

DCUSA Change Declaration		At what stage is this document in the process?
<h1 data-bbox="164 365 592 454">DCP 357</h1> <h2 data-bbox="159 495 979 627">Sharing theft data between the TRAS and ELEXON</h2> <p data-bbox="159 654 646 689">Date Raised: 17 September 2019</p> <p data-bbox="159 710 533 745">Proposer: Rebecca Lowe</p> <p data-bbox="159 766 421 801">Party Name: EDF</p> <p data-bbox="159 822 526 857">Party Category: Supplier</p>		<p data-bbox="1091 383 1374 414">01 – Change Proposal</p> <p data-bbox="1091 501 1318 533">02 – Consultation</p> <p data-bbox="1091 620 1347 651">03 – Change Report</p> <p data-bbox="1091 739 1406 770">04 – Change Declaration</p>
<p data-bbox="159 902 601 938">Purpose of Change Proposal</p> <p data-bbox="159 958 1437 1072">This CP seeks 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.</p>		
	<p data-bbox="300 1113 1437 1227">DCUSA Parties have voted on DCUSA Change Proposal (DCP) 357 with the outcome being a decision on whether or not the Change Proposal (CP) is to be accepted and the proposed variation to the DCUSA made accordingly.</p> <p data-bbox="300 1247 1307 1283">This document provides the DCUSA Change Declaration for DCP 357.</p> <p data-bbox="300 1303 1302 1339">The DCUSA Parties consolidated votes are provided as Attachment 1.</p>	
	<p data-bbox="300 1364 968 1400">For DCP 357, DCUSA Parties have voted to:</p> <ul data-bbox="336 1426 1078 1516" style="list-style-type: none"> <li data-bbox="336 1426 1078 1462">• Accept the proposed variation (solution); and <li data-bbox="336 1482 879 1516">• Accept the implementation date. 	
	<p data-bbox="300 1554 724 1590">Parties Impacted: Suppliers</p>	
	<p data-bbox="300 1671 1374 1706">Impacted Clauses: Schedule 25 – Theft Risk Assessment Service (TRAS)</p>	

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Any questions?

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Timeline

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 March 2020
Implementation	25 June 2020

1 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?

1.3 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

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

- 1.4 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.
- 1.5 The proposed legal text is provided as Attachment 2. ELEXON has also provided a Privacy Impact Assessment for this year’s data request. This is provided as Attachment 5.

2 Governance

Justification for Part 2 Matter

- 2.1 This CP is 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.

Next Steps

- 2.2 DCUSA Parties voted to accept DCP 357 and as such, it will be implemented in line with Section 8 below.

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 356 Assessment

- 4.1 To deliver the following:
 - 4.2 • Create permissions in Schedule 25 to share data between the TRAS Service Provider and ELEXON
 - 4.3 • Create timings for the TRAS Service Provider and ELEXON to deliver the reports
 - 4.4 • Codify the data items from the Outcome File which are to be included in the report between the TRAS Service Provider and ELEXON
- 4.5 The proposed legal text is provided as Attachment 2.
- 4.6 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.
- 4.7 *[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 Code Specific Matters

- 5.1 Not applicable.

6 Relevant Objectives

Assessment against the DCUSA Objectives

- 6.1 For a DCUSA Change Proposal to be approved it must be demonstrated that it better meets the either the DCUSA General Objectives or, and as is the case for DCP 357, the DCUSA Charging Objectives.

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 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 Licence.	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 and Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	None

6.2 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.

7 Impacts & Other Considerations

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

7.1 It is not believed that DCP 357 will impact on any SCR currently in progress and that this CP needs to be raised in order to ensure that any SCR currently in progress can correctly interpret the legal text.

Consumer Impacts

7.2 No consumer impacts have been identified.

Environmental Impacts

7.3 In accordance with DCUSA Clause 11.20.5A, 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.

8 Implementation

8.1 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.

9 Legal Text

9.1 The legal text for DCP 357 has been recommended by the Proposer and reviewed by the DCUSA legal advisor and is provided as Attachment 2.

9.2 The Proposer is satisfied that the legal text meets the intent of the change.

10 Voting

10.1 The 357 Change Report was issued to DCUSA Parties for voting on 21 February 2020 for a period of fifteen working days.

Part 2 Matter: Authority Decision is not required

DCP 357 Proposed Variation (Solution) Decision

10.2 For the majority of the Party Categories that were eligible to vote:

- the number of groups in each Party Category which voted to accept the proposed variation was more than 65% of the total number of Groups in that Party Category which voted; and
- the sum of the Weighted Votes of the Groups in each Party Category which voted to accept the proposed variation was more than 65%

10.3 DCUSA Parties have voted to **accept** the proposed variation (solution) of DCP 357.

DCP 357 Implementation Date Decision

10.4 For the majority of the Party Categories that were eligible to vote:

- the number of groups in each Party Category which voted to accept the implementation date was more than 65% of the total number of groups in that Party Category which voted; and
- the sum of the Weighted Votes of the Groups in each Party Category which voted to accept the implementation date was more than 65%.

10.5 DCUSA Parties have voted to **accept** the implementation date of DCP 357

The table below sets out the outcome of the votes that were received in respect of the DCP 357 Change Report that was issued on 21 February 2020 for a period of 15 working days.

DCP 357	WEIGHTED VOTING				
	DNO ¹	IDNO ²	SUPPLIER	CVA REGISTRANT ³	GAS SUPPLIER ⁴
CHANGE SOLUTION	N/A	N/A	Accept	N/A	N/A
IMPLEMENTATION DATE	N/A	N/A	Accept	N/A	N/A

11 Recommendations

DCUSA Parties

11.1 DCUSA Parties have voted on DCP 357, with the outcome being a decision to accept the Change Proposal and thus the proposed variation to the DCUSA will be made accordingly.

12 Attachments

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

¹ Not eligible to vote

² Not eligible to vote

³ Not eligible to vote

⁴ Not eligible to vote