




DCUSA Change Report		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>Date raised: <b>18 February 2020</b></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> 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.		
	This document is issued in accordance with Clause 11.20 of the DCUSA, and details DCP 365 'Requirement for Suppliers to Provide Outcome Files Regardless of the Investigation Outcome'.	
	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>11 May 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>	

Contents

1

Executive Summary

2

2

Governance

3

3

Why Change?

3

4

Solution

4

5

Relevant Objectives

4

6

Impacts & Other Considerations

4

7

Implementation

5

8

Legal Text

5

9

Recommendations

5

10

Attachments

5

?

Any questions?

Contact:

Austin Gash

DCUSA@electralink.co.uk

0207 432 3008

Proposer:

Rebecca Lowe

Rebecca.Lowe@edfenergy.com

020 8186 2518

Timetable

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

Change Proposal timetable

Activity	Date
Initial Assessment Report Approved 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 Executive Summary

### What?

- 1.1 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.
- 1.2 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?

- 1.3 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?

- 1.4 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 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 365

- 3.1 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.

## 4 Solution

### DCP 365 Assessment

- 4.1 As was noted in section 1 above, the TIG agreed to add the proposed legal text in to Schedule 25 of DCUSA.
- 4.2 The proposed legal text amendments to Schedule 25 of the DCUSA is provided as Attachment 1.

## 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 365 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. the following DCUSA General Objective:

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 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

## 6 Impacts & Other Considerations

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

## Environmental Impacts

- 6.2 In accordance with DCUSA Clause 11.14.6, the Proposer assessed whether there would be a material impact on greenhouse gas emissions if DCP 365 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 365 will be implemented on 25 June 2020. As DCP 365 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 25 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 365 Legal Text
- Attachment 2 – DCP 365 Voting Form
- Attachment 3 – DCP 365 Change Proposal Form