RETAIL ENERGY CODE

This document is classified as **WHITE**.
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01	Initial Assessment Report
02	Preliminary Change Report
03	Final Change Report

INITIAL ASSESSMENT REPORT

R0020 – ETTOS REPORT DISSEMINATION

DOCUMENT VERSION	1.0
DATE ISSUED	03/12/2021
DOCUMENT APPROVAL STATUS	APPROVED BY REC CHANGE PANEL
RESPONSIBLE COMMITTEE	CHANGE PANEL

CHANGE OVERVIEW

The ETTOS Service Provider have upgraded their security for report dissemination services and will be decommissioning their onsite servers by 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. 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.

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

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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 Service 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 Service Provider, enabling the ETTOS Service 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 by 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 Service Provider, will be decommissioning their onsite servers by 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 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 IMPACTS

REC PARTIES AND SERVICE USERS
Energy Suppliers
Distribution Network Operators
Gas Transporters

REC SERVICE PROVIDERS
Energy Theft Tip Off Service

CONSUMERS
All Consumers

REC DOCUMENTS / PRODUCTS
Schedule 7 - Energy Theft Reduction
Energy Theft User Guide
REC Charging Statement

This change will amend the legal text within Schedule 7, to reflect the removal of the ETTOS portal and the introduction of encrypted emails as the delivery mechanism for ETTOS Service Data. 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 registered Single Point of Contact (SPOC) will receive the tip offs. The ETTOS Service Provider will continue to generate 'unread email' reports through message read receipts received from the ETTOS Recipient.

Changes will also be required to two Category 3 documents, which will be updated and implemented by the Responsible Providers alongside this Change Proposal.

4.1 CROSS CODE IMPACTS

This change does not have any cross-code impacts.

5 CHANGE PATH AND RESPONSIBLE COMMITTEE

CHANGE PATH	SELF-GOVERNANCE
RESPONSIBLE COMMITTEE	CHANGE PANEL

This Change Proposal proposes updates to REC Schedule 7 – Energy Theft Reduction, which is under the responsibility of the Change Panel.

Therefore, we propose that the Responsible Committee for this Change Proposal should be the Change Panel.

6 PRIORITY STATUS AND URGENCY

PRIORITY STATUS	HIGH
URGENCY	URGENT

PRIORITISATION MATRIX

Significance	Score	Weighting
Legal/Regulatory Compliance	2	30
Strategic Direction	0	20
Cost Benefits / Value	0	10
Consumer Impacts	1	30
Operational Efficiency	0	10

Urgency

3	N/A	13	23	33
2	02	12	22	32
1	01	11	21	31
0	00	10	20	N/A

Significance

Weighted Significance Score	1
Urgency	3
Overall Priority Score	**13**

Effort	0 - Minimal

Priority Score	Priority Status
23 - 33	Critical
13 - 22	High
11 - 21	Medium
00 - 10	Low

PRIORITY STATUS
High

The Priority Status for this Change Proposal is 'High' based on a 'Weighted Significance' score of 1 and an 'Urgency' score of 3. This is broken down as below:

Significance:

Legal/Regulatory Compliance – a score of 2 to reflect that ETTOS Recipients would not be able to meet REC obligations without a change to Schedule 7 when the ETTOS portal becomes obsolete. There may also be impacts to Energy Suppliers' ability to meet Licence Condition obligations on Energy Theft, as tip-offs may not be received.

Strategic Direction – a score of 0 because this change does not support the implementation of the REC Strategy and Strategic Objectives.

Cost Benefits/Value – a score of 0 because there are no direct financial benefits identified for Consumers, REC Parties, or RECCo.

Consumer Impacts – a score of 1 to reflect that although no improvement to Consumer experience would be seen through the implementation of this change, there is the potential for Consumer detriment if this Change Proposal is not progressed as ETTOS Recipients would be unable to receive and act upon tip-offs.

Operational Efficiency – a score of 0 to reflect there are no improvements to the operational efficiency of REC Parties or Market Participants.

Urgency:

- This Change Proposal has been given an urgency score of 3 to reflect the need for it to be progressed immediately for it to achieve its required timetable.

We propose that this Change Proposal should follow an urgent timetable on the basis that:

- The change needs to be linked to a specific date (e.g. introduction of legislation, system release date, planned consultation or impact assessment timings, etc.).

This Change Proposal must be implemented on the same date, or prior to, the closure of the ETTOS portal on 31 January 2022. In order to achieve this, the Change Proposal will need to be progressed with a reduced timetable for assessment and consultation.

7 SUMMARY OF CHANGE PROPOSAL PLAN

The solution for this Change Proposal should be a simple update to Schedule 7 (Energy Theft Reduction), requiring ETTOS Recipients to confirm an email address for the receipt of ETTOS Service Data via encrypted emails. Therefore, no solution development activity is required. A consultation period of 5 working days would normally apply to this type of urgent timetable. However, if this is issued before the Christmas break period it allows a slightly longer timetable for response for those parties who are working over this period. We therefore propose a 12 Working Day consultation period between 22 December 2021 and 12 January 2022.

	FROM	TO
PRELIMINARY CHANGE REPORT ISSUED	10/12/2021	10/12/2021
PRELIMINARY CHANGE REPORT APPROVAL	21/12/2021	21/12/2021
CONSULTATION ISSUED	22/12/2021	12/01/2022
FINAL CHANGE REPORT ISSUED	14/01/2022	14/01/2022
RESPONSIBLE COMMITTEE DECISION	18/01/2022	18/01/2022
PUBLISH CHANGE DECISION	19/01/2022	19/01/2022
APPEAL WINDOW CLOSURE	01/02/2022	01/02/2022

8 GLOSSARY

TERM	DEFINITION
Distribution Network Operator (DNO)	means a person holding an Electricity Distribution Licence
Energy Supplier	means a person which is either or both an Electricity Supplier and/or a Gas Supplier.
Energy Theft Tip Off Service (ETTOS)	is described in Annex 1 of the Energy Theft Reduction Schedule.
ETTOS Recipient	means each Energy Supplier, each Gas Transporter and each Distribution Network Operator
ETTOS Service Data	means the materials, information and other data received by ETTOS Recipients pursuant to the Energy Theft Tip-Off Service.
ETTOS Service Provider	means the person or persons with which RECCo contracts from time to time for provision of the Energy Theft Tip-Off Service.
Metering Equipment Manager (MEM)	means, as applicable, either: (a) for electricity, the Meter Operator Agent (as defined in the BSC) Appointed by an Electricity Supplier; or (b) for gas, the Meter Asset Manager (as defined in the UNC) Appointed by the Gas Supplier.
Retail Energy Code (REC)	means this Code, including its Schedules and the Technical Specification, maintained pursuant to the electricity supply licences granted under the Electricity Act 1989 and the gas supply licences granted under the Gas Act 1986, as such code is modified from time to time in accordance with its provisions
Retail Energy Code Company (RECCo)	means the company established under Clause 5 of the main body of this Code.
Energy Theft	includes: (a) circumstances described in Paragraphs 5(1) (Restoration of connection without consent) and 6(1)(a) (Damage to electrical plant etc) of schedule 6 to the Electricity Act (in so far as they relate to an electricity supplier; (b) circumstances described in Paragraph 6(1)(b) (Damage to electrical plant etc) of schedule 6 to the Electricity Act; (c) circumstances described in Paragraph 11(1) (Interference with meters) of schedule 7 to the Electricity Act; (d) circumstances described in Paragraphs 10(1)(a) and 11(2) of schedule 2B to the Gas Act (in so far as they relate to a gas supplier); and (e) circumstances described in Paragraphs 10(1)(b) and 10(1)(c) of schedule 2B to the Gas Act.
Working Day (WD)	means any day other than a Saturday, a Sunday, Christmas Day, Good Friday or a day that is a bank holiday in either or both England and Wales within the meaning of the Banking and Financial Dealings Act 1971.