

DCUSA DCP 209 Consultation Responses – Collated Comments

Company	Confidential / Anonymous	1. Do you understand the intent of the DCP 209?	Working Group Comments
Working Group General Response		The Working Group noted that all respondents understood the intent of the DCP 209 change.	
British Gas	Non-confidential	Yes we understand the intend of DCP 209	Noted.
Electricity North West	Non-confidential	<p>Yes we understand the intent specifically the following taken from the change proposal:</p> <p>“The intent is to improve communications with unregistered customers, set out processes for managing unregistered customers up to, but excluding, the registration process itself and where necessary new obligations on parties.”</p> <p>however we are concerned that the intent is being watered down when you consider clauses 3.4 (focused on one scenario), 3.5 (honest customers) and 3.6 (illegal abstraction) of the consultation document.</p>	Noted. The Working Group agreed to include a more scenario based approach in this change.
GTC	Non-confidential	Yes	Noted.
Northern Powergrid	Non-confidential	Yes – This change proposal supports Ofgem’s policy intent as set out in its decisions on Tackling Theft of Electricity in relation to reducing losses. The intent is to improve the communication with unregistered customers with the aim of getting them registered by a supplier. It is clear that unregistered customers contribute to overall	Noted.

		system losses (resulting in the same effects as theft of electricity) and resolving such customers creates fairer outcomes for those customers who are registered normally and pay for their energy in the normal manner.	
RWE npower	Non-confidential	Yes. The intent of the DCP is to put in place an industry process for addressing unregistered customers.	Noted.
Scottish Power Energy Retail Ltd	Non-confidential	Yes	Noted.
Scottish Power Networks	Non-confidential	Yes	Noted.
SSE Energy Supply	Non-confidential	Yes	Noted.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Yes	Noted.

UK Power Networks	Non-confidential	Yes.	Noted.
Western Power Distribution	Non-confidential	Yes	Noted.

Company	Confidential / Anonymous	2. Are you supportive of the principles of the DCP 209?	Working Group Comments
Working Group General Response		The Working Group noted that all respondents were supportive of the principles of the change.	
British Gas	Non-confidential	We are supportive of the principles of DCP 209. All correctly registered customers are picking up the costs of customers who are receiving a supply but are not registered to a supplier.	Noted.
Electricity North West	Non-confidential	We support the principle to get unregistered customers registered but have some concerns that the intent may not deliver this to its full extent.	Noted. Please refer to the Working Group response to question 1.
GTC	Non-confidential	Yes	Noted.
Northern Powergrid	Non-confidential	Yes, we are fully supportive of the principles of DCP 209. While the DNOs have obligations under SLC 49 in respect of unregistered customers it is only suppliers that can agree contracts with such customers and register them. Therefore, Distributors will need assistance from Suppliers to effectively and efficiently resolve unregistered	Noted.

		<p>customers.</p> <p>The change should ensure that all DCUSA Parties are aware of what is required of them and ensure a consistent approach throughout the industry via clear obligations, supporting processes and efficient communications to assist unregistered customers to get them a supply contract (and subsequent registration).</p>	
RWE npower	Non-confidential	<p>Yes. Unregistered customers do not contribute any payments towards the cost of energy or associated costs, such as maintaining a network. These costs are generally passed onto other customers and suppliers, which is unfair and impacts competition. The industry process to tackle this issue must be fair, transparent and take into account the circumstances of these individuals who are unregistered customers. Additionally, the process should cater for individuals who are unwilling to engage with the industry in this matter, which may result in disconnection in some cases.</p>	<p>Noted. The Working Group agreed to add a DNO decision process step on whether to disconnect a premises having taken in to consideration whether the consumer is vulnerable, site visit and d</p>
Scottish Power Energy Retail Ltd	Non-confidential	Yes	Noted.
Scottish Power Networks	Non-confidential	Yes	Noted.
SSE Energy Supply	Non-confidential	Yes	Noted.
Southern	Non-	Yes - this Change Proposal provides a model to comply	Noted.

Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	confidential	with Standard Licence Condition 49 and DCUSA Schedule 23.	
UK Power Networks	Non-confidential	Yes. Unregistered customers are non-standard and inevitably fall foul of normal 'New Customer' registration processes. New obligations setting out how DNOs and Suppliers must work cooperatively to progress customers to MPAN registration will help. Mitigating system losses benefits all consumers through lower bills.	Noted.
Western Power Distribution	Non-confidential	Yes	Noted.

Company	Confidential / Anonymous	3. Do you prefer the approach of best practice Stage 1 Template Letter A or Stage 1 Template Letter B? Please provide your rationale.	Working Group Comments
Working Group General Response		The Working Group noted each respondent's preference for either template letter A, B or both letters and those respondents who chose to provide feedback on the letters rather than provide their preference.	
British Gas	Non-confidential	Our preference is Template Letter B. This letter reads better and guides the customer through the process	Noted.

		better	
Electricity North West	Non-confidential	<p>Whilst we acknowledge that the letters provided are optional (and should remain so), we offer the following comments on the letters only and not when and if they need to be sent:</p> <p>Any letter should be written based on an initial investigation and this may include discussions with the customer. Indeed it may be as a consequence of a customer moving into premises that such a situation arises so any communication should be written in an appropriate tone for the situation at hand.</p> <p>The first (soft) letter is open ended with no deadlines. We would prefer a notification in the first letter so they understand what will occur should they not provide the relevant information or appoint a supplier of their choice by such a deadline.</p> <p>All the letters infer that an MPAN exists, this is not true in all unregistered instances and as such dialogue with the customer is required to determine this. We may have to create an MPAN for them to quote to the supplier of choice and provide it within the letter. They may be written in such a way because of the decision by the working group to limit the scope to this instance. We believe that this is potentially misleading and as such may need to be very clear in the legal text as to what it is referring to.</p> <p>We don't understand the relevance of the 'get financially fit' link on the Ofgem website – this link has no relevance</p>	<p>Noted. The Working Group noted that the proposed letters are template letters and should be modified to take in to consideration any discussions undertaken with the customer. It is noted that these letters are templates based on the legal advice received from DCUSA to show Parties the powers that they can act upon.</p> <p>Distributors are free to communicate with customers in any manner which they prefer and customise their communication process accordingly such as phone, e-mail, letter etc.</p> <p>The Working Group agreed to develop a template letter for those customers who do not have an MPAN. The Working Group noted that the template letters were provided to act as a basis for letters that Distributors may need to tailor and not for every specific unregistered customer scenario.</p> <p>The Working Group noted that there were 5 different links</p>

		<p>to these situations and could exacerbate the problem by being seen as condescending and indeed where the customer is illegally extracting electricity completely irrelevant, it would be better to direct them to the following link http://www.goenergyshopping.co.uk/en-gb to assist customers in choosing a supplier.</p> <p>There is also no reference to the fact that theft in conveyance charges may be levied on the customer should they fail to register a supplier by the allotted timescale.</p>	<p>proposed and agreed to ask Ofgem if they had a preference for the best website link for the consumer to determine their preferred Supplier.</p> <p>The Working Group agreed to amend the hard letter in regards to cost implications.</p>
GTC	Non-confidential	<p>We prefer Stage 1 template letter B as this template is much more logically set out and clearer to the consumer which actions need to be taken. Template A does not get the point across clearly enough and there are one or two issues with the layout which would require correcting for example asking for supplier information twice.</p> <p>In our experience with our gas processes we have found that placing some text which will appear in a letter window can also encourage more response from an end user. We use "Important Information- Please Read" which is highlighted in red. We adopted this process as in some cases Consumers assume that the letter is a circular and do not open/bin the letter. We found that we get a lot more active engagement by completing this simple step.</p>	<p>Noted.</p> <p>The Working Group agreed to include some proposed wording in the window of the letters.</p>
Northern Powergrid	Non-confidential	<p>Northern Powergrid believes both letters serve the intended purpose and Northern Powergrid intends to use both depending on the specific circumstances or relevant</p>	<p>Noted.</p>

		stage in the communication process. Letter A provides some background on who the distributor is and what the distributor is trying to achieve. Letter B assists the customer further by providing the customer with a step by step guide to getting registered with their chosen supplier.	
RWE npower	Non-confidential	Neither. Please see response to Q6.	Noted. Please see the Working Group response to question 6.
Scottish Power Energy Retail Ltd	Non-confidential	Whilst both letters are appropriate, our preference is Template B, which sets out timescale of 14 days for customer to respond.	Noted.
Scottish Power Networks	Non-confidential	We prefer Stage 1 Template Letter A, as we believe that this is clearer set out for the Customer, and affords them the opportunity to feed back in a structured format. Upon receipt of the completed details from the Customer, this template also evidences the information that the Customer has provided where forward action to a Supplier is required, or for Audit purposes going forward.	Noted.
SSE Energy Supply	Non-confidential	Stage 1 template letter A is our preferred option, Letter B has more restrictive options for customers	Noted.
Southern Electric Power Distribution plc and Scottish Hydro	Non-confidential	We prefer Letter B as it contains clearer instructions on how to register with a supplier and puts greater onus on the customer to respond.	Noted.

Electric Power Distribution plc			
UK Power Networks	Non-confidential	Template Letter A seeks to collect more potentially useful information but Template Letter B is substantially clearer and more straightforward. In our experience many unregistered customers do not have English as a first language so simplicity is important.	Noted. The Working Group agreed to draft a simple and straight forward letter.
Western Power Distribution	Non-confidential	Please see answer to No 4	Noted.

Company	Confidential / Anonymous	4. Do you prefer the option of having both best practice Stage 1 Template Letter A or Stage 1 Template Letter B available for use?	Working Group Comments
Working Group General Response		The Working Group noted that the majority of respondents preferred that both best practice Stage 1 Template Letter A and Stage 1 Template Letter B be made available to Parties.	
British Gas	Non-confidential	Ultimately it is a decision for the distributor as to which letter to send. Perhaps we could trial the letters and see which one gets the best results	Noted.
Electricity North West	Non-confidential	We believe that there are many letters that will be required tailored to the situation at hand rather than the default letters suggested.	Noted. The Working Group noted that these letters are templates and not mandated and may be customised by DNOs.

		We also do not believe that template A is best practice, because best practice is for the customer to liaise with their supplier of choice and not the distributor. That said template B is less empathetic.	
GTC	Non-confidential	We believe that Letter B is the superior letter however we would not have an issue with other parties wishing to use template letter A. It would seem a sensible compromise to allow both sets of letters if there is a split preference.	Noted.
Northern Powergrid	Non-confidential	Both letters should be available to Distributors to provide the flexibility to choose which letter best suites the scenarios encountered when dealing with unregistered customers.	Noted.
RWE npower	Non-confidential	Please see response to Q6.	Noted.
Scottish Power Energy Retail Ltd	Non-confidential	Yes, we believe both templates cover full requirements.	Noted.
Scottish Power Networks	Non-confidential	We would prefer the option of having both Stage 1 templates available for use. Although we have expressed a preference for Template A, we feel it would be beneficial for parties to have the ability to assess their preference of template against the actual customer response rate to ensure the maximum benefit in issuing the correspondence to Customers.	Noted.
SSE Energy	Non-	Option of both letters	Noted.

Supply	confidential		
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	It is useful to have both available as this allows for differing situations and facilitation of the most appropriate action for the end customer.	Noted.
UK Power Networks	Non-confidential	Yes, we support both versions being included as examples for parties to follow. However, it is important that these are provided for guidance and parties are free to draft their own letters in accordance with their internal policies and processes. Parties may develop more effective text and/or need to incorporate additional sections such as notification of charges to be levied where 'Unregistered' crosses into the realms of 'Theft-in-Conveyance'.	Noted. The Working Group agreed that they would incorporate text on the notification of charges in a draft template letter.
Western Power Distribution	Non-confidential	Prefer the option to have both Stage 1 A & B available – a syou can then send a soft or harder version depending on your requirements.	Noted.

Company	Confidential / Anonymous	5. What do you think the timescales should be between best practice Stage 1 and Stage 2 letters? Please provide your rationale.	Working Group Comments
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Working Group General Response		The Working Group noted that the majority of the respondents proposed approximately one month between the issuing of the Stage 1 and Stage 2 letters as best practice. The Working Group agreed to consider the cooling off period in the customers registration process in this communication (Stage 1 Letter B and Stage 2 Letter) by including the wording “If you have already entered in to a contract with your Supplier then please ignore this letter” and the relevant legal text to reflect this.	
British Gas	Non-confidential	Customers need to be given sufficient time to respond to the initial letter and agree a contract with a customer. I would have thought 28 days should be sufficient	Noted.
Electricity North West	Non-confidential	We believe that 30 days is sufficient time to progress this to the next stage.	Noted.
GTC	Non-confidential	2 weeks should be a sufficient amount of time to allow between letters. We have found this is a reasonable time frame under our gas processes and that there should be a relatively similar approach between industries. In addition consumers are unlikely to be away from a property for more than 2 weeks without some form of postal management arrangements in place. This may be different for some commercial properties but parties could use their discretion in such cases.	Noted. The GTC respondent clarified that they would also be happy with a 1 month timescale between Stage 1 and Stage 2 letters.
Northern Powergrid	Non-confidential	1 month between stage 1 and stage 2 this will allow the supplier enough time to register the customer if contact has been made prior to issuing the stage 2 letter.	Noted.
RWE npower	Non-confidential	The time period between the two letters should be balanced between giving the customers enough time to respond whilst not so long that the initial correspondence has been forgotten. We would suggest that two – four weeks would be optimal.	Noted.

Scottish Power Energy Retail Ltd	Non-confidential	Our understanding is Template letter B, states that a response is required within 14 days, therefore to ensure the integrity of the process, we would suggest that the gap between first and second letters should not exceed 28 days.	Noted.
Scottish Power Networks	Non-confidential	We believe that the timescales between Stage 1 and Stage 2 should be in the region of 6-8 weeks. We anticipate that this will be adequate to allow for the following to have taken place: <ul style="list-style-type: none"> • Customer to contact Supplier and negotiate contract • Supplier to send registration for site (assuming that Customer Cooling off period is included in this process) • Supplier to resubmit registration in cases where there are Rejections 	Noted.
SSE Energy Supply	Non-confidential	10 days which is in line with current business practises	Noted.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	One calendar month would allow for completion of registration processes for both commercial and domestic customers. Any shorter timescale for follow up could result in wasted effort as the registration could be underway. ECOES / MPRS can be monitored for progress during this period.	Noted.

UK Power Networks	Non-confidential	We would consider this a decision to be taken by individual parties. However, if there has still been no communication with the customer 28 days after the issue of the second copy of the 'soft' Stage 1 letter then proceeding to Stage 2 appears appropriate and necessary.	Noted.
Western Power Distribution	Non-confidential	1 month	Noted.

Company	Confidential / Anonymous	6. Do you have any comments on any of the detail of the proposed best practice letters?	Working Group Comments
British Gas	Non-confidential	<p>Stage 1 Letter A:</p> <ul style="list-style-type: none"> I would add question numbers so that the 'have you answered' can refer to the relevant question. The question about the MPAN I would include that this is the bottom line of the S number and that it is also the MPAN both terms can exist on customer communication and there could be other 13 digit numbers on a bill starting 15 or 23. I would highlight that the 15/23 is DNO specific. Length of time at property – I would change this to 'exact date or where not known years & months'. <p>Stage 1 Letter B:</p> <ul style="list-style-type: none"> For the 1st 2 "If you do" I would add 'for the address shown above' to make it clear it 	Noted. The Working Group agreed to re-draft the template letters based on the feedback provided by the respondents to question 6.

		<p>specifically applies to this property in case the customer has more than one property.</p> <ul style="list-style-type: none"> • The question about the MPAN I would include that this is the bottom line of the S number and there could be other 13 digit numbers on a bill starting 15 or 23. • I would highlight that the 15/23 is DNO specific. <p>Stage 2 Letter:</p> <ul style="list-style-type: none"> • I would highlight the potential costs associated with getting the supply restored if it is cut off and the customer subsequently asks for it to be reconnected. • What safeguards are being proposed for vulnerable individuals who may not be able to read / understand the letters? • Is there a health risk that the distributors could disconnect individuals who have vital medical equipment? 	
Electricity North West	Non-confidential	See response to Q3 and Q4.	Noted. Please see the Working Group response to question 3 and 4.
GTC	Non-confidential	<p>We have a concern with regards to stipulating: “An MPAN is a thirteen digit number beginning [15/23].”</p> <p>On the basis that the situation with the MPAN may be related to being on a different network or “crossed/duplicated networks”. It may be better to provide a list of networks and their starting MPAN numbers however we agree that this would make the letter less fluid. It could be added as an extra attachment</p>	The Working Group noted that once the DNO has determined that the customer is connected to their network and not an IDNO network then there should be no issue with an MPAN being issued with a prefix. The Working Group agreed to research the MPANs and prefixes to be referenced in the standard letter.

		however or at the end of the letter. We would welcome a debate on this within the working group. It may be an overthought point but it would seem prudent to avoid confusion for the consumer as much as possible either by inclusion or exclusion.	
Northern Powergrid	Non-confidential	Northern Powergrid contributed significantly to the drafting of the letters so we have no comments to make at this stage, although we believe the working group will benefit from comments made by other DCUSA parties.	Noted.
RWE npower	Non-confidential	Both letter templates have separate advantages over the other. We would suggest a single version is created taking the appropriate elements from each. Specifically: <ul style="list-style-type: none"> • Letter A has a form for customers to respond and more methods of responding i.e. mail. • Letter B has a clearer step by step process for the customer to follow. Perhaps the letters could be combined	Noted. The Working Group agreed to add a third letter which will be a hybrid of Letter A and Letter B. A fourth letter may be drafted that would be limited to 1 page for use in some circumstances.
Scottish Power Energy Retail Ltd	Non-confidential	We are comfortable with the detail on the proposed best practise letters.	Noted.
Scottish Power Networks	Non-confidential	We are supportive of the best practice letters, however would anticipate that there may be tweaks that each party may make to align with their business protocol	Noted.
SSE Energy	Non-	Would like to see 'Urgent action required' in large bold at	Noted. The Working Group agreed to add wording in the

Supply	confidential	the top of the letter to encourage the customer to read the initial letter which could reduce the need for follow up actions	Window to encourage customers to read the letter and bold lettering at the top of the template letters.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	The letters appear to be lengthier than optimum, as our experience has shown that a letter longer than one page loses effectiveness. We would not generally implement return slips as the success rate with these in practice has proven to be very low.	Noted. The Working Group agreed to draft a 1 page letter.
UK Power Networks	Non-confidential	While we would likely make some small variations to the 'Best Practice' letters the broad thrust and message imparted seems correct. Stage 1 Template B refers to a guidance leaflet for registering with a Supplier but this hasn't been drafted as part of the consultation pack. We'd also observe that the Ofgem Website link quoted "get-financially-fit-and-save-over-£2000-2015" looks incongruous in this context. If the letter templates or attachments are to be published by DCUSA they should have the company name and area in the drafts removed.	Noted. The Working Group noted that the guidance document was circulated to members and for it to be included in the final DCP 209 documents.
Western Power Distribution	Non-confidential	NO	Noted.

Company	Confidential / Anonymous	7. Do you support the proposed high level outline process?	Working Group Comments
British Gas	Non-confidential	Yes we support the process	Noted.
Electricity North West	Non-confidential	No, this covers off only one scenario of many.	Noted.
GTC	Non-confidential	Yes we are supportive of the high level process	Noted.
Northern Powergrid	Non-confidential	Yes we support the high level process. In addition Northern Powergrid believes if appropriate obligations are created for both distribution and supply parties the overall process for getting unregistered customers registered will improve. We invest a significant amount of resource to identify and try to resolve unregistered customers, however, without supporting assistance and registration by the supplier the customer will remain unregistered. Introducing obligations to support the outline process will assist in the clarity of appropriate communication with the customer by the supplier and should ensure the loop is closed and ensure that, where necessary, actions continue to be taken in respect of customers which remain unregistered.	Noted.
RWE npower	Non-confidential	Yes. The high level process takes into account the requirement for DNOs to contact the unregistered customers and for suppliers to feed back any progress with registering these customers.	Noted.

Scottish Power Energy Retail Ltd	Non-confidential	Yes	Noted.
Scottish Power Networks	Non-confidential	Yes	Noted.
SSE Energy Supply	Non-confidential	Yes	Noted.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Yes. This mirrors our current processes.	Noted.
UK Power Networks	Non-confidential	Section 5.8 of the draft legal text would suggest that the High Level Process is outlined in Appendix 2. However, there is no Appendix 2 – it jumps from Appendix 1 to Appendix 3. Nevertheless, in lieu of such text we are in agreement with the processes envisaged by the draft outline process diagram.	Noted. The Working Group noted that the high level process diagram had been mislabelled as Appendix 3 as opposed to Appendix 2 and to amend it in the draft legal text.
Western Power	Non-confidential	Yes	Noted.

Distribution			
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Company	Confidential / Anonymous	8. Do you have any comments on the DCP 209 draft outline process diagram?	Working Group Comments
British Gas	Non-confidential	<ul style="list-style-type: none"> • Should the distributor notify us that we would be the customers preferred supplier we will need a process to contact the customers to agree a contract <ul style="list-style-type: none"> ○ Will we have set guidelines on how to contact customers and timescales? ○ If we are unable to contact a customer what happens to them? ○ If we contact a customer but they refuse to agree a contract what happens then? Process states to inform distributor but not how this would happen • If properties are empty will there be risks of individuals not receiving letters (i.e. a holiday home that is empty over the winter) 	<p>Noted. The Working Group noted that the most effective method of communicating with the customer is via mobile phone. The Working Group agreed to provide best practice inboxes such as those set out in Schedule 23. This will include a log of the attempts that Parties have made to contact the customer to register their supply.</p> <p>If the customer refuses to register their supply, there are two alternatives:</p> <ol style="list-style-type: none"> 1. the DNO starts to bill for energy which creates a subset of customers being managed by the DNO for meter use but is not a substitute for getting the customer registered; or 2. the premise is disconnected. <p>The Working Group considered that the majority of unregistered consumers should be resolved through the unregistered customer registration process proposed in this change and will be up to the DNO to customise their approach to each customer.</p>
Electricity North West	Non-confidential	No, this covers off only one scenario of many. At any time information received may put on hold the process which is not covered off.	Noted.
GTC	Non-	It's not clear within the process diagram which processes	Noted. The Working Group agreed to look at the drafting in

	confidential	are “mandatory” and which could be adapted depending on the business/party. The diagram itself is a little difficult to follow in terms of exactly what should happen where/when however we are satisfied that it does cover the main points of the schedule.	Schedule 23 on obligations and best practice.
Northern Powergrid	Non-confidential	If DCP 209 is approved such that all parties are required to follow the key process steps Northern Powergrid believes that DNO’s will see steady reductions in the number of unregistered customers. The key to the process is efficient and effective communication between the Distributors, Suppliers and customers.	Noted.
RWE npower	Non-confidential	Yes. The process does not take the scenarios into account where: <ul style="list-style-type: none"> • A customer does not respond at all to the DNO lettering/ contact efforts. The customer is unable (non-domestic only) or unwilling to sign a supply contract.	Noted.
Scottish Power Energy Retail Ltd	Non-confidential	We understand the process in relation to Supplier actions and have no further comment.	Noted.
Scottish Power Networks	Non-confidential	We believe that the draft outline process is an accurate representation of how the process is anticipated to work.	Noted.
SSE Energy Supply	Non-confidential	No	Noted.

Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	We would prefer to see actual obligations recorded on the diagram rather than potential ones. This needs further development work by the Working Group.	Noted.
UK Power Networks	Non-confidential	It may be necessary to re-examine the arrows from Supplier: 'Response received from Customer' and Distributor: 'Response received from customer' and ensure they link to the appropriate boxes in the section beneath	Noted. The Working Group agreed to re-examine the arrows.
Western Power Distribution	Non-confidential	NO	Noted.

Company	Confidential / Anonymous	9. Do you have any suggestions to help ensure the efficient implementation of the outline process, including if there are any missing elements or potential further refinements?	Working Group Comments
British Gas	Non-confidential	The collection of accurate meter technical details and start meter reading will be a pre-requisite before we could fully complete any registration of a customer. Are DNO's proposing to collect this information for Suppliers or will	Noted. The Working Group agreed that either one would have to: <ul style="list-style-type: none"> Trust the meter provided Collect meter data

		Suppliers agents be expected to visit and obtain this information. If this information was provided by the customer on the letter templates would this be sufficient to meet requirements for registration. We would want to ensure that Distributors take the appropriate action where vulnerable customers are identified should disconnection be threatened	<ul style="list-style-type: none"> • Or swop the meter.
Electricity North West	Non-confidential	No	Noted.
GTC	Non-confidential	We are happy that this process covers the main points in order to resolve an unregistered customer.	Noted.
Northern Powergrid	Non-confidential	From our direct experience Northern Powergrid believes there would be additional benefits if DCUSA Parties each had one point of contact for resolving unregistered customers. As these customers fall outside of normal business as usual registration processes for newly metered customers and change of supplier. We believe that having direct contact points would ensure that Distributor's and Supplier's subject matter specialists could work together to resolve unregistered customers.	Noted. The Working Group noted that this respondent had a preference for a point of contact for unregistered customers. The Working Group agreed that Parties should be obligated to exchange contact details in order to resolve these unregistered customers without prescribing the type of contact itself.
RWE npower	Non-confidential	No.	Noted.
Scottish Power Energy Retail Ltd	Non-confidential	We suggest that there is a requirement to review the proposed Code of Practice in relation to the visit procedure.	Noted. The Working Group noted that a cold call to the premises may be required to engage with the customer but that an appointment would be needed for a meter exchange to take place. The Working Group agreed to review Schedule 23 to see what elements may be applicable to the DCP 209 change and could be incorporated. The investigation will need to guide

			which type of call is made. Cold calls could be accommodated under infill work.
Scottish Power Networks	Non-confidential	We do not at this point believe that there are any areas that are missing that were in the remit of the workgroup.	Noted.
SSE Energy Supply	Non-confidential	No	Noted.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	The Working Group need to carry out further work to refine the process, with a focus on obtaining and sharing customer contact details, so that key information can be shared and acted upon in the most efficient way.	Noted. Please see previous Working Group responses on an obligation to obtain and share information.
UK Power Networks	Non-confidential	The efficient implementation of the outline process is dependent on effective communication between Distributors and Suppliers. As a process operating outside of the Data Transfer Network there's the issue of producing and maintaining lists of email contacts.	Noted. The Working Group considered that if the customer provided a preference for Supplier A then those contact details can be shared with SupplierA.
Western Power Distribution	Non-confidential	It would be beneficial for all suppliers & DNO's to provide contacts within their organisations for Unregistered Customers resolution	Noted.

Company	Confidential / Anonymous	10. Do you have any comments on the proposed obligations and best practice as set out in the draft legal text?	Working Group Comments
British Gas	Non-confidential	<ul style="list-style-type: none"> • 5.2(b) Full stop missing after 'Act'. • 10.2 – If the site is unregistered how can the customer be on the PSR? 	Noted. The Working Group agreed to review the formatting and the reference to the PSR.
Electricity North West	Non-confidential	<p>Why is this being raised as a separate schedule when theft in conveyance is also considered under schedule 23? Is the intent to remove any reference to theft in conveyance to this new schedule?</p> <p>Customer details – not all instances have metering data so suggest changed to 'if appropriate'</p> <p>Why are we referencing Section 2B in the definition of De-energisation?</p> <p>Supplier – definition is not correct in all instances where it is used throughout the code of practice especially since this is covering pre registration activities. Perhaps it should be limited to the first part of the definition (pre the brackets)</p> <p>Unregistered customer – this needs a better definition since an untraded MPAN can still have a registered supplier.</p> <p>Unregistered premises – as above</p> <p>Vulnerable customers – we are creating a further housekeeping issue here which is already on the DCUSA</p>	Noted. The Working Group determined that an unregistered customer is not necessarily a thief so a separate schedule was devised. A subsequent change to Schedule 23 may need to be added to link the registration of theft cases to this new schedule.

		<p>housekeeping log as a consequence of DCP054. Ofgem talk of vulnerability and not vulnerable customers. We should therefore amend this to cater for such a definition.</p> <p>Para 3.2 – does the working group believe that no gaps are being created here by such a reference?</p> <p>3.4 b – trend data? This is not trend data but actual instances. We also do not like the term ‘management of customers’.</p> <p>4.1 ‘available industry data’ what does this mean?</p> <p>5.1 – whilst this may well be an approach we adopt it is the customer’s responsibility to register a supplier and liaise directly with them.</p> <p>5.2b – why monthly updates – They should be registered by that time? This just further exacerbates theft in conveyance</p> <p>5.2c – this will depend on the circumstances since there is no supplier registered it will be disconnected with a little ‘d’. There will be no communication between parties since the MPAN status is either ‘N’ or nonexistent.</p> <p>10 – why is such an obligation just placed on distributors?</p> <p>10.2 how can they be on a priority services register?</p> <p>11 – we use Customer and Unregistered Customer throughout this section. Please review and determine which is appropriate for the section it is contained within.</p>	<p>Noted. The Working Group agreed to consider whether to include a definition of vulnerable customers from Schedule 23 or the Ofgem definition of vulnerability in this change and consequentially change Schedule 23 if required as part of the proposed solution to this CP.</p> <p>The Working Group agreed to review a draft version of the new Schedule including the comments provided by respondents.</p>
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GTC	Non-confidential	No	Noted.
Northern Powergrid	Non-confidential	New obligations should ensure each party is aware of what is required of them. Best practice elements are clearly optional but will always provide guidance on what the industry believes to be best working practice.	Noted.
RWE npower	Non-confidential	<p>Yes.</p> <ul style="list-style-type: none"> • 3.2 'tampering' and 'Theft in Conveyance' are not needed as covered by the Theft of Electricity definition. • 3.4 (b), Unsure of the benefits in collecting trend data and how this can be achieved? • 4.1 (a) <ul style="list-style-type: none"> o Superfluous ';' at the end of the sentence, or; o Add (b) which is 'act on tip offs from others e.g. supplier.' • 5.1 (a) Need to be clear that DNO is responsible for informing occupier that they are required to obtain a supply contract and additionally, capturing relevant contact details. This is not currently clear. • 5.1 (b) End of sentence needs tidying. • 5.2 (a) Superfluous ';' at end of sentence. • 5.2 (c) Also need to capture non-domestic customers who are unable to agree a supply contract within this point. 	Noted.

		<ul style="list-style-type: none"> • 5.3 Superfluous ‘;’ at the end of the sentence. • 5.4 Need to add that this will take place after a contract has been agreed with the customer. • 5.6 Perhaps worth adding that it needs to be a valid email address. • 9.1 Unsure if this visit will always be ‘without prior notification’. • 11 As noted in Q12, rather than referring to the individual on site as an unregistered customer, occupier may be more accurate. • Appendices – There is a superfluous ‘4’ in the list of appendices. 	
Scottish Power Energy Retail Ltd	Non-confidential	No	Noted.
Scottish Power Networks	Non-confidential	None	Noted.
SSE Energy Supply	Non-confidential	No	Noted.
Southern Electric Power Distribution plc and Scottish Hydro Electric	Non-confidential	The obligations appear reasonable and mirror the Revenue Protection Code of Practice.	Noted.

Power Distribution plc			
UK Power Networks	Non-confidential	The split between Obligations and Best Practice recommendations appears sensible.	Noted.
Western Power Distribution	Non-confidential	NO	Noted.

Company	Confidential / Anonymous	11. We would like to draw Parties attention to Clause 8.4 of the legal drafting and request that Parties suggest the timescales for the process steps outlined within that Clause?	Working Group Comments
British Gas	Non-confidential	W = 28 days X = 14 days 7 = 7 days We assume that stage (e) of the process will be dependent on the results of the site visit in stage (d) should the distributor decide to carry out a visit.	Noted. The Working Group agreed to remove the reference to a timescale as it is at the DNOs discretion.
Electricity North West	Non-confidential	This is under best practice and as such may not be followed in the order identified. We may visit in advance of any formal notifications to the customer. The initial letter doesn't follow a report production but follows the identification of the potential unregistered customer situation and may not result in a letter being sent once the initial investigation has been undertaken (stuck in supplier/distributor internal processes) so no fixed terms	Noted.

		can be followed.	
GTC	Non-confidential	<p>Our suggestions are as follows:</p> <p>W: 5</p> <p>X: 10</p> <p>Y: 5</p> <p>We see no reason that timescales need to be overly long since parties can adopt their own timescales according to the legal text. It would seem reasonable therefore to encourage parties to be as quick and efficient as possible whilst bearing in mind that not all circumstances and situations will allow for this which means they will be longer as a result.</p>	Noted.
Northern Powergrid	Non-confidential	<p>Northern Powergrid suggests the follow timescales in respect of Clause 8.4:</p> <p>8.4 (b) 7 working days following production of the report.</p> <p>8.4 (d) Site visit (where deemed appropriate) to be carried out 20-25 working days following issuing of stage 1 letter.</p> <p>8.4 (e) Within 5 working days of receiving site visit results a stage 2 letter will be issued to the customer.</p>	Noted.
RWE npower	Non-confidential	<p>Yes, plus other suggestions:</p> <ul style="list-style-type: none"> • 8.4 refers to the process diagram, probably helpful if we include the appendix reference in the final document. • 8.4 (a) Need to be clear that this is an action for 	Noted.

		<p>DNOs rather than Parties.</p> <ul style="list-style-type: none"> • 8.4 (b) W should be one month. • 8.4 (d) X should be 2 weeks. • 8.4 (e) Y should be 2 weeks after (d) or maximum one month after (b) as steps (c) and (d) are effectively optional. 	
Scottish Power Energy Retail Ltd	Non-confidential	Please refer to comments on question 5. In the scenario the customer is in the process of registering and receives a 2nd letter, the expectation would be that the customer would contact the Distribution Network Operator to inform of action taken.	Noted.
Scottish Power Networks	Non-confidential	<p>We would suggest that a minimum of 10 working days would be sufficient to issue a letter to the Customer. We believe that this will allow for internal checks to take place in the first instance, and for any file creation and production of letters.</p> <p>It is worth noting that upon implementation that the 'New' file will contain all records. We believe that a phased approach should be taken in the issue of letters at this stage, and that clause 8.4 should be applicable to the run following the initial one.</p>	Noted.
SSE Energy Supply	Non-confidential	We believe this needs to be clarified as 8.4 d mentions 'If the Distributor decides, at their sole discretion, that a site visit is warranted then this will be carried out within X Working Days of the issue of a Stage 1 letter; ' We would have thought this would still not occur until after stage 2 and would prefer more time to look at the timescales.	Noted.
Southern	Non-	When an unregistered customer has been identified a	Noted. The Working Group agreed to utilise the Section 8.4

Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	confidential	Stage 1 letter should be sent within 10 working days. This should be followed up with a Stage 2 letter after one month. The 7 working days for a potential de-energisation or disconnection is standard.	legal text drafting proposed by SSE and modified by the Working Group.
UK Power Networks	Non-confidential	Although such timescales are merely 'Best Practice' it is difficult to apportion specific and definitive timescales to all steps. For example, 8.4 (b) might reasonably be carried out within 10WD but 8.4 (d) may depend on the Distributor's capacity to schedule a site visit by appropriately qualified persons. Furthermore, where the provenance of a connection point is uncertain or it's safety in doubt then a site visit might be necessary BEFORE the issue of a Stage 1 letter. The issue of a Stage 2 letter may be influenced by the outcome of a site visit and may not naturally follow within a short, pre-determined time. Section 3.4 of the Consultation notes the range of scenarios that may be encountered and accordingly recognises the interplay with both DCUSA Schedule 23 and Distributor's Licence Condition 49 which involve additional elements potentially impacting resolution timescales.	Noted.
Western Power Distribution	Non-confidential	8.4 b – DNO should issue stage 1 letter within 7WD of the monthly report being produced 8.4 d – 14 8.4 e - 14	Noted.

Company	Confidential/ Anonymous	12. Do you have any other general comments on the proposed legal text?	Working Group Comments
British Gas	Non-confidential	We do not specifically mention Smart meters. Going forward the processes for installing and commissioning Smart meters should be much more tightly controlled than for legacy metering and therefore the potential for customers to get connected without being registered should be more limited. However we may need to think about whether we need to make any specific mention for smart metering.	Noted. The Working Group agreed that the installation of smart meters will clarify the meter data but it will not address those customers who are unregistered who will still be on a legacy meter system. It was noted that future industry change including UPRN's may help to identify unregistered customers from other utility records.
Electricity North West	Non-confidential	We have concerns over the use of either schedule 23 or this one and how they interact. A review of both should be undertaken to ensure that there are no clashes of obligations. Schedule 23 still, has issues regarding De-Energisation, Disconnection and Vulnerable Customers. By keeping this as a separate schedule we are creating a further interpretation issue.	Noted. Please see the previous Working Group response.
GTC	Non-confidential	n/a	
Northern Powergrid	Non-confidential	Northern Powergrid contributed significantly to the drafting of the legal text so we have no comments to make at this stage, although we believe the working group will benefit from comments made by other DCUSA	Noted.
RWE npower	Non-confidential	Yes. Perhaps worth checking the document and where a customer is not yet proven to be an unregistered customer, referring to them as 'the occupier' rather than an	Noted. The Working Group agreed to consider whether to use the term occupier as opposed to unregistered customer.

		unregistered customers. The term used is inconsistent throughout the document.	
Scottish Power Energy Retail Ltd	Non-confidential	No	Noted.
Scottish Power Networks	Non-confidential	None	Noted.
SSE Energy Supply	Non-confidential	No	Noted.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Please refer to our comments and suggested amendments in the marked up text enclosed with our response.	Noted.
UK Power Networks	Non-confidential	No.	Noted.
Western Power Distribution	Non-confidential	NO	Noted.

Company	Confidential / Anonymous	13. DCUSA Schedule 23 Revenue Protection Code of Practice (CoP) is considered to contain sensitive information and as a result is not published on the external section of the DCUSA website. Do Parties consider that a similar requirement should be applied to the new Schedule proposed by this CP?	Working Group Comments
British Gas	Non-confidential	It is probably worth carving out similar parts of the new Schedule to prevent publication	Noted.
Electricity North West	Non-confidential	Yes	Noted.
GTC	Non-confidential	We have no issues with this being public information in general however the working group may wish to consider that if the information were publicly available it could be open to being misused. The misuse could arise from parties who should be treated under Schedule 23 but intentionally try to manipulate distribution businesses to use this process instead. We believe the risk of this however would be relatively low.	Noted.
Northern Powergrid	Non-confidential	Yes as the purpose of the new code of practice is to outline the process and timescales, it would not be advisable to allow the customer access to this document given we are providing details of what steps will be taken if a customer does not actively seek a supplier to register their property. There is the possibility that unscrupulous customers may use the information from this document to frustrate parts of the process or frustrate communications with Distributors and Suppliers to delay registering with a	Noted.

		supplier	
RWE npower	Non-confidential	No. Schedule 23 was is considered sensitive as it may enable those minded to proactively take steps to steal electricity to both avoid detection and/or the consequences of detection. In the case of unregistered customers detection and the following steps are less open to influence by the customer.	Noted.
Scottish Power Energy Retail Ltd	Non-confidential	Yes, we agree that a similar requirement should be applied to this Change Proposal condensed to 1 or 2 pages containing the relevant information.	Noted. The Working Group considered that some of the steps in the process and visit procedure elements could be placed in an appendix and not place the appendix in the public version of the DCUSA website. The Working Group agreed to consider this once the final version of the draft legal text is complete.
Scottish Power Networks	Non-confidential	We do not believe that the new schedule proposed by this CP warrants the same level of sensitivity as the Schedule 23 Revenue Protection Code of Practice. It is clear in the CP that following any investigations if the site then is recognised to fall into the remit of the processes that are underpinned by Scheduled 23, then this should be invoked. However it is generally agreed that these are 2 distinctively different processes and there is no direct implication that an 'unregistered site' is other than a breakdown in the current process. This can be resolved by the registration of the MPAN.	Noted.
SSE Energy Supply	Non-confidential	Yes	Noted.
Southern Electric Power	Non-confidential	Yes – this would be a consistent approach.	Noted.

Distribution plc and Scottish Hydro Electric Power Distribution plc			
UK Power Networks	Non-confidential	No, we do not believe that anything in the new draft Schedule is sufficiently 'sensitive' that it should be hidden from public view. We maintain that the principle of the DCUSA text being openly published is the correct one.	Noted.
Western Power Distribution	Non-confidential	NO	Noted.

Company	Confidential / Anonymous	14. Which DCUSA General Objectives does the CP better facilitate? Please provide supporting comments.	Working Group Comments
		<ol style="list-style-type: none"> 1. The development, maintenance and operation by each of the DNO Parties and IDNO Parties of an efficient, co-ordinated, and economical Distribution System. 2. The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent with that) the promotion of such competition in the sale, distribution and purchase of electricity. 3. The efficient discharge by each of the DNO 	

		<p>Parties and IDNO Parties of the obligations imposed upon them by their Distribution Licences.</p> <p>4. The promotion of efficiency in the implementation and administration of this Agreement and the arrangements under it.</p> <p>5. compliance with the Regulation on Cross-Border Exchange in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.</p>	
<p>British Gas</p>	<p>Non-confidential</p>	<p>1. The development, maintenance and operation by each of the DNO Parties and IDNO Parties of an efficient, co-ordinated, and economical Distribution System.</p> <p>We believe Objective 1 is better facilitated as a reduction in non-technical losses caused by unregistered customers should make Distribution Networks more efficient.</p> <p>2. The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent with that) the promotion of such competition in the sale, distribution and purchase of electricity.</p> <p>We believe Objective 2 is better facilitated as this change proposal will ensure better accuracy of cost allocation and prevent smearing of costs across the wider Supplier community.</p> <p>3. The efficient discharge by each of the DNO Parties and IDNO Parties of the obligations imposed upon them by their Distribution Licences.</p>	<p>Noted.</p>

		We believe Objective 3 is better facilitated as this change helps DNO Parties to fulfil the obligations placed on them under RIIO-ED1 (SLC 49 on Losses and theft of electricity).	
Electricity North West	Non-confidential	<p>We agree with general objective 1. This is enhancing the theft code of practice covering theft in conveyance situations.</p> <p>We disagree with general objective 3. We already have a licence obligation to do this whether it is in DCUSA or not.</p> <p>We disagree with general objective 4 in that if this is only what is to be delivered it may make matters worse because it is covering off only very specific scenarios.</p>	Noted.
GTC	Non-confidential	We agree with the working groups assessment of the DCUSA objectives.	Noted.
Northern Powergrid	Non-confidential	<p>Objective 1 – A reduction in non-technical losses caused by unregistered customers should make Distribution Networks more efficient.</p> <p>Objective 3 – Helps DNO parties to fulfil the obligations placed on them under RIIO-ED1. This includes SLC 49 on losses and theft of electricity and specifically 49.6 in respect of Relevant Theft (the definition of Relevant Theft includes circumstances where (c) any person takes a supply of electricity at premises which have never been registered with an Electricity Supplier i.e. Unregistered Customers.</p>	Noted.

RWE npower	Non-confidential	<p>We believe that DCUSA objectives 1, 2 & 3 are better facilitated by this proposal:</p> <p>1 - Reducing non-technical losses caused by unregistered customers should make distribution networks more economically efficient.</p> <p>2 – Reducing unallocated energy costs, which may not equally be shared across suppliers (as based on % share of a GSP), will facilitate effective competition.</p> <p>3 - The change would help DNO's in support of licence obligations proposed for RIIO ED1 (SLC 49 on Losses and theft of electricity).</p>	Noted.
Scottish Power Energy Retail Ltd	Non-confidential	<p>General Objective 3 & 4</p> <p>3. Enables DNOs/IDNO fulfil obligation under SLC 49 to ensure that losses are as low as reasonably practicable.</p> <p>4. The change ensures a clear policy is in place for the detection of theft and ensuring a common way forward to register those customers that are have fallen out of the normal registration process.</p>	Noted.
Scottish Power Networks	Non-confidential	<p>1. The development, maintenance and operation by each of the DNO Parties and IDNO Parties of an efficient, co-ordinated, and economical Distribution System.</p> <p>Currently unregistered sites may have an impact on the planning and maintenance of the DNO system. As the details around the consumption of these sites are at present unknown it is difficult to assess the scale of the impact.</p> <p>2. The facilitation of effective competition in the generation and supply of electricity and (so far as</p>	Noted.

		<p>is consistent with that) the promotion of such competition in the sale, distribution and purchase of electricity.</p> <p>We believe that a co-ordinated approach to the resolution of unregistered sites will have a positive impact on both the DNO's and Suppliers, with accurate consumption data being correctly attributed to the registered supplier.</p> <p>3. The efficient discharge by each of the DNO Parties and IDNO Parties of the obligations imposed upon them by their Distribution Licences.</p> <p>We believe that the process proposed by this CP will allow the DNO to meet their obligations, with the support of suppliers (as Distributors cannot actually register sites).</p> <p>4. The promotion of efficiency in the implementation and administration of this Agreement and the arrangements under it</p> <p>We believe that having a co-ordinated approach with the inclusion of the letter templates, and the proposed tracking schedule between Distributors and Suppliers may further this objective</p>	
SSE Energy Supply	Non-confidential	<p>Objective 3. change helps DNO Parties to fulfil the obligations placed on them under RIIO-ED1 (SLC 49 on Losses and theft of electricity).</p> <p>objective 4. this change provides clarity on responsibilities for detecting theft and registering customers who fall outside of the standard registration process and should improve the administration of the Agreement.</p>	Noted.
Southern	Non-	The following Objectives would be better facilitated by	Noted.

Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	confidential	implementation of this Change Proposal: General Objective 1 as one of the main aims of tackling unregistered customers is to reduce distribution losses; General Objective 3 as a standard approach to unregistered customers would assist DNOs to discharge the obligations imposed by Standard Licence Condition 49 in a more efficient manner; General Objective 4 as the Code of Practice would provide a structure for DCUSA parties to work together in tackling unregistered customers.	
UK Power Networks	Non-confidential	General Objectives 1 and 2 are positively facilitated by reducing the scale of unaccounted electricity being consumed by Unregistered Customers. The CP would also assist in respect of General Objective 3 through aiding Distributors in the resolution of Unregistered Customers pursuant to Licence Condition 49.	Noted.
Western Power Distribution	Non-confidential	1,3,4	Noted.

Company	Confidential / Anonymous	15. 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	I am not aware of wider industry development that may be impacted	Noted. The Working Group recalled the comment on UPRNs assisting the process.
Electricity North West	Non-confidential	No	Noted.

GTC	Non-confidential	We are not aware of any wider impacts	Noted.
Northern Powergrid	Non-confidential	No.	Noted.
RWE npower	Non-confidential	No.	Noted.
Scottish Power Energy Retail Ltd	Non-confidential	No	Noted.
Scottish Power Networks	Non-confidential	None	Noted.
SSE Energy Supply	Non-confidential	no	Noted.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Non-confidential	Not at this time.	

UK Power Networks	Non-confidential	No.	Noted.
Western Power Distribution	Non-confidential	No	Noted.

Company	Confidential / Anonymous	16. Do you have a preference on the implementation date for the DCP 209 change? Please provide supporting commentary.	Working Group Comments
British Gas	Non-confidential	As a Supplier we would not want to be swamped with requests to contact customers if we take a “big bang” approach to implementation. Depending on volumes we would want the flexibility to agree a timetable for customer contact following implementation of this proposal. Once the initial backlog of unregistered customers is cleared we could then work to more prescriptive SLA’s regarding customer contact and follow up. If this approach is taken we believe we could implement the proposal within 3 months of Authority consent.	Noted. The Working Group agreed to look at adding text around endeavour with 28 days as a proposed SLA.
Electricity North West	Non-confidential	No	Noted. The Working Group discussed potential implementation dates and is considering an implementation date of the 01 January 2016 as a suitable implementation date.
GTC	Non-confidential	We would prefer a longer implementation time frame on the basis that there is an enormous amount of change currently going on within the industry and there is nothing preventing parties at present from adopting this process	Noted.

		early should they choose to. We do not have a specific date in mind however post November 2015 would be preferable to us.	
Northern Powergrid	Non-confidential	As soon as possible as the current SLC 49 came into force on 1 April 2015 and we would like further support from suppliers to resolve unregistered customers.	Noted.
RWE npower	Non-confidential	No.	Noted.
Scottish Power Energy Retail Ltd	Non-confidential	As per previous comment, we need to ensure the Code Of Practice is fully updated and in place before implementation.	Noted.
Scottish Power Networks	Non-confidential	We would suggest a formal implementation date 3 months from agreement of the change. This will allow all parties to ensure appropriate communications to internal business, planning and allocation of resources and set up of Internal processes to accommodate. However we would suggest that if parties are already set up there is scope to commence this earlier.	Noted.
SSE Energy Supply	Non-confidential	At least six months from the date this is DCP is agreed	Noted.
Southern Electric Power Distribution plc and Scottish	Non-confidential	The first DCUSA release post CP approval.	Noted.

Hydro Electric Power Distribution plc			
UK Power Networks	Non-confidential	The improved communication channels and setting out the respective obligations of both Distributor and Supplier parties will be of genuine benefit in resolving Unregistered Customer situations. We would therefore support the earliest feasible implementation date.	Noted.
Western Power Distribution	Non-confidential	NO	Noted.

Company	Confidential / Anonymous	17. Are there any alternative solutions or matters that should be considered by the Working Group? Please note the specific intent of the Change Proposal.	Working Group Comments
British Gas	Non-confidential	No further alternatives to be considered	Noted.
Electricity North West	Non-confidential	No	Noted.
GTC	Non-confidential	None that we are aware of	Noted.
Northern	Non-	We welcome the legal advice that endorses the prospect	Noted.

Powergrid	confidential	of the disconnection of unregistered customers as this can be used in communications to significantly improve the effectiveness of the overall process i.e. by encouraging unregistered customers to seek a supplier. However we note that the intent of the change proposal is not to disconnect unregistered customers but rather to improve communications with unregistered customers and set out processes for managing unregistered customers i.e. to encourage them to actively seek a contract with a supplier. So we believe the very useful prospect of disconnection should be viewed as part of the wider solutions proposed by DCP 209 rather than a solution in itself to drive customers towards suppliers.	
RWE npower	Non-confidential	No.	Noted.
Scottish Power Energy Retail Ltd	Non-confidential	The Code of Practice needs to be fully reviewed, in particular around the visit procedure. The Code of Practice appears to suggest that after the 2nd letter, no further communication is sent to the customer and a visit is made without prior notification. This needs to be ironed out and agreement in respect of disconnection / reconnection / warrant application etc.	Noted.
Scottish Power Networks	Non-confidential	None	Noted.
SSE Energy Supply	Non-confidential	no	Noted.
Southern	Non-	Nothing further at this time.	Noted.

Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	confidential		
UK Power Networks	Non-confidential	The original Change Proposal set clear boundaries as to its intent and scope. There is a very significant cross-over between Unregistered Customers (typically viewed as the innocent victims of industry failings) and those individuals actively engaged in deliberate Theft-in-Conveyance with all of the attendant challenges of rogue services, stolen meters and serious safety concerns together with a DNO's obligation to make all reasonable efforts to recover costs and the value of electricity stolen. In our experience deliberate Theft-in-Conveyance is the bigger issue but we understand the limits of the CP and we agree that it aids in case resolution across the whole spectrum from the accidentally unregistered to the wholly culpable customer.	The Working Group agreed to amend some changes to the process.
Western Power Distribution	Non-confidential	NO	Noted.