

TRAS Tip Off Line Subgroup Minutes

Meeting Name	TRAS Tip Off Line Subgroup - Introduction of Energy Theft Tip Off Line Service CP
Meeting Number	Meeting 06
Date	Monday, 25 April 2016
Time	10:00am
Location	Royal Institute of British Architects, 66 Portland Place, London W1B 1AD

ATTENDEE	COMPANY
Alex Ross- Shaw [ARS]	Northern Gas
Chris Allanson[CA] (teleconference)	Northern Powergrid
Easton Brown [EB]	EDF Energy
Emma Hegarty [EH] (teleconference)	SSE
Jonathan Hawkins [JH]	Utility Warehouse
Maitrayee Bhowmick-Jewkes [MBJ]	Npower
Kevin Woollard [KW] (teleconference)	British Gas
Kirsty Dudley [KD] (teleconference)	E. ON
Lorna Mallon [LM] (teleconference)	Scottish Power
Paul Hart [PH]	UK Power Networks
Piers Merritt [PM]	British Gas
Sarah McKenna [SM] (teleconference)	Northern Powergrid
Tim Porter [TP] (teleconference)	SSE Power Distribution
Thomas Cadge [TC] (teleconference)	Brookfields Utilities
Sarah Jones [SJ] (Chair)	ElectraLink
Fungai Madzivadondo [FM] (Secretariat)	ElectraLink

1 INTRODUCTIONS AND ADMINISTRATION

- 1.1 Apologies were received from Anne Jackson (SSE), Sasha Pearce (Npower), Chris Allanson (Northern Powergrid) and Richard Pomroy (Wales and West Utilities).
- 1.2 The minutes from the last meeting were approved with no amendments.
- 1.3 Updates on all new and outstanding actions are provided in Appendix A below.

2 ENERGY THEFT TIP OFF LINE SERVICE (ETTS) UPDATE

- 2.1 SJ informed the group that SPAA Ltd and DCUSA Ltd has signed the Energy Tip Off Line Service (ETTOS) Contract with Crimestoppers. It was noted that the ETTOS service is scheduled to be implemented in September 2016.
- 2.2 The group noted that as part of the ETTOS implementation activities a Working Group is being set up to monitor the implementation of the ETTOS service. The first ETTOS Working Group meeting has been scheduled for Tuesday, 10 May 2016. Some of the Working Group members highlighted that they had not received any communication regarding the ETTOS Working Group. ElectraLink took an action to include the Tip Off Line Working Group in further ETTOS invitation emails to be issued to Parties.

ACTION: TOLG/250416/01

- 2.3 It was noted that all SPAA and DCUSA Parties are required to provide a nominated point of contact for ETTOS matters. The role of the ETTOS Single Point of Contact (ESPOC) will be to manage the interface between Parties and Crimestoppers in the implementation phase of the project.
- 2.4 SJ explained that the change proposal to give Crimestoppers access to gas data during the Tip Off Line reporting processes has not been progressed and is still awaiting a proposal from Xoserve. It was highlighted that the process to allow Crimestoppers to access Supplier and GT information should be set up before the ETTOS service goes live. The group noted that SPAA and DCUSA are comfortable to go ahead and start implementation activities, however the delay in agreeing the process for provision of gas data may affect the implementation of the service in the gas market.

3 REVIEW CONSULTATION RESPONSES

- 3.1 The Group reviewed the responses to the 'Introduction of Energy Theft Tip Off Line Service' CP consultation and provided its comments as set out in Attachment 1. The group noted the following points:
- 3.2 The respondents all understood the intent of the CP and were supportive of the principles of the CP.
- 3.3 On the DCUSA General Objective 2¹ a respondent pointed out that it is not clear from the consultation how it would make a material difference to any aspect of energy industry competition. 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. The group determined that DCUSA General Objectives 1,2 and 3 and the SPAA General Objective f were better facilitated and these will be noted in the Change Report.
- 3.4 One of the respondents pointed out that the implementation of the CP may require a longer lead time to allow Parties to communicate the changes across their business. The group noted that the ETTOS Contract with the ETTOS Service Provider has been signed by SPAA Ltd and DCUSA Ltd, 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.

¹ 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

- 3.5 It was highlighted that Parties would like to have more information on the ETTOS delivery plan. The group noted that information on the delivery plan will be provided over the next few months and any party is welcome to participate in the ETTOS Working Group.
- 3.6 A respondent asked what would happen if DNO/IDNOs are unable to identify the correct customer address in ECOES, is there an obligation for network operator to carry out further investigation on the reported tip off? 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 process set out in the Theft Code of Practice. It was agreed that no additional information was required in the legal text to clarify this.
- 3.7 It was suggested that there should be a template that contains minimum information to be passed onto Transporters when a supplier is not present on a site. It was noted that 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.
- 3.8 A respondent enquired whether the ETTOS service provider has a set criterion for pursuing reported cases. 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 their licence and code of practice obligations.
- 3.9 It was highlighted that there is a month gap between the implementation of the Tip Off Line Service and Project Nexus go live date, therefore a process for IGTs to provide gas data may need to be set up in the interim period. The group agreed that the ETTOS Working Group should consider whether a process is required for IGTs ahead of Project Nexus implementation and should also confirm whether IGT data post Project Nexus is included in Xoserve's proposal.

ACTION: TOLG/250416/02

- 3.10 The group considered whether a breach process similar to the TRAS Disputes procedure would be set up for the ETTOS service. It was noted that Clause 7.5 of the ETTOS Schedule states that the TRAS breach process is to be used to deal with ETTOS disputes.
- 3.11 With regards to information security issues it was agreed that these would be considered by the ETTOS Working Group as part of the implementation process.

ACTION: TOLG/250416/03

- 3.12 A respondent highlighted that there may an impact to the Tip Off Line reporting process, currently UNC modification 574S "Creating the Permission to Release Supply Point Data to the Theft Risk Assessment Service" is under development. It was noted that the UNC Modification 574 relates to TRAS and is not relevant to the ETTOS service.
- 3.13 This respondent also queried whether the implementation of the ETTOS service should be delayed until after Xoserve's data cleansing project. 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.
- 3.14 The group discussed whether the current review of the 'Confirmed Theft' and 'Theft of Gas' definition will have an impact on the implementation of the ETTOS. The group concluded that the ETTOS service is not impacted by the definition of confirmed theft, therefore it would not

be appropriate to delay the implementation of the ETTOS service until after this definition is implemented.

- 3.15 ElectraLink took an action to update the collated consultation responses document and circulate to the Working Group.

ACTION: TOLG/250416/04

4 REVIEW LEGAL TEXT

- 4.1 With regards to the legal text responses, the group noted the following:

- A respondent suggested that the legal text would place an obligation on Transporters to investigate tip offs that may have insufficient information to allow them to conclude the case and that additional text should be added to reflect instances where it is not possible to conclude tip offs sufficiently thus protecting parties from any liabilities. 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.
- It was suggested that there are no details provided as to how the unmatched data is stored, how often it is reviewed or processes to be followed once a Supplier is identified. 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.
- A respondent suggested that the process for reporting unmatched tip offs should clarify whether the tip off has been issued to a network operator. The group agreed that this should be raised with the ETTOS Working Group.

ACTION: TOLG/250416/05

- It was highlighted that as it stands clause 5.2b is an uncapped indemnity with very wide applicability and that some further explanation is required. The group noted that the Service Provider was not willing to provide the service without an indemnity from 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. It was agreed that Clause 5.2b should remain as drafted.
- A respondent suggested that "gas safety concern" should be replaced with "Public Reported Escape" and that this should be a defined term within the ETTOS schedule. The group agreed that they 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 A² safety concern as defined in the Theft Codes of Practice.
- It was noted that in Schedule 34 appendix 1, the existing text refers to "each meter point in Great Britain." This point does not refer to the changed text from this

² Category A issues should be notified by telephone followed by the DTC Data Flow D0238.

proposal so is strictly out of scope but worth considering. The group agreed that issues with Schedule 34 are to be highlighted to the TRAS Expert Group.

ACTION: TOLG/250416/06

- The group considered whether the term 'gas distribution transporter' should be replaced with 'gas transporter' in clause 8.5 and agreed for the reference to GT and iGT in the SPAA text to be amended to 'Large Transporter/Small Transporter' as defined in the SPAA.
 - With regards to the suggestion to add 'full' address to clause 8.5a, the group amended the legal text to clarify that the network operator is required to identify the 'full' address.
 - The group amended the legal text in clause 8.5d to clarify that the network operator should provide the reason it could not match the tip off.
 - A respondent suggested that the definition of Tip Offs should be included in the Theft Code of Practise (DCUSA Schedule 23 and SPAA Schedule 33). The group concluded that a definition of tip off is not required.
 - It was suggested that paragraph 8.2c is aimed at Service Recipients having/requesting a reasonable number of logins and that the wording should be made clear for new entrants to the market. It was concluded that the wording did not require amendment.
 - A respondent suggested that the legal text should refer to '*tip off investigations*' rather than '*theft investigations*'. The group agreed to amend the text in clause 8.7.
 - It was highlighted that there is no reference to Management Information (MI) reporting within the ETTOS service description and that although this will be provided by the Service Provider there are no code obligations for Service Recipients to receive this. 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.
- 4.2 The group approved the proposed legal text. ElectraLink took an action to update the SPAA and DCUSA legal text documents and issue to the legal advisor for final review.

ACTION: TOLG/250416/07

5 REVIEW OF CHANGE REPORT

- 5.1 The Working Group reviewed the draft DCP 264 Change Report. It was noted that the draft Change Report will be updated with the Working Groups feedback and recommendations provided during their review of the consultation responses.
- 5.2 Concerns raised in the consultation responses are to be included in the Change Report. The Group noted that a Change Report and consultation documents will be included with the final SPAA CPD 16/325.
- 5.3 ElectraLink took an action to update the DCP 264 Change Report and issue to the Working Group for review.

ACTION: TOLG/250416/08

6 NEXT STEPS

6.1 The group noted the following next steps:

- ElectraLink to update the Change Report and circulate to the Working Group for review.
- ElectraLink to circulate the updated legal text to the external Legal Advisor for final review.
- The Working Group to provide feedback and comments on the Change Report and legal text by Thursday, 5 May 2016.
- ElectraLink to submit the DCP 264 Change Report to the May DCUSA Panel Meeting for the Panel's approval.
- A final SPAA CP to be issued in the May SPAA Change Pack for consideration at the June Change Board.

ACTION: TOLG/250416/09

7 ANY OTHER BUSINESS	
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7.1 No items of other business were raised.

8 DATE OF NEXT MEETING

8.1 No further TRAS Tip Off Line Subgroup meeting has been scheduled

9 APPENDIX A: SUMMARY OF ACTIONS

NEW AND OPEN ACTIONS

Action Ref.	Action	Owner	Update
TOLG/141215/01	Engage with National Grid and DNOs in regards to the identifying potential safety concerns and understanding the theft reporting process.	ElectraLink	12/02/16: To be considered as part of the implementation activities. ONGOING 02/03/2016 –Ongoing 11/03/16 – Ongoing 25/04/16 - Ongoing
TOLG/250416/01	Include the Tip Off Line Working Group in a further ETTOS invitation to be issued to Parties.	ElectraLink	
TOLG/250416/02	ETTOS Working Group should consider whether a process is required for IGTs ahead of Project Nexus implementation and should also confirm whether IGT data post Project Nexus is included in Xoserve's proposal.	ElectraLink	
TOLG/250416/03	ETTOS Working Group to consider the information security issues as part of the implementation process.	ElectraLink	
TOLG/250416/04	Update the collated consultation responses document and circulate to the Working Group.	ElectraLink	
TOLG/250416/05	Highlight to the ETTOS Working Group that reporting on unmatched tip offs should clarify whether the tip off has been issued to a network operator	ElectraLink	

Action Ref.	Action	Owner	Update
TOLG/250416/06	Pass on Schedule 34 issues to the TRAS Expert Group 'Schedule 34 appendix 1. The existing text refers to “..each meter point in Great Britain..” Does this include NTS meter points and if so is this intended?’	ElectraLink	
TOLG/250416/07	Update the SPAA and DCUSA legal text documents and issue to the legal advisor for final review.	ElectraLink	
TOLG/250416/08	Update the DCP 264 Change Report and issue the Working Group for review.	ElectraLink	
TOLG/250416/09	Submit a final SPAA CP 16/325 for issue in the May Change Pack for consideration at the June Change Board.	ElectraLink	

CLOSED ACTIONS

Action Ref.	Action	Owner	Update
TOLG/020316/05	Provide wording relating to gas and electricity safety concerns for inclusion in Crimestoppers' operating model.	Richard Pomroy (Gas) Chris Allanson (Electricity)	25/04/16 – Completed
TOLG/110316/01	Add wording on maintaining tip off accounts to the legal text to clarify that recipients are to be reasonable when requesting access logins.	ElectraLink	25/04/16 - Completed
TOLG/110316/02	Check the wording in clause 5.1 with the legal advisor to determine how this should be placed within the legal text.	ElectraLink	25/04/16 - Completed

Action Ref.	Action	Owner	Update
TOLG/110316/03	Update the consultation document and circulate to the Working Group for review.	ElectraLink	25/04/16 - Completed