









Part A: Generic

DCUSA Change Proposal (DCP)		At what stage is this document in the process?
<h1>DCP 370:</h1> <h2>Inclusion of Outcome Files in the Escalation Process</h2> <p><i>06 April 2020</i></p> <p><i>Proposer Name: Rebecca Lowe</i></p> <p><i>Company Name: EDF</i></p> <p><i>Company Category: Supplier</i></p>		<div>01 – Change Proposal</div> <div>02 – Consultation</div> <div>03 – Change Report</div> <div>04 – Change Declaration</div>
<p>Purpose of Change Proposal:</p> <p>This change is seeking to introduce the inclusion of Outcome files in the TRAS Escalation process to improve theft reporting and increase opportunities for analysis.</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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2	Governance	Contact:
3	Why Change?	Code Administrator
4	Code Specific Matters	Austin Gash
5	Relevant Objectives	 email address
6	Impacts & Other Considerations	austin.gash@electrallink.co.uk
7	Implementation	 telephone
8	Recommendations	0203 319 1866
		Proposer:
		Rebecca Lowe
Indicative Timeline		 email address
The Secretariat recommends the following timetable:		rebecca.lowe@edfenergy.com
Initial Assessment by Panel	15 April 2020	 telephone
Change Report Approved by Panel	20 May 2020	020 8186 2518
Change Report issued for Voting	22 May 2020	
Party Voting Closes	12 June 2020	
Change Declaration Issued to Parties	16 June 2020	
Implementation	25 June 2020	

1 Summary

What

As part of the Theft Risk Assessment Service (TRAS) Supplier Parties are required to submit consumption files by 17.00 hours on the 5th Working Day after the 5th calendar day of each calendar month. Each Supplier Party shall provide to the TRAS the Supplier Party's

Consumption File populated with the data for all the Metering Points for which it is Registered as at the end of the 5th calendar day of the month (to be provided via the STS agreed between that Supplier Party and the TRAS Service Provider).

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. Currently there is a change in flight (DCP 365) which would place a requirement on Suppliers to provide Outcome Files regardless of the investigation outcome through to the TRAS.

Subject to DCP 365 being approved and implemented on 25 June 2020, this requirement will need to be monitor for analysis and reporting purposes. Therefore, it was agreed by the TIG to include this process within the TRAS Escalation Process administrated by the Secretariat.

The Secretariat will develop a system for monitoring the process through the escalation process and raise a Contract Change Notification (CCN) detailing the change required to Experian's reporting to ensure any Outcome File information is captured within their reports.

Why

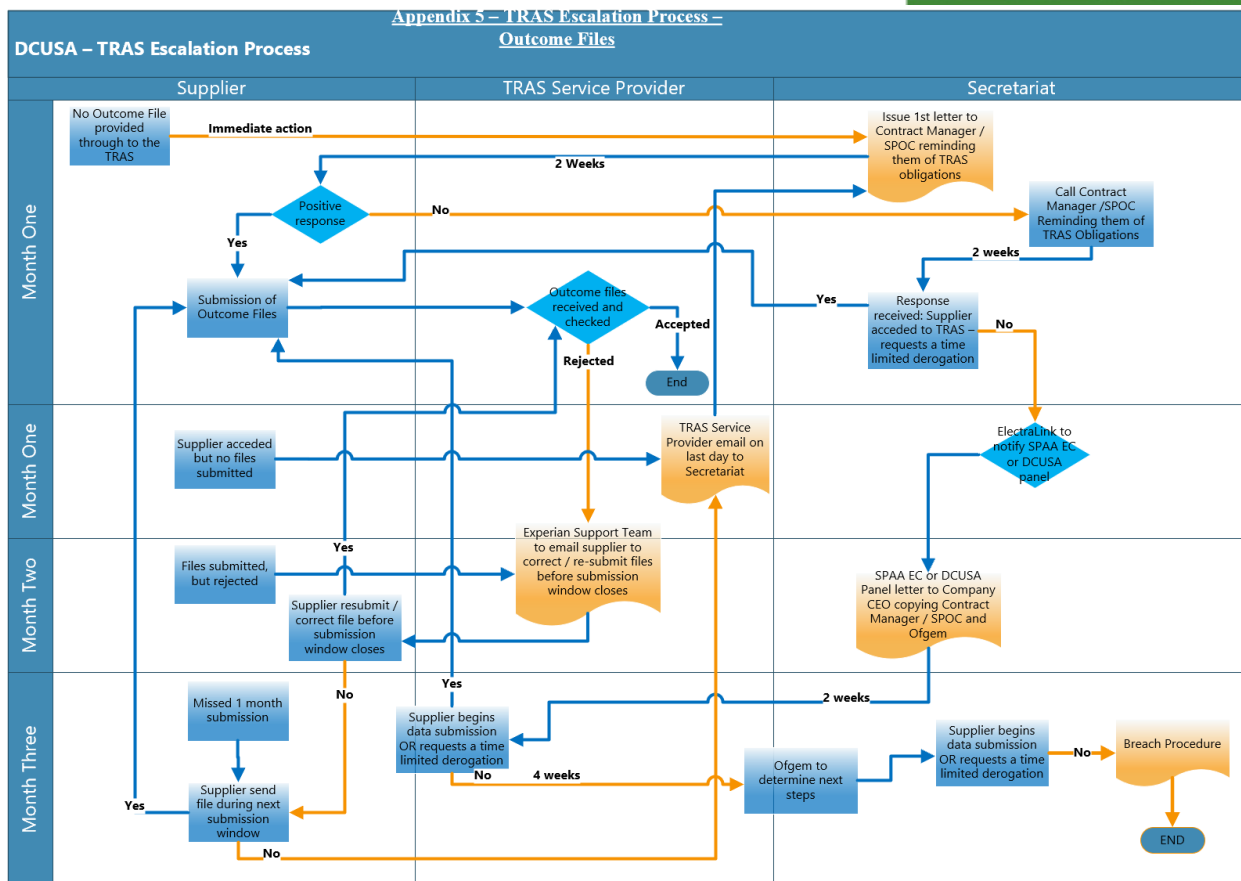
This CP has been raised to introduce within Schedule 25 of DCUSA the inclusion of Outcome files in the TRAS Escalation process to improve theft reporting and increase opportunities for analysis.

How

Amend paragraph 8.11 in Schedule 25 of the DCUSA as follows:

The TRAS escalation process shall be triggered where a Supplier fails to meet their TRAS obligations under this paragraph 8, to submit defined data items split by residential and commercial **and Outcome Files** to the TRAS Service Provider on a monthly basis. The TRAS escalation process is set out in Appendix 5.

Include within Appendix 5 in Schedule 25 of the DCUSA the following process map:



The proposed Legal Text is provided as attachment 1.

2 Governance

Justification for Authority Consent

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.

This Change Proposal should:

- Be treated as a Standard Change
- Progressed to Change Report phase

3 Why Change?

Legal Text

This CP has been raised to introduce within Schedule 25 of DCUSA the inclusion of Outcome files in the TRAS Escalation process to improve theft reporting and increase opportunities for analysis. 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?

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

Does this Change Proposal Impact Other Codes?

- BSC ☐
- CUSC ☐
- Grid Code ☐
- MRA ☐
- SEC ☐
- Other ☒ SPAA
- (tick) ☐
- 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