is better facilitated by DCP357:

DCUSA General Objectives	Identified impact
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<input type="checkbox"/> 1 The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks	None
<input type="checkbox"/> 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	None
<input type="checkbox"/> 3 The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences	None
<input checked="" type="checkbox"/> 4 The promotion of efficiency in the implementation and administration of the DCUSA	Positive impact
<input type="checkbox"/> 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.	None

- 5.3 The Proposer believes that this CP better facilitates DCUSA General Objective 4 as this change will ensure ELEXON/BSC are accurately incorporating theft in their Risk Evaluation. This Change will provide better evaluation of Revenue Protection risk, implementation of Identified theft reconciliation reporting, that should lead to improved reconciliation of theft volumes. This change will also help to monitor the use of theft data shared between the TRAS Service Provider and ELEXON for settlement reporting purposes. This will help to DCUSA Parties comply with data protection legislation whereby only necessary and justifiable data is to be shared.

## 6 Impacts & Other Considerations

Provide detail on:

- ELEXON will be impacted by the change
- ELEXON will be able to better evaluate the Revenue protection risk and provide identified theft reconciliation report.
- ELEXON will design and produce the identified theft reconciliation report.

### Environmental Impacts

- 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 357 were implemented. The Proposer did not identify any material impact on greenhouse gas emissions from the implementation of this CP.

## 7 Implementation

- 7.1 Subject to Party approval, DCP 357 will be implemented on 25 June 2020. As DCP 357 is classified as a Part 2 Matter, Authority determination is not required.

## 8 Legal Text

- 8.1 The proposed amendments to the legal text in Schedule 35 are set out within Attachment 1. The legal text has been reviewed by the TIG and the Proposer, who all agree that the amendments meet the intent of the CP.

## 9 Recommendations

### Panel's Recommendation

## 10 Attachments

- Attachment 1 – DCP 357 Legal Text
- Attachment 2 – DCP 357 Voting Form
- Attachment 3 – DCP 357 Change Proposal Form
- Attachment 4 – DCP 357 Privacy Impact Assessment