

Minutes

Meeting Name	DCP 054 Working Group	Meeting Number	008
Meeting Date	20 May 2010	Meeting Time	10:00
Venue	ElectraLink, 2-3 Golden Square, London, W1F 9HR		

Attendee

Angela Mann
 Andrew Wallace
 Anne Jackson
 Sasha Pearce
 Alex Burford (Secretary)

Company

E.ON UK
 Ofgem
 SSE Energy Ltd
 Npower Ltd
 ElectraLink Ltd

1. ADMINISTRATION

- 1.1 Apologies were received from Danielle King (E.ON UK).

2. MINUTES OF THE PREVIOUS MEETING

- 2.1 The minutes from meeting 006 were agreed without amendment.

3. UK RPA MANUAL

- 3.1 The Working Group noted an email from Alan Dick from UK RPA outlining a number of sensitive sections in the UK RPA Manual which should not be included in the Code of Practice. The group agreed when to consider the issues identified as part of its review.

4. CODE OF PRACTICE DISCUSSION

- 4.1 The group noted that the purpose of the meeting was to discuss the Code of Practice for theft in Electricity and Gas. It was agreed that the group will focus on the framework of the Code of Practice and consider areas which can be addressed jointly.
- 4.2 The group noted that there are some differences between the gas and electricity processes which should be highlighted in the Code of Practice. It was agreed that the group will consider the differences in process when reviewing the Code of Practice.
- 4.3 The group reviewed the framework developed by SP and further developed the objectives and principles.
- 4.4 The Working Group agreed the objectives and the following high level principles for inclusion in the CoP:
- 4.4.1 Sources of Information. DT and AM gave an update on the work carried out on this section. It was agreed that the Code of Practice should contain information on how an investigation of suspected theft is carried out. AW noted that the purpose of this section is to provide an outline of the role of Suppliers in an instance of theft. It was agreed that the Code of Practice should make reference to Suppliers procedures regarding sources of information for instances of theft. AM took an action to re-word the

sources of information section as per the group's instructions.

Action: AM

4.4.2 Collection and Retention of Evidence. It was noted that the group's original intention was to bring certain sections of the UK RPA Manual into the Code of Practice but that 'collection and retention of evidence' has been identified by Alan Dick as UKRPA owned and not suitable for inclusion in the DCUSA. AW noted that rights being enacted in the CoP are in relation to the rights of Suppliers. It was noted that the CoP should not put the onus on the Supplier to communicate with the RPS.

4.4.3 AW also suggested that Consumer Focus may also have an issue around the use of the evidence that has been collated and retained and noted that customers would to know why they have been disconnected. AJ suggested that the CoP should consider what a consumer would require this information for and that the CoP should include the rationale for the collation of evidence as well as suggesting ways of obtaining it - for example photos and diagrams. AW noted that the section should be more structured. AM took an action to redraft the section as per the group's instructions.

Action: AM

4.4.4 Assessment of Unrecorded Units. AW noted that the UK RPA Manual has three different approaches to calculating unrecorded units: Audit of appliances; past consumption history; and consumption. AW suggested that the group should consult with parties to determine which appliances should be considered as part of such assessment. It was suggested that the CoP should also outline the use of market domain data to assist in the assessment of unrecorded units. AJ took an action to update the section as per the group's instructions.

Action: AJ

4.4.5 Supplier's Policies. AJ informed the group that she is still awaiting confirmation of SSE's Supplier Policy. It was agreed that the CoP should reflect Supplier's licence obligations and AM noted that the 1998 Electricity Code of Practice deals with Supplier's Policies. It was agreed that when the CoP is issued for consultation parties should be asked to give their views on what sections of the policies should be included in the CoP. SP took an action to lift out the relevant sections from the 1998 Electricity Code of Practice and include them in the CoP.

Action: SP

4.4.6 Reports. AJ noted that the process for reporting theft to the Supplier is addressed in the 1998 Electricity Code of Practice, which states that the RPS should issue a D236 data flow to Suppliers on a rolling 12 month basis. AJ took an action to re-word this section as per the group's instructions.

Action: AJ

4.4.7 Data Requirements. The group noted the updates to the section made by SP. AW took an action to establish when the next UK RPA board meeting

will take place and to determine what the data requirements are and SP agreed to update the section as per the group's comments.

Action: AW

Action: SP

4.4.8 Reporting suspension of theft. The group noted that the completion of this section is dependent on legal advice from Wragges & Co in relation to theft in conveyance. It was agreed that the section should address the process for notifying the suspected party in such a way that does not result in the covering up of interference or damage to the meter before the investigations can be made. The group agreed to reconsider the issue once the advice from Wragges has been issued.

4.4.9 Priorities and Timescales. The group agreed instances of theft and be categories into 3 levels of priority:

A. Serious safety concern (a situation which gives rise to danger and which must be remedied).

B. Evidence of interference but with no particular safety concern.

C. Information giving cause for suspicion that abstraction has taken or is taking place.

4.4.10 The group agreed there should be each category should be clearly defined and include examples. The CoP should give sufficient guidance to the RPS to enable them to place an instance of theft into a category. AW noted that a section on timescales in the gas industry should also be included. The group noted that when the RPS visits a property that is suspected of theft it should also seek to resolve the issue at the first visit. SP took an action to update as per the group's instructions.

Action: SP

4.4.11 Conduct of investigations. The group noted that the UK RPA has indicted this section as UK RPA owned and not suitable for inclusion in the DCUSA. The group noted that a section on conduct of investigations should be included as guidance. The group also noted that the CoP should also include the differences between civil and criminal proceedings. SP took an action to update as per the group's instructions.

Action: SP

4.4.12 Visit procedure/gaining entry. It was agreed that warrants for gaining entry should be sought by the RPS when access to the property has been refused. AJ noted that when a minor answers the door to a visit the RPS should not enter the property. AW noted that the group should take advice from Consumer Focus before agreeing the final draft. SP took an action to update as per the group's instructions.

Action: SP

- 4.4.13 Investigations Process. AW noted that the section should also include information on how stolen units are calculated, in terms of the electricity industry gas industry. SP took an action to update as per the group's instructions.

Action: SP

- 4.4.14 Disconnection of supply and recovery of costs. The group noted the requirement to ensure the document is future proofed – particularly with regard to references to legislation. It was noted that the DCUSA has a processes in place to ensure that changes to legalisation do not invalidate the Agreement and that regular reviews are held to ensure it is maintained. AW took an action to update this section as per group instructions and include any future developments which Ofgem which the CoP to consider.

Action: AW

- 4.4.15 Treatment of vulnerable customers. The group agreed that the CoP requires clarification on the definition of a vulnerable customer. Members discussed the possible inclusion of a reference to a security deposit to be put in place by customers to avoid disconnection (as set out in the UKRPA) but concluded that it was not appropriate for the CoP. SP took an action to update as per the group's instructions.

Action: SP

- 4.4.16 Re-visits. The group noted that the current wording in relation to re-visits puts an emphasis on the Supplier to instruct the RPS. The group agreed that the emphasis should be on the RPS. SP agreed to update the section as per the group's instructions.

Action: SP

- 4.4.17 Maintenance of records. It was agreed that the section will be populated using the Appendix of the Electricity 1998 Code of Practice. SP took an action to update as per the group's instructions.

Action: SP

- 4.4.18 Safety issues. The group noted that the UK RPA has indicated that this section from the manual is owned by the UK RPA and not suitable for inclusion in the DCUSA. AJ suggested that the CoP should clearly state that no one should put themselves or customers at risk. AM further noted that each company should have its own safety procedures in place. SP took an action to update as per the group's instructions.

Action: SP

- 4.4.19 Incentive scheme. It was agreed that an incentive scheme will be included in the CoP once one has been agreed through a consultation process.

- 4.4.20 Appendices. The group reviewed the list of appendices in the Code of Practice framework document. The group agreed to remove the appendix on general qualifications of RP staff. The group agreed that the section in relation to the impact of the Human Rights Act on the use of warrants should be re-worded before the final draft is issued. The group also agreed that the appendix on the Data Protection Act should not be included. It was agreed that the CoP should reference the Data Protection Act but not

give an interpretation of it. AM took an action to circulate a document on the Data Protection Act in relation to theft.

Action: AM

- 4.5 SP took an action to update the appendix section as per the group's instructions.

Action: SP

5. NEXT STEPS

- 5.1 The group agreed to complete their actions and forward to AB to collate and distribute before the next meeting.

Action: AB

6. ANY OTHER BUSINESS

- 6.1 There was no other business raised at the meeting.

7. DATE OF NEXT MEETING

- 7.1 It was agreed that a sub-group meeting will convene in the 17 June 2010. ElectraLink took an action to confirm the date and venue.

Action: ElectraLink

APPENDIX A – ACTIONS**OPEN ACTIONS**

No.	Action	On	Due
008/01	<p>Draft the following sections of the CoP:</p> <ul style="list-style-type: none">• Sources of Information - AM• Collection and Retention of Evidence – AM• Assessment of Unrecorded Units - AJ• Supplier's Policies - SP• Reports - AJ• Data Requirements - SP• Priorities and Timescales - SP• Conduct of investigations - SP• Visit procedure/gaining entry - SP• Investigations Process - SP• Disconnection of supply and recovery of costs - AM• Treatment of vulnerable customers - SP• Re-visits - SP		11/06/10

	<ul style="list-style-type: none"> • Maintenance of records - SP • Safety issues - SP • Appendices – SP 		
008/02	Establish when the next UK RPA board meeting will take place and to determine what the data requirements are.	AW	10/06/10
008/03	Collate and distribute CoP sections before the next meeting.	AB	14/06/10

CLOSED ACTIONS

No.	Action	On	Due
006/01	<p>Draft the following sections of the CoP:</p> <ul style="list-style-type: none"> • Scenarios • Sources of information • Collection and Retention of Evidence (to include handling of case materials) • Assessment of Unrecorded Units • Suppliers' policies • Reports • Data Requirements 	<p>DK and AM</p> <p>DK and AM.</p> <p>AM</p> <p>AJ</p> <p>AJ</p> <p>AJ</p> <p>SP</p>	TBA

006/02	Provide the group with the current processes set out in the draft Electricity CoP to aid discussions at the next meeting. Complete, Document was discussed on the agenda.	SP	TBA
006/03	Confirm the date and venue of next meeting. Complete, group members were notified.	ElectraLink	TBA