




Part A: Generic


DCUSA Change Proposal (DCP)		At what stage is this document in the process?
<h1>DCP 369:</h1> <h2>Theft Charter</h2> <p><i>17 December 2019</i></p> <p>Proposer Name: <i>Rebecca Lowe</i></p> <p>Company Name: <i>EDF</i></p> <p>Company Category: <i>Supplier</i></p>		<p>01 – Change Proposal</p> <p>02 – Consultation</p> <p>03 – Change Report</p> <p>04 – Change Declaration</p>
<p>Purpose of Change Proposal:</p> <p>This Change Proposal seeks to implement a cross-industry Theft Charter which shall be endorsed and integrated with existing vulnerability measures by all energy suppliers. The introduction of such a charter shall ensure that a consistent approach is taken to the identification of vulnerable customers whilst undertaking energy theft investigations and will be supported by a 'light-touch' desk-top assurance framework administered by the Secretariat.</p>		
	<p>Governance:</p> <p>The Proposer recommends that this Change Proposal should be:</p> <ul style="list-style-type: none"> • Treated as a Standard Change; • Progressed to the Change Report stage; and • Considered a Part 2 Matter <p>The Panel will consider the proposer's recommendation and determine the appropriate route.</p>	
	<p>Impacted Parties:</p> <p>Suppliers</p>	
	<p>Impacted Clauses:</p> <p>Schedule 25 - TRAS</p>	

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 Any questions?

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Indicative Timeline

The Secretariat recommends the following timetable:

Initial Assessment Report by Theft Issues Group	18 February 2020
Initial Assessment by Panel	18 March 2020
Change Report Approved by Panel	15 April 2020
Change Report issued for Voting	17 April 2020
Party Voting Closes	11 May 2020
Change Declaration Issued to Parties	13 May 2020
Implementation	25 June 2020

1 Summary

What

The Theft Charter is an Industry developed customer facing document which sets out a high-level policy for the identification and management of vulnerable customers whilst meter tampering investigations are being undertaken.

The Charter is aligned with wider, and already established, vulnerability measures such as SafetyNet and the Priority Services Register with a specific focus on vulnerability considerations in the context of meter tampering investigations.

Implementation of the Charter is supported by a 'light-touch' remote desk-top assurance framework will be administered by the Secretariat to ensure consistent and compliant implementation by Industry.

Why

A single customer facing version of an Industry agreed Theft Charter will ensure a consistent approach by Suppliers to the identification of customer vulnerability whilst undertaking meter tampering investigations.

The Charter helps to enforce that whilst vulnerability needs be an operational consideration; the theft of energy remains a criminal act which may result in legal action being undertaken for the identified perpetrator(s).

How

It is proposed that compliance with the Charter by Suppliers is achieved through Code obligation rather than a change to Licence.

The obligation on Suppliers will ensure that the management of vulnerable customers in the context of meter tamper investigations is integrated within wider existing vulnerable customer policy and training within individual supplier organisations.

Suppliers will also be required to make the Charter easily accessible e.g. a link to the latest baseline version of the Charter on individual organisation web site pages.

Desk-top assurance will be undertaken by the Secretariat to ensure compliant and consistent implementation of the Charter across Industry. Assurance will be a light-touch principle-based framework ensuring the Charter's implementation remains effective and integrated with wider vulnerability policy, while limiting the burden on Industry. The Charter will be maintained centrally by the appointed Code Manager ensuring consistency across the industry once implemented.

The proposed Legal Text is provided as attachment 1.

Theft Vulnerability Charter is provided as attachment 2.

2 Governance

Justification for Authority Consent

This Change Proposal should be classed as self-governance as it does not have a material impact on DCUSA Parties other than endorsing the Code and integrating within wider vulnerability measures which are already an established energy supplier Licence Condition.

It is recommended that the Charter is endorsed by the Regulator and central industry bodies such as Energy UK and Citizens Advice.

The appointed Secretariat will ensure that the baseline version of the Charter is maintained and reviewed from time to time to ensure it remains fit for purpose. It is recommended that the Charter is reviewed at least annually.

The appointed Secretariat will undertake desk-top spot checks from time-to-time to ensure that Suppliers are complying with the Charter, and that the latest version of the baseline Charter is accessible and appropriately integrated with wider customer facing communications dealing with vulnerability and meter tampering investigations.

Requested Next Steps

This Change Proposal should:

- Be treated as a Standard Change

3 Why Change?

Legal Text

This change will ensure a consistent approach is taken to the identification of vulnerable customers whilst undertaking energy theft investigations by on an Industry agreed set of operational principles. Draft Legal Text is provided as attachment 1.

4 Code Specific Matters

Reference Documents

N/A

Relevant Objectives

DCUSA Charging Objectives	Identified impact
<input type="checkbox"/> 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	None

<input type="checkbox"/> 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)	None
<input type="checkbox"/> 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	None
<input type="checkbox"/> 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	None
<input type="checkbox"/> 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.	None
DCUSA General Objectives	Identified impact
<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
<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

6 Impacts & Other Considerations

Does this Change Proposal impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

Engagement programme with industry central bodies e.g. Ofgem, Energy UK

It is proposed that the Theft Charter is implemented ahead of the Retail Energy Code (REC). and is not in scope of the Significant Code Review (SCR). Engagement with interested third parties such as Energy UK and Citizens Advice has identified a number of synergies which would be formally established as part of the Charter's implementation.

Does this Change Proposal Impact Other Codes?

- BSC
- CUSC
- Grid Code
- MRA
- SEC
- Other (tick) SPAA
- None

Consideration of Wider Industry Impacts

N/A

Confidentiality

N/A

7 Implementation

The proposed implementation date is 25 June 2020, which is the next applicable DCUSA release, subject to Party approval.

8 Recommendations

It is recommended that the appointed Secretariat ensures that the approved version of the Charter is reviewed on at least an annual basis to ensure the principles remain fit for purpose and aligned with wider theft and vulnerability measures within the Industry.

It is recommended that the appointed Secretariat undertakes desk-based spot checks from time to time to ensure that suppliers are complying with the Charter and that the latest version of the baseline Charter is accessible and appropriately integrated with wider customer facing communications.