









## Part A: Generic

DCUSA Change Proposal (DCP)		At what stage is this document in the process?
<h1>DCP 372:</h1> <h2>Changes to the Theft Code of Practice</h2> <p><i>Date: 12 August 2020</i></p> <p><i>Proposer Name: Jane Edge</i></p> <p><i>Company Name: British Gas</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><b>Purpose of Change Proposal:</b></p> <p>This Change Proposal seeks to incorporate suggested changes to the relevant sections of the DCUSA Theft Code of Practice (Schedule 23) as a result of the gap analysis exercise against the Supplier and Network Operator Guidelines, and ahead of the formation of the new schedule being incorporated into v2.0 of the Retail Energy Code.</p>		
	<p><b>Governance:</b></p> <p>The Proposer recommends that this Change Proposal should be:</p> <ul style="list-style-type: none"> <li>• Treated as an Urgent Change with an extraordinary release date;</li> <li>• Progressed to the Change Report stage; and</li> <li>• Considered a Part 1 Matter</li> </ul> <p>The Panel will consider the proposer's recommendation and determine the appropriate route.</p>	
	<p><b>Impacted Parties:</b></p> <p>Suppliers, Network Operators</p>	
	<p><b>Impacted Clauses:</b></p> <p>Schedule 23 – Theft Code of Practice</p>	

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Indicative Timeline		 email address <a href="mailto:austin.gash@electralink.co.uk">austin.gash@electralink.co.uk</a>
<b>The Secretariat recommends the following timetable:</b>		 telephone 0203 319 1866
Initial Assessment by Panel	19 August 2020	<b>Proposer:</b> Jane Edge   email address <a href="mailto:Jane.Edge@britishgas.co.uk">Jane.Edge@britishgas.co.uk</a>   telephone
Change Report Approved by Panel	16 September 2020	
Change Report issued for Voting	17 September 2020	
Party Voting Closes	08 October 2020	
Change Declaration Issued to Parties	09 October 2020	
Authority Consent	13 November 2020	
Expected Implementation Date 5 working days following Authority Consent	20 November 2020 <sup>1</sup>	

## 1 Summary

### What?

- 1.1 The Theft Codes of Practice contained within Schedule 23 of DCUSA were last fully reviewed in Q3 2018. Upon the introduction of the Supplier and Network Operator Best Practice Guidelines, Theft Steering Group (TSG) members suggested that at a future point in time there should be a review date to determine if these should be codified.

<sup>1</sup> This timetable follows the standard timeframes for the Authority to provide their decision within, however, it should be noted that a quicker than normal turn-around is currently expected.

## Why?

- 1.2 This topic was discussed at the March 2020 Theft Issues Group (TIG) meeting, and members suggested that the Guidelines should be signposted from the Code, however as they need reasonably frequent updates, and contain alternative approaches for organisations to consider, the full content should not be added to the Codes however that some further elements of the Guidelines should be considered for codification.
- 1.3 TIG members recommended an approach for TSG members consideration at the April 2020 meeting which would entail a review of the existing Code of Practice narrative, taking the form of a gap analysis between the Code of Practice and Supplier and Network Operator Best Practice Guideline documents and a review of the topic areas by way of a TIG sub-group. Feedback from the TIG sub-group would then be shared with the wider TIG. TSG members also requested that Ofgem confirm if proposed changes should be made by way of a DCUSA Change Proposal or through the drafting of the REC Code of Practice schedule. Ofgem confirmed a DCUSA Change Proposal should be progressed on the basis that it requires Authority consent. This also enables incorporation of the changes into the REC schedule to be consulted on as part of v2.0 in the Autumn of 2020.

## How?

- 1.4 An exercise was undertaken to review the gaps in the Theft of Electricity Code of Practice (Schedule 23) against the Supplier Best Practice Guidelines and the Network Operator Best Practice Guidelines. The gaps identified were then presented to the May 2020 TIG meeting, and several areas were identified for inclusion in the Code of Practice. In addition, some tidying up of the schedule was undertaken to align the text with definitions.

## 2 Governance

### Justification for Authority Consent

- 2.1 The Authority agree that this change has no obvious impact upon the Switching SCR. Whilst this change is directly relevant to the Retail Code Consolidation (RCC) SCR, the Authority are comfortable that DCP 372 relating to the incorporated updates to the DCUSA Schedule 23 complementary to, and should be implemented ahead of the RCC SCR and so have no adverse impact upon our progression of the RCC SCR at the end of this year.
- 2.2 Considering this change has an impact on the drafting of the REC schedules, it was suggested that it should be treated as an Urgent change and that Authority consent will be required.
- 2.3 This Change Proposal should:
  - Be treated as an Urgent Change with an extraordinary release date 5 working days following Authority Consent;
  - Progressed to the Change Report phase

### 3 Why Change?

#### Legal Text

- 3.1 This Change Proposal seeks to incorporate suggested changes to the relevant sections of the DCUSA Theft Code of Practice (Schedule 23) as a result of the gap analysis exercise and to ensure that no further updates are required to Schedule 23 of DCUS before the introduction of the REC.

### 4 Code Specific Matters

#### Reference Documents

- 4.1 N/A

### 5 Relevant Objectives

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
5.1 This Change Proposal will help bring about the efficient transition of Schedule 23 'Theft of Electricity Code of Practice' from DCUSA governance to under REC governance and therefore, it will better facilitate DCUSA General Objective Four.	

## 6 Impacts & Other Considerations

### Does this Change Proposal impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

- 6.1 The Retail Code Consolidation Significant Code Review does not apply to the DCUSA and no other SCR would be impacted by this Change Proposal.

### Does this Change Proposal Impact Other Codes?

- 6.2 As a theft matter, any constraint seen in relation to similar changes proposed to the SPAA may have to be considered.

- |           |                                     |
|-----------|-------------------------------------|
| BSC       | <input type="checkbox"/>            |
| CUSC      | <input type="checkbox"/>            |
| Grid Code | <input type="checkbox"/>            |
| MRA       | <input type="checkbox"/>            |
| SEC       | <input type="checkbox"/>            |
| Other     | <input checked="" type="checkbox"/> |
| None      | <input type="checkbox"/>            |

### Consideration of Wider Industry Impacts

- 6.3 N/A

### Confidentiality

- 6.4 N/A

## 7 Implementation

- 7.1 It is suggested that this Change Proposal should be implemented by extraordinary release, which would be set for five working days following Authority Consent. It is worth noting that the 'Indicative Timeline' provided on page 2 of this document provides a view of dates applicable to a standard timeline for Authority decision, however, a quicker than normal Authority decision is currently expected.

## 8 Recommendations