









## Part A: Generic

DCUSA Change Proposal (DCP)		At what stage is this document in the process?
<h1>DCP 365</h1> <h2>Requirement for Suppliers to Provide Outcome Files Regardless of the Investigation Outcome</h2> <p><i>18 February 2020</i></p> <p><b>Proposer Name:</b> <i>Rebecca Lowe</i></p> <p><b>Company Name:</b> <i>EDF Energy</i></p> <p><b>Company Category:</b> <i>Supplier</i></p>		<p><b>01 – Change Proposal</b></p> <p>02 – Consultation</p> <p>03 – Change Report</p> <p>04 – Change Declaration</p>
<p>Purpose of Change Proposal:</p> <p>The intent of this Change Proposal is to introduce a requirement for Suppliers to provide their Outcome Files regardless of the investigation outcome to improve theft reporting.</p>		
	<p>Governance:</p> <p>The Proposer recommends that this Change Proposal (CP) should be</p> <ul style="list-style-type: none"> <li>• Part 2 Matter</li> <li>• Treated as a Standard Change</li> <li>• Proceed to the Change Report phase</li> </ul> <p>The Panel will consider the proposer’s recommendation and determine the appropriate route.</p>	
	<p>Impacted Parties:</p> <p>DCUSA Parties: Suppliers</p>	
	<p>Impacted Clauses:</p> <p>Schedule 25 of DCUSA – Theft Risk Assessment Service</p>	

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Indicative Timeline		 Email Address <a href="mailto:dcusa@electralink.co.uk">dcusa@electralink.co.uk</a>
<b>The Secretariat recommends the following timetable:</b>		 Telephone 0203 319 1866
Initial Assessment by the Theft Issues Group (TIG)	18 February 2020	<b>Proposer:</b> Rebecca Lowe
Initial Assessment	18 March 2020	 Email Address <a href="mailto:Rebecca.Lowe@edfenergy.com">Rebecca.Lowe@edfenergy.com</a>
Change Report Approved by Panel	15 April 2020	 Telephone +44 (0)20 8186 2518
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?

Outcome Files are required for accurate reporting of industry effort and engagement in investigating theft and, therefore, it is important that they are submitted where any investigation has happened – regardless of outcome. During a service review meeting Experian reported that whilst the submission of consumption files is increasing as the number of Suppliers involved in TRAS increases, the submission of Outcome Files was not increasing at a similar rate.

The Code requires that a Supplier takes all reasonable steps to submit an Outcome File. Where an investigation found a Confirmed Theft the Incentive Schemes create a financial motivation for Suppliers to report this in an Outcome File. However, there is no equivalent incentive to notify TRAS where an investigation does not find evidence of theft.

## Why?

This CP has been raised to introduce a requirement within Schedule 25 of DCUSA for Suppliers to provide Outcome Files regardless of the investigation outcome. By submitting outcome files regardless of the investigation outcome this will assist the TRAS Service Provider analyse theft trends and patterns. The TRAS methodology can be improved by understanding where theft cannot be detected.

## How?

At the January Theft Issues Group (TIG) meeting, the group agreed to add the below text in to Schedule 25 of DCUSA:

### **Insert a new paragraph 8.5A in Schedule 25 of the DCUSA as follows:**

8.5A For the avoidance of doubt, each Supplier Party shall submit an Outcome File for each and every theft investigation which is commenced (including desktop investigations), and shall continue to submit monthly updates until such investigation has been concluded (whether or not a Theft of Electricity is identified).

## 2 Governance

### **Justification for Part 1 and Part 2 Matter**

This Change Proposal should be classed as a Part 2 Matter as it 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 Change Report (as it has been refined by the Theft Issues Group)

### 3 Why Change?

Experian were finding that whilst the submission of consumption files is increasing as the number of Suppliers involved in TRAS increases, the submission of Outcome Files was not increasing at a similar rate. Outcome Files are required for accurate reporting of industry effort and engagement in investigating theft and, therefore, it is important that they are submitted where any investigation has happened – regardless of outcome.

#### Part B: Code Specific Details

### 4 Solution and Legal Text

#### Proposed Solution

As was noted in section 1 above, the TIG agreed to add the proposed legal text in to Schedule 25 of DCUSA:

The proposed legal text amendments to Schedule 25 of the DCUSA is provided as Attachment 1.

### 5 Code Specific Matters

#### Reference Documents

N/A

### Relevant Objectives

The Proposer believes that this CP better facilitates DCUSA General Objective 4 as this change will help to ensure effective administration of the TRAS service and help Suppliers meet their licence conditions.

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
<b>DCUSA General Objectives</b>	<b>Identified impact</b>
<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

## Impacts & Other Considerations

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

The Retail Code Consolidation Significant Code Review does not apply to DCUSA, but as a theft matter constraint in SPAA may have to be considered.

### Consumer Impacts

It is believed that this CP will not have any impacts on general consumers.

### Does this Change Proposal Impact Other Codes?

- BSC
- CUSC
- Grid Code
- MRA
- SEC
- Other  SPAA
- None

### Consideration of Wider Industry Impacts

A similar change is being progressed to update Schedule 34 (Theft Risk Assessment Service) of the SPAA.

### Environmental Impacts

In accordance with DCUSA Clause 10.4.5A, the Proposer assessed whether there would be a material impact on greenhouse gas emissions if this CP were implemented. The Proposer did not identify any material impact on greenhouse gas emissions from the implementation of this CP.

### Confidentiality

This change is non-confidential.

## 6 Implementation

The proposed implementation date for this CP will be the first standard DCUSA release following Party approval, which is expected to be 25 June 2020.

## Recommendations