





DCUSA Change Declaration		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: 18 February 2020</p> <p>Proposer: Rebecca Lowe</p> <p>Party Name: EDF</p> <p>Party Category: Supplier</p>	01 – Change Proposal	
	02 – Consultation	
	03 – Change Report	
	04 – Change Declaration	
<p>Purpose of Change Proposal</p> <p>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.</p>		
	<p>DCUSA Parties have voted on DCUSA Change Proposal (DCP) 365 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>This document provides the DCUSA Change Declaration for DCP 365.</p> <p>The DCUSA Parties consolidated votes are provided as Attachment 1.</p>	
	<p>For DCP 365, DCUSA Parties have voted to:</p> <ul style="list-style-type: none"> • Accept the proposed variation (solution); and • Accept the implementation date. 	
	<p>Parties Impacted: Suppliers</p>	
	<p>Impacted Clauses: Schedule 25 – Theft Risk Assessment Service (TRAS)</p>	

Contents

1 Summary	3
2 Governance	3
3 Why Change?	3
4 Solution	3
5 Code Specific Matters	4
6 Relevant Objectives	4
7 Impacts & Other Considerations	5
8 Implementation	5
9 Legal Text	5
10 Voting	5
11 Recommendations	6
12 Attachments	6



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 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 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 The proposed legal text is provided as Attachment 2.

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 365 and as such, it will be implemented in line with Section 8 below.

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 2.

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 365, the DCUSA Charging Objectives.
- 6.2 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 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

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 365 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 365 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 365 will be implemented on 25 June 2020. As DCP 365 is classified as a Part 2 Matter, Authority determination is not required.

9 Legal Text

- 9.1 The legal text for DCP 365 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 365 Change Report was issued to DCUSA Parties for voting on 17 April 2020 for a period of fifteen working days.

Part 2 Matter: Authority Decision is not required

DCP 365 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 365.

DCP 365 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 365

The table below sets out the outcome of the votes that were received in respect of the DCP 365 Change Report that was issued on 17 April 2020 for a period of 15 working days.

DCP 365	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 365, 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 365 Consolidated Party Votes
- Attachment 2 – DCP 365 Legal Text
- Attachment 3 – DCP 365 Change Proposal Form

¹ Not eligible to vote

² Not eligible to vote

³ Not eligible to vote

⁴ Not eligible to vote