









DCUSA Change Report		At what stage is this document in the process?
<div>DCP 369</div> <div>Theft Charter</div> <div>Date raised: 18 February 2020</div> <div>Status of Change: Standard</div>	01 – Change Proposal	
	02 – Consultation	
	03 – Change Report	
	04 – Change Declaration	
<div>Purpose of Change Proposal:</div> <div>This Change Proposal seeks to implement a cross-industry Theft Charter which shall be endorsed and integrated with existing vulnerability measures by all energy suppliers. The introduction of such a charter shall ensure that a consistent approach is taken to the identification of vulnerable customers whilst undertaking energy theft investigations and will be supported by a 'light-touch 'desk-top assurance framework administered by the Secretariat.</div>		
<div></div>	<div>This document is issued in accordance with Clause 11.20 of the DCUSA, and details DCP 369 'Theft Charter'.</div> <div>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>06 August 2020</b>.</div> <div>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.</div> <div>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.</div>	
<div></div>	<div>Parties Impacted: <b>Suppliers</b></div>	
<div></div>	<div>Impacted Clauses: <b>DCUSA Schedule 23 Theft of Electricity Code of Practice</b></div>	

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<sup>1</sup> In respect of DCP 369, the proposed variation to this Agreement was accepted in accordance with Section 1C, Clause 13 but the proposed implementation date was rejected. Therefore, this change was re-submitted to the Assessment Process by the Theft Issues Group (TIG) to determine a new implementation date. At the May TIG, members proposed a new implementation date of 05 November 2020. The group also made several changes to the Theft Charter; however, the intention of the Change remains the same. Due to the Theft Charter being updated, the DCUSA Parties are being asked to vote on the solution and implementation date again.

Reissued Change Report to be Approved by Panel	17 June 2020	
Change Report issued for Voting	19 June 2020	
Party Voting Closes <sup>2</sup>	10 July 2020	
Change Report issued for Voting	16 July 2020	
Party Voting Closes	06 August 2020	
Change Declaration Issued to Parties	10 August 2020	
Implementation	05 November 2020	

## 1 Executive Summary

### What?

- 1.1 The Theft Charter is an Industry developed customer facing document which sets out a high-level policy for the identification and management of vulnerable customers whilst meter tampering investigations are being undertaken.
- 1.2 The Charter is aligned with wider, and already established, vulnerability measures such as SafetyNet and the Priority Services Register with a specific focus on vulnerability considerations in the context of meter tampering investigations.
- 1.3 Implementation of the Charter is supported by a 'light-touch' remote desk-top assurance framework will be administered by the Secretariat to ensure consistent and compliant implementation by Industry.

### Why?

- 1.4 A single customer facing version of an Industry agreed Theft Charter will ensure a consistent approach by Suppliers to the identification of customer vulnerability whilst undertaking meter tampering investigations.
- 1.5 The Charter helps to enforce that whilst vulnerability needs be an operational consideration; the theft of energy remains a criminal act which may result in legal action being undertaken for the identified perpetrator(s).

### How?

- 1.6 It is proposed that compliance with the Charter by Suppliers is achieved through Code obligation rather than a change to Licence.

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<sup>2</sup> due to not receiving any votes after issuing it to Parties last month, that during yesterday's Panel meeting, the Panel agreed for it to be re-issued to Parties for voting, with the caveat that if no votes are received in this new voting period, the change will be treated as rejected.

- 1.7 The obligation on Suppliers will ensure that the management of vulnerable customers in the context of meter tamper investigations is integrated within wider existing vulnerable customer policy and training within individual supplier organisations.
- 1.8 Suppliers will also be required to make the Charter easily accessible e.g. a link to the latest baseline version of the Charter on individual organisation web site pages.
- 1.9 Desk-top assurance will be undertaken by the Secretariat to ensure compliant and consistent implementation of the Charter across Industry. Assurance will be a light-touch principle-based framework ensuring the Charter's implementation remains effective and integrated with wider vulnerability policy, while limiting the burden on Industry. The Charter will be maintained centrally by the appointed Code Manager ensuring consistency across the industry once implemented.
- 1.10 The proposed Legal Text is provided as attachment 1.
- 1.11 Theft Charter is provided as attachment 2.

## 2 Governance

### Justification Part 2 Matter

- 2.1 This Change Proposal should be classed as self-governance as it does not have a material impact on DCUSA Parties other than endorsing the Code and integrating within wider vulnerability measures which are already an established energy supplier Licence Condition.
- 2.2 It is recommended that the Charter is endorsed by the Regulator and central industry bodies such as Energy UK and Citizens Advice.
- 2.3 The appointed Secretariat will ensure that the baseline version of the Charter is maintained and reviewed from time to time to ensure it remains fit for purpose. It is recommended that the Charter is reviewed at least annually.
- 2.4 The appointed Secretariat will undertake desk-top spot checks from time-to-time to ensure that Suppliers are complying with the Charter, and that the latest version of the baseline Charter is accessible and appropriately integrated with wider customer facing communications dealing with vulnerability and meter tampering investigations.
- 2.5 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 05 November 2020.

### 3 Why Change?

#### Background of DCP 369

- 3.1 This change will ensure a consistent approach is taken to the identification of vulnerable customers whilst undertaking energy theft investigations by on an Industry agreed set of operational principles. The Legal Text is provided as attachment 1.

### 4 Solution

#### DCP 369 Assessment

- 4.1 As was noted in section 1 above, the TIG agreed to add the proposed legal text in to Schedule 23 of DCUSA.
- 4.2 The proposed legal text amendments to Schedule 23 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 369 better facilitates DCUSA General Objective 4 as this change will help to ensure a consistent approach is taken to the identification of vulnerable customers whilst undertaking energy theft investigations by on an Industry agreed set of operational principles.

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
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## 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 369 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 369 will be implemented on 05 November 2020. As DCP 369 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 23 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 369 Legal Text
- Attachment 2 – DCP 369 Voting Form v1.1
- Attachment 3 – Theft Charter v1.1
- Attachment 4 – DCP 369 Change Proposal Form