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CHANGE PROPOSAL PLAN

R0091 – REVISION OF THE THEFT DETECTION INCENTIVE SCHEME

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RESPONSIBLE COMMITTEE	CHANGE PANEL	CHANGE PATH	SELF GOVERNANCE

DEADLINE FOR ALTERNATIVE CHANGE PROPOSALS	24/02/2023

LEAD CHANGE ANALYST



Elise Handy

Click to send an email

020 7898 9740

CHANGE OVERVIEW

The Energy Theft Detection Incentive Scheme (TDIS) seeks to encourage Suppliers to undertake theft investigations. Following the completion of the first TDIS Reporting Year operated wholly under the REC, there have been several areas of the Code identified where additional clarity would benefit the administration of the TDIS.

KEY MILESTONES

	FROM	TO
PRELIMINARY CHANGE REPORT AND CONSULTATION ISSUED	17/02/2023	17/02/2023
CONSULTATION	17/02/2023	10/03/2023
FINAL CHANGE REPORT ISSUED	21/03/2023	21/03/2023
RESPONSIBLE COMMITTEE DECISION (EX-COMMITTEE)	21/03/2023	24/03/2023
APPEAL WINDOW CLOSURE	07/04/2023	07/04/2023

1 SCOPE

1.1 IN SCOPE

This document details the plan for the assessment and consultation of minor clarifications to the Schedules associated with the TDIS.

1.2 OUT OF SCOPE

This Change Proposal will not introduce new processes or obligations on REC Parties, it will clarify existing processes or obligations to address areas of concern identified following the first year of operation wholly under the REC.

2 REQUIRED ACTIVITIES AND STAKEHOLDER ENGAGEMENT

2.1.1 ANALYSIS

The Code Manager and RECCo have completed an analysis on the drafting of REC Products associated with the TDIS and identified areas which require further clarification. An external legal review has also been conducted prior to publishing this Change Proposal Plan.

2.1.2 SOLUTION DEVELOPMENT

No additional solution development activity is required as a fully formed Change Proposal has been developed prior to publishing the Change Proposal Plan.

The legal text changes will be finalised ahead of the publication of the Preliminary Change Report.

2.1.3 IMPACT ASSESSMENT

No additional impact assessment activity is planned as this change only clarifies existing obligations rather than introducing new obligations which would require assessment.

A period of consultation has been included within the plan to enable the validation of this assumption.

2.1.4 PRELIMINARY CHANGE REPORT DEVELOPMENT AND CONSULTATION

A standard consultation period of 15 Working Days has been included in the plan to ensure that the updates to the REC reflect clarifications to existing obligations.

It is proposed that this Change Proposal Plan move straight to consultation once the Preliminary Change Report has been issued. This is due to the simple nature of the solution required to implement the necessary changes.

2.1.5 FINAL CHANGE REPORT

Following the consultation period, time has been included within the plan for a review of any consultation responses received and for these to be addressed prior to publishing the Final Change Report for a decision.

2.2 RAID

2.2.1 RISKS AND ISSUES

REF.	RISK	NOTES	MITIGATION
R0091.CPP.R001	There is a risk that there are other omissions or clarifications required which have not been identified by the Code Manager.	The Code Manager does not propose to delay the progression of this Change Proposal if omissions or further clarifications are identified.	If any items are identified during the progression of this change, these will be included as part of a future Change Proposal.
R0091.CPP.R002	Implementation planned within the appeal window.	This change is targeting implementation on 01 April 2023, in line with the start of the new TDIS Reporting Year. This implementation date is within the appeal window, which closes on 07 April 2023.	Due the simplicity of this change we do not anticipate any appeals being made, however, should a successful appeal be made the changes to the Schedules will be rolled back across EMAR and the REC Portal.

2.2.2 ASSUMPTIONS AND DEPENDENCIES

REF.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
R0091.CPP.A001	There is the assumption that the proposed changes will have no impact on REC Party obligations.	Whilst it is important to implement this Change Proposal in line with the next TDIS Reporting Year, the Code Manager will validate that there will be no impact on REC Parties.	This will be validated during the consultation.