




DCUSA Change Report		At what stage is this document in the process?
<h1>DCP 396:</h1> <h2>Housekeeping Change to Schedule 33</h2> <p>Date Raised: 11th October 2021</p> <p>Proposer Name: Peter Waymont</p> <p>Company Name: Eastern Power Networks</p> <p>Party Category: DNO</p>		01 – Change Proposal
		02 – Consultation
		03 – Change Report
		04 – Change Declaration
<p>Purpose of this Change Proposal:</p> <p>This Change Proposal seeks to implement a Housekeeping change to Schedule 33</p>		
	<p>This document is issued in accordance with Clause 11.20 of the DCUSA, and details DCP 396 – ‘Housekeeping Change to Schedule 33.’</p> <p>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 January 2021.</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 3011</p>	
	 <p>Impacted Parties: Suppliers, DNOs and IDNOs.</p>	
	 <p>Impacted Clauses: New paragraph to Schedule 33</p>	

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Any questions?

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Timetable

The timetable for the progression of the CP is as follows:

Change Proposal timetable

Activity	Date
Initial Assessment Report	20 October 2021
Change Report Approved by Panel	15 December 2021
Change Report issued for Voting	17 December 2021
Party Voting Closes	12 January 2022
Change Declaration Issued to Parties	14 January 2022

1 Executive Summary

What?

- 1.1 An additional paragraph needs to be added to Schedule 33 to cater for of an approved change (MAP CP 0322) which impacted various MRA Agreed Procedures (MAP)s including MAP21 (Disconnections) implemented on 21 August 2020 (v1.7).

Why?

- 1.2 DCP391 'Retail Code Consolidation Significant Code Review' introduced Schedule 33 (Disconnections) into the DCUSA. At the time, it was believed that this was in line with the correct version of MAP21, however, it was subsequently discovered that the version used was not the latest one and as such omitted the clause introduced by MAP CP 0322

How?

- 1.3 Introduce the obligation on Suppliers and Distributors to use the Secure Data Exchange Portal (SDEP) for exchanging personal data, unless otherwise stated as per the text contained within MAP CP 0322

2 Governance

Justification Part 2 Matter

- 2.1 This Change Proposal should be treated as a Part 2 Matter as it is considered to be a Housekeeping change to align Schedule 33 to that of the previous host (MAP21) which included such a clause introduced by the approved MAP CP 0322 in version 1.7. Unfortunately, this amendment was overlooked during the development of DCP 391.

Requested Next Steps

- 2.2 The DCUSA Panel recommends that this CP:
 - Be issued to Parties for Voting.

3 Why Change?

Background of DCP 396

- 3.1 MAP CP 0322 implemented changes to several agreed procedures in order to require Suppliers and Distributors to use the Secure Data Exchange Portal (SDEP) for exchanging personal data relating to customers in preference to the use of emails. This was implemented in August 2020.
- 3.2 The Significant Code Review on Retail Code Consolidation saw the demise of the Master Registration Agreement. As part of this, the disconnections process (MAP21) was moved into the DCUSA via the implementation of DCP391 on 1st September 2021.

- 3.3 Unfortunately MAP CP 0322 was omitted in error from the legal text of Schedule 33.
- 3.4 This Change Proposal is therefore considered as a housekeeping change to Schedule 33 of the DCUSA, such that it includes the approved change to the disconnections procedure previously implemented into MAP21 via MAP CP 0322.

4 Solution

- 4.1 The original solution, which had been suggested within the CP form had set out that the following legal text should be added to Schedule 33, and noted that it, bar one very minor amendment, was effectively the same text as had been implemented into MAP21 by MAP CP 0322:
- “Where personal data relating to a Customer is exchanged between parties for the purposes of this schedule, except where otherwise stated, this shall be sent via the Secure Data Exchange Portal.”*
- 4.2 Following a review of MAP21, to ascertain where MAP CP 0322 had added the above paragraph, it was found that it should be included as a new sub-paragraph (3.9) at the end of paragraph 3 ‘PRINCIPLES’ of Schedule 33 of the DCUSA. It was also noted that the words ‘Secure Data Exchange Portal’ were capitalised and that the term was not currently defined within the DCUSA and would therefore need to be defined.
- 4.3 It should be noted that “Secure Data Exchange Portal” was not defined within MAP21 itself but within the main body of the MRA and was defined as *“has the meaning given in Clause 58.1”*. However, the bulk of the arrangements held in the MRA have transitioned to the Retail Energy Code (REC), and Schedule 1 ‘Interpretations and Definitions’ of the REC contains the following:

<i>“Secure Data Exchange Portal</i>	<i>SDEP</i>	<i>means the portal of that name which forms part of the Secure Data Exchange Service.”</i>
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- 4.4 Given the above it was determined that “Secure Data Exchange Portal” should be defined by reference to the same term in the REC.

5 Relevant Objectives

Assessment Against the DCUSA Objectives

- 5.1 For a DCUSA Change Proposal to be approved it must be demonstrated that it better facilitates the DCUSA Objectives. There are five General Objectives and six Charging Objectives. The full list of objectives is documented in the DCUSA.
- 5.2 The Proposer believes that DCP 396 will better facilitate the fourth 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 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 EU Internal Market Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	None

5.3 This Proposer considers that this CP only can only impact upon the DCUSA General Objectives and more specifically, that it better facilitates General Objective Four “the promotion of efficiency in the implementation and administration of the DCUSA”. This is because the proposed amendment should have been catered for within DCP391 but was unfortunately omitted. Its inclusion therefore maintains the status quo post the transition of the disconnections procedure from the MRA to the DCUSA.

6 Impacts & Other Considerations

6.1 The omission of such text will have a consequential impact on the Retail Energy Code who is responsible for managing the Secure Data Exchange Portal (SDEP). There are currently two messages in the SDEP to manage this – Logical Disconnections (Elec.); and Physical Disconnections (Elec.). Without the obligation in DCUSA there will be mixed messaging between codes.

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

6.2 The Retail Code Consolidation SCR is now closed.

Does this Change Proposal Impact Other Codes?

BSC..... ☐ MRA..... ☐ Grid Code..... ☐ REC..... ☐
 CUSC..... ☐ SEC..... ☐ Distribution Code.. ☐ None..... ☒

6.3 This change will ensure there is no impact on other codes. Without it there will be a misalignment with the REC.

Consideration of Wider Industry Impacts

6.4 No

Confidentiality

6.5 None

7 Implementation

Proposed Implementation Date

7.1 It is proposed that this CP should be implemented within the first DCUSA release after Party approval and this is expected to be 24 February 2022.

8 Legal Text

8.1 The DCP 396 legal text was suggested by the Proposer and following a review by DCUSA Ltd.'s legal advisors, it was agreed that the following amendments to Schedule 33 would need to be made:

Add the following new paragraph 3.9 to Schedule 33 as follows:

3.9 Where personal data relating to a Customer is exchanged between Parties for the purposes of this Schedule, this shall be sent via the Secure Data Exchange Portal (except as otherwise stated in this Schedule).

Add the following definition to the 'Glossary of Terms' in paragraph 1.6 of Schedule 33 as follows:

<u>Secure Data Exchange Portal</u>	<u>has the meaning given to that term in the Retail Energy Code.</u>
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8.2 The formal version of the DCP 396 legal text acts as Attachment 1 to this Change Report.

9 Recommendations

Panel's Recommendation

9.1 The Panel approved this Change Report on 15 December 2021.

9.2 The Panel have recommended that this report is issued for Voting and DCUSA Parties should consider whether they wish to submit views regarding this Change Proposal.

10 Attachments

- Attachment 1: DCP 396 Legal Text
- Attachment 2: DCP 396 Voting Form
- Attachment 3: DCP 396 CP Form