

Part A: Generic

DCUSA Change Proposal (DCP)		At what stage is this document in the process?
<h1>DCP 357:</h1> <h2>Sharing theft data between the TRAS and ELEXON</h2> <p><i>17 September 2019</i></p> <p><i>Proposer Name: Rebecca Lowe</i></p> <p><i>Company Name: EDF Energy</i></p> <p><i>Company Category: 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>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>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 - Theft Risk Assessment Arrangements</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 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?

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?

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
	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

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 2.

2 Governance

Justification for Authority Consent

The Change does not require Authority Consent as the proposal seeks to introduce a report to share data between code administrators.

Requested Next Steps

This Change Proposal should:

- Be treated as a Standard Change

3 Why Change?

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

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.

This data set has no bias and is an accurate reflection of the activities Suppliers have been undertaking.

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.

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 and Legal Text

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

Legal Text

Draft Legal Text is provided as attachment 1.

5 Code Specific Matters

Reference Documents

ELEXONs Risk Evaluation Register can be found: <https://www.elexon.co.uk/reference/performance-assurance/performance-assurance-processes/>

6 Relevant Objectives

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.

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

7 Impacts & Other Considerations

Provide detail on:

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

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

N/A

Does this Change Proposal Impact Other Codes?

- | | |
|--------------|--|
| BSC | <input type="checkbox"/> |
| CUSC | <input type="checkbox"/> |
| Grid Code | <input type="checkbox"/> |
| MRA | <input type="checkbox"/> |
| SEC | <input type="checkbox"/> |
| Other (tick) | <input checked="" type="checkbox"/> The TRAS Service Provider is also impacted and a Contract Change Notice will be required to deliver the data between the TRAS and ELEXON |
| None | <input type="checkbox"/> |

Consideration of Wider Industry Impacts

ELEXON Risk Evaluation Register – R018 Revenue Protection

Confidentiality

N/A

8 Implementation

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

9 Recommendations