

Derogation Application

Originator Details

Companies	Huddle Energy Limited
Originator's Name	Sigita Vaisnoraite
Email Address	
Telephone Number	

Details of obligation(s) to which you are seeking a derogation, quoting relevant DCUSA clause(s)

Paragraph	Schedule 25, Paragraph 8
Obligation	Supplier Data

Reason Derogation Sought - details of the justification for seeking this derogation

Huddle Energy is seeking a derogation from Theft Risk Assessment's Supplier Data because Huddle Energy is convinced that it will be a huge burden for the new entrant and that granted derogation will not impact the industry's good practise or any of the processes.

Huddle Energy is a new and relatively small supplier compared with the rest of the industry. For the first 3 months Huddle Energy will not be supplying large volume of customers (in the first three months we should have less than 300 customers). Hence, our exception will not impact industry or influence Theft Risk Assessment calculations.

We understand the risks of not providing the data to TRAS for the first months. However, we will be supplying student houses and there is little risk that tenants will be stealing energy.

Moreover, we are building our own CRM system. Thus, for the first months we will be testing and fixing our systems. For this reason, to set a considerable time for programming our system to be able to send the reports to Experian will be a huge burden for us and might be even inaccurate.

We would appreciate your consideration of our reasons and good will to comply with obligations when we are ready.

Conditions – description of the conditions of this derogation (i.e. the extent to a derogation is requested / whether a less onerous obligation will be met for the period of the derogation)

During this period of derogation, we will have time to fully set up as a supplier as well as prepare and fix our systems to fully function. Moreover, we will be able to set aside the time for programming our systems to generate the necessary reports for Experian.

Impact - details of the anticipated impact on the costs and operations of other parties:

There should be no impact on costs or operations of other parties, as we will be supplying relatively small number of customers for the first few months. We genuinely believe that there is insignificant probability of any costs to be incurred.

Action Being Taken - details of the action you will take to become compliant with the obligation including dates of any key milestones associated with these actions:

In the first month, we will fix our CRM system in order to function properly. In the second month, we will take a considerable time to understand what is needed to be able to send the reports. In the third month, we will test if are able to generate the reports and fix any issues. After 3 months, we should be compliant with Schedule 25, Paragraph 8.

Timescales - period of time for which the derogation is sought

We are seeking for three (3) months, however we would consider shorter period of times if three months are rejected.

Associated Derogations – details of any previous or current derogations which are related to this one

Huddle Energy has not applied to any other derogations.

To be completed by Panel Secretary

Date Application received	4 July 2017
Date Application presented to DCUSA Panel	
Outcome	

Responses, or any part thereof, can be provided in confidence. Parties are asked to clearly indicate any parts of a response that are to be treated confidentially.