





DCUSA Change Declaration		At what stage is this document in the process?
<h1>DCP 369</h1> <h2>Theft Charter</h2> <p><b>Date Raised:</b> 18 February 2020</p> <p><b>Proposer:</b> Rebecca Lowe</p> <p><b>Party Name:</b> EDF</p> <p><b>Party Category:</b> Supplier</p>		01 – Change Proposal
		02 – Consultation
		03 – Change Report
		04 – Change Declaration
<b>Purpose of Change Proposal</b> <p>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.</p>		
	<p>DCUSA Parties have voted on DCUSA Change Proposal (DCP) 369 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 369.</p> <p>The DCUSA Parties consolidated votes are provided as Attachment 1.</p>	
	<p><b>For DCP 369, DCUSA Parties have voted to:</b></p> <ul style="list-style-type: none"> <li>• <b>Accept the proposed variation (solution); and</b></li> <li>• <b>Accept the implementation date.</b></li> </ul>	
	<p><b>Parties Impacted:</b> Suppliers</p>	
	<p><b>Impacted Clauses:</b> DCUSA Schedule 23 Theft of Electricity Code of Practice</p>	

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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
Deferred for Further Development <sup>1</sup>	
Reissued Change Report Approved by Panel	17 June 2020

<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.

Change Report issued for Voting	19 June 2020	
Party Voting Closes <sup>2</sup>	10 July 2020	
Change Report reissued for Voting	16 July 2020	
Party Voting Closes	06 August 2020	
Change Declaration Issued to Parties	07 August 2020	
Implementation	05 November 2020	

## 1 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.

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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.

- 1.5 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.
- 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 2.
- 1.11 Theft Charter is provided as attachment 3.

## 2 Governance

### Justification for 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.

## Next Steps

- 2.6 DCUSA Parties voted to accept DCP 369 and as such, it will be implemented in line with Section 8 below.

## 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 2.

## 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 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 369, the DCUSA Charging Objectives.
- 6.2 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 is consistent therewith) the promotion of such competition in the sale, distribution and purchase of electricity.	<b>None</b>
<input type="checkbox"/> 3 The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licence.	<b>None</b>
<input checked="" type="checkbox"/> 4 The promotion of efficiency in the implementation and administration of the DCUSA.	<b>Positive</b>
<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.	<b>None</b>

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

### Environmental Impacts

7.2 In accordance with DCUSA Clause 11.20.5A, 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.

## 8 Implementation

8.1 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.

## 9 Legal Text

9.1 The legal text for DCP 369 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 369 Change Report was issued to DCUSA Parties for voting on 16 July 2020 for a period of fifteen working days.

**Part 2 Matter: Authority Decision is not required**

## DCP 369 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 369.

## DCP 369 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 369.

The table below sets out the outcome of the votes that were received in respect of the DCP 369 Change Report that was issued on 16 July 2020 for a period of 15 working days.

DCP 369	WEIGHTED VOTING				
	DNO <sup>3</sup>	IDNO <sup>4</sup>	SUPPLIER	CVA REGISTRANT <sup>5</sup>	GAS SUPPLIER <sup>6</sup>
CHANGE SOLUTION	N/A	N/A	Accept	N/A	N/A
IMPLEMENTATION DATE	N/A	N/A	Accept	N/A	N/A

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<sup>3</sup> Not eligible to vote

<sup>4</sup> Not eligible to vote

<sup>5</sup> Not eligible to vote

<sup>6</sup> Not eligible to vote

## 11 Recommendations

### DCUSA Parties

11.1 DCUSA Parties have voted on DCP 369, 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 369 Consolidated Party Votes
  - Attachment 2 – DCP 369 Legal Text
  - Attachment 3 – DCP 369 Theft Charter
  - Attachment 4 – DCP 369 Change Report
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