

CPD 16/325 - DCP 264 Consultation responses – collated comments

Company	Confidential / Anonymous	1. Do you understand the intent of the CP?	Working Group Comments
British Gas	Non-confidential	Yes	Noted
EDF Energy	Non-confidential	Yes	Noted
ESP Electricity	Non-confidential	Yes, ESPE understand the intent of the CP.	Noted
SGN	Non-confidential	SGN understands the intent of the change proposal	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Yes	Noted
SP Manweb plc and SP Distribution plc	Non-confidential	Yes, this CP allows for the delivery of a contract between DCUSA and the ETTOL Provider to support the work being carried out in TRAS	Noted

SSE	Non-confidential	We understand that the intent of this CP is to set out the obligations for Suppliers and Transporters in regards to ETTOL and to introduce these obligations into a new SPAA Schedule, clarifying that the ETTOL is separate to TRAS.	Noted
The Electricity Network Company, Independent Power Networks Limited, GTC Pipelines Limited and Independent Pipelines Limited	Non-confidential	Yes	Noted
UK Power Networks	Non-confidential	Yes	Noted
Utility Warehouse	Non-confidential	Yes. I understand this is to remove references to the ETTOS from DCUSA Schedule 25 and introduce a new schedule to include details of the service.	Noted
Wales & West Utilities	Non-confidential	Yes	Noted
Undisclosed	Anonymous	Yes.	Noted
RWE npower	Non-confidential	RWE npower understands the intent of raising this CP. DCP264 will introduce a new schedule to the DCUSA setting out obligations for	Noted

		industry parties in relation to the Energy Theft Tip Off Service (ETTOS).	
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Company	Confidential / Anonymous	2. Are you supportive of the principles of the CP?	Working Group Comments
British Gas	Non-confidential	Yes	Noted
EDF Energy	Non-confidential	Yes	Noted
ESP Electricity	Non-confidential	ESPE are supportive of the principles of the CP.	Noted
SGN	Non-confidential	We are supportive of the principles of the Change Proposal as it seeks to address a gap in the current process.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Yes	Noted
SP Manweb plc and SP Distribution plc	Non-confidential	Yes	Noted

SSE	Non-confidential	Yes we are in support of the principles. In order to mitigate theft in the industry it is imperative that Suppliers and Transporters work together and are able to share certain data to ensure that tip-offs can be effectively investigated.	Noted
The Electricity Network Company, Independent Power Networks Limited, GTC Pipelines Limited and Independent Pipelines Limited	Non-confidential	Yes	Noted
UK Power Networks	Non-confidential	Yes	Noted
Utility Warehouse	Non-confidential	Yes. Having the requirements detailed in a new schedule provides greater clarity on the responsibilities of the ETTOS Service Provider, ETTOS Recipient and DCUSA Ltd.	Noted
Wales & West Utilities	Non-confidential	We support the principles of the CP but not the legal text as currently drafted and therefore in its current form we do not support implementation of this Change Proposal. As it stands we the legal text needs further discussion before the Change Proposal is implemented as it seems drafted more to protect SPAA Ltd than to protect the interests of SPAA Parties. We discuss these points further in our response to the legal drafting.	Noted
Undisclosed	Anonymous	Yes.	Noted

RWE npower	Non- confidential	RWE supports the principles of the CP as it will remove reference to the previous service which was set up to provide tip off to the TRAS (Theft Risk Assessment Service) as the contract could not be implemented. This CP will introduce a new DCUSA Schedule which will include details of ETTOS.	Noted
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Company	Confidential / Anonymous	3. Do you have any comments on the draft legal text?	Working Group comments
British Gas	Non- confidential	No	Noted
EDF Energy	Non- confidential	EDF Energy are happy with the draft text.	Noted
ESP Electricity	Non- confidential	Not at this time	Noted
SGN	Non- confidential	We believe that the legal text would place an obligation on Transporters to investigate tip offs that may have insufficient information to allow us to conclude the case. We believe that the legal text should reference an agreed level of minimum information that allows an investigation to proceed. We believe that the legal text needs to be amended to reflect instances where it is not possible to concluded tip offs sufficiently thus protecting parties from any liabilities.	<p>The group concluded that additional text is not required as paragraph 8.5d already states that the network operator can inform the ETTOS Service Provider that no action can be taken where there is insufficient information.</p> <p>The group did not want to limit the tip offs that may be provided by the ETTOS Service Provider by introducing a minimum level of information.</p>

Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	No	Noted
SP Manweb plc and SP Distribution plc	Non-confidential	None	Noted
SSE	Non-confidential	<p>The legal text states:</p> <p>8.1 (d) If the ETTOS Service Provider cannot match the tip-off to a Supplier or a Transporter, then the ETTOS Service Provider logs the tip-off as unmatched.</p> <p>However there are no details provided as to how this data is stored, how often it is reviewed or processes to be followed once a Supplier is identified. This requires further clarity.</p>	<p>The group concluded that the detailed process for dealing with unmatched tip offs should not be included in the legal text. The process will be determined by the ETTOS Working Group/SPAA EC and DCUSA Panel once there is more clarity on the number of unmatched tip offs.</p>
The Electricity Network Company, Independent Power Networks	Non-confidential	<p>Yes</p> <p>We believe that the drafting in 8.1(e) should be updated slightly to remove the reference to the distribution services area. IDNOs do not have distribution services areas (as defined in the licence) and there may be potential for this drafting to mean that the tip off may</p>	<p>Agreed – legal text updated as proposed.</p>

Limited, GTC Pipelines Limited and Independent Pipelines Limited		<p>automatically revert to the DNO for that area when it would be better placed with the IDNO. Some proposed drafting is below -</p> <p>(e) In addition to the above, where the ETTOS Service Provider identifies that there is an electricity safety concern, then the ETTOS Service Provider contacts the DNO/IDNO Party for the relevant distribution services area <u>who operates the relevant network</u>.</p>	
UK Power Networks	Non-confidential	No	Noted
Utility Warehouse	Non-confidential	<p>Where the ETTOS Service Provider marks a tip-off initially as unmatched (Legal Text – Schedule XX - section 8.1) or returned by the DNO/IDNO as unmatched (Legal Text – Schedule XX - section 8.5), what will happen after they are recorded and will these be reviewed by another party at a high level (such as the TRAS Expert Group or ETTOS Performance Reviews)? Will two different instances of unmatched be distinguishable when recorded by the ETTOS Service Provider?</p>	<p>The group concluded that the detailed process for dealing with unmatched tip offs should not be included in the legal text. The process will be determined by the ETTOS Working Group/SPAA EC and DCUSA Panel once there is more clarity on the number of unmatched tip offs.</p> <p>An action has been taken to request that reporting on unmatched tip offs identifies the reason that the tip off could not be matched and whether the tip off has been issued to the network operator.</p>
Wales & West Utilities	Non-confidential	We do not support implementation of the Change Proposal with the current legal text. As it stands Schedule XX 5.2 b is an uncapped	5.2 b The group noted that the Service Provider was not willing to provide the service without an indemnity from

		<p>indemnity with very wide applicability. At least some further explanation is required.</p> <p>Schedule 34 appendix 1. The existing text refers to "...each meter point in Great Britain.." Does this include NTS meters points and if so is this intended? This point does not refer to the changed text from this proposal so is strictly out of scope but worth considering.</p> <p>Schedule XX 5.2 (b) Delete. This is an uncapped indemnity. There is no explanation for this obligation which is unusual particularly in respect of the ETTOS parent being covered. It is not usual to include an indemnity in the schedule of a contract. This is effectively an uncapped indemnity from the ETTOS Recipient to SPAA should a third party sue the ETTOS service provider or its parent because the third party has suffered loss due the failure of the ETTOS Recipient to act on a tip off. This should be deleted in its entirety. It is not clear how this obligation interacts with paragraphs 2.1 (Suppliers fund SPAA for ETTOS Liabilities which are defined widely in the new definition). Surely more generally indemnities should be dealt with in the main body of the agreement.</p> <p>Schedule XX 8.1 e replace "gas safety concern" by "Public Reported Escape" we may need a definition of "Public Reported Escape"</p> <p>Schedule XX 8.5 replace "gas distribution transporter" with "gas transporter"</p> <p>Schedule XX 8.5 a replace with "identify the full address if the full address was not provided by the ETTOS Service Provider"</p> <p>Schedule XX 8.5 d add "with reason" at end</p>	<p>SPAA/DCUSA Ltd. The risk of claims against the Service Provider is relatively low, but from the Service Provider's perspective it does not intend to do anything further with the information once it has been reported to the relevant licensee. The risk of the indemnity could have been socialised amongst the industry, but it was thought more appropriate for the Party at fault to bear the risk.</p> <p>The group concluded that clause 5.2b should remain, as drafted.</p> <p>Issues with Schedule 34 to be highlighted to the TRAS Expert Group.</p> <p>8.1e The group did not wish to introduce a new definition for Public Reported Escape and concluded that the SPAA text should refer to Serious Safety Concern and the DCUSA text should refer to a Category A safety concern as defined in the Theft Codes of Practice.</p> <p>8.5 Reference to GT and iGT in the SPAA text to be amended to Large Transporter/Small</p>
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			<p>Transporter as defined in the SPAA.</p> <p>8.5a Legal text amended to clarify that the network operator is required to identify the 'full' address.</p> <p>8.5d Legal text amended to clarify that the network operator should provide the reason it could not match the tip off.</p>
Undisclosed	Anonymous	<p>Tip-offs are referenced in the Theft Code of Practice and within the proposed schedule however there isn't a definition for a tip-off – should one be introduced?</p> <p>8.2.c – We believe this paragraph is aimed at Service Recipients having/requesting a reasonable number of logins, however, the paragraph wording could potentially be clearer to assist new entrants to.</p> <p>8.7 – We'd suggest an amendment of this to 'Suppliers shall provide outcomes of their tip-off investigations to the TRAS Service Provider'. This is because not all outcomes will be a Confirmed Theft but all outcomes should be inputted into the model.</p> <p>There is no reference to MI within the ETTOS service description – although we believe this will be provided by the Service Provider there are no code obligations for Service Recipients to receive this this.</p>	<p>The group concluded that a definition of tip off is not required.</p> <p>8.2c The group concluded that the wording did not require amendment.</p> <p>8.7 Legal text amended to refer to tip off investigations rather than theft investigations.</p> <p>The group concluded that details of MI reporting are not required in the legal text. The reporting requirements and service levels are included in the ETTOS Contract which is available to SPAA and DCUSA Parties on request.</p>

RWE npower	Non- confidential	We accept the draft legal text.	Noted
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Company	Confidential / Anonymous	4. Do you consider that the proposal better facilitates the DCUSA/SPAA objectives? Please give supporting reasons.	Working Group Comments
British Gas	Non- confidential	<p>General Objective One - The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks</p> <p>We agree that General Objective 1 is better facilitated as reduced theft enables more accurate data about consumption to be utilised by Distributors. More accurate data gives Distributors more opportunity to manage their network in an efficient and economic manner.</p> <p>General Objective Two - The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent therewith) the promotion of such competition in the sale, distribution and purchase of electricity</p> <p>We agree that General Objective 2 is better facilitated as the establishment of an ETTOS service enables a more efficient and targeted approach to tackling theft of electricity. This more efficient action in tackling theft reduces costs and therefore helps facilitate competition in the supply of electricity.</p> <p>General Objective Three - The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences</p> <p>We agree that General Objective 3 is better facilitated as the provision of information relating to suspected theft to Distributors may assist Distributors in</p>	Noted

		detecting theft in conveyance and meeting their requirements in Standard Licence Condition 49.	
EDF Energy	Non-confidential	Yes. The proposal better facilitates the SPAA objectives as it provides a process for routing Crimestopper theft tips to the Supplier or Transporter who should be investigating them enabling them to fulfil their obligations under Supply Licence Condition 12A and Transporter Condition 27.	Noted
ESP Electricity	Non-confidential	We agree with the Working Group's assessment.	Noted
SGN	Non-confidential	SGN is not party to DCUSA as we are a Gas Transporter.	Noted
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	<p>We believe that the proposal better facilitates General Objectives One and Three.</p> <p>It assists General Objective One as successful operation of the Service should allow DNOs and IDNOs to reduce their network losses by greater detection of energy theft and potentially unregistered customers and the subsequent resolution of these cases.</p> <p>In relation to General Objective Three, the Service should add a means by which suspected theft can be efficiently and consistently communicated between industry parties, allowing those parties to take action as necessary to discharge their obligations.</p> <p>We do not agree however that the CP would contribute to better achieving General Objective Two - it is not clear from the consultation how it would make a material difference to any aspect of energy industry competition. Linkage to this Objective either needs to be better explained or the argument should be removed from further consideration. The CP is in our view fully justified by</p>	<p>Noted</p> <p>The group acknowledged the point with regards to objective 2 and agreed that the impact on competition would be dependent on the effectiveness of the service.</p>

SP Manweb plc and SP Distribution plc	Non-confidential	<p>Yes</p> <p>Objective 1 is better facilitated, as Where theft is resolved, and sites are registered this allows the previously unallocated energy to flow through the appropriate Industry Settlement channels and affords the DNO greater visibility of what is happening on the Network. This increased accuracy will contribute to a greater degree of control for the Distributor which we believe will result in increased efficiencies, and greater safety across the board.</p> <p>General Objective 2 We believe is better facilitated, as again a co-ordinated approach between the ETTOL and Suppliers should see benefits of an increase in customers who have previously not been paying for energy now being treated the same as Registered customers. This end result of this approach should be a reduced cost for customers (and facilitation of competition)</p> <p>General Objective 3 is better facilitated as the Energy Theft Tip off Line provides a co-ordinated approach to tackling theft. Where the ETTOL is unable to identify a Supplier this will be passed to the DNO to review, this allows further investigation in terms of identifying a Supplier, or if there is none this may allow for Theft in Conveyance leads to be recognised and managed into the registered sites process, thereby contributing to the Distributors obligation in relation to SLC 49</p>	Noted
SSE	Non-confidential	<p>We agree that this proposal is better facilitated by SPAA / DCUSA objectives:</p> <ol style="list-style-type: none"> 1. The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks 	Noted

		<p>2. The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent therewith) the promotion of such competition in the sale, distribution and purchase of electricity</p> <p>3. The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences</p> <p>Due to the fact that the proposal details clear responsibilities of Transporters, Distributors and Suppliers in relation to ETTOLS - a system which facilitates competition.</p>	
The Electricity Network Company, Independent Power Networks Limited, GTC Pipelines Limited and Independent Pipelines Limited	Non-confidential	<p>Yes. This change better facilitates DCUSA General Objectives 1 and 3.</p> <p>We agree with the assertion in the consultation document that DCUSA General Objective 1 is better facilitated by this change as the reduction in theft of electricity which will follow from this CP introduction will allow Distributors to more accurately analyse consumptions and manage their networks accordingly.</p> <p>We also agree with the assertion of the consultation document that General Objective 3 is better facilitated by this change. The information that will be provided by the ETTOS will enable distributors to better meet the requirements of SLC 49.</p>	Noted
UK Power Networks	Non-confidential	The Consultation sets out clearly in Section 4 the manner in which the proposal better facilitates the DCUSA objectives.	Noted
Utility Warehouse	Non-confidential	Yes.	Noted

		<p>1. This better facilitates the General Objective One as the reduction of energy theft will enable Distributors to manage their network more efficiently by minimising losses on their network.</p> <p>2. General Objective Three is better facilitated as this assists Distributor's in their obligation to prevent and detect theft.</p> <p>3. With regards to General Objective Two, I don't believe that the introduction of the ETTOS will directly facilitate effective competition in the generation and supply market, however, it is arguable that the long term benefits and reduced costs could assist in a more competitive market.</p>	
Wales & West Utilities	Non-confidential	We believe it better facilitates SPAA relevant objective f	Noted
Supplier 1	Anonymous	<p>DCUSA – Objective 1, 2 and 3</p> <p>SPAA - SPAA Objective f</p> <p>This change supports parties with meeting their licence condition for detecting theft.</p>	Noted
RWE npower	Non-confidential	We agree with the justification for better facilitation of DCUSA objectives as mentioned in the CP form.	Noted

Company	Confidential / Anonymous	5. Are you supportive of the proposed implementation date of 5 Working days following Authority decision?	Working Group Comments
British Gas	Non-confidential	Yes	Noted

EDF Energy	Non-confidential	Yes. There are no system or process changes required to implement this change.	Noted
ESP Electricity	Non-confidential	Yes, we agree with the implementation date as proposed.	Noted
SGN	Non-confidential	SGN believes that a longer lead time will be required so that we can communicate the change out accurately across our business to ensure that we get the correct level of engagement and sign on from our various business units. In advance of the change being implemented the legal text concerns need to be discussed and addressed.	The group noted that the ETTOS Contract with the ETTOS Service Provider has been signed by SPAA and DCUSA Ltd and therefore the CPs should be implemented as soon as possible. In parallel with the progression of the CPs, a project will be undertaken to implement the ETTOS service which will engage all potential service recipients.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Yes	Noted
SP Manweb plc and SP	Non-confidential	Yes, we believe that this is sufficient time to accommodate	Noted

Distribution plc			
The Electricity Network Company, Independent Power Networks Limited, GTC Pipelines Limited and Independent Pipelines Limited	Non-confidential	Yes, subject to the necessary contractual provisions being in place.	Noted
SSE	Non-confidential	We are supportive of this implementation date as this proposal introduces obligations and should not impact existing processes.	Noted
UK Power Networks	Non-confidential	Yes, subject to recognition that the Service Provider must: (a) obtain access to ECOES and its gas equivalent; and (b) establish the email portal and work with Suppliers & Distributors to arrange User Accounts and test appropriately ahead of a full go-live of the service.	Noted
Utility Warehouse	Non-confidential	Yes	Noted
Wales & West Utilities	Non-confidential	When the legal text is satisfactory this Change Proposal can be implemented 5 Working days following Authority decision as our processes for theft are not yet part of our core systems. If they were we would need a longer implementation period.	Noted

Supplier 1	Anonymous	<p>We are happy with a 5 WD implementation or a standard release in June.</p> <p>We would like to have more information on the delivery plan so Service Recipients can prepare for the fully live service and the potential of receiving tip-offs prior to the service go live.</p>	The group noted that information regarding the implementation of the service will be provided over the next few months.
RWE npower	Non-confidential	RWE agrees that this is a reasonable timeframe within which to implement the change.	Noted

Company	Confidential / Anonymous	6. Do you have any other comments on the CPD 16/325 - DCP264?	Working Group Comments
British Gas	Non-confidential	No	Noted
EDF Energy	Non-confidential	No.	Noted
ESP Electricity	Non-confidential	<p>I think that there should be more detail about what the procedure will be where an email would come through requesting supplier information. For my understanding, the network operator would then send it back if we had the correct supplier information. If they are using ECOES then they would have the same information available as DNO/IDNOs, so what would our obligations be in this scenario? Would there be an obligation on DNOs/IDNOs to investigate these emails if a Supplier isn't found? Alternatively, would we just look at the same information and send it back? I think that the Working Group needs to clearly explain what obligations are expected to come into effect if the CP is approved and implemented.</p>	<p>The group noted that there are already obligations on DNOs/IDNOs in the distribution licence to prevent, detect and investigate theft. It is possible that the DNO/IDNO may be able to identify the supplier, even if this information is not available on ECOES. If there is an address but no registered supplier, then the DNO/IDNO would be required to follow the</p>

			<p>process set out in the Theft Code of Practice.</p> <p>The group concluded that no additional information was required in the legal text to clarify this.</p>
SGN	Non-confidential	<p>SGN believes that it would be beneficial to have a standard template that contains minimum information that would need to be passed onto Transporters when a supplier is not present on a site. The provision of minimum information in our opinion would increase the chances of the case being investigated successfully and in a timely manner. If an investigation relates to an unregistered site this will take time to investigate as such cases can be complex. SGN would be interested to know if there are any plans to have SLA's on the time it takes to investigate a site. If a customer comes to ETTOL and it is found that they have not got a gas supplier will ETTOL be proactively involved in ensuring that the end user finds a supplier or will this activity fall on the GT to pursue?</p> <p>Do the ETTOL have a criteria that they follow when deciding not to pursue a case reported by a member of the public, if such a criteria exists could this be communicated to Transporters so that we can ensure a consistent approach is followed if and when we decide not to pursue a case.</p>	<p>The information to be reported is included in the ETTOS Service Provider Operating Model. The group did not believe that there should be a specified minimum level of information as it was better for tip offs to be passed to the network operator and investigated if possible. The legal text allows the network operator to report back if they are unable to find out any additional information in relation to the tip off.</p> <p>The group noted that the ETTOS Service Provider will not be investigating tip offs. They will simply receive tip offs and pass them to the relevant recipient, provided there is sufficient information to pass the tip off on. Network operators should decide what action to take in order to meet</p>

			their licence and code of practice obligations.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	No	Noted
SP Manweb plc and SP Distribution plc	Non-confidential	<p>We support this introduction of the ETTOL and are believe that the inclusion of DNOs in the process is a positive step.</p> <p>We are happy to support the ETTOL in identifying Suppliers where it is not obvious who that supplier may be (we are very cognisant that there may be some data issues that may prevent correct identification in the first instance).</p> <p>We believe that there has been adequate consideration of safety issues, and while this is an important consideration across the Network, unregistered sites give us a greater degree of concern. We are also aware that there may be some learnings when the service goes live, and that there is a lot involved in this process, we are keen to support where we can</p>	Noted
SSE	Non-confidential	No further comments.	

The Electricity Network Company, Independent Power Networks Limited, GTC Pipelines Limited and Independent Pipelines Limited	Non-confidential	No	Noted
UK Power Networks	Non-confidential	An obligation is placed upon the Service Provider to inform the DNO or IDNO party of any electrical safety concern stemming from a tip-off received. Many Distributors will not act as the Revenue Protection agent for the metering point and theft situations don't normally involve interference with distribution assets. This process would operate most efficiently if the Service Provider was furnished with appropriate guidance such that only the most urgent situations are conveyed via this route; the Distributor may then apply their expertise in determining whether to attend ' <i>in extremis</i> ' in the furtherance of public safety. Any suspected tampering introduces a degree of safety concern but in lieu of a clear indication of immediate danger the tip-off should be routed to the Supplier in the normal manner.	Noted
Utility Warehouse	Non-confidential	No, I support that the CP fully addresses the requirements and benefits of the ETTOS.	Noted
Wales & West Utilities	Non-confidential	The process being introduced by Xoserve to provide data to the ETTOL only applies to large transporters. IGTs will need to raise a request to	The group agreed that the ETTOS Working Group should consider whether a

		provide a similar service for their supply points after the implementation of Project Nexus.	process is required for IGTs ahead of Project Nexus implementation and should also confirm that IGT data post Project Nexus is included in Xoserve's proposal.
Supplier 1	Anonymous	CPs were raised to introduce a breach process for the TRAS – will similar CPs be introduced for the ETTOS? In relation to Information Security/DPA how will the Service Provider demonstrate the portal security?	The ETTOS Schedule refers to the TRAS breach process to deal with ETTOS disputes. The group noted that information security and DPA issues will be considered by the ETTOS Working Group as part of the implementation process.
RWE npower	Non- confidential	No	Noted

Company	Confidential / Anonymous	7. Are you aware of any wider industry developments that may impact upon or be impacted by this CP?	Working Group Comments
British Gas	Non- confidential	No	Noted
EDF Energy	Non- confidential	TRAS – which has been considered.	Noted

ESP Electricity	Non-confidential	N/A	Noted
SGN	Non-confidential	SGN is aware of several industry initiatives that are currently being developed that may have an impact on this process. Currently UNC modification 574S "Creating the Permission to Release Supply Point Data to the Theft Risk Assessment Service" is under development. It is still unclear if this modification is required before ETTOL goes live furthermore if this modification is not approved then would it undermine the ETTOL. In addition to this UNC modification Xoserve are currently doing a piece of work to data clean address data again this may impact on the ETTOL therefore it may be worth considering delaying the go live of the ETTOL until this work is complete.	UNC Modification 574 relates to TRAS and is not relevant to the ETTOS service. The group noted that any improvement in gas data quality should assist the ETTOS process, however it was not appropriate to delay the implementation of the ETTOS until the data cleanse is complete.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	No	Noted
SP Manweb plc and SP Distribution plc	Non-confidential	No	Noted
SSE	Non-confidential	With the current review under CPD 16/331 of the definitions for 'Confirmed Theft' and 'Theft of Gas', we have concerns that this could	The group concluded that the ETTOS service is not impacted by the definition of confirmed

		have an impact on ETTOLS. It is our opinion that work on these definitions should be completed before ETTOLS is fully implemented.	theft, therefore it would not be appropriate to delay the implementation of the ETTOS service until after this definition is implemented.
The Electricity Network Company, Independent Power Networks Limited, GTC Pipelines Limited and Independent Pipelines Limited	Non-confidential	No	Noted
UK Power Networks	Non-confidential	No.	Noted
Utility Warehouse	Non-confidential	No	Noted
Wales & West Utilities	Non-confidential	No response	Noted
Supplier 1	Anonymous	No	Noted
RWE npower	Non-confidential	Not at present.	Noted