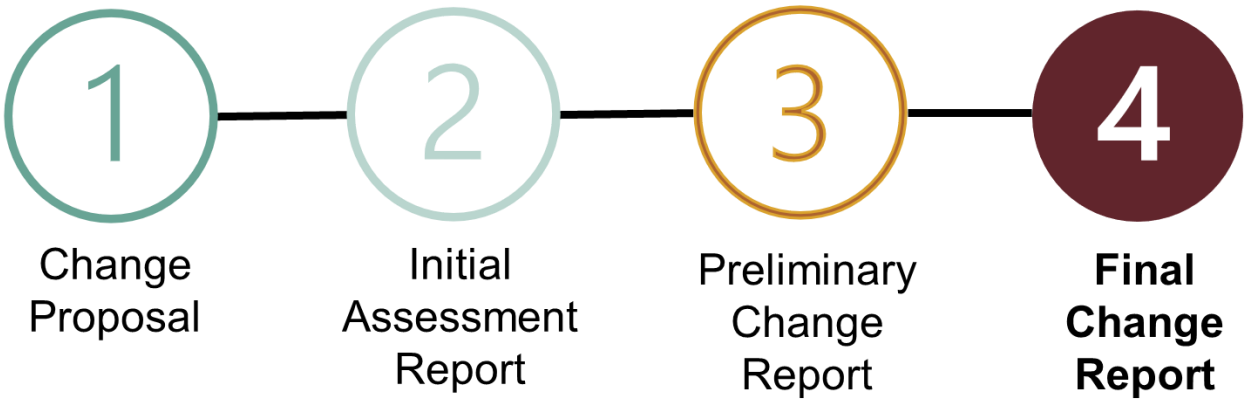
RETAIL ENERGY CODE

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Information is for public, unrestricted dissemination and publication.

FINAL CHANGE REPORT



PURPOSE:	The Final Change Report is the final stage of the Change Proposal. The Code Manager will set out their final assessment and recommendation, clarifying any changes made from the Preliminary Change Report.
NOTES:	There are three versions of the Final Change Report: one is issued the Responsible Committee for decision; one is published after the vote; and (if Authority Approval is required) one is published after the Authority determination.
NEXT STEPS:	The Final Change Report will be issued to the Responsible Committee who will vote to either approve or reject the Change Proposal, considering the recommendation of the Code Manager.

RETAIL ENERGY CODE

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

FINAL CHANGE REPORT

R0020 – ETTOS REPORT DISSEMINATION

DOCUMENT VERSION	1.0
DATE ISSUED	14/01/2022
DOCUMENT APPROVAL STATUS	PRE-VOTE

RESPONSIBLE COMMITTEE	CHANGE PANEL

LEAD ANALYST	Ann Perry	EMAIL

CHANGE OVERVIEW

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

CODE MANAGER'S RECOMMENDATION

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

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

RETAIL ENERGY CODE

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RETAIL ENERGY CODE

BACKGROUND

1 SUMMARY

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

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

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

Updates are required to the REC to reflect these changes.

2 PROBLEM STATEMENT

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

3 USER STORIES

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

4 SUMMARY OF ANALYSIS UNDERTAKEN

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

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

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

5 KEY RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

5.1 RISKS AND ISSUES

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

5.2 ASSUMPTIONS AND DEPENDENCIES

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

6 PROPOSED SOLUTION

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

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

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

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

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

7 DRAFT LEGAL TEXT

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

8 PROPOSED IMPLEMENTATION DATE AND APPROACH

PROPOSED IMPLEMENTATION DATE	31 January 2022

PROPOSED IMPLEMENTATION APPROACH	BIG BANG

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

9 CHANGE PATH

CHANGE PATH	SELF-GOVERNANCE

10 RESPONSIBLE COMMITTEE

RESPONSIBLE COMMITTEE	CHANGE PANEL

11 SUMMARY OF CONSULTATION RESPONSES

A consultation was issued on 22 December 2021 to obtain views on the Preliminary Change Report. Five responses were received, from two Energy Suppliers and three Distribution Network Operators. The full non-confidential responses can be found in Appendix 2.

11.1 SUMMARY OF RESPONSES

11.1.1 COMMENTS ON THE SOLUTION

All respondents agreed with the proposed solution.

One respondent indicated that the solution appears to be an easier way of managing the process for all parties. Another respondent indicated that a number of issues they face with the current ETTOS web portal will be resolved through the transition to encrypted emails.

One respondent highlighted that although their organisations email service supports TLS version 1.2 encryption, there are other security factors to consider and as they have not yet received the test email, they are not currently in a position to highlight any issues with the solution.

The ETTOS Service Provider has been successfully using TLS encryption for the last 2-3 months, for the emails they send to ETTOS Recipients to notify them that a tip-off has been received and prompting the ETTOS Recipient to log onto the web portal.

ETTOS recipients are due to receive a specific test email and report before 21 January 2022. If the testing highlights any compatibility issues, the Code Manager and ETTOS Service Provider will work with the impacted ETTOS recipients on a case-by-case basis to identify and resolve the root causes or put in place mitigations.

11.1.2 CASE FOR CHANGE AND CODE MANAGER'S RECOMMENDATION

All respondents agreed with the case for change and the Code Manager's recommendation, however, one respondent highlighted that consideration may need to be given to issues arising from the test email activity.

The Code Manager and ETTOS Service Provider will work with the ETTOS recipients on a case-by-case basis where compatibility issues are identified through the testing.

11.1.3 IMPLEMENTATION APPROACH AND DATE

All respondents agreed with the implementation approach and date.

12 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

No amendments have been made following consultation.

13 BUSINESS CASE ASSESSMENT

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

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

14 CASE FOR CHANGE

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

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

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

15 CODE MANAGER'S RECOMMENDATION

Based on the evidence in sections 13 and 14 of this report, the Code Manager considers a positive business case can be made for implementing this solution and recommends that the Change Panel:

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

16 APPENDIX 1 - LINKS

CHANGE PROPOSAL	Change Proposal Page
LEGAL DRAFTING	Link to EMAR Change Set

17 APPENDIX 2 - CONSOLIDATED CONSULTATION RESPONSES

QUESTION	RESPONDENT DETAILS	RESPONSE	CODE MANAGER COMMENTS
Do you agree with the proposed solution? If not, please explain why?	**Utilita Energy Limited** Energy Supplier	Yes	
	Scottish Power Energy Networks Distribution Network Operator	Yes, SPEN are supportive of this solution, it appears an easier way of managing the process for all parties	
	MVV Environment Ltd. Energy Supplier	Yes, we do agree.	
	Northern Powergrid Distribution Network Operator	Yes	
	Electricity North West Limited Distribution Network Operator	Yes – we agree with the proposed solution. The portal created a number of issues which will be resolved through the use of encrypted emails.	
Do you agree with the proposed implementation date and implementation technique? If not, please explain why?	**Utilita Energy Limited** Energy Supplier	Yes	
	Scottish Power Energy Networks Distribution Network Operator	Yes, SPEN are supportive of both the implementation date and technique	
	MVV Environment Ltd. Energy Supplier	Yes, we do agree.	

	Northern Powergrid Distribution Network Operator	Yes	
	Electricity North West Limited Distribution Network Operator	Yes. We agree.	
Following implementation, tip-off reports will be provided by emails encrypted using Transport Layer Security (TLS) version 1.2, which will encrypt emails between email servers. TLS works with most popular email services such as Outlook, Microsoft 365, and Gmail. - Does your organisation use an email server that supports/works with TLS version 1.2 encryption? - Are you aware of any issues with your organisation receiving TLS encrypted emails and downloading any attachments? If yes, please provide rationale for your response.	**Utilita Energy Limited** Energy Supplier	We do not foresee any impact on our organisation, due to these changes.	
	Scottish Power Energy Networks Distribution Network Operator	Scottish Power Energy Networks support TLS version 1.2 encryption. We are not aware of any issues in terms of this process.	
	MVV Environment Ltd. Energy Supplier	Yes, our email server does support the TLS version 1.2. encryption.	
	Northern Powergrid Distribution Network Operator	We currently support TLS version 1.2 encryption, however there are other security factors to consider. The test ETTOS report email will take place between the 10th and 21st January, and as we have not yet received the test email we are not in a position to highlight any issues	The ETTOS Service Provider has been successfully using TLS encryption for the last 2-3 months, for the emails they send to ETTOS Recipients to notify them that a tip-off has been received and prompting the ETTOS Recipient to log onto the web portal. ETTOS recipients are due to receive a specific test email and report before 21st January. If the testing highlights any compatibility issues, the Code Manager and ETTOS Service Provider will work with the

			impacted ETTOS recipients on a case-by-case basis to identify and resolve the root causes or put in place mitigations.
	Electricity North West Limited Distribution Network Operator	I can confirm that Electricity North West's email server supports TLS version 1.2 encryption. We are not aware of any issues receiving encrypted emails.	
Do you agree with the Code Manager's assessment of the Change Path, that this Change Proposal should be subject to Self-Governance approval by the Change Panel?	**Utilita Energy Limited** Energy Supplier	Yes	
	Scottish Power Energy Networks Distribution Network Operator	Yes	
	MVV Environment Ltd. Energy Supplier	Yes ,we do agree.	
	Northern Powergrid Distribution Network Operator	Yes	
	Electricity North West Limited Distribution Network Operator	We agree that this proposal should be subject to self-governance.	
Do you agree with the Code Manager's recommendation that this Change Proposal should be approved for implementation on 31 January 2022?	**Utilita Energy Limited** Energy Supplier	Yes	
	Scottish Power Energy Networks Distribution Network Operator	We are supportive if the 31st January 2022 implementation date.	
	MVV Environment Ltd. Energy Supplier	Yes ,we do agree.	

If not, please explain why?	**Northern Powergrid** Distribution Network Operator	Yes, although consideration may need to be given to issues arising from the test email activity	The Code Manager and ETTOS Service Provider will work with the ETTOS recipients on a case-by-case basis where compatibility issues are identified through the testing.
	Electricity North West Limited Distribution Network Operator	This change needs to be implemented as soon as possible to coincide with the closure of the portal.	
Do you have any other comments relating to this Change Proposal?	**Utilita Energy Limited** Energy Supplier	No further comments	
	Scottish Power Energy Networks Distribution Network Operator	No other comments	
	MVV Environment Ltd. Energy Supplier	No, we do not have any other comments.	
	Northern Powergrid Distribution Network Operator	No	
	Electricity North West Limited Distribution Network Operator	No	