RETAIL ENERGY CODE

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01	Initial Assessment Report
02	Preliminary Change Report
03	Final Change Report

PRELIMINARY CHANGE REPORT

R0020 – ETTOS REPORT DISSEMINATION

DOCUMENT VERSION	1.0
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DOCUMENT APPROVAL STATUS	APPROVED BY RESPONSIBLE COMMITTEE

RESPONSIBLE COMMITTEE	CHANGE PANEL

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CHANGE OVERVIEW

The Energy Theft Tip Off Service (ETTOS) Provider has upgraded their security for report dissemination services and will be decommissioning their onsite servers on 31 January 2022. Consequently, the ETTOS web portal will no longer be used to provide the ETTOS Service Data (tip-off reports) to ETTOS Recipients. This change will make the ETTOS web portal obsolete. Instead, encrypted emails will be used to send tip-off reports directly to ETTOS Recipients. Updates are required to the REC to reflect these changes.

CODE MANAGER'S RECOMMENDATION

The Code Manager recommends Change Proposal R0020 is **APPROVED** for implementation on 31 January 2022.

	High Impact: N/A
	Medium Impact: N/A
	Low Impact: Energy Suppliers, Distribution Network Operators, Gas Transporters

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BACKGROUND

1 SUMMARY

The Energy Theft Tip Off Service (ETTOS) is a REC service operated by Crimestoppers for members of the public to anonymously report suspected theft of gas and electricity. Crimestoppers, as the ETTOS Provider, seeks to match the tip-off received to an Energy Supplier. If tip-off is matched to an Energy Supplier, it is included in a report to the Energy Supplier. If a tip-off isn't matched to an Energy Supplier, then the relevant Gas Transporter (GT) or Distribution Network Operator (DNO) receives the tip-off. The GT or DNO confirms the full address and Registered Supplier back to the ETTOS Provider, enabling the ETTOS Provider to provide the tip-off to the correct Energy Supplier. Currently ETTOS Recipients receive their reports via the ETTOS web portal.

Crimestoppers have upgraded their security for report dissemination services and will be decommissioning their onsite servers on 31 January 2022.

Consequently, the Energy Theft Tip Off Service (ETTOS) web portal will no longer be used to provide the ETTOS Service Data (tip-off reports) to ETTOS Recipients. This change will make the ETTOS web portal obsolete and encrypted emails will be used to send tip-off reports directly to ETTOS Recipients instead.

Updates are required to the REC to reflect these changes.

2 PROBLEM STATEMENT

The ETTOS Provider, will be decommissioning their onsite servers on 31 January 2022. Consequently, the ETTOS web portal will no longer be used to provide the ETTOS Service Data (tip-off reports) to ETTOS Recipients. Instead, reports will be sent directly to ETTOS Recipients via encrypted emails. Updates are required to the REC to reflect the changes to the ETTOS report dissemination process.

3 USER STORIES

REF.	USER STORIES
CONSUMER USER STORIES	
C1	As a Consumer, I want my Energy Supplier or Distribution Network to receive and act upon energy theft tip-offs, to ensure the safety and security of my energy supply.
MARKET PARTICIPANT USER STORIES	
M1	As an ETTOS Recipient, I need to be aware of changes to the way I will receive and send tip-off information, so I can engage in the process and plan any required changes to my processes.
M2	As an ETTOS Recipient, I need to receive my ETTOS Service Data in a timely manner, so that I am able to act on tip-offs, to reduce risks for consumers and my business.

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PROPOSAL

4 SUMMARY OF ANALYSIS UNDERTAKEN

Analysis of the issue identified legal text changes are required to two REC Schedules

- Schedule 7 (Energy Theft Reduction), to reflect the removal of the ETTOS portal and the introduction of encrypted emails as the delivery mechanism for ETTOS Service Data.
- Schedule 10 (Charging Methodology) to remove reference to discrete charges relevant to ETTOS Recipients.

Two Category 3 documents are also impacted by this issue (The REC Charging Statement and Energy Theft User Guide), which will be updated and implemented by the Responsible Providers as Category 3 Change Proposals, aligned with the implementation of this Change Proposal.

5 KEY RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

5.1 RISKS AND ISSUES

No.	RISK	NOTES	MITIGATION
R1	The proposed solution for email encryption is the use of Transport Layer Security (TLS) version 1.2. Most email services can accommodate the sending and receiving of TLS encrypted emails. It is possible that some, less well used services, may not be compatible or may require the addition of a plug-in.	The ETTOS Service Provider has been using TLS encryption for the last 2-3 months, for the emails they send to ETTOS Recipients to notify them that a tip-off has been received and prompting the ETTOS Recipient to log onto the web portal. The ETTOS Service Provider has confirmed that all notifications have been successfully received during this period.	The consultation on this Preliminary Change Report will include a question on the email services used by ETTOS Recipients, this will enable the compatibility of email services used by ETTOS Recipients to be validated. Further testing of the email encryption compatibility will be completed between 10 January and 21 January as part of the Release Plan.

5.2 ASSUMPTIONS AND DEPENDENCIES

No.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
A1	The requirement to establish a nominated email address to receive tip offs, instead of logging in to the ETTOS web portal, is not complex and is achievable within the short lead time available.	It is assumed there will be changes required to manual processes used by ETTOS Recipients. ETTOS Recipients will be required to provide/confirm an email address to which encrypted emails will be sent.	This will be validated in the consultation on this Preliminary Change Report.

No.	DEPENDENCY	NOTES	STATUS
D1	The Change Panel will need to be comfortable with the timetable for progression in order to meet the required implementation date.	If the Change Proposal does not follow the required timetable, it may not be approved in time to implement the necessary changes prior to the removal/closure of the ETTOS portal.	Closed

6 PROPOSED SOLUTION

This change will amend the legal text within Schedule 7, to reflect the removal of the ETTOS web portal and the introduction of encrypted emails as the delivery mechanism for ETTOS Service Data.

The proposed email encryption solution is the use of Transport Layer Security (TLS) version 1.2, to encrypt emails between email servers. Most email services can accommodate the sending and receiving of TLS encrypted emails, including the most popular services such as Outlook, Outlook 365 and Gmail.

ETTOS Recipients will be required to provide/confirm one email address for the receipt of ETTOS Service Data via encrypted emails. In the event an ETTOS Recipient does not provide an email address ahead of 31 January 2022, their currently registered Single Point of Contact (SPOC) will receive the tip offs.

The ETTOS Service Provider will generate ‘unread email’ reports through email message read receipts received from the ETTOS Recipient.

Updates will be made to Schedule 10, to remove reference to requesting additional licences for the ETTOS web portal as the removal of the ETTOS portal makes the entitlement to web portal accounts, and associated costs for any additional accounts, obsolete. Legal text changes are required to reflect this.

7 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0020 can be found on the Change Proposal Page in the REC Portal.

8 PROPOSED IMPLEMENTATION DATE AND APPROACH

PROPOSED IMPLEMENTATION DATE	31 January 2022

PROPOSED IMPLEMENTATION APPROACH	BIG BANG

This Change Proposal must be implemented on the same date, or prior to, the closure of the ETTOS portal on 31 January 2022.

9 CHANGE PATH

CHANGE PATH	SELF-GOVERNANCE

10 RESPONSIBLE COMMITTEE

RESPONSIBLE COMMITTEE	CHANGE PANEL

11 BUSINESS CASE ASSESSMENT

This Change Proposal has been raised to implement the necessary changes to the REC Schedules, to reflect the removal of the ETTOS portal and the introduction of encrypted emails as the delivery mechanism for ETTOS Service Data.

We have not identified material costs or significant impacts as a consequence of the proposed solution.

12 CASE FOR CHANGE

The Code Manager considers that there is a positive case for change to implement this Change Proposal, on the basis that:

- The proposed solution is fully formed and appropriately resolves the problem statement.

- The impact of not implementing this solution would cause detriment to Consumers and Market Participants, as there would be no mechanism for the receipt, and subsequent investigation, of energy theft tip-offs.

13 CODE MANAGER'S RECOMMENDATION

Based on the evidence in sections 11 and 12 of this report, the Code Manager considers a positive business case can be made for implementing this solution and recommends that the Change Panel:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 31 January 2022.

14 CONSULTATION PLAN AND NEXT STEPS

The consultation on this Preliminary Change Report for R0020 will be published on the REC Portal on **22 December 2021** and will close on **12 January 2022**.

Following consultation, the Code Manager will produce an updated version of this Preliminary Change Report (referred to as the Final Change Report). This will include the outcome of the consultation, setting out a summary of the consultation submissions and the Code Manager's response.

The Final Change Report will be issued to Change Panel to make its determination.

15 APPENDIX

CHANGE PROPOSAL	Change Proposal Page
LEGAL DRAFTING	Link to EMAR