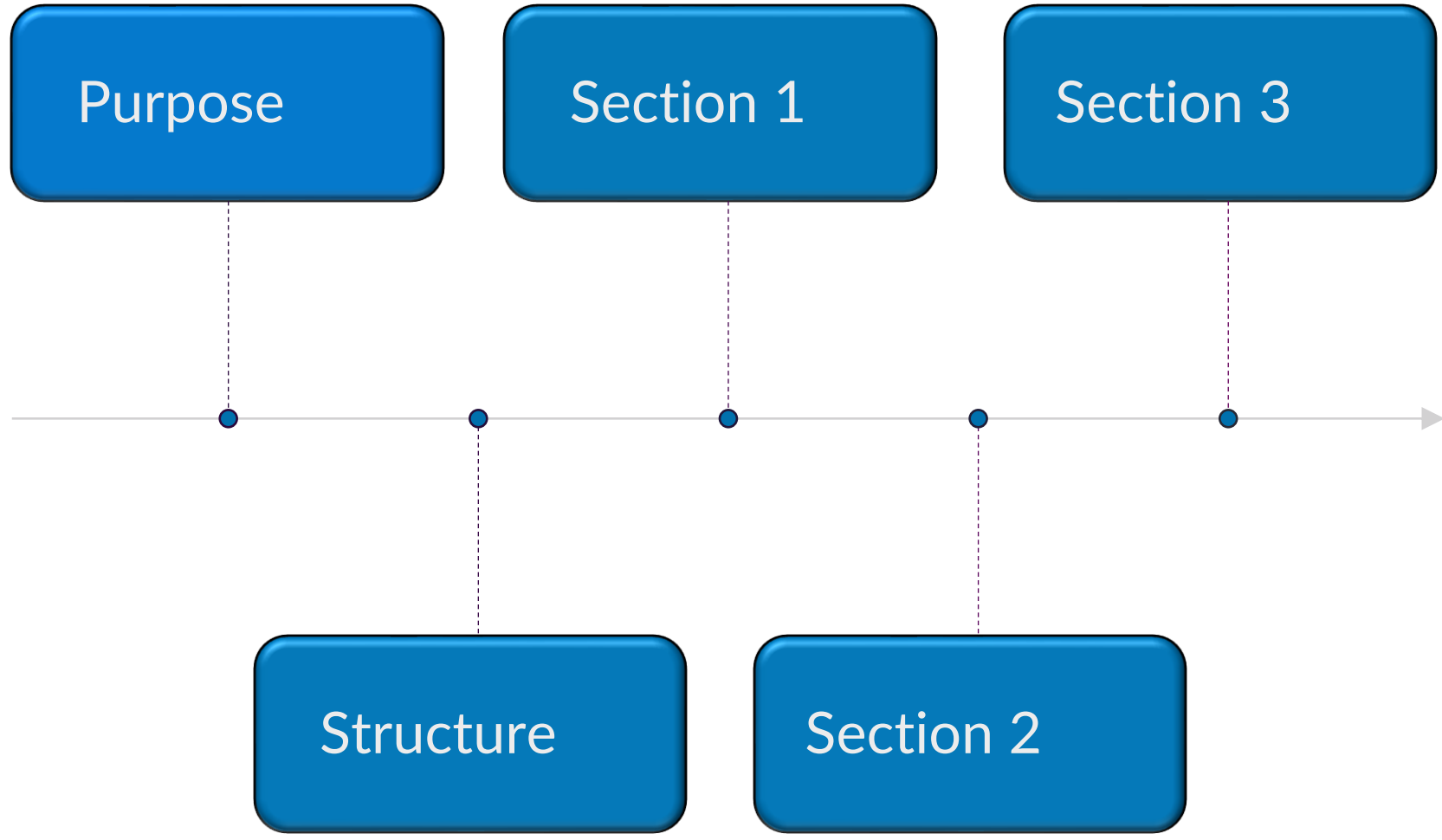
Energy Theft end to end process mapping

October 2023

CONTENTS

- **Purpose**
- **Structure**
- **Section 1: Process Maps**
- **Section 2: Party Obligations**
- **Section 3: Process Gaps**

The links above and to the right are hyperlinks that enable the reader to navigate the document



PURPOSE

This document has been created to understand and map out the end to end process in relation to energy theft. It has been designed to understand who the key actors are within the process, what obligations are placed on them and where there may be any gaps within the process that could lead to energy theft going unnoticed or give rise to energy theft occurring. The regulatory frameworks referenced are:

- **Licence Conditions**
- **Retail Energy Code (REC)**

The obligations outlined in these frameworks have been mapped against relevant steps within the process maps with the detail of each obligation provided further in this document.

In addition gaps within these processes have been mapped to the relevant process step on each process map.

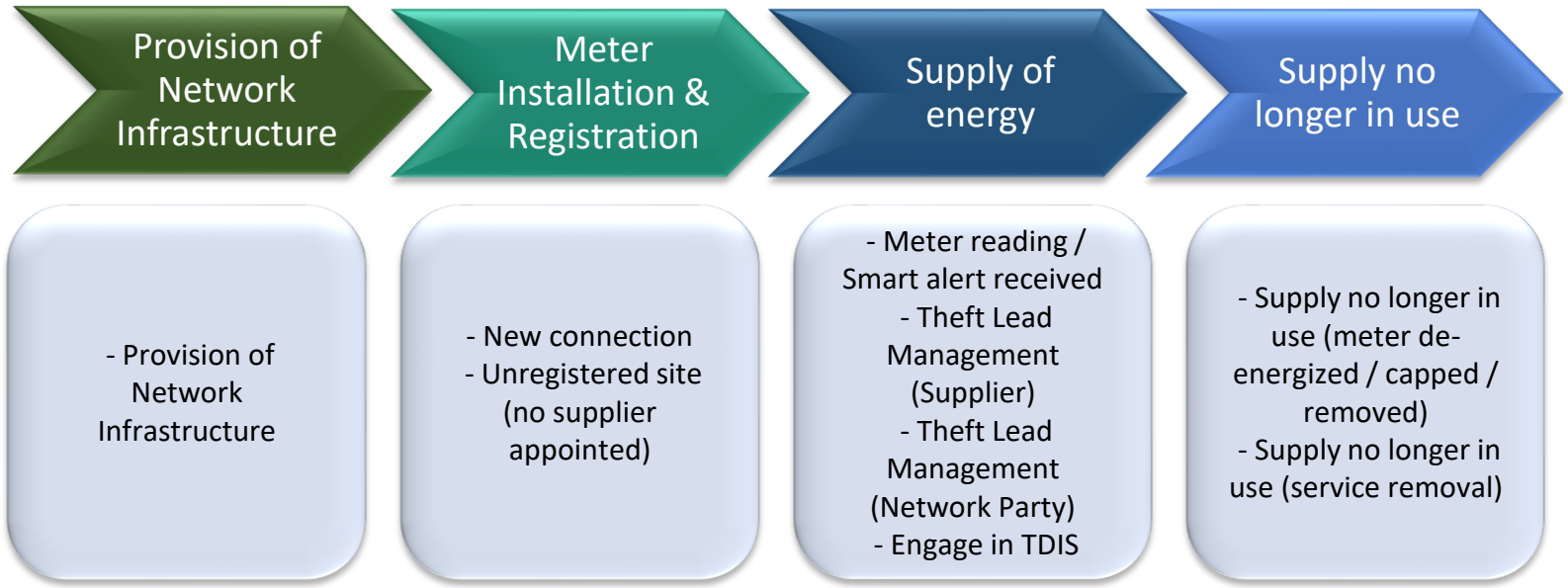
STRUCTURE

This document is divided into the following sections:

- **Section 1: Process Maps**
  - This presents the high level process maps for each stage of the supply point lifecycle including a detailed SIPOC analysis
- **Section 2: Party Obligations**
  - This details each of the obligations highlighted within the process maps
- **Section 3: Process Gaps**
  - This details the potential gaps that have been identified within the process maps

High Level Summary

Process mapping was completed against the life cycle of a supply point. This approach was chosen as opposed to the specific theft lifecycle (as outlined in the ASE in 2022) due to the stronger potential to draw out gaps and failures in existing processes. The lifecycle is set out below alongside the process maps that have been drafted.



Obligations placed on parties are mapped to relevant steps of these processes along with an assessment of potential process gaps covering the following areas:

- Awareness / Incentivisation
- Monitoring / Reporting
- Obligations / Responsibilities

High Level Summary

In addition to this a deeper dive has taken place using the SIPOC framework to gain detailed understanding of the inputs and outputs to each process. An example is below for the Provision of Network Infrastructure process.

S(Supplier) **I**(Input) **P**(Process) **O**(Output) **C**(Customer)

SUPPLIERS (those who input into the process step)	INPUTS (what are the inputs to the process step?)	PROCESS (the process step)	OUTPUTS (what are the end results once the process step is complete?)	CUSTOMERS (who does the process step impact upon?)
• Energy consumer • Energy Supplier • Network provider • Local authority • Building Contractor • ETTOS	• Application received from consumer for new connection to be installed (direct to network provider) • Application received from contractor / local authority for new connection to be installed • Request from an Energy Supplier to install a new connection • Report of potential theft occurring at the site • Potential theft identified	New network connection request received	• New connection installed and confirmation sent to industry • Potential theft lead identified and logged in the relevant management system	• Energy Consumer • Energy Supplier • Network Provider

Process Gap Summary

Whilst the gaps identified are not new, collectively they represent known issues that have existed for a long time. Individually the gaps are not likely to contribute to a significant volume of Energy Theft, collectively they are likely to. With some gaps directly impacting others within the process. The overall themes of these has been summarised below.

AWARENESS / INCENTIVE

- Broadly parties are aware of how the processes work, however, there are some grey areas that would benefit from clarification.
- Existing incentives are not as effective as they are designed to be with some suppliers not engaging fully with industry wide schemes such as the Theft Detection Incentive Scheme.
- There is also scope to review and explore the use of incentives elsewhere in the lifecycle (for example entering unrecorded volumes into settlement) to encourage appropriate behaviours.
- Parties are not clear on when a it would be appropriate / viable to pursue a prosecution for energy theft with the Police.

MONITORING / REPORTING

- There is an overall lack of consistency in the approach taken by parties to monitor aspects of the process, specifically new connections, unregistered sites and those where a supply has been interrupted due to Energy Theft.
- There is also a lack of central reporting and a single view outside of the TDIS for sharing information within the industry relating to the volume and detail of investigations and their outcomes. This can make it challenging for parties to act in a co-ordinated manner especially where there are multiple supply parties with an interest in a particular theft case.
- Inconsistent data is kept by Police forces regarding prosecutions for energy theft and there is no clear visibility back to industry parties on the success of prosecutions.

OBLIGATION / RESPONSIBILITY

- Parties are aware of their obligations and responsibilities in relation to Energy Theft, however, there are some Suppliers and Network Parties that are not consistently adhering to them particularly those relating to proactive theft detection practices.
- There is also scope for changes to some of the existing obligations (for example change of supplier) to assist with the prevention of Energy Theft.

Section 1: Process Maps

Provision of Network Infrastructure

Process map

Key:
- Potential gap identified

- Party obligation

Provision of Network Infrastructure | Meter Installation & Registration | Supply of energy | Supply not in use

Provision of Network Infrastructure

Network Party (Distributor/ Transporter)

Start Point → Network Infrastructure Installed → Monitor for registration → *Site registered??* → X → No → *Suspected theft identified?* → X → No → *Theft likely to have occurred?* → X → No → See "Theft Lead Management' process map for next steps

Yes (Site registered??) → End

Yes (Suspected theft identified?) → *Is it suspected theft in conveyance?* → X → Yes → Add to Lead Management System → Carry out desktop analysis → 4

No → Identify Supplier to notify → 5 / 2

Review Lead

Yes (Theft likely to have occurred?) → X

Start Point → Change to contact point for theft leads → 1

2 / 1 / 5 → Receive notification of contact point change → Apply update → End

Supplier

Start Point → Suspected Theft in conveyance identified → Identify Network Operator notification contact → 1 / 3

Receive Theft Lead → See "Theft Lead Management' process map for next steps

Start Point → Change to contact point for theft leads → 1

Receive notification of contact point change → 1 / 5 → Apply update → End

ETTOS

Start Point → Receive Theft Lead → *Is there a registered supplier?* → X → Yes → Identify network party → 39 / 38

No → Receive notification of contact point change → 6 / 5 → Apply update → End

Provision of Network Infrastructure

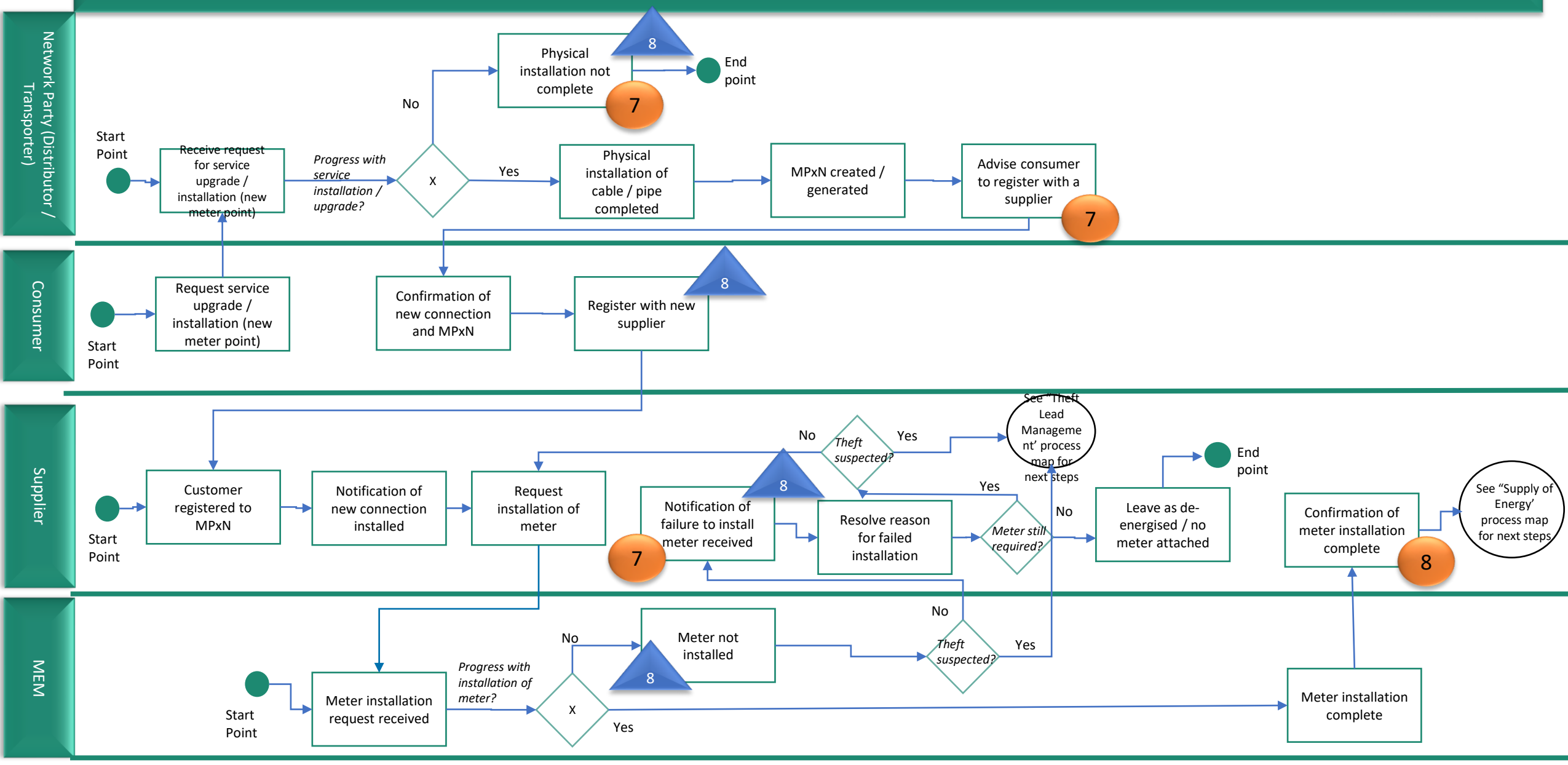
	SUPPLIERS (those who input into the process step)	INPUTS (what are the inputs to the process step?)	PROCESS (the process step)	OUTPUTS (what are the end results once the process step is complete?)	CUSTOMERS (who does the process step impact upon?)
SIPOC analysis	• Energy consumer • Energy Supplier • Network provider • Local authority • Building Contractor • ETTOS	• Application received from consumer for new connection to be installed (direct to network provider) • Application received from contractor / local authority for new connection to be installed • Request from an Energy Supplier to install a new connection • Report of potential theft occurring at the site • Potential theft identified	New network connection request received	• New connection installed and confirmation sent to industry • Potential theft lead identified and logged in the relevant management system	• Energy Consumer • Energy Supplier • Network Provider
Awareness / Incentives Gap	• Different approaches and data sets are used to identify theft – smaller organisations may have limited resources / capabilities when compared with larger organisations and so may be less effective in detecting energy theft • The Theft Estimation Methodology (TEM) indicates there may be potential bias towards which types of consumer are investigated for energy theft. E.g. Low income / PPM customers are more likely to be investigate • The importance of network parties collating evidence and sharing with energy suppliers / third parties once a theft instance has been resolved. E.g. Photos of the tampered installation / cannabis farm size. This is particularly noticeable when network parties attend emergency isolation visits to make a site safe • Fewer incentives for network Parties to detect and prevent theft				
Monitoring / reporting gaps	• Consistent process for updating and sharing theft contact information as and when it changes • There is no clear, consistent approach that parties take to monitoring sites once a theft has been resolved to detect / prevent further theft occurring at the same site • Inconsistent approach to monitoring and reporting of volume of recoveries of costs and prosecutions. Police info indicates it is inconsistent amongst Police forces. Not clear if suppliers & network parties have consistent processes or visibility for this • Consistent approach and processes across organisations to monitor / prevent future instances of energy theft • Theft is suspected from a consumer but there is no linked address				
Party Obligations	REC Schedule 8 Section 5.1 Ofgem Condition 27. Theft, damage and meter interference REC (3) Responsibilities of Parties: Theft REC Unbilled Energy Code of Practice Schedule 8 - (15) Reports REC Unbilled Energy Code of Practice Schedule 8 (8) - Conduct of Investigations REC Schedule 7 - Annex 1: Energy Theft Tip-Off Service				
Theft Lifecycle stage	• Theft Investigation (Suspected theft in conveyance) • Theft Detection (Desktop analysis) • Theft Resolution (Seek losses, adjust settlement, complete TDIS reporting & inform police)				

Meter Installation & Registration

Key:
- Potential gap identified
- Party obligation

Provision of Network Infrastructure | Meter Installation & Registration | Supply of energy | Supply not in use

Meter Installation and Registration – New connection



Meter Installation and Registration - New connection

	SUPPLIERS (those who input into the process step)	INPUTS (what are the inputs to the process step?)	PROCESS (the process step)	OUTPUTS (what are the end results once the process step is complete?)	CUSTOMERS (who does the process step impact upon?)
SIPOC analysis	• Energy consumer • Energy Supplier • Network provider (if service upgrade request received)	• Consumer application for service upgrade (if development has taken place) • Consumer informing the supplier they have taken responsibility for a site without a meter	• Service upgrade request received • New meter installation request received	• Physical installation of upgraded cable / pipe • Physical installation of new meter • Failed attempt to install upgraded cable / pipe • Failed attempt to install new meter	• Energy consumer • Energy Supplier • MEM • Network Provider
Responsibility / Incentives Gap	• There are some instances in which consumers have attempted to contact a supplier to register however they are unable to promptly contact a supplier or the chosen supplier is unwilling to take on the new consumer. Network parties have limited options as they are not able to pass the consumer to a specific supplier.				
Monitoring / reporting gaps	• No consistent process / approach in place to monitor new connection orders that are not progressed to ensure they are not connected illegally. E.g. Contractor installing meter for the customer which goes unregistered or rogue landlord acquiring PPMs that are not registered and consumer is unaware				
Party Obligations	REC Schedule 8 Section 20.1 & 20.2 & 20.3				
Theft Lifecycle stage	• Theft Prevention (physical installation)				

Key:
- Potential gap identified

- Party obligation

Provision of Network Infrastructure | Meter Installation & Registration | Supply of energy | Supply not in use

Unregistered site (no supplier appointed)

Supplier

Start Point

Notification received of unregistered site with supply in use

13

Is the supply registered or not?

X

Yes

See "Theft Lead management Supplier" for next steps

No

Notify Network Party

14

Start Point

14

Report to network Party on status of unregistered consumers

16

Network Party

Start Point

Notification received of unregistered site with a supply in use

13

Is the site registered or not?

X

Yes

See "Theft Lead Management Supplier" next steps

No

Investigate reasons for unregistered site.

Attempt to contact the occupier to gain consumer details

11

Contact with the consumer established?

X

No

12

Yes

Conduct site visit to establish contact

15

Contact with the consumer established?

X

No

Yes

Conduct site visit to check safety and suitability of connection and carry out remedial work if required

Is the site connected?

X

No

Update industry records, make MPxN dead and close instance

End

Yes

12

Obtain consumer information and generate MPxN

Generate potential theft lead and add to management system

See "Theft Lead management Network" for next steps

Back bill consumer for unrecorded energy

16

Instruct consumer to register with energy supplier of choice

See "Meter Installation and Registration – New connectionfor next steps

Potential theft suspected?

X

Yes

No

End

14

Report to Supplier on status of unregistered consumers

16

Start Point

Unregistered site (No supplier appointed)

	SUPPLIERS (those who input into the process step)	INPUTS (what are the inputs to the process step?)	PROCESS (the process step)	OUTPUTS (what are the end results once the process step is complete?)	CUSTOMERS (who does the process step impact upon?)
SIPOC analysis	• Supplier • Network Party • MEM (following a site visit) • Data collector (following a site visit) • Police (following a site visit) • Revenue Protection Agent (following a site visit)	• Dataflow received by a supplier (D0004) from the Data Collector • Dataflow received by a supplier (D0002) from the MEM • Notification from the Police following a call out • Notification from an RPA • Notification from a supplier / network party	• Notification received of unregistered consumer / site	• Consumer identified and contract agreed • Site and consumer registered with industry • Consumer remains un-identified • Site disconnected • Theft lead generated	• Supplier • Network Provider • Consumer • MEM (who's meter may be removed) • RPA
Responsibility / Incentives Gap	• Ensuring all parties are aware of responsibilities for back billing unbilled consumption. From the point of supplier registration, it is their responsibility, prior to this it is the responsibility of the Network Party				
Monitoring / reporting gaps	• Not clear if parties are pro-actively monitoring sites to ensure the consumer has registered with an energy supplier after the MPxN has been registered • Not clear if Suppliers and Network Parties are regularly sharing data on the status of unregistered sites nor by which method • A process for managing sites in which the consumer is an unknowing party to energy. Eg. PPM consumer who is regularly topping up their meter but as there is no registered supplier the energy and payments are unaccounted for owing to landlord / developer installing unregistered meter. • Pro-active monitoring to take place to capture unregistered sites or are parties reliant on external notifications				
Party Obligations	REC Schedule 8 section 19.1 & 19.2 REC Schedule 8 Section 19.1 & 19.3 REC Schedule 8 Section 20.1 & 20.2 REC Schedule 8 Section 20.3 REC Schedule 8 Section 21 REC (4) Responsibilities of Parties: Unregistered Sites				
Theft Lifecycle stage	• Theft Causation (Notification of unregistered site) • Theft Investigation (Obtain customer information) • Theft Detection (Conduct site visit to inspect disconnection)				

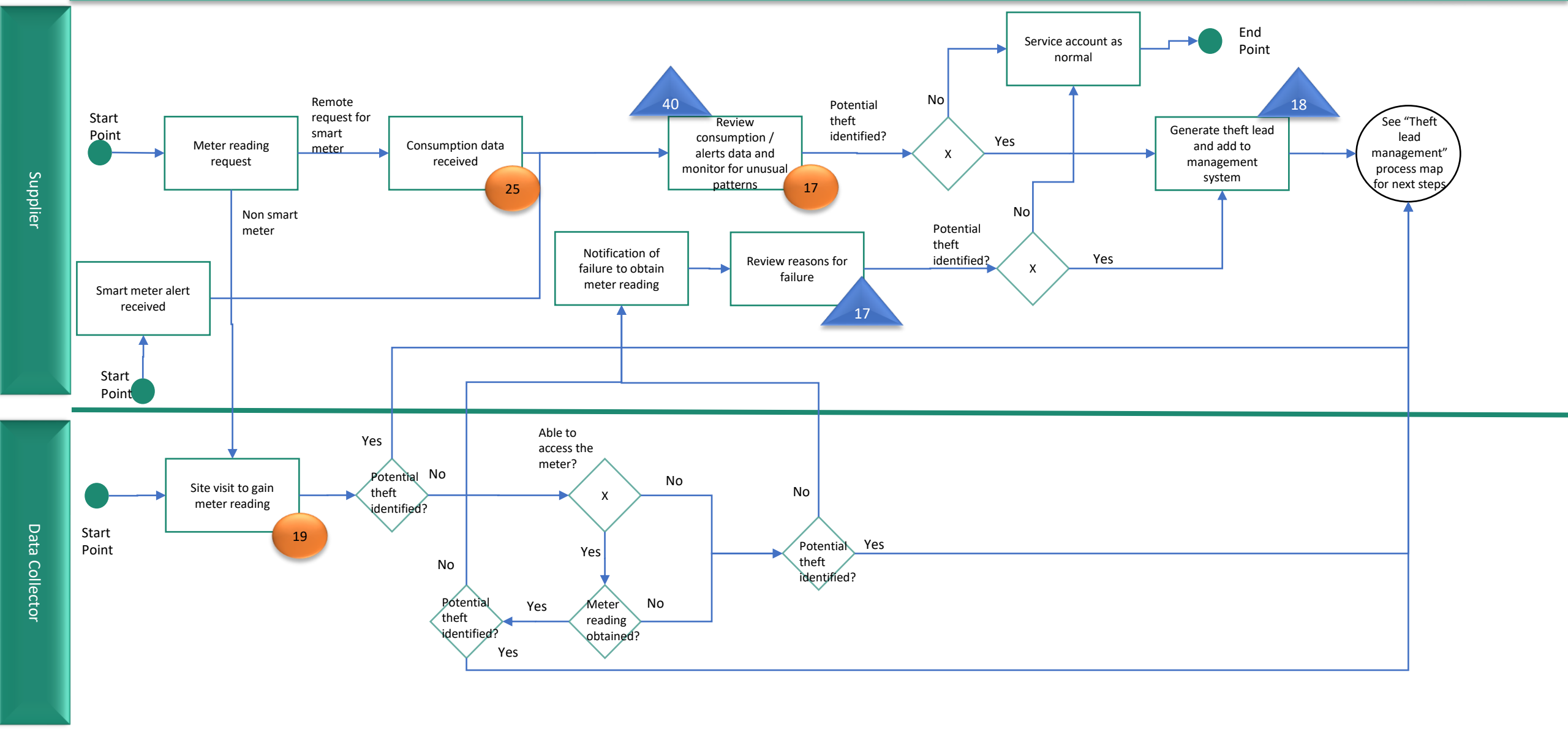
Supply of Energy

Key:
- Potential gap identified

- Party obligation

Provision of Network Infrastructure | Meter Installation & Registration | **Supply of energy** | Supply not in use

Supply of Energy (meter reading / smart alert received)



Supply of Energy (meter reading / smart alert received process)

	SUPPLIERS (those who input into the process step)	INPUTS (what are the inputs to the process step?)	PROCESS (the process step)	OUTPUTS (what are the end results once the process step is complete?)	CUSTOMERS (who does the process step impact upon?)
SIPOC analysis	• Energy Supplier • Data Collector • Meter installer / Meter asset provider	• Consumer makes a remote request for smart meter or a non-smart meter	• Site visit to gain meter reading • Consumption data received or smart alert received • Receive notification of failure to obtain meter reading • Review reasons for failure and assess whether potential theft is identified • Review consumption data and monitor for unusual patterns	• Generate theft lead and add it to the theft lead management system	• Energy Supplier • Data Collector • Meter installer/ MAP provider • Local Authorities • Network Party
Responsibility / Incentives Gap	• The Theft Estimation Methodology (TEM) indicates there may be potential bias towards which types of consumer are investigated for energy theft. E.g. Low income / PPM customers are more likely				
Monitoring / reporting gaps	• D004 data flows may not be prioritised leading to potential irregularities / theft ongoing for longer than necessary • No reporting requirement for parties to provide updates on successful progression of FOTL scenarios and not clear how each supplier is treating these • Parties may be more reluctant to engage with warrant of entry due to recent issues and press coverage with outcomes that could lead to consumer issues or reputational damage. A vulnerability assessment is likely to influence how they are dealt with • Once monitoring has commenced, continuous monitoring will continue for the theft lead • There are no obligations on parties around how they deal with notifications received for freeman on the land situations and no performance monitoring to ensure that suppliers don't just remove these customers from their customer base. • Consistent use and understanding of smart alerts as an indicator of theft				
Party Obligations	REC (6) Information exchange between Parties REC Schedule 8 - (22) Annex A: The Theft Charter Ofgem - Condition 12A. Matters relating to Theft of Gas				
Theft Lifecycle stage	• Theft Prevention (Request for meter reading at site) • Theft Causation (failure to obtain meter reading) • Theft Investigation (Review and monitor unusual patterns OR reasons for failed meter reading)				

Theft Leads Management

Key:
- Potential gap identified

- Party obligation

Provision of Network Infrastructure | Meter Installation & Registration | **Supply of energy** | Supply not in use

Theft leads management (supplier)

Supplier

Start Point

Theft lead received (internal / external)

Conduct desktop analysis

Current suppliers responsibility?

Yes

Complete vulnerability assessment

Theft suspected?

No

Update theft management system

23

Complete reporting for TDIS

End point

Yes

Pass lead to field agent for site visit

28

26

27

Report satisfactory to explain outcome?

Yes

x

No

Request further info from the RP Agent

No

Pass to relevant party for follow up

End point

Start Point

End point

Notification from network Party of theft resolved

Complete assessment of losses

Theft report and vulnerability assessment received

Seek to recover losses from customer

25

End point

Adjustment settlement

complete reporting for TDIS.

Report instance to Police (if applicable)

25

RP Agent (external or internal)

Theft lead received

Yes

Further info required?

No

Conduct site visit

Complete vulnerability assessment

Site access gained?

X

No

41

X

Warrant of entry required?

Yes

Engage with third parties to gain warrant

Yes

Provide further info to the Supplier

Theft identified?

No

No

Communicate outcome to supplier inc vulnerability

Yes

24

Resolve theft instance

Theft report provided and vulnerability to supplier

ETTOS

Theft lead received

Is there a registered supplier?

No

Identify Network Party

See "Theft lead management Network Party" process map for next steps

Theft Leads Management (Supplier)

	SUPPLIERS (those who input into the process step)	INPUTS (what are the inputs to the process step?)	PROCESS (the process step)	OUTPUTS (what are the end results once the process step is complete?)	CUSTOMERS (who does the process step impact upon?)
SIPOC analysis	• Energy Supplier • Network party • Energy Consumer • Local Authority • Property Landlord • Meter Equipment Manager • RPA • Building contractor • ETTOS • Police • Data Collector	• Network identifies theft not in conveyance • Police notification received of supply interference (following site visit) • Tip off received from third party (ETTOS, member of public, local authority) • MEM notification of supply interference following a site visit • RPA notification following a site visit • Dataflow received indicating irregularity • Meter readings / smart alerts received indicating unusual usage patterns • Unusual / no meter top ups identified • Long term failure to access meter to gain reads	• Theft lead received	• Desktop analysis to qualify lead • Notification to network party (if theft in conveyance) • Update theft management system • Engage RPA to Conduct site visit to resolve theft instance (potentially disconnect site or install PPM) • No theft identified • Gain warrant of entry if required • Engage with Police if they are needed at site • Assessment of losses completed and entered into settlement process • Seek to recover losses from customer (if known) • Provide details to Police for potential prosecution (if deemed suitable) • Complete reporting for TDIS.	• Energy Consumer • Energy Supplier • Network Party • Code Manager • Property Landlord • Police • MEM (if meter removed) • RPA
Responsibility / Incentives Gap	• There is no formal mechanism for the sharing of information between parties regarding theft leads. For example, to tell new Suppliers that their old Supplier suspected theft, or to share information about developers and landlords who have been found to engage in theft so that their other premises can be checked. • Lack of central database / information sharing mechanism for parties outside of TDIS which is accessible to all parties.				
Monitoring / reporting gaps	• Are all instances of no-theft identified (after investigation) captured in the reporting – does this skew the figures? • There is no clear, consistent approach that parties take to monitoring sites once a theft has been resolved to detect / prevent further theft occurring at the same site • Inconsistent approach to monitoring and reporting of volume of recoveries of costs and prosecutions. Police info indicates it is inconsistent amongst Police forces. Not clear if suppliers & network parties have consistent processes or visibility for this • Sometimes even with a warrant it is not possible to gain entry due to police not being able to offer support (there are limits to police powers to force entry) • There is no formal process in place to facilitate co-ordination of site visits by multiple organisations, e.g. where there is suspected gas and electricity theft at the same premises which has a separate supplier for each. • It is not currently possible to object to a change of supply whilst a theft investigation is ongoing. This provides an opportunity for a consumer to continually change supplier to avoid detection. • There is currently a gap regarding a consistent approach to determining how and when a prosecution could be followed through either with the CPS or a private prosecution.			
Party Obligations	REC Schedule 8 - (22) Annex A: The Theft Charter REC Schedule 8 - (6) Provision of Information from Energy Suppliers to Network Parties REC Schedule 8 - (7) Actions to be taken				
Theft Lifecycle stage	• **Theft Causation (Theft lead received)** • **Theft investigation (Conduct desktop analysis)** • **Theft Detection (Conduct site visit)** • **Theft Resolution (Seek losses, adjust settlement, form TDIS report and inform the police)**				

Key:
- Potential gap identified
- Party obligation

Theft leads management (Network Party)

Network Party (Distributor/ Transporter)

Start Point

Theft lead received (internal / external)

29

Is there an MPxN at the site?

No

See "unregistered site" process map

Yes

Conduct desktop analysis

Is it a gas supply?

No

Is there a registered supplier?

No

Yes

Yes

Is there a registered supplier or supplier de-registered in error?

No

Yes

Has theft occurred after the ECV?

No

Yes

Pass lead to current / last registered supplier

Update theft management system

End point

No

Theft suspected?

Yes

Conduct site visit

30

Site access gained?

X

No

Warrant of entry required?

42

X

Yes

Engage with third parties to gain warrant

Yes

No

Theft identified?

31

No

Yes

Resolve theft instance

30

Complete assessment of losses

32

31

Seek to recover losses from customer

Ofgem CV21, E4 & I5 returns,

31

Report instance to Police (if applicable)

Instruct consumer to register with a supplier or apply for new connection

End point

Supplier

Theft lead received

See "Theft lead management process map"

Theft Lead Management (network party)

	SUPPLIERS (those who input into the process step)	INPUTS (what are the inputs to the process step?)	PROCESS (the process step)	OUTPUTS (what are the end results once the process step is complete?)	CUSTOMERS (who does the process step impact upon?)
SIPOC analysis	• Energy Supplier • Network party • Energy Consumer • Revenue protection agency • Local Authority • Property landlord • Meter Equipment Manager/RPA (if site is unsafe) • Building contractor • ETTOS • Police	• Supplier identifies theft in conveyance • Police notification received of supply interference (following site visit) • Tip off received from third party (ETTOS, member of public, local authority) • MEM notification of supply interference following a site visit • RPA notification following a site visit	• Theft lead received	• Desktop analysis to qualify lead • Notification to supplier (if not theft in conveyance) • Update theft management system • Conduct site visit to resolve theft instance (potentially disconnect site) • Gain warrant of entry if required • Assessment of losses completed and entered into settlement process • Seek to recover losses from customer (if known) • Provide details to Police for potential prosecution (if deemed suitable)	• Energy Consumer • Energy Supplier • Network Party • Code Manager • Police • ETTOS
Responsibility / Incentives Gap					
Monitoring / reporting gaps	• There is no clear, consistent approach that parties take to monitoring sites once a theft has been resolved to detect / prevent further theft occurring at the same site • Inconsistent approach to monitoring and reporting of volume of recoveries of costs and prosecutions. Police info indicates it is inconsistent amongst Police forces. Not clear if suppliers & network parties have consistent processes or visibility for this • Correct use of the with or without warrant process				
Party Obligations	REC Schedule 8 - (6) Information exchange between Parties REC Schedule 8 - (6) Provision of Information by Parties to Revenue Protection Agents REC Schedule 8 - (6) Exchange of Information REC Schedule 8 - (7) Actions to be taken				
Theft Lifecycle stage	• Theft Causation (Theft lead received) • Theft investigation (Conduct desktop analysis) • Theft Detection (Conduct site visit) • Theft Resolution (Seek losses, adjust settlement, form TDIS report and inform the police)				

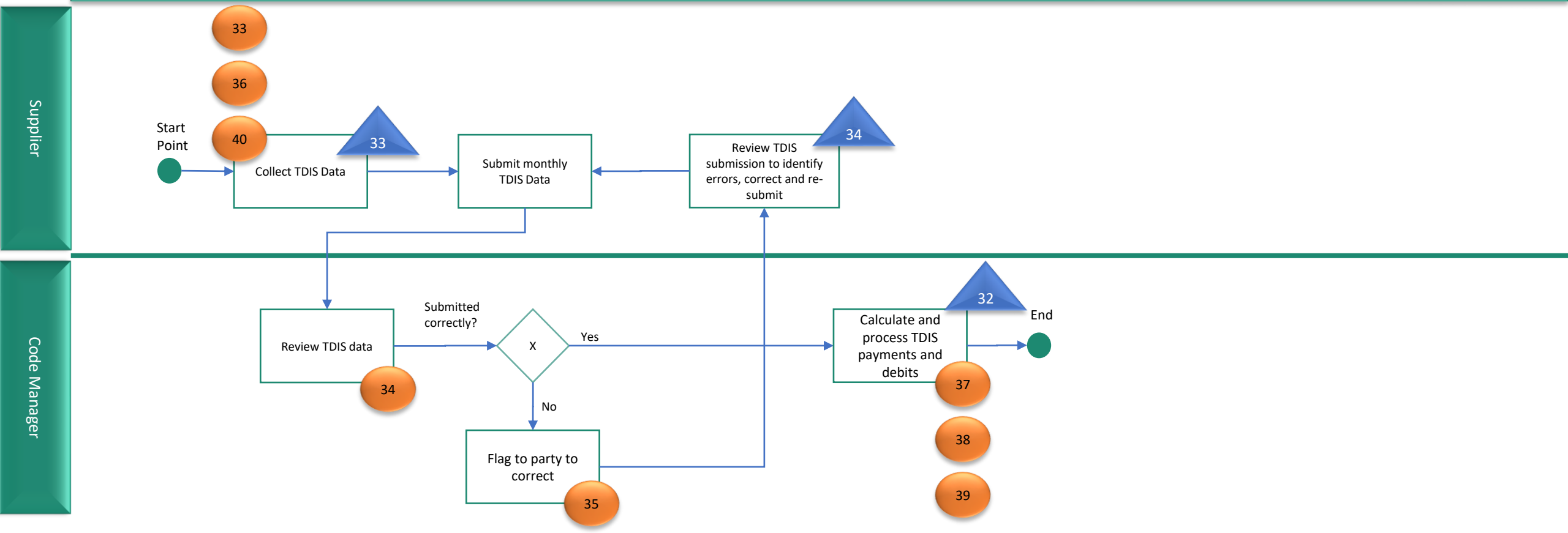
Key:
- Potential gap identified

- Party obligation

Provision of Network Infrastructure | Meter Installation & Registration | **Supply of energy** | Supply not in use

recco

Engage in Theft Detection Incentive Scheme



Engage in Theft Detection Incentive Scheme

	SUPPLIERS (those who input into the process step)	INPUTS (what are the inputs to the process step?)	PROCESS (the process step)	OUTPUTS (what are the end results once the process step is complete?)	CUSTOMERS (who does the process step impact upon?)
SIPOC analysis	• Energy Supplier • Code Manager • Network Provider • Revenue protection agent • Whistleblower	• Supplier to collect TDIS data • Supplier to submit TDIS data in required format • Code Manager validates TDIS data • If TDIS is submitted incorrectly, flag to the relevant party for resubmission	• Supplier to engage with TDIS scheme	• League table reporting generated • TDIS payments made by code manager • Suppliers pay into the TDIS	• Energy Supplier • Code Manager • RPA
Responsibility / Incentives Gap	**• Due to the timescales associated with the TDIS scheme years and payments, it may be challenging for new entrants and / or smaller parties to engage with the TDIS and fulfil their licence obligations. Setting up the process and infrastructure (even outsourcing) is costly. Payments come in a long time after the event which could hamper investment in the function. • No clear definition of what is deemed to be a completed investigation and therefore included in the TDIS. Parties completing desktop investigations (without completing a site visit) may not be including these in official reporting figures.**				
Monitoring / reporting gaps	**• Due to the cost of conducting the theft detection / prevention activities even when factoring in payments from the TDIS, it may not be commercially beneficial for a party to complete their obligations. It may be deemed more effective to pay into the scheme and do the minimum (resolving confirmed thefts provided to them) rather than be proactive • The exclusion of network parties from the TDIS is a gap in REC processes • Lack of enforcement action beyond TDIS where parties do not meet licence obligations • TDIS data is not currently utilised to its full extent. E.g., it could be analysed to look for repeat offenders or looking for linked properties or consumers or multiple thefts at the same site over time • No feedback given if report submission has been rejected from TDIS. Users have to manually review the report to determine the reasons for the failure. • Lack of validation on some of the data / information fields. E.g. the volume of energy unrecorded (kWh) is free text and "0" can be used.**				
Party Obligations	REC Schedule 8 - (13) Assess Ability to Pay and Agree Payment Terms REC Schedule 7 - Annex 3: Theft Detection Incentive Scheme REC Schedule 7 - (5) Energy Theft Detection Incentive Scheme REC Schedule 7 - Annex 3: Theft Detection Incentive Scheme REC Schedule 7 - (5) Energy Theft Detection Incentive Scheme REC Schedule 7 - Annex 3: Theft Detection Incentive Scheme REC Schedule 7 - Annex 3: Theft Detection Incentive Scheme				
Theft Lifecycle stage	• Theft Resolution (submitting theft instance to TDIS) • Theft Prevention (Collecting and enhancing data through submitting a TDIS report)				

Supply no longer in use

Key:
- Potential gap identified

- Party obligation

Provision of Network Infrastructure → Meter Installation & Registration → Supply of energy → Supply not in use

Supply no longer in use (meter de-energized / capped / removed)

Supplier

Start Point

Receive request to de-energise supply / remove the meter

44

47

Supplier notified

37

42

Monitor de-energised sites / sites with no meter

43

Theft suspected?

No

X

Yes

Generate theft lead and add to management system

See "Theft Lead Management' process map for next steps

Send request to MEM

Yes

De-energisation / removal still required?

X

No

Investigate reasons for failure

Resolve reasons for failure

See "Supply of Energy" process map for next steps

MEM

Receive request to de-energise / remove meter

Conduct site visit to complete work

Work completed?

X

Yes

Notify supplier of de/energisation / meter removal

No

43

Notify supplier and other relevant parties of failed visit

ETTOS

Start Point

Suspected energy theft occurrence at de-energised site / site with no meter

Identify Supplier Party

See "Theft Lead Management" process map

If it is a gas site, the supplier should follow the Voluntary Service Removal / Withdrawal process after the appropriate period of time has elapsed

Key:
- Potential gap identified

- Party obligation

Provision of Network Infrastructure | Meter Installation & Registration | Supply of energy | Supply not in use

Supply no longer in use (Service removal)

Supplier

Start Point

Receive request to remove service from premise

44

Meter on site?

X

No

Send request for service removal to network party

47

Yes

Send request for meter removal to MEM

Start Point

Supplier initiated service removal

Supplier notified

Send request for service removal to network party

Investigate and resolve reasons for failure

Send request to MEM

Meter Removal still required?

X

Yes

No

See "Supply Energy" process map

Investigate and resolve reasons for failure

Service removal still required?

X

No

Yes

See "Supply no longer in use – de-energised" process map

Update records and complete final billing processes

42

End Point

MEM

Receive request to de-energise / remove meter

Conduct site visit to complete work

Work completed?

Yes

Notify supplier of de/energisation / meter removal

43

46

No

Notify supplier of failed visit

Network Party

Receive request for service removal from supplier

Service removed?

Yes

Notify supplier of successful removal

X

No

Notify supplier of failure

Start Point

Receive request for service removal from consumer

Notify supplier of intent to remove service

Start Point

47

37

Monitor sites that have had a service removed

Yes

See "Theft Lead Management" process map

Theft suspected?

No

ETTOS

Suspected energy theft occurrence at site with no service?

Identify last known supplier

See "Theft Lead Management" process map

Site no longer in use

	SUPPLIERS (those who input into the process step)	INPUTS (what are the inputs to the process step?)	PROCESS (the process step)	OUTPUTS (what are the end results once the process step is complete?)	CUSTOMERS (who does the process step impact upon?)
SIPOC analysis	• Energy consumer • Energy Supplier • Network provider • Local authority • Building Contractor • Meter Equipment Manager/RPA (if site is unsafe)	• Consumer request due to permanently empty site • Supplier request to logically disconnect • Safety issues raised with network provider • Site demolition / re-development • Alternative supply has been installed • Theft identified	Disconnection / Reconnection request received	• Site dis-connected, metering equipment removed • Site re-connected live metering equipment in place • Failed disconnection • Failed reconnection • Theft lead generated	• Supplier • Consumer • Network Provider • MEM • Revenue Protection Agent
Responsibility / Incentives Gap	• Lack of clarity on which party (network or supplier) should monitor a site once the service has been removed to ensure a connection is not illegally made. • A consistent process needs to be maintained across networks for supplier driven requests to remove services in instances of theft • ETTOS grey area around when a service removal is requested when theft is identified but access to the remove the meter isn't possible				
Monitoring / reporting gaps	• There is no clear, consistent approach that parties take to monitoring sites once they are de-energised / removed to ensure a connection is not made illegally				
Party Obligations	REC Schedule 8 - (10) Information to Consumers REC Schedule 8 - (10) Information to Consumers Ofgem - Condition 10A. Smart Metering REC Schedule 8 - (8) Conduct of Investigations REC Schedule 8 – (22) Annex A: The Theft Charter				
Theft Lifecycle stage	• Theft Causation (Receive request for disconnection/reconnection) • Theft Investigation (Investigate why a disconnection failed) • Theft Detection (Add theft lead to management system)				

Section 2: Party Obligations

Party obligations – Provision of Network Infrastructure

Reference	Code / Licence	Section reference	Applies to which party	Obligation overview
1	REC Unbilled Energy Code of Practice - Schedule 8	Section 5.1	Network Parties & Suppliers	Sharing information in relation to potential interference as required to include a telephone number that should be "widely publicised"
2	Ofgem Electricity Distribution Consolidated Standard Licence Conditions	Condition 27. Theft, damage and meter interference	Network Parties & Distributors	27.1 This paragraph applies if the licensee, in the course of providing services to any Authorised supplier of electricity to premises directly connected to the licensee's Distribution System, has reason to believe that there has been: (a) damage to any electrical plant, electric line, or Metering Equipment through which such premises are supplied; or (b) interference with the Metering Equipment through which such premises are supplied so as to alter its register or prevent it from duly registering the quantity of electricity supplied. 27.2 If paragraph 27.1 applies, the licensee must inform the Authorised supplier in question of the relevant incident as soon as is reasonably practicable.
3	REC Unbilled Energy Code of Practice - Schedule 8	(3) Responsibilities of Parties: Theft	Suppliers	3.1 Each Network Party shall investigate and resolve all cases of Theft in Conveyance affecting its own network. Where such theft is identified, the Network Party shall seek to recover the Relevant Costs from the Perpetrator. 3.2 The Energy Supplier shall investigate and resolve all cases of Energy Theft other than Theft in Conveyance. Where theft is identified, the Energy Supplier shall seek to recover the Relevant Costs from the Perpetrator and shall (to the extent possible) arrange for the stolen electricity/gas to be entered into Settlement. 3.3 Where, in the course of investigating actual or suspected Energy Theft an Energy Supplier identifies that a Consumer's Premises is unsafe, then the Energy Supplier or its agent shall notify the relevant Network Party, in a prompt and appropriate manner, of the unsafe situation and any actions taken. 3.4 Energy Suppliers and Network Parties shall (and shall ensure that their agents shall) act on reports made to them regarding Energy Theft for which they have responsibility in accordance with this Code of Practice (or Energy Licences or Law), and take the appropriate steps required of them in respect of such Energy Theft (whether required of them under this Code of Practice, their Energy Licence or Law). 3.5 Where an Energy Supplier has an Energy Contract (which includes a deemed contract) with the relevant Consumer, then that Energy Supplier is responsible for dealing with any investigation and arranging to rectify the situation. Where no such contract exists between the Supplier and relevant Consumer, or the incident occurs upstream of the Emergency Control Valve (ECV) then the relevant Network Party is responsible for dealing with any investigation and arranging to rectify the situation.

Party obligations – Provision of Network Infrastructure

Reference	Code / Licence	Section reference	Applies to which party	Obligation overview
4	REC Unbilled Energy Code of Practice - Schedule 8	(15) Reports	Suppliers	15.1 Electricity Suppliers shall provide a monthly report to each DNO setting out each of the cases of Energy Theft investigated, identifying those that were a Confirmed Energy Theft and the volume of units associated with each such case. 15.2 Gas Suppliers shall ensure that details of Confirmed Energy Thefts are provided to the relevant Gas Shipper to enable consistent reporting under the UNC. The details provided must include (as a minimum): the Energy Supplier Investigation ID; the MPRN; confirmation of theft of gas; the supply start and end date of the assessed period of unrecorded gas; and the volume of unrecorded gas.
5	REC Unbilled Energy Code of Practice - Schedule 8	(8) Conduct of Investigations	Network Parties & Suppliers	8.3 If a Consumer switches Energy Supplier before Theft is confirmed, the outgoing Energy Supplier shall advise the incoming Energy Supplier of the incomplete investigation. Where the incoming Energy Supplier requests further details, only facts (and not opinions) shall be shared. Any information transferred should be subject to the Parties' data protection policies and procedures.

Party obligations – Provision of Network Infrastructure

Reference	Code / Licence	Section reference	Applies to which party	Obligation overview
6	REC Energy Theft Reduction - Schedule 7	Annex 1: Energy Theft Tip-Off Service	Network Parties & Suppliers	8.1 A full description of the Energy Theft Tip-Off Service is set out in the ETTOS Contract. The Energy Theft Tip-Off Service can be summarised as follows: (a) the ETTOS Service Provider makes itself available to receive tip-offs; (b) the ETTOS Service Provider seeks to match the tip-off to an Energy Supplier and if the ETTOS Service Provider can match the tip-off to an Energy Supplier, then the ETTOS Service Provider notifies the Energy Supplier of the tip-off; (c) if the ETTOS Service Provider cannot match the tip-off to an Energy Supplier, then the ETTOS Service Provider notifies the relevant Gas Transporter or Distribution Network Operator of the tipoff; (d) if the ETTOS Service Provider cannot match the tip-off to an Energy Supplier, a Gas Transporter or a Distribution Network Operator, then the ETTOS Service Provider logs the tip-off as unmatched; and (e) in addition to the above, where the ETTOS Service Provider identifies that there is a serious safety concern, then the ETTOS Service Provider contacts the National Gas Emergency Service or the relevant Distribution Network Operator, as applicable. 8.2 Each ETTOS Recipient shall: (a) provide a single point of contact (a group or multi-user email address) for the ETTOS Service Provider to manage the exchange of information between the ETTOS Service Provider and that ETTOS Recipient in respect of the Energy Theft Tip-Off Service; (b) ensure that the group or multi-user email address is maintained and monitored, for the receipt of ETTOS Service Data. (c) provide reasonable support to the ETTOS Service Provider in relation to publicising the Energy Theft Tip-Off Service (provided that no ETTOS Recipient shall be obliged to incur material cost in so doing). 8.3 Each Gas Transporter and Distribution Network Operator shall ensure that data is provided to the ETTOS Service Provider to enable it to match tip-offs containing a full address to the relevant RMP, Energy Supplier and Gas Transporter and Distribution Network Operator. Such data shall be provided in such format and at such frequency as the ETTOS Service Provider reasonably requests. 8.4 Where an Energy Supplier receives a tip-off from the ETTOS Service Provider for a premises and fuel for which it is the Registered Supplier, the Energy Supplier shall read the tip-off within 10 Working Days and ensure that it is investigated in accordance with the Unbilled Energy Code of Practice.

Party obligations – Meter Registration & Installation (New Connection)

Reference	Code / Licence	Section reference	Applies to which party	Obligation overview
7	REC	Schedule 8 Section 20.1 & 20.2	Supplier/Network Party	Network Party and Suppliers are to exchange relevant information to facilitate effective communications with unregistered consumers Network Parties and Suppliers are to have appropriate and co-ordinated reporting in place to enable the recording of unregistered sites and the progress towards registration
8	REC	Schedule 8 Section 20.3	Suppliers	Confirm to Network Party contract has been entered with the consumer Confirm all industry registrations are complete and initiate

Party obligations – Unregistered sites (No Supplier Appointed)

Reference	Code / Licence	Section reference	Applies to which party	Obligation overview
11	REC	Schedule 8 section 19.1 & 19.2	Network Party	They must take all reasonable steps communicate with occupiers and unregistered consumers to obtain consumer contact data
12	REC	Schedule 8 Section 19.1 & 19.3	Suppliers	They must take all reasonable steps communicate with occupiers and unregistered consumers to obtain consumer contact data with the intention of agreeing an energy contract Install a meter if there is a valid MPxN but not settlement meter If they're unable to communicate with the unregistered consumer or they believe the unregistered consumer is not genuinely seeking to enter into a contract information is to be shared with the network Party for further follow up and potential disconnection
13	REC	Schedule 8 Section 20.1 & 20.2	Network Party and Suppliers	Network Party and Suppliers are to exchange relevant information to facilitate effective communications with unregistered consumers Network Parties and Suppliers are to have appropriate and co-ordinated reporting in place to enable the recording of unregistered sites and the progress towards registration
14	REC	Schedule 8 Section 20.3	Suppliers	Confirm to Network Party contract has been entered with the consumer Confirm all industry registrations are complete and initiate
15	REC	Schedule 8 Section 21	Network Party	Defines the conduct and requirements of a Network Party when attending an unregistered site
16	REC	(4) Responsibilities of Parties: Unregistered Sites	Network Party and Suppliers	4.1 The Network Party shall take all reasonable cost-effective steps to identify and investigate Unregistered Consumers with the intention of resolving such cases of Unregistered Consumers (by an Energy Supplier agreeing an Energy Contract and becoming the Registered Supplier). 4.2 Energy Suppliers and Network Parties shall (and shall ensure that their agents shall) act on reports made to them regarding Occupiers and potential Unregistered Consumers for which they have responsibility in accordance with this Code of Practice, and take the appropriate steps required of them (whether required of them under this Code of Practice, their Energy Licences or Law).

Party obligations – Supply energy

Reference	Code / Licence	Section reference	Applies to which party	Obligation overview
17	REC Unbilled Energy Code of Practice - Schedule 8	(6) Information exchange between Parties	Supplier	Provision of Information from Network Parties to Suppliers 6.1 Network Parties and Energy Suppliers must have an appropriate mechanism in place to enable individuals to inform them of suspected Energy Theft. 6.2 If a Network Party becomes aware of any suspected incidents of Energy Theft, and where the Network Party is providing information to the Energy Supplier (or other equipment owner) in accordance with Condition 27 (Theft, damage and meter interference) of the Electricity Distribution Licence or Condition 7 (Provisions of Information Relating to Gas Illegally Taken) of the Gas Transporter Licence, then the Network Party shall provide such information not later than the next Working Day after becoming aware of the same. 6.3 When the Network Party carries out a Disconnection on the grounds of safety due to damage or interference arising as a result of Energy Theft, then the Network Party shall inform the Supplier of such Disconnection as soon as reasonably practicable (especially where Vulnerable Consumers are affected), and in all cases not later than the next Working Day following such Disconnection. 6.4 If the Network Party (or its Revenue Protection Agent) becomes aware of any suspected or actual incidence of Energy Theft which is not Theft in Conveyance, the Network Party shall ensure that the Supplier is notified of such incidence and provided with all relevant information known to the Network Party (or its Revenue Protection Agent) promptly and in all cases not later than the next Working Day after becoming aware of the same. Neither the Network Party (nor its Revenue Protection Agent) shall undertake any future visits or attempt to remedy the situation unless requested and authorised by the Supplier. 6.5 Where an exchange of data is required, Parties shall pass the data between themselves with the appropriate levels of security, considering both the nature of the information being shared and the Data Protection Legislation. 6.6 If a Network Party or Energy Supplier discovers suspected Energy Theft for which they are not responsible, they shall endeavour to collect sufficient evidence whilst at site to enable the responsible Party to progress an investigation. Any evidence passed should be subject to a Parties own data protection policy. 6.7 Network Parties and Energy Suppliers shall monitor analytical sources of Consumer data and identify trends in Consumer behaviour as part of their desktop review, which will enable them to categorise leads and to decide whether or not to continue investigation of a lead. 6.8 Network Parties and Energy Suppliers shall publicise a telephone number for receiving reports of suspected Energy Theft, which shall be the number identified as being the Energy Theft Tip-Off Service. 6.9 If an Energy Supplier receives a report of suspected Energy Theft relating to one or more Consumers for whom the Energy Supplier is not responsible for investigating reports of theft, then the Energy Supplier shall record the details and pass these through to the Network Party by the end of the next Working Day.

Party obligations – Supply energy

Reference	Code / Licence	Section reference	Applies to which party	Obligation overview
18	REC Unbilled Energy Code of Practice - Schedule 8	(22) Annex A: The Theft Charter	Supplier	In checking the meter tampering, energy suppliers can undertake the following actions: · Gain access to premises to inspect the metering equipment, a visual check is essential to confirm tampering activity and assess whether the premises and equipment are safe. · If access is refused, an energy supplier can apply to the courts for a warrant of entry, which gives the legal right to gain access to a premise, by force if necessary. · Recover all costs associated with the tampering investigation, replacing or repairing a tampered meter and the value of energy assessed to have been stolen. · Install alternative metering equipment, e.g. a pre-payment meter. · Monitor ongoing energy consumption and maintain appropriate records to help determine whether there are any further attempts to use energy illegally. · Request the network operator to consider either a de-energisation or disconnection of supply where co-operation is not achieved and/or premises upon inspection are found to be unsafe. · Undertake action in the civil courts to recover all of their costs and the value of stolen and unbilled energy where a customer decides not to pay. · Pursue action in the courts either via a private prosecution or via the police and the Crown Prosecution Service (CPS) or Crown Office and Procurator Fiscal Service (COPFS) in Scotland.

Party obligations – Supply energy

Reference	Code / Licence	Section reference	Applies to which party	Obligation overview
19	REC Unbilled Energy Code of Practice - Schedule 8	(22) Annex A: The Theft Charter	Suppliers	By supporting the Charter energy suppliers agree to ensure the following activities in respect of domestic customers: · Integration of the Charter with wider cross-organisation policies and procedures including dealing with customer vulnerability. · That an appropriate programme of vulnerability awareness training is undertaken with all relevant staff. · Matters are clearly explained to customers (where present) whilst the meter tampering investigation is ongoing. · Provision of a clearly written summary of the findings and next steps. · Awareness of the Charter and compliance with its principles by all organisations that may visit a premise during a meter tampering investigation. · Clearly record on-site observations including any cases of suspected customer vulnerability. Discuss spreading payments over a longer period of time or installing alterative metering equipment to recover the costs in manageable amounts in instances where meter tampering is confirmed. · Confirm if an alternative names contact (e.g. carer) needs to be made aware of investigation and possible next steps where a Vulnerable Consumer is identified.
20	REC Unbilled Energy Code of Practice - Schedule 8	(22) Annex A: The Theft Charter	Supplier	Implementation and oversight of the Charter is based on the following measures in respect of domestic customers: · Obligation – on individual energy suppliers to promote the Charter on their websites as part of a wider Vulnerable Consumer policy. · Continuous Improvement - regular review of the Charter to ensure it remains fit for purpose. · Code of Practice – is supported by an industry Code of Practice which reflects the principles set out in the Charter. · Annual independent checks – to ensure energy suppliers are continuing to follow the Charters principles. · Engagement – industry will continue to work with Ofgem, Energy UK, Citizens Advice, charities and other relevant bodies and organisations to offer Vulnerable Consumers the most suitable solutions.

Party obligations – Supply energy

Reference	Code / Licence	Section reference	Applies to which party	Obligation overview
21	Ofgem Gas supply standard license conditions	Condition 12A. Matters relating to Theft of Gas	Supplier/Consumer	12A.12 The licensee must ensure (and ensure that any Representative ensures) that the following standards are met when it is taking any of the steps referred to in paragraphs 12A.1 to 12A.4 of this condition at a particular premises: (a) The licensee must take (and ensure that any Representative takes) all reasonable steps to identify whether: (i) the Domestic Customer and/or the occupants of those premises which are Domestic Premises (in this condition "the relevant premises") is of Pensionable Age, disabled or chronically sick; and/or (ii) a Domestic Customer at the relevant premises will have difficulty in paying all or part of the Charges for the Supply of Gas resulting from Theft of Gas; (b) The licensee must take (and ensure that any Representative takes) into account the Domestic Customer's ability to pay all or part of the Charges for the Supply of Gas resulting from Theft of Gas when calculating instalments, giving due consideration to: (i) relevant information provided by third parties, where it is available to the licensee; and (ii) where instalments will be paid using a Prepayment Meter, the value of all of the charges that are to be recovered through that meter; (c) Where the licensee or any Representative has identified persons of a category described in sub-paragraphs 12A.12(a)(i) and/or (ii), the licensee or any Representative must, before seeking to Disconnect the relevant premises, as a minimum offer the Domestic Customer to pay those Charges for the Supply of Gas using a Prepayment Meter, where it is safe and reasonably practicable in all the circumstances of the case for the Domestic Customer to do so; (d) Where the licensee or any Representative knows or has reason to believe that there may be persons of a category described in sub-paragraph 12A.12 (a)(i), the licensee or any Representatives must take all reasonable steps not to Disconnect the relevant premises in Winter; (e) The licensee must have (and ensure that any Representative has) sufficient evidence to establish (on the balance of probabilities) the Statutory Disconnection Power before stopping the supply of gas to the premises on grounds of Theft of Gas; (f) The licensee must have (and ensure that any Representative has) sufficient evidence to establish (on the balance of probabilities) that Theft of Gas has occurred as a result of that Customer's intentional act or by culpable negligence before requiring payment of all or part of the Charges for the Supply of Gas relating to that Theft of Gas (g) The licensee must provide (and ensure that any Representative provides) in plain and intelligible language, clear, timely and accurate information and advice to the Customer about: (i) the basis of any assessment made by the licensee (or its Representative) that Theft of Gas occurred; (ii) the basis for the calculation of any Charges for the Supply of Gas associated with the Theft of Gas made to the Customer; (iii) what steps the Customer should take if they wish to dispute that Theft of Gas occurred; and (iv) the steps a Customer may take to reinstate supply if the licensee (or its Representative) has exercised the Statutory Disconnection Power.

Party obligations – Supply energy

Reference	Code / Licence	Section reference	Applies to which party	Obligation overview
22	Ofgem Gas supply standard licence conditions	Condition 12A. Matters relating to Theft of Gas	Supplier/ Consumer	12A.13 The licensee must keep (and ensure that any Representative keeps) a record of its compliance with its obligation under this licence condition. 12A.14 The licensee must take all reasonable steps to establish management arrangements that facilitate the licensee's compliance with its obligations under this condition, including, as appropriate, steps to ensure that any Representative, agent and subcontractor of the licensee establish equivalent arrangements.
23	Ofgem Gas supply standard licence conditions	Condition 12A. Matters relating to Theft of Gas	Consumer	10 A.9 The licensee must not use any Electricity Consumption Data which is obtained by it in respect of any relevant premises other than: (a) for the purpose of complying with a relevant condition or a relevant requirement; (b) where the requirements of paragraph 10A.7 are satisfied, for the purpose of investigating a suspected theft or abstraction of electricity; (c) where the requirements of paragraph 10A.8 are satisfied, for the purpose of the Trial
24	Ofgem Electricity Distribution Consolidated Standard Licence Conditions	Condition 10A. Smart Metering – Matters Relating to Obtaining and Using Consumption Data	Supplier	10A.7 The requirements of this paragraph are that the licensee has reasonable grounds to suspect that any person is taking, from that part of the licensee's distribution system through which the relevant premises are supplied, a supply of electricity which is in the course of being conveyed by the licensee (for the purposes of this paragraph referred to as the suspected theft or abstraction of electricity), and it obtains Electricity Consumption Data which relates to any one or more periods of less than one month only for the purposes of investigating that suspected theft or abstraction of electricity.
25	Ofgem Gas supply standard licence conditions	Condition 12A. Matters relating to Theft of Gas	Supplier	12A.13 The licensee must keep (and ensure that any Representative keeps) a record of its compliance with its obligation under this licence condition. 12A.14 The licensee must take all reasonable steps to establish management arrangements that facilitate the licensee's compliance with its obligations under this condition, including, as appropriate, steps to ensure that any Representative, agent and subcontractor of the licensee establish equivalent arrangements.

Party obligations – Theft lead management (supplier)

Reference	Code / Licence	Section reference	Applies to which party	Obligation overview
26	REC Unbilled Energy Code of Practice - Schedule 8	(22) Annex A: The Theft Charter	Supplier	In checking the meter tampering, energy suppliers can undertake the following actions: · Gain access to premises to inspect the metering equipment, a visual check is essential to confirm tampering activity and assess whether the premises and equipment are safe. · If access is refused, an energy supplier can apply to the courts for a warrant of entry, which gives the legal right to gain access to a premise, by force if necessary. · Recover all costs associated with the tampering investigation, replacing or repairing a tampered meter and the value of energy assessed to have been stolen. · Install alternative metering equipment, e.g. a pre-payment meter. · Monitor ongoing energy consumption and maintain appropriate records to help determine whether there are any further attempts to use energy illegally. · Request the network operator to consider either a de-energisation or disconnection of supply where co-operation is not achieved and/or premises upon inspection are found to be unsafe. · Undertake action in the civil courts to recover all of their costs and the value of stolen and unbilled energy where a customer decides not to pay. · Pursue action in the courts either via a private prosecution or via the police and the Crown Prosecution Service (CPS) or Crown Office and Procurator Fiscal Service (COPFS) in Scotland.
27	REC Unbilled Energy Code of Practice - Schedule 8	(6) Provision of Information from Energy Suppliers to Network Parties	Supplier	6.10 Where the Energy Supplier is providing information to the Network Party in respect of incidents arising as a result of Energy Theft, the Energy Supplier shall provide such information not later than the next Working Day after becoming aware of the same.
28	REC Unbilled Energy Code of Practice - Schedule 8	(7) Actions to be taken	Supplier	7.2 Where a priority 1 situation is identified by or notified to an Energy Supplier, that Energy Supplier: (a) shall immediately notify the relevant Network Party if there is a dangerous situation that the Network Party needs to rectify; and (b) may in addition instruct its Revenue Protection Agent to attend the Premises (at the same time as the Network Party, where applicable).

Party obligations – Theft Lead Management (network party)

Reference	Code / Licence	Section reference	Applies to which party	Obligation overview
29	REC Unbilled Energy Code of Practice - Schedule 8	(6) Information exchange between Parties	Network Party	6.1 Network Parties and Energy Suppliers must have an appropriate mechanism in place to enable individuals to inform them of suspected Energy Theft. 6.2 If a Network Party becomes aware of any suspected incidents of Energy Theft, and where the Network Party is providing information to the Energy Supplier (or other equipment owner) in accordance with Condition 27 (Theft, damage and meter interference) of the Electricity Distribution Licence or Condition 7 (Provisions of Information Relating to Gas Illegally Taken) of the Gas Transporter Licence, then the Network Party shall provide such information not later than the next Working Day after becoming aware of the same. 6.3 When the Network Party carries out a Disconnection on the grounds of safety due to damage or interference arising as a result of Energy Theft, then the Network Party shall inform the Supplier of such Disconnection as soon as reasonably practicable (especially where Vulnerable Consumers are affected), and in all cases not later than the next Working Day following such Disconnection. 6.4 If the Network Party (or its Revenue Protection Agent) becomes aware of any suspected or actual incidence of Energy Theft which is not Theft in Conveyance, the Network Party shall ensure that the Supplier is notified of such incidence and provided with all relevant information known to the Network Party (or its Revenue Protection Agent) promptly and in all cases not later than the next Working Day after becoming aware of the same. Neither the Network Party (nor its Revenue Protection Agent) shall undertake any future visits or attempt to remedy the situation unless requested and authorised by the Supplier. 6.5 Where an exchange of data is required, Parties shall pass the data between themselves with the appropriate levels of security, considering both the nature of the information being shared and the Data Protection Legislation. 6.6 If a Network Party or Energy Supplier discovers suspected Energy Theft for which they are not responsible, they shall endeavour to collect sufficient evidence whilst at site to enable the responsible Party to progress an investigation. Any evidence passed should be subject to a Parties own data protection policy. 6.7 Network Parties and Energy Suppliers shall monitor analytical sources of Consumer data and identify trends in Consumer behaviour as part of their desktop review, which will enable them to categorise leads and to decide whether or not to continue investigation of a lead. 6.8 Network Parties and Energy Suppliers shall publicise a telephone number for receiving reports of suspected Energy Theft, which shall be the number identified as being the Energy Theft Tip-Off Service. 6.9 If an Energy Supplier receives a report of suspected Energy Theft relating to one or more Consumers for whom the Energy Supplier is not responsible for investigating reports of theft, then the Energy Supplier shall record the details and pass these through to the Network Party by the end of the next Working Day.

Party obligations – Theft Lead Management (network party)

Reference	Code / Licence	Section reference	Applies to which party	Obligation overview
30	REC Unbilled Energy Code of Practice - Schedule 8	(6) Provision of Information by Parties to Revenue Protection Agents	Network Party	6.11 The Network Party or Energy Supplier responsible for investigating a case of suspected Energy Theft shall provide its Revenue Protection Agent with the relevant information required for investigation of a case (where known), including: (a) Consumer name; (b) address; (c) MPAN/MPRN; (d) reason for suspicion; (e) any known or suspected vulnerability status; or, (f) any known or suspected potential hazards. 6.12 The Network Party or Energy Supplier shall also ensure that the Revenue Protection Agent is provided with up-to-date contact details that can be given to the Consumer during a site visit.
31	REC Unbilled Energy Code of Practice - Schedule 8	(6) Exchange of Information	Network Party	6.19 Energy Suppliers and Network Parties shall use the relevant contact details set out in the published theft contacts register when there are no other applicable avenues to report matters relating to the identification of theft, revenue protection activities and/or untraded energy.
32	REC Unbilled Energy Code of Practice - Schedule 8	(7) Actions to be taken	Network Party	7.3 For priority 2 and 3 situations, the Energy Supplier or Network Party, shall screen the information received and, where further action is needed, refer case to its Revenue Protection Agent as soon as reasonably practicable.

Party obligations – Engage in Theft Detection Incentive Scheme

Reference	Code / Licence	Section reference	Applies to which party	Obligation overview
33	REC Unbilled Energy Code of Practice - Schedule 8	(13) Assess Ability to Pay and Agree Payment Terms	Supplier	13.1 Parties shall ensure that where a debt in respect of Relevant Costs arises, the following shall apply: (a) they have appropriate credit management policies and guidelines, including clear guidance and training for staff; (b) they allow for debtors to be dealt with on a case-by-case basis; and (c) they put in place appropriate controls to ensure that staff incentives do not drive inappropriate behaviour.
34	REC Energy Theft Reduction - Schedule 7	Annex 3: Theft Detection Incentive Scheme	Supplier	9.1 All notices to Energy Suppliers under or in relation to the TDIS are to be sent to its Contract Manager and to its single point of contact nominated for the purpose of performance assurance. 9.2 TDIS Qualifying Suppliers may be required to self-certify (in a format determined by the REC PAB) that all Confirmed Energy Thefts are in accordance with the definition of Confirmed Energy Theft under this Code. 9.3 The REC PAB reserves the right to conduct an audit of each TDIS Qualifying Supplier's evidence for Confirmed Energy Thefts.
35	REC Energy Theft Reduction - Schedule 7	(5) Energy Theft Detection Incentive Scheme	Supplier	5.1 RECCo shall administer the Theft Detection Incentive Scheme as described in Annex 3. 5.2 Each Party shall comply with its respective obligations in respect of the Theft Detection Incentive Scheme as set out in Annex 3.

Party obligations – Engage in Theft Detection Incentive Scheme

Reference	Code / Licence	Section reference	Applies to which party	Obligation overview
36	REC Energy Theft Reduction - Schedule 7	Annex 3: Theft Detection Incentive Scheme	Supplier	5.1 The TDIS will provide an individual 'pot' for each of the relevant consumer segments. 5.2 The size of the individual incentive pots will be calculated individually in advance of the TDIS Reporting Year, based on the following methodology: (X * Y) Where: X = The Theft Target for the TDIS Reporting Year which applies to the relevant consumer segment of the scheme. Y = The Theft Detection Value which applies to the relevant consumer segment of the scheme. 5.3 Based on the formula set out above, ahead of each TDIS Reporting Year the Code Manager shall publish the value of each individual incentive pot for that year.
37	REC Energy Theft Reduction - Schedule 7	Annex 3: Theft Detection Incentive Scheme	Supplier	8.4 Once calculated, notification of the relevant debit and credit values will be communicated to each individual TDIS Qualifying Supplier by the Code Manager, within 144 calendar days after the end of the TDIS Reporting Year. 8.5 The TDIS credits and debits will be undertaken by RECCo via existing Energy Supplier invoicing arrangements. All debit invoices issued under the TDIS will be subject to the normal payment terms as set out in the main body of this Code. 8.6 Non-payment of the TDIS debit invoices will be treated in the same manner as the non-payment of other RECCo invoices under this Code, with the same sanctions being applicable. 8.7 The issuing of credits from the TDIS shall be done in such a way as to not discriminate between TDIS Qualifying Suppliers. This shall be achieved by paying out the proportion of the TDIS credits to all eligible TDIS Qualifying Suppliers commensurate to the proportion of the TDIS debits received at that time.

Party obligations – Engage in Theft Detection Incentive Scheme

Reference	Code / Licence	Section reference	Applies to which party	Obligation overview
38	REC Energy Theft Reduction - Schedule 7	(5) Energy Theft Detection Incentive Scheme	Supplier	8.1 The Code Manager shall calculate of the financial debits and credits resulting from the TDIS, in accordance with the rules of the scheme, utilising the information provided within the TDIS Reporting Year Summary Report. 8.2 All debits and credits associated with the TDIS Reporting Year will be calculated by the Code Manager based on the total number of Confirmed Energy Thefts shown within the final TDIS Reporting Year Summary Report, covering the full TDIS Reporting Year and utilising Energy Supplier market share figures based on the figures utilised at the commencement of that TDIS Reporting Year. 8.3 Debits and credits resulting from the TDIS will be calculated for each consumer segment within the scheme using the following formula: (X*(STD / TTD))- (X*FMPS) except where FMPS equals zero when expressed to five decimal places, in which case no credit or debit will be applied, or in the case of a TDIS Qualifying Supplier whose Theft Target for such segment was zero, in which case no debit may be applied but a credit may be. Where: X is the total incentive pot value of the relevant consumer segment of the TDIS, amended in line with the percentage change in the 'Consumer Price Index' between the index published for the start and the end of the TDIS Regulatory Year. STD is the number of Confirmed Energy Thefts recorded by the Energy Supplier in the relevant consumer segment. TTD is the total number of Confirmed Energy Thefts recorded in the TDIS Reporting Year for the relevant consumer segment. FMPS is the final Metering/Supply Meter Point market share of the TDIS Qualifying Supplier in the TDIS Reporting Year for the relevant consumer segment (being the TDIS Qualifying Supplier's market share as a percentage of the Metering/Supply Meter Points of all the TDIS Qualifying Suppliers based on the figures used at the start of the TDIS Reporting Year).

Party obligations – Engage in Theft Detection Incentive Scheme

Reference	Code / Licence	Section reference	Applies to which party	Obligation overview
39	REC Energy Theft Reduction - Schedule 7	Annex 3: Theft Detection Incentive Scheme	Supplier	6.1 Only submissions which meet the Confirmed Energy Theft definition count towards Theft Targets. Each Energy Supplier must ensure that its submissions are compliant with the data specification set out in the Performance Assurance Reporting Catalogue. 6.2 Each Energy Supplier shall record all Energy Theft investigations at the point the theft investigation commences and shall submit such records to the Code Manager via the REC Portal. Once the investigation is concluded, details of the Energy Theft investigation must be re-submitted together with the outcome. Submissions must be compliant with the data specification set out in the Performance Assurance Reporting Catalogue. 6.3 Any Confirmed Energy Theft not reported within the relevant timeframe as may be prescribed by the Code Manager will be excluded from the TDIS unless otherwise agreed with the REC Performance Assurance Board. Only Confirmed Energy Thefts identified within the specified start and end dates of the TDIS Reporting Year will be eligible for that TDIS Reporting Year. 6.4 The Code Manager shall ensure that there is a process in place to share data relating to Confirmed Energy Thefts with the CDSP and DNOs for the purpose of the volume of energy associated with each such case being recognised within settlement, consistent with the intent of paragraph 15 of the Unbilled Energy Code of Practice.

Party obligations – Engage in Theft Detection Incentive Scheme

Reference	Code / Licence	Section reference	Applies to which party	Obligation overview
40	REC Energy Theft Reduction - Schedule 7	Annex 3: Theft Detection Incentive Scheme	Code Manager/Supplier	7.1 The Code Manager shall produce and provide to Energy Suppliers, by 1 March each year for the following TDIS Reporting Year, a timetable (known as the a TDIS Reporting Timeframe) which will include the deadlines for: (a) submission of Confirmed Energy Theft reports; (b) raising queries on the Indicative TDIS Summary Report; and (c) final submission of Confirmed Energy Theft reports, including resolution of any data validation errors for reports previously submitted, for inclusion with the TDIS Reporting Year. 7.2 Any changes to the TDIS Reporting Timeframe during the TDIS Reporting Year will be subject to at least one month's notice of the change being given to Energy Suppliers. 7.3 The Code Manager shall produce and provide to each Energy Supplier and the REC PAB, an overall Indicative TDIS Summary Report. The Code Manager shall provide each Energy Supplier with a copy of the Indicative TDIS Summary Report with the Confirmed Energy Thefts for all other Energy Suppliers anonymised. The Code Manager shall provide the REC PAB with a non-anonymised copy of the Indicative TDIS Summary Report. 7.4 The content of the Indicative TDIS Summary Report will detail the aggregate number of Confirmed Energy Thefts recorded for the relevant scheme month for each Energy Supplier against each of their relevant Theft Targets. The specific format of the Indicative TDIS Summary Report may be revised from time to time subject to the approval of the REC Performance Assurance Board. 7.5 Each Energy Supplier is responsible for reviewing the Indicative TDIS Summary Report and raising any queries with the Code Manager on a timely basis, and in all cases prior to the date required by the TDIS Reporting Timeframe. 7.6 The Code Manager shall issue to the TDIS Qualifying Suppliers and the REC Performance Assurance Board an updated version of the Indicative TDIS Summary Report (the TDIS Reporting Year Summary Report), in accordance with the REC Performance Assurance Board calendar. The Code Manager shall provide each Energy Supplier with a copy in which the Confirmed Energy Thefts for all other Energy Suppliers are anonymised. The Code Manager shall provide the REC PAB with a copy that has not been anonymised.

Party obligations - Site no longer in use

Reference	Code / Licence	Section reference	Applies to which party	Obligation overview
41	REC Unbilled energy Code of Practice – schedule 8	(10) Information to Consumers	Supplier/consumer	10.2 On leaving the Premises, the Revenue Protection Agent shall leave the following information for the Consumer: (a) the contact details for the Party which the Revenue Protection Agent is representing; (b) the outcome of the visit (e.g. sufficient evidence of Energy Theft has occurred, and whether there has been a Disconnection); (c) a statement explaining the statutory basis for any action taken (i.e. specific reference to legislation); (d) who the Consumer needs to contact in order to get their supply re-instated (where relevant); (e) what the Consumer can expect next / what they should do (e.g. contact the Energy Supplier/Network Party, await to hear from the Energy Supplier/Network Party etc); (f) what the Consumer should do if they are unhappy with the outcome (e.g. contact the Energy Supplier/Network Party in the first instance, and other options available under the Energy Supplier's/Network Party's normal redress processes); (g) informing the Consumer that if they are not able to resolve the issue with the Energy Supplier/Network Party in 8 weeks they can contact the energy ombudsman scheme; and (h) contact details for further independent sources of help and advice (e.g. Consumer Focus; Consumer Direct; Citizen's Advice Bureau; Social Services).
42	REC Unbilled energy Code of Practice – schedule 8	(10) Information to Consumers	Supplier/Network Party	10.3 Each Network Party and each Energy Supplier shall ensure that: (a) the responsible Party is informed as appropriate as to the Relevant Costs to be recovered from the Perpetrator in relation to Energy Theft; and (b) Consumers are informed, following a make safe, Disconnection of who to contact in order to find out how to get the supply reinstated.

Party obligations - Site no longer in use

Reference	Code / Licence	Section reference	Applies to which party	Obligation overview
43	REC Unbilled Energy Code of Practice - Schedule 8	(10) Information to Consumers	Network Party	10.4 Where a Consumer is not present at the Premises, written documentation shall be left at the Premises in a sealed and addressed envelope.
44	REC Unbilled Energy Code of Practice - Schedule 8	(10) Information to Consumers	Network Party	10.5 Where it is not possible for a Party or its agent to leave the written information, as described above, with the Consumer on leaving the Premises, this must be done so as soon as possible thereafter.
45	Ofgem Electricity Distribution Consolidated Standard Licence Conditions	Condition 10A. Smart Metering – Matters Relating to Obtaining and Using Consumption Data	Network Party	10A.7 The requirements of this paragraph are that the licensee has reasonable grounds to suspect that any person is taking, from that part of the licensee's distribution system through which the relevant premises are supplied, a supply of electricity which is in the course of being conveyed by the licensee (for the purposes of this paragraph referred to as the suspected theft or abstraction of electricity), and it obtains Electricity Consumption Data which relates to any one or more periods of less than one month only for the purposes of investigating that suspected theft or abstraction of electricity.

Party obligations - Site no longer in use

Reference	Code / Licence	Section reference	Applies to which party	Obligation overview
46	REC Unbilled Energy Code of Practice - Schedule 8	(8) Conduct of Investigations	Supplier/Network Party	8.2 Each Energy Supplier and each Network Party shall ensure that: (a) its Statutory Powers are only exercised where it (or its Revenue Protection Agent) reasonably believes that there is sufficient evidence to prove (on the balance of probabilities) that a Relevant Offence has been committed; (b) its Statutory Powers are only exercised where it (or its Revenue Protection Agent) reasonably believes that there is sufficient evidence to prove (on the balance of probabilities) that the Relevant Offence was committed by the current Occupier (or owner) of the Premises; (c) neither it (nor its Revenue Protection Agent) misleads Consumers about the scope of the Party's Statutory Powers; (d) it follows all reasonable lines of enquiry to confirm that, on the balance of probabilities, Energy has or is being taken otherwise than in pursuance of an Energy Contract made with an Energy Supplier before exercising any Statutory Powers to Cut-Off or Disconnect; (e) it exercises its discretion to avoid Cutting-Off or Disconnecting a Premises where there is insufficient evidence to suggest that the Relevant Offence was committed by the current occupier (or owner). For Energy Suppliers, the commission of a Relevant Offence by the current owner/occupier of the Premises is currently an explicit pre-condition for the exercise of powers to Disconnect and Cut-Off under the relevant provisions of the Gas Act and Electricity Act; (f) it exercises its discretion to avoid Cutting-Off or Disconnecting a Premises where there is insufficient evidence to prove (on the balance of probabilities) that Energy is being taken otherwise than in pursuance of a contract (or deemed contract) made with a gas/electricity supplier before exercising any Statutory Powers to Cut-Off or Disconnect; (g) its terms and conditions (and all other documentation) properly reflect the Statutory Powers and do not (implicitly or expressly) provide for wider powers; (h) it does not mislead Consumers about the scope of Statutory Powers to Disconnect and Cut-Off (e.g. Suppliers should not imply that they have the power to Cut-Off a Premises on safety grounds where these powers do not exist; rather it should be made clear that such powers may be exercised by the relevant Network Party); (i) it informs Consumers following a Cut-Off or Disconnection of who to contact in order to find out how to get the supply reinstated; and (j) Consumer data is kept up-to-date and accurate during the course of an investigation.

Party obligations - Site no longer in use

Reference	Code / Licence	Section reference	Applies to which party	Obligation overview
47	REC Unbilled Energy Code of Practice - Schedule 8	(22) Annex A: The Theft Charter	Supplier/Network Party	In checking the meter tampering, energy suppliers can undertake the following actions: · Gain access to premises to inspect the metering equipment, a visual check is essential to confirm tampering activity and assess whether the premises and equipment are safe. · If access is refused, an energy supplier can apply to the courts for a warrant of entry, which gives the legal right to gain access to a premise, by force if necessary. · Recover all costs associated with the tampering investigation, replacing or repairing a tampered meter and the value of energy assessed to have been stolen. · Install alternative metering equipment, e.g. a pre-payment meter. · Monitor ongoing energy consumption and maintain appropriate records to help determine whether there are any further attempts to use energy illegally. · Request the network operator to consider either a de-energisation or disconnection of supply where co-operation is not achieved and/or premises upon inspection are found to be unsafe. · Undertake action in the civil courts to recover all of their costs and the value of stolen and unbilled energy where a customer decides not to pay. · Pursue action in the courts either via a private prosecution or via the police and the Crown Prosecution Service (CPS) or Crown Office and Procurator Fiscal Service (COPFS) in Scotland.

Section 3: Process Gaps

Gaps – Provision of Network Infrastructure

Reference	Applies to which party	Area related to (awareness, obligation / incentive, monitoring / reporting)	Potential gaps
1	Network Parties & Suppliers	Monitoring / reporting	Consistent process for updating and sharing theft contact information as and when it changes
2	Network Parties & Suppliers	Awareness	Different approaches and data sets used to identify theft – smaller organisations may have limited resources / capabilities when compared with larger organisations
3	Network Parties & Suppliers	Monitoring / reporting	Consistent approach and processes across organisations to monitor / prevent future instances of energy theft
4	Network Parties & Suppliers	Awareness	Potential bias towards which consumers are targeted for theft investigation E.g. Low income / PPM customers are more likely to be the subject of investigation (Theft Estimation Methodology)
5	Network Parties & Suppliers, Police	Monitoring / reporting	How much data is kept / understood in terms of monitoring and reporting of volume of recoveries of costs and prosecutions? Police info indicates it is inconsistent amongst Police forces – do Suppliers / Network Parties keep records and can share?
6	Network Parties	Industry awareness	Network Parties collating evidence and sharing with energy suppliers / third parties once a theft instance has been resolved. Especially a problem on emergency safety isolations E.g. Photos of the tampered installation / cannabis farm size
7	Network Parties	Obligation / incentive	Fewer incentives for network Parties to detect and prevent theft
38	ETTOS	Monitoring/ Reporting	If the theft lead is a third party theft, it won't be theft from the supplier or network party.
39	ETTOS	Monitoring / Reporting	Theft is suspected from a consumer but there is no linked address

Gaps – Meter Installation and Registration – New connection

Reference	Applies to which party	Area related to (awareness, obligation / incentive, monitoring / reporting)	Potential gaps
8	Network Parties, Suppliers	Monitoring / reporting	Where installations are not complete, what processes are in place to monitor to prevent future connections by another method? E.g. Contractor installing meter for the customer which goes unregistered Monitoring to ensure that consumers do register with an energy supplier once the MPxN is registered
9	General	Responsibility / Incentives	There are some instances in which consumers have attempted to contact a supplier to register however they are unable to promptly contact a supplier or the chosen supplier is unwilling to take on the new consumer. Network parties have limited options as they are not able to pass the consumer to a specific supplier.
10	General	Responsibility / Awareness	No consistent process / approach in place to monitor new connection orders that are not progressed to ensure they are not connected illegally. E.g. Contractor installing meter for the customer which goes unregistered or rogue landlord acquiring PPMs that are not registered and consumer is unaware
11	General	Monitoring / reporting	Where installations are not complete, what processes are in place to monitor to prevent future connections by another method? E.g. Contractor installing meter for the customer which goes unregistered
12	General	Monitoring / reporting	Where the customer is unknown, is there pro-active reporting / monitoring to ensure customer is registered or disconnection activity takes place if no customer details?
45	General	Monitoring / reporting	Potential that house / building numbers are re-assigned and mixed up during construction post meter installation. Are processes needed to mitigate this?
46	General	Monitoring / reporting	what checks are in place to ensure temporary supplies for construction are correctly replaced with permanent supply or removed

Gaps – Unregistered sites (No supplier Appointed)

Reference	Applies to which party	Area related to (awareness, obligation / incentive, monitoring / reporting)	Potential gaps
13	Network Parties, Suppliers	monitoring / reporting	Is there pro-active monitoring taking place to capture unregistered sites or are parties reliant on external notifications?
14	Network Parties, Suppliers	monitoring / reporting / awareness / obligation	How regularly does this information sharing happen and by what method does it take place? Do all parties know of their responsibilities here?
15	Network Parties, Suppliers	monitoring / reporting / awareness / obligation	A process for managing sites in which the consumer is an unknowing party to energy. Eg. PPM consumer who is regularly topping up their meter but as there is no registered supplier the energy and payments are unaccounted for owing to landlord / developer installing unregistered meter.
16	Network Parties, Suppliers	monitoring / reporting / awareness / obligation	It is the network operator's obligation to back bill a customer where there has been no supplier in place but in some cases, suppliers are being appointed and try to back bill for the earlier period where there was no supplier.

Gaps – Supply energy

Reference	Applies to which party	Area related to (awareness, obligation / incentive, monitoring / reporting)	Potential gaps / issues
17	Suppliers	Monitoring / reporting	D004 data flows may not be prioritised leading to potential irregularities / theft ongoing for longer than necessary
18	Suppliers, Network Parties	Incentive / monitoring / reporting	Should stronger monitoring / incentives be in place governing how consumers are targeted for further investigation? The TEM indicated that people in urban areas with PPMs are more likely to be targeted for investigation.
19	Network Parties, Suppliers	Monitoring / reporting	No reporting requirement for parties to provide updates on successful progression of these – should this be a REC responsibility to implement
20	Suppliers	Obligation / monitoring	Parties may be more reluctant to engage with warrant of entry due to recent issues and press coverage with outcomes that could lead to consumer issues or reputational damage
21	Suppliers, Network Parties	Monitoring, reporting	Once monitoring has commenced, continuous monitoring will continue for the particular theft lead
22	Suppliers, Network Parties	Obligation / monitoring	There is no obligations on parties around how they deal with notifications received for freeman on the land situations and no performance monitoring to ensure that Suppliers don't just remove these customers from their customer base.
40	Suppliers, Network Parties	Monitoring / Reporting	Consistent use and understanding of smart alerts as an indicator of theft

Gaps – Theft Leads Management (Supplier)

Reference	Applies to which party	Area related to (awareness, obligation / incentive, monitoring / reporting)	Potential gaps / issues
23	Suppliers	Monitoring / reporting	Are all instances of no-theft identified (after investigation) captured in the reporting – does this skew the figures?
24	Suppliers	Obligation, monitoring	What activities are in place to follow up to ensure re-occurrence does not happen?
25	Suppliers	Monitoring / reporting	How much data is kept / understood in terms of monitoring and reporting of volume of recoveries of costs and prosecutions? Police info indicates it is inconsistent – do suppliers / network Parties keep records and can share?
26	Suppliers	Obligation, monitoring	There is an obligation on suppliers to have a deterrent in place to prevent repeat offending at the same property / by the same consumer however it is not specific. It is not clear that suppliers have these
27	Suppliers	Awareness / Obligation	Sometimes even with a warrant it is not possible to gain entry due to police not being able to offer support (there are limits to police powers to force entry)
28	Suppliers	Awareness / Obligation	There is no formal process in place to facilitate co-ordination of site visits by multiple organisations, e.g. where there is suspected gas and electricity theft at the same premises which has a separate supplier for each.
29	Suppliers	Awareness / Obligation	There is no formal mechanism for the sharing of information between parties regarding theft leads. For example, to tell new Suppliers that their old Supplier suspected theft, or to share information about developers and landlords who have been found to engage in theft so that their other premises can be checked.
41	Suppliers	Awareness/ Monitoring	Correct use of the with or without warrant process
47	Suppliers	Monitoring / Reporting	There is no formal process in place to facilitate co-ordination of site visits by multiple organisations, e.g. where there is suspected gas and electricity theft at the same premises which has a separate supplier for each.

Gaps – Theft Leads Management (Network Party)

Reference	Applies to which party	Area related to (awareness, obligation / incentive, monitoring / reporting)	Potential gaps / issues
30	Network Party	Obligation, monitoring	There is no clear, consistent approach that parties take to monitoring sites once a theft has been resolved to detect / prevent further theft occurring at the same site
31	Network Party	Monitoring / reporting	Inconsistent approach to monitoring and reporting of volume of recoveries of costs and prosecutions. Police info indicates it is inconsistent amongst Police forces. Not clear if suppliers & network parties have consistent processes or visibility for this
42	Suppliers	Awareness/ Monitoring	Correct use of the with or without warrant process

Gaps – Engage in TDIS

Reference	Applies to which party	Area related to (awareness, obligation / incentive, monitoring / reporting)	Potential gaps / issues
32	Suppliers	Incentive	Due to the timescales associated with the TDIS scheme years and payments, it may be challenging for new entrants and / or smaller parties to engage with the TDIS and fulfil their licence obligations. Setting up the process and infrastructure (even outsourcing) is costly. Payments come in a long time after the event which could hamper investment in the function.
33	Suppliers	Incentive, monitoring, reporting	Due to the cost of conducting the theft detection / prevention activities even when factoring in payments from the TDIS, it may not be commercially beneficial for a party to complete their obligations. It may be deemed more effective to pay into the scheme and do the minimum (resolving confirmed thefts provided to them) rather than be proactive
34	Suppliers	Monitoring	No feedback given if report submission has been rejected from TDIS
35	Suppliers	Obligation, monitoring	Lack of enforcement action beyond TDIS where parties do not meet licence obligations
36	Suppliers/Network parties	Obligation, monitoring	The exclusion of network parties from the TDIS is a gap in REC processes
48	Suppliers/Network parties	Reporting	No clear definition of what is deemed to be a completed investigation and therefore included in the TDIS. Parties completing desktop investigations (without completing a site visit) may not be including these in official reporting figures.
49	Suppliers/Network parties	Monitoring	TDIS data is not currently utilised to its full extent. E.g. it could be analysed to look for repeat offenders or looking for linked properties or consumers or multiple thefts at the same site over time
50	Suppliers/Network parties	Monitoring	Lack of validation on some of the data / information fields. E.g. the volume of energy unrecorded (kWh) is free text and “0” can be used.

Gaps – Site no longer in use

Reference	Applies to which party	Area related to (awareness, obligation / incentive, monitoring / reporting)	Potential gaps / issues
37	Suppliers	Incentive, monitoring, reporting	What processes are in place to monitor that sites are not reconnected by some other means?
43	Supplier	Responsibility / Obligation	ETTOS grey area around when a service removal is requested when theft is identified but access to the remove the meter isn't possible
44	Supplier	Responsibility / Obligation	A consistent process needs to be maintained across networks for supplier driven requests to remove services in instances of theft