RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0091 – CLARIFICATIONS TO THE THEFT DETECTION INCENTIVE SCHEME

On 17 February 2023 the Code Manager issued a consultation to industry to seek feedback on the Preliminary Change Report for R0091.

The purpose of this document is to consolidate the responses and for the Code Manager to answer any questions raised within those responses.

DOCUMENT VERSION	1.0
RESPONSE TYPE	NON-CONFIDENTIAL
DATE ISSUED	21/03/2023
RESPONSIBLE COMMITTEE	CHANGE PANEL
LEAD ANALYST	ELISE HANDY

DATE CONSULTATION ISSUED	17/02/2023
RESPONSE DEADLINE	10/03/2023

Question 1:	Do you agree with the proposed solution? If not, please explain why.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (DNO)	Whilst we agree with the proposed solution, we feel that there is also missing detail with the theft detection process. Section 8 - ETTOS SERVICE DESCRIPTION AND RECIPIENT OBLIGATIONS (Page 10) on the Schedule 7 Energy Theft Reduction Document, states how and who ETTOS report to, but there is no mention of when a report of cannabis/drug cultivation is on site, or where weapons are on site. There is currently uncertainty within industry with regards to what happens in these scenarios. As a DNO, we have always passed the reports back to Crimestoppers and advised them that they would need to pass this report onto the police before we could attend most importantly due to the safety of our engineers but also due to the potential evidence tampering that could be caused by attending site.	Noted. While this point is outside the scope of this change, we will capture the points made and include them in any further development work on the scheme.
Energise Energy Solutions (MEM)	Yes	Noted.
British Gas (Energy Supplier)	Yes – we have reviewed the document, and confirm it is purely some change in terminology and does not change any aspect of our activity. It appears to simply be resolving some minor legacy issues remaining from the move to RECCo. We are happy with the proposed solution.	Noted.

Xoserve (Other)	This change has a number of facets that do not impact the CDSP / GRDA and therefore we offer no comment on these solution components. R0091 does introduce the Code Manager providing Confirmed Energy Theft Notifications to the CDSP. We have suggested that changes might be better made to Schedule 8 to reflect the revised reporting lines which are currently described in Schedule 7 of the Legal Text. **We do not want any of our observations regarding the Legal Text to delay the implementation of this change on 01 April 2023.**	Noted, the Code Manager has reviewed the suggested changes and decided to keep Schedule 8 outside the scope of R0091. The comments have been captured so that they may be included in further development of the TDIS and theft schedules.
Npower Commercial Gas Limited (npower Business Solutions) (Energy Supplier)	Yes, we are happy with the proposed amendments to Schedule 1 – Interpretations and Definitions and Schedule 7 – Energy Theft Reduction	Noted.

Question 2:	Do you agree with the proposed implementation date and plan? If not, please explain why.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (DNO)	We agree with the proposed implementation date and plan.	Noted.
Energise Energy Solutions (MEM)	Yes	Noted.
British Gas (Energy Supplier)	Yes	Noted.

Xoserve (Other)	We are happy with the proposal to be approved for implementation on the 01 April 2023. Schedule 7, Annex [3] Paragraph 6.4 of the proposed legal text references that the Code Manager will send us Confirmed Energy Theft Notifications. We continue to work with the Code Manager to ensure that the data is provided in the correct format and expect to receive test data using actual data that may be in advance of this proposed implementation date. We have yet to receive test data to ensure it provides the expected and necessary content and receipt of this is an important development milestone to determine effective interfacing and may impact technical implementation date between the CDSP and the Code Manager. Any delay to the technical implementation does not impact the 01 April 2023 date for the remaining components of R0091.	Noted Development work on this is ongoing and an update will be provided to the CDSP ensure the data is viable prior to implementation.
Npower Commercial Gas Limited (npower Business Solutions) (Energy Supplier)	Yes, we are happy for the clarified obligations to be in place for the new TDIS Reporting Year on 1st April 2023.	Noted.

Question 3:	Do you agree with the Code Manager's assumption that the proposed changes will have no impact on REC Party obligations?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (DNO)	We agree with the Code Manager's assumption that the proposed changes will have no impact on REC Party obligations.	Noted.

Energise Energy Solutions (MEM)	Yes	Noted.
British Gas (Energy Supplier)	Yes we agree – see our answer to question 1.	Noted.
Xoserve (Other)	N/A	
Npower Commercial Gas Limited (npower Business Solutions) (Energy Supplier)	As far as we have been able to assess, the proposed changes do not introduce any new, or change any existing, obligations.	Noted.

Question 4:	Do you agree with the Code Manager's recommendation for this Change Proposal to be approved for implementation on 01 April 2023? If not, please explain why.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (DNO)	We agree with the Code Manager's recommendation for this Change Proposal to be approved for implementation on 01 April 2023.	Noted.
Energise Energy Solutions (Other)	Yes	Noted.
British Gas (Energy Supplier)	Yes – 1st April 2023 seems sensible.	Noted.
Xoserve (Other)	We note and support the proposed implementation date of 01 April 2023. As part of the solution to provide information to the CDSP we	Development work on this is ongoing and an update will be provided to the CDSP ensure the data is viable prior to implementation.

	expect to receive the first Confirmed Energy Theft Notifications report in May 2023.	
Npower Commercial Gas Limited (npower Business Solutions) (Energy Supplier)	Yes, we support the implementation of these changes going ahead on 1st April 2023.	Noted.

Question 5:	Do you have any other comments or questions relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (DNO)	We feel that there is missing detail with the theft detection process. Section 8 - ETTOS SERVICE DESCRIPTION AND RECIPIENT OBLIGATIONS (Page 10) on the Schedule 7 Energy Theft Reduction Document, states how and who ETTOS report to, but there is no mention of when a report of cannabis/drug cultivation is on site, or where weapons are on site. There is currently uncertainty within industry with regards to what happens in these scenarios. As a DNO , we have always passed the reports back to Crimestoppers and advised them that they would need to pass this report onto the police before we could attend most importantly due to the safety of our engineers but also due to the potential evidence tampering that could be caused by attending site.	Please see response in question 1.
Energise Energy Solutions (Other)	N/A	

British Gas (Energy Supplier)	No	
Xoserve (Other)	The proposed legal text to Schedule 7 cross references the intent of a paragraph in Schedule 8. Our understanding is that R0091 changes the obligation in Schedule 8 so suggest that this paragraph itself is changed to reflect the arrangements that we understand will be in place following implementation of R0091. We attach a strawman of potential amendments to Schedule 8 - paragraph 15. Please see the attached document, which we are happy to discuss further if required. Schedule 8 para 15 suggested text 20230309 We also highlight that the proposed Legal Text references 'volume of energy' we would suggest that this be amended to 'quantity of energy' if this component of the Legal Text is retained.	Please see above response to question 1.
Npower Commercial Gas Limited (npower Business Solutions) (Energy Supplier)	We will review the new Category 3 documents (Theft Target Methodology and Energy Theft Detection Incentive Scheme Reporting Timeframe) currently being consulted on separately, but we note REC will use the existing methodology for scheme year 23/24, that the incentive pot remains the same for this year and targets will be based on overall industry performance and adjusted if required. We also note that the Code Manager will conduct additional analysis and consultation later this year regarding new or modified segmentation as part of the development of the TTM for 2024/25 TDIS Reporting Year. We are supportive of this and are keen to see amendments made to the methodology.	Noted.