










DCUSA Change Report		At what stage is this document in the process?
<h1>DCP 370</h1> <h2>Inclusion of Outcome Files in the Escalation Process</h2> <p>Date raised: 06 April 2020</p> <p>Status of Change: Standard</p>		01 – Change Proposal
		02 – Consultation
		03 – Change Report
		04 – Change Declaration
Purpose of Change Proposal: <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>This document is issued in accordance with Clause 11.20 of the DCUSA, and details DCP 370 'Inclusion of Outcome Files in the Escalation Process'.</p> <p>DCP 370 is considered as a Part 2 matter and Parties are invited to consider the proposed amendment (Attachment 1) and submit their votes using the Voting form (Attachment 2) to dcusa@electralink.co.uk by 12 June 2020.</p> <p>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.</p> <p>If you have any questions about this paper or the DCUSA Change Process, please contact the DCUSA by email to dcusa@electralink.co.uk or telephone 020 7432 3008.</p>	
	Parties Impacted: Suppliers	
	Impacted Clauses: DCUSA Schedule 25 - TRAS	

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Timetable		 Any questions? Contact: Austin Gash  DCUSA@electralink.co.uk  0207 432 3008 Proposer: Rebecca Lowe  Rebecca.Lowe@edfenergy.com  +44 (0)20 8186 2518
The timetable for the progression of the CP is as follows:		
Change Proposal timetable		
Activity	Date	
Initial Assessment Report Approved by Panel	15 April 2020	
Change Report Approved by Panel	20 May 2020	
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 Executive Summary

What?

- 1.1 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).

- 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. 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.
- 1.3 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.
- 1.4 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?

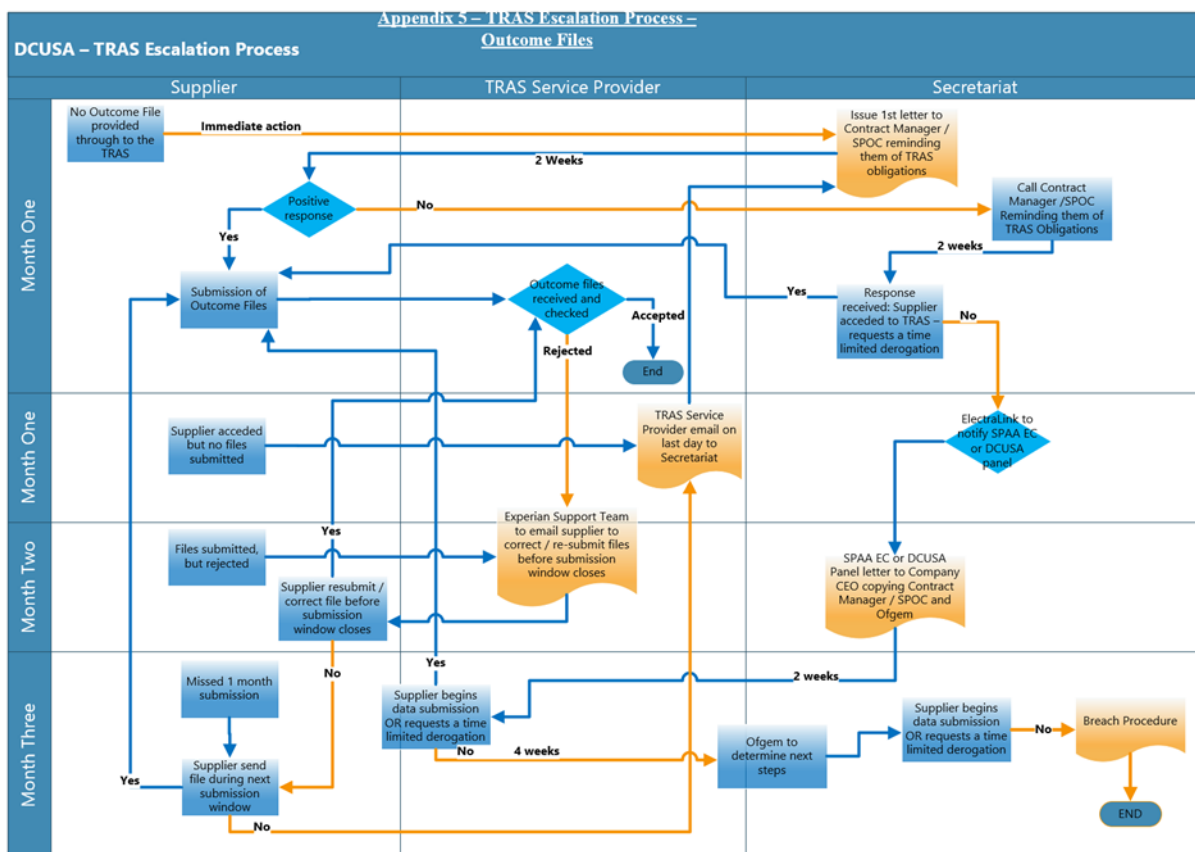
- 1.5 This CP has been raised to introduce within Schedule 25 of DCUSA the inclusion of Outcome files in the TRAS Escalation process to improve theft reporting and increase opportunities for analysis.

How?

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

*The TRAS escalation process shall be triggered where a Supplier **Party** fails to meet **its** obligations under this paragraph 8 to submit **Consumption Files and/or Outcome Files** to the TRAS Service Provider on a monthly basis. The TRAS escalation process is set out in Appendix 5.*

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



- 1.8 The proposed Legal Text is provided as attachment 1.

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 370

- 3.1 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.

4 Solution

DCP 370 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 370 better facilitates DCUSA General Objective 4 as this change will improve theft reporting, increase the opportunities for analysis, and would act as a steppingstone to providing further insight around Supplier behaviour when submitting outcome files and how to improve the TRAS service overall.

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 be 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 370 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 370 will be implemented on 25 June 2020. As DCP 370 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

- 9.1 The Panel approved this Change Report on 20 May 2020. The Panel considered that the Working Group has carried out the level of analysis required to enable Parties to understand the impact of the proposed amendment and to vote on DCP 370.
- 9.2 The Panel have recommended this report be issued for voting and DCUSA Parties should consider whether they wish to submit views regarding this CP. The Voting Form can be found in Attachment 2.

10 Attachments

- Attachment 1 – DCP 370 Legal Text
- Attachment 2 – DCP 370 Voting Form
- Attachment 3 – DCP 370 Change Proposal Form