

**DCUSA and SPAA TRAS De Minimis threshold RFI Responses – Collated Comments**

<b>Company</b>	<b>Confidential / Anonymous</b>	<b>1. If you are a Supplier who would seek to be excluded from the obligation to submit data into TRAS, please provide details of the impact that submission of this data has on your organisation. Where possible please provide specific cost information, with rationale for your response.</b>	<b>Working Group Comments</b>
Axis Telecom Limited	Non-confidential	The ongoing costs of providing data are not yet determined.  Axis and our third party suppliers have expended significant effort in the development and testing of the required data extracts; this work is still to be completed.	Noted
British Gas	Non-confidential	We would not seek to be excluded	Noted
Anonymo us	Anonymous	NA - we are not seeking to be excluded.	Noted
Economy Energy	Non-confidential	N/A over 50k supply points	Assume this is a proposed threshold level. Statistics provided below.
npower	Non-confidential	n/a	N/A
Undisclos ed	Confidential	Supplier Party supports the objectives of the TRAS. However, the work needed to deliver the TRAS file in the required format is significant. We have been engaging our customer management software partner for a few months and it was only at the end of November that we were able to have a TRAS file generation functionality to test. We are still doing our internal	The group agreed that developing and validating the functionality takes time but once systems are set up to provide the data, there is limited ongoing impact.

		validation, with the hope of meeting the December deadline. If the functionality does work as it should, then the TRAS requirement has a limited impact on us. Extracting the data and submitting it is not very time consuming, what does take time is developing and validating the functionality. We expect any new supplier will have a similar experience to ours, so we support the de minimum criteria.	
ScottishPower Energy Retail Ltd	Non-confidential	n/a	N/A
SSE	Non-confidential	N/A	N/A
Zog Energy Ltd	Non-confidential	We are not looking to be excluded from the obligation to submit data into TRAS.	Noted

<b>Company</b>	<b>Confidential / Anonymous</b>	<b>2. If you are a Supplier who would seek to be excluded from the obligation to submit data into TRAS, please confirm whether an exclusion to provide data into TRAS for a certain period of time would address these issues. If yes, please confirm how long a time bound exemption should be, with rationale for your response.</b>	<b>Working Group Comments</b>
Axis Telecom Limited	Non-confidential	The exclusion from the obligation to provide data should apply whilst the De Minimis level applies to the Supplier's portfolio.	The group noted this respondent's preference for a volume threshold rather than time limit.
British Gas	Non-confidential	We would not seek to be excluded	Noted

Anonymo us	Anonymous	NA - we are not seeking to be excluded.	Noted
Economy Energy	Non- confidential	N/A over 50k supply points	Assume this is a proposed threshold level. Statistics provided below.
npower	Non- confidential	n/a	N/A
Undisclos ed	Confidential	A time bound exclusion would address the issue for us. This could be as short as one month, or perhaps not even needed, subject to the outcome of the internal validation mentioned in the previous question. However, we think the appropriate exclusion is a minimum customer number exclusion. The TRAS requirement is costly to develop, so it seems appropriate that only suppliers of certain volume have to meet it.	The group noted this respondent's preference for a volume threshold rather than time limit.
ScottishPo wer Energy Retail Ltd	Non- confidential	n/a	N/A
SSE	Non- confidential	N/A	N/A
Zog Energy Ltd	Non- confidential	We are not looking for an exclusion period for providing data into TRAS.	Noted

<b>Company</b>	<b>Confidential / Anonymous</b>	<b>3. If you are a Supplier who would seek to be excluded from the obligation to submit data into TRAS, please confirm how you intend to meet your Supply Licence obligations regarding theft?</b>	<b>Working Group Comments</b>
----------------	---------------------------------	--	-------------------------------

Axis Telecom Limited	Non-confidential	With manual processes to monitor and assess consumption levels and to progress suspected cases.	<p>The group noted that a process is required to monitor how each Supplier is meeting its theft obligations, particularly if the Supplier is exempt from the TRAS arrangements.</p> <p>The group noted that there are provisions for theft reporting under SPAA and it is important to make sure that that these provisions are robust even if the Supplier data is not being utilised by TRAS.</p> <p>The group agreed that an equivalent theft reporting process should be considered under DCUSA.</p>
British Gas	Non-confidential	We would not seek to be excluded	Noted
Anonymous	Anonymous	NA - we are not seeking to be excluded.	Noted
Economy Energy	Non-confidential	N/A over 50k supply points	Assume this is a proposed threshold level. Statistics provided below.
npower	Non-confidential	n/a	N/A
Undisclosed	Confidential	We intend to meet the TRAS obligation shortly, so this question is not applicable.	Noted
ScottishPower Energy Retail Ltd	Non-confidential	n/a	N/A
SSE	Non-confidential	N/A	N/A

Zog Energy Ltd	Non-confidential	We are not looking to be excluded from the obligation to submit data into TRAS.	Noted
Company	Confidential / Anonymous	4. Please provide details of the impact on your organisation or the overall TRAS arrangements if Suppliers are granted an exemption from providing data.	Working Group Comments
Axis Telecom Limited	Non-confidential	Please refer to item 5	N/A
British Gas	Non-confidential	<p>If suppliers are given an exemption from providing data to the TRAS this could potentially lead to a reduction in the value to all Suppliers of the complete TRAS solution. Current all suppliers are compelled under the TRAS Direction to comply with the following: "The licensee must ensure that the TRAS identifies, collects, scrutinises and evaluates Relevant Information to profile the risk of Unrecorded Electricity, and in particular Theft of Electricity, at <b>all individual premises</b> where Electricity is conveyed by a Licensed Distributor;" The same clause applies to the Gas Direction. It is unclear how Suppliers would be able to meet this obligation if some Suppliers are exempt from providing data. This exemption could also lead to customers choosing to switch supply to those Suppliers that have an exemption to minimise the likelihood of detection if they are committing energy theft. If such an exemption is permitted we would want to see those Suppliers demonstrate that they have robust alternative arrangements in place for preventing and detecting energy theft.</p>	<p>Noted.</p> <p>The group noted that if the CPs are approved to introduce a de minimis threshold and Ofgem provides its consent then Suppliers cannot be penalised for not implementing a TRAS that covers all individual premises.</p>

		Should a Supplier be given an exception from providing data it would still be subject to licence obligations to prevent, detect and investigate theft.	
Anonymo us	Anonymous	NA - we are not seeking to be excluded.	Noted
Economy Energy	Non- confidential	No impacts that we can see on our organisation. From a TRAS point of view you wouldn't have a full industry view. What % of the portfolio is held by suppliers with less than 50k supply points.	The group noted that less than 1% of supply points are supplied by Suppliers with less than 50k registered supply points (approximately 292k supply points).  Further information on the breakdown of supply point registrations is included below.
npower	Non- confidential	It is difficult to assess without exemption numbers being known.  Internally we will incur costs for participating in TRAS and we would also need time to develop systems and processes to meet the TRAS requirements.	Noted
Undisclos ed	Confidential	We do not think there is any significant impact from the exemption, as by definition it would only apply to small suppliers.	Noted
ScottishPo wer Energy Retail Ltd	Non- confidential	We believe any exemption would create a break in the process, resulting in theft investigations halting as the TRAS Service Provider would be unable to pass leads to a supplier.	Noted. The TRAS Service Provider will be asked to confirm what happens when a supply point is transferred to or from an exempt Supplier.
SSE	Non- confidential	We believe that there is a very low impact on us if suppliers are provided an exemption from providing data in that their	The group noted that suppliers who are exempt from

		<p>contribution to the data set is not necessary to establish a 'norm' from which to judge outliers. However suppliers who do submit their data will not be able to identify which sites are outliers on their own portfolios and this was provided as a benefit of this kind of scheme.</p> <p>Additionally supply points may switch from the small suppliers to a large supplier and the history for that supply point will be missing from the Experian portfolio, which will impact the quality of the outlier assessment.</p> <p>The intent of TRAS was to ensure that no thieves should find a safe haven under any supplier and that switching supplier should not lessen the likelihood of a potential thief being identified. We believe that allowing a supplier to not participate will damage this intent.</p>	<p>providing data will not receive the benefits of TRAS.</p> <p>The TRAS Service Provider will be asked to confirm what happens when a supply point is transferred to or from an exempt Supplier.</p> <p>The group noted this concern that an exemption could provide a safe haven for thieves.</p>
Zog Energy Ltd	Non-confidential	<p>We strongly believe that introducing supplier exemptions would significantly reduce the effectiveness of TRAS. It is well known that fraudulent activity will congregate to suppliers that have less ability to detect theft. Hence exempt suppliers will see increased cases of theft, which are not reported to TRAS. This is especially true for new entrants into the market that will have greater vulnerability due to less mature process.</p>	Noted

Company	Confidential / Anonymous	5. If an exemption is introduced, above what volume of supply points should Suppliers be required to submit data? Please provide rationale for the proposed value.	Working Group Comments
Axis Telecom Limited	Non-confidential	<p>The De Minimis level should be a combination of number of supply points and volume. This combination should be driven by values which would lead to the Supplier's data having no</p>	<p>The group agreed that the introducing a de minimis threshold should not increase the complexity of the TRAS arrangements. Therefore a simple number of</p>

		material impact on the Service. The definition of materiality should be agreed between relevant parties.	<p>supply points or volume exemption should be applied.</p> <p>The TRAS Service Provider will be asked to confirm at what level an exemption would have a material impact on the service.</p>
British Gas	Non-confidential	<p>It would be good if SPAA and DCUSA could provide some anonymous data on how many suppliers would be included if the level was 1,000, 5,000, 10,000 etc. Once a threshold is proposed it would also be good to understand the total number of customers that would not be included in TRAS, so we can assess the overall impact rather than simply on an individual basis. Will we also require a clear monitoring process/trigger when parties customer volumes ultimately exceed the limit set so they monitored to ensure data is started to be provided. Any change in the arrangements will also need to include timescales for starting to provide data for example within 1 month of exceeding the threshold the Supplier should submit data the following month.</p>	<p>The group noted that approximately (excluding non-domestic only Suppliers):</p> <ul style="list-style-type: none"> <li>• 10 Suppliers have 0 – 100 supply points (328 supply points)</li> <li>• 6 Suppliers have 100 – 1k supply points (1.5k supply points);</li> <li>• 3 Suppliers have 1k – 5k supply points (9k supply points)</li> <li>• 3 Suppliers have 5k – 10k supply points (20k supply points)</li> <li>• 8 Suppliers have 10k – 50k supply points (235k supply points)</li> <li>• 20 Suppliers have more than 50k supply points (50m supply points)</li> </ul> <p>More detailed analysis will be carried out using up to date information and separating out domestic and non-domestic supply points.</p>



			The group agreed that a straw man should be produced and issued for industry consultation. This will set out the monitoring provisions and timescales.
Anonymo us	Anonymous	<p>We have concerns regarding the introduction of a threshold – this could cause ‘safe havens’ for those committing energy theft to utilise and potentially causes data blind spots in the overall TRAS analytics. We believe some form of data provision is required but would need to be developed.</p> <p>Could exemption be a time volume rather than a volume of meter points? The determination of the exemption value could be time not volume – we would like this to be a consideration.</p> <p>How would suppliers then join the TRAS once they are passed any exemption value? Would this ‘on-boarding’ have a different cost to those already outlined for TRAS parties or new costs determined? What about where suppliers are on the cusp and keep going above and below the exemption value - could they continually be opting in and out?</p> <p>How would any criteria for exemption be monitored to ensure compliance?</p> <p>If suppliers are unable to deliver their licence obligations via their own mechanisms would there be a process to allow them to opt back into the TRAS if they are still below the exception value?</p>	<p>The group noted this concern that an exemption could provide a safe haven for thieves.</p> <p>The group agreed that the straw man should be produced which will set out the timescales for initiating the submission of data. This will include a time lag to allow the new Supplier to be included in the TRAS Service Provider systems.</p> <p>The group noted that there are no specific costs for onboarding new Suppliers. However there are initial and ongoing licence costs for all new Suppliers once the first 42 Suppliers have joined the joint licence.</p> <p>The group agreed that once parties have breached the threshold they will not become exempt again if they dip below the threshold in subsequent months.</p> <p>The Code Administrator will monitor the MPXN count for exempt Suppliers and highlight when the threshold has been breached.</p> <p>The exemption would be optional. Any Supplier wishing to participate in TRAS would be allowed.</p>
Economy Energy	Non- confidential	n/a	N/A
npower	Non- confidential	Although there is no indication in the relevant CP (DCP 254), we	Based on recent data, less than 100 supply points

		would only support for low market entry numbers e.g.100.	would mean 10 Suppliers excluded (328 supply points)
Undisclosed	Confidential	We support an exemption on line with other regulations based on customer volumes. Taking as reference the supply licence condition, the requirement to offer prepayment and present QR codes to domestic customers only applies after 50,000 customers, so this might be a relevant reference point.	Based on recent data, less than 50k supply points would mean 20 Suppliers included in the TRAS (approximately 40 excluded).  This would exclude approx. 292k supply points.
ScottishPower Energy Retail Ltd	Non-confidential	We believe that rather than a threshold being set to stop any submissions a more sensible solution would be to set a threshold below which suppliers still have to submit a list of MPANs / MPRNs they supply in any given month. This would allow leads to still be passed to them, allowing them to fulfil their licence obligation to investigate theft.	The TRAS Service Provider will be asked to confirm what information would be issued to Suppliers if they only provide a list of MPXNs and details of theft investigations they have carried out.
SSE	Non-confidential	<p>It is not clear what the exemption would include. Would it mean that a supplier would not have to submit their data on a monthly basis to TRAS or that a supplier would not have to update Experian (TRAS) with any information about theft found or both. Each exemption factor should be impact assessed separately.</p> <p>Our view is that if an exemption is introduced the choice of threshold should consider the costs involved in complying with the SPAA / DCUSA TRAS changes and whether these are disproportionately high for small suppliers. An additional factor should be whether the supplier involved is able to reduce the risk of theft on their portfolio through other means or mechanisms.</p> <p>A further impact is the collective impact of the suppliers who</p>	<p>The TRAS Service Provider will be asked to confirm what information would be issued to Suppliers if they only provide a list of MPXNs and details of theft investigations they have carried out.</p> <p>The TRAS Service Provider will be asked to confirm at what level an exemption would have a material impact on the service.</p>

		<p>have exemptions and whether the volume of meter points involved becomes significant. Experian may be able to assist with this assessment.</p> <p>Considering these factors we would expect the threshold to be very low.</p>	
Zog Energy Ltd	Non-confidential	No exemption should be introduced.	Noted

<b>Company</b>	<b>Confidential / Anonymous</b>	<b>6. If an exemption is introduced, should this apply to I&amp;C Suppliers and/or Domestic Suppliers? Please provide rationale for your response.</b>	<b>Working Group Comments</b>
Axis Telecom Limited	Non-confidential	The exemption levels should apply to both Domestic and non-Domestic Suppliers – it would depend on material impact	<p>Based on consideration of all responses to this question, the group initially concluded that the exemption should apply to domestic Suppliers only.</p> <p>Therefore Suppliers with non-domestic supply points will not be eligible for an exemption. This was based on concern that the financial impact of theft at non-domestic supply points could be significant.</p> <p>Suppliers will be asked for views on this decision as part of the industry consultation.</p>
British Gas	Non-confidential	We saw this exemption only applying to domestic Suppliers. If an exemption was to be given to non-domestic Suppliers we would want to see different De-Minimis levels set for each market sector owing to the potential financial impact non-domestic theft v domestic.	
Anonymous	Anonymous	<p>Any introduced values would require individual impact assessments but we would expect there to be individual values for domestic and I&amp;C.</p> <p>We would also like to see impact assessments completed on a fuel type basis because as with the sector type it might require different thresholds introduced, we wouldn't like to see a blanket value introduced.</p> <p>How would any exemption values be monitored for accuracy? Once created will</p>	

		they be fixed for the term of the TRAS or would there be a review process e.g. annually.	
Economy Energy	Non-confidential	No preference	
npower	Non-confidential	If any exemption is introduced there is a risk of possible undermining of the arrangements as not all Suppliers will be working in the same way.	
Undisclosed	Confidential	We think it should apply to both types of suppliers, as we cannot see a reason to treat them differently. We acknowledge that this makes it more difficult to establish an exemption, as for I&C suppliers a small number of customers might still mean a large supply of gas and electricity.	
ScottishPower Energy Retail Ltd	Non-confidential	<p>The threshold has to be just for domestic suppliers. The impact of theft at an I&amp;C site is far greater so no exemption should apply. However, we believe the threshold for domestic suppliers should be set at a very low level if a total exemption is applied, given the impact theft can have on the overall market (as well as the clear safety risks).</p> <p>As above, we prefer a threshold that reduces the number of data items that should be provided rather than a total exemption from all provisions.</p>	
SSE	Non-confidential	<p>We do not agree with one industry assertion that theft is 'rare' in the I &amp; C sector and believe that the numbers of instances of theft found are generally proportional to the effort and tools available in the Industry. TRAS is one such tool and it should not be dismissed for any sector at such an early stage of the project without evidence.</p> <p>We believe that I &amp; C theft is less likely to be found on very large supply points and extremely small portfolios so consideration for exemptions might be based</p>	

		on factors such as these rather than specific market sectors.	
Zog Energy Ltd	Non-confidential	No exemption should be introduced.	

Company	Confidential / Anonymous	7. Should exempt Suppliers still be required to pay towards the cost of the TRAS provisions? Please provide rationale for your response	
Axis Telecom Limited	Non-confidential	No. The exempt Supplier will have their own internal costs of processes to meet the licence obligations. To expect them to contribute to the cost of the TRAS provisions would be wholly unjustified.	<p>Based on consideration of all responses to this question, the group initially concluded that all Suppliers should pay a share of the TRAS costs, regardless of whether they have been granted an exemption.</p> <p>This was based on the view that all Suppliers will benefit from any reduction in theft due to the introduction of the TRAS.</p> <p>Also the number of supply points covered by the exemption will be minimal and therefore the costs allocated to these Suppliers will also be small. It would therefore not be cost effective to introduce a separate invoicing process for these Suppliers for potentially a short period of time until they breach the threshold.</p>
British Gas	Non-confidential	<p>We believe that exempt Suppliers should still be required to pay for the cost of the TRAS provisions. The benefits of TRAS in reducing energy theft will be shared across all Suppliers by the way in which currently the costs of unidentified stolen energy are smeared across all Suppliers under Group Correction and RBD. For this reason all Suppliers should contribute to the costs of the TRAS.</p> <p>All Suppliers have the same licence condition to ensure the "Theft Arrangement" is put in place.</p>	
Anonymous	Anonymous	If the main reason for exemption is related to costs then we'd prefer the cost allocation to be reviewed to avoid the possibility of safe havens and data black spots. Could the introduction of the De Minimis be the way forward or could smaller suppliers have a longer period to join the TRAS to allow development costs to be spread over time?	
Economy Energy	Non-confidential	How much of the costs would be added to those suppliers that are not exempt?	

npower	Non-confidential	Yes. Irrespective of exemption, there is potential for all Suppliers to benefit and so a sharing of costs payment would be fair. With costs based on 'market share', the numbers for all small suppliers should be 'totalised' to give a clearer perspective on that 'market share' as a group rather than as individual Suppliers.	
Undisclosed	Confidential	We think the administrative costs of charging exempt suppliers are likely to outweigh the benefits, as their cost based on market share will be very small. Hence we think exempt suppliers should not pay. In practice this is temporary as eventually every exempt supplier will acquire enough customers to become non-exempt.	
ScottishPower Energy Retail Ltd	Non-confidential	Yes – as they pay per market share (ie per MPAN / MPRN) the costs to remove them would be higher to the overall market than if they paid. Further, as the supplier would still be able to receive information from the tip off line, they are still receiving part of the TRAS service so should pay.	
SSE	Non-confidential	In the situation where an exemption is put in place it is our opinion that all Suppliers should be required to pay for TRAS costs, as every Supplier will benefit through tighter control of theft of, reducing the amount of unrecorded gas and improving the imbalance of the electricity and gas markets.	
Zog Energy Ltd	Non-confidential	Yes, exempt suppliers should still be required to pay as the services form part of a suppliers licence and all suppliers should move to providing and complying with licence obligations.	

Company	Confidential / Anonymous	8. Do you have any other comments?	Working Group Comments
---------	--------------------------	------------------------------------	------------------------

Axis Telecom Limited	Non-confidential	n/a	N/A
British Gas	Non-confidential	<p>The Change Proposals as drafted merely provide for an exemption to provide data.</p> <p>The Suppliers who are given an exception from providing data would still be subject to wider theft licence obligations and any implemented theft incentive schemes.</p> <p>It is not clear how the TRAS provider will be able to provide potential theft leads for example as a result of a change of supply event if that Supplier is not submitting data.</p> <p>The exempt Supplier would also need to submit the results of any theft investigations to enable the TRAS to update its theft methodology. These issues would need to be looked into with the TRAS provider.</p>	<p>Noted</p> <p>The TRAS Service Provider will be asked to confirm what happens when a supply point is transferred to or from an exempt Supplier.</p> <p>The TRAS Service Provider will be asked to confirm what information would be issued to Suppliers if they only provide a list of MPXNs and details of theft investigations they have carried out.</p>
Anonymo us	Anonymous	<p>We recommend that if an exemption threshold is implemented that suppliers are not automatically exempt but instead follow a process to 'opt-out'; we make this suggestion because we do not believe that all eligible for exemption suppliers would like to opt out and introduce their own processes to deliver the licence obligation.</p> <p>Would parties who are dual fuel be automatically exempt for both or could they opt out for one or the other? Does it have to be a consistent approach where you are either in or out or could it be mixed? How would these choices be monitored?</p> <p>If the exemption is introduced we would like to see reporting</p>	<p>The exemption would be optional. Any Supplier wishing to participate in TRAS would be allowed.</p> <p>The group noted that only one Hunter licence is required for each Supplier, covering both gas and electricity. Therefore the licence costs would be incurred as soon as the Supplier is required to submit either gas or electricity data. The group agreed that any exemption should be based on the total number of supply points rather than having a separate exemption for gas and electricity which would add further complexity to the arrangements</p>

		<p>introduced which clearly outlines the number of supply points which are not part of the TRAS so a nationwide % of exempt supplies can be monitored. It could identify trends of movement to these suppliers and potentially work as a safe haven trigger to ensure individual monitoring is completed.</p> <p>How would data on actual detected thefts from exempt suppliers feed into the TRAS Theft Target and also the Theft incentive Scheme?</p> <p>Will an impact assessment be completed to understand if all eligible parties were to become exempt what impact would occur to the overall TRAS modelling?</p> <p>How would the introduced exempt value be monitored? Would it be fixed for the duration of the TRAS contract or would it be reviewed on an annual basis to understand the impacts to TRAS model etc.</p>	<p>The group agreed that the number of Suppliers and supply points covered by the exemption should be monitored, with an annual review. The SPAA EC and DCUSA Panel will have the ability to amend the threshold with Authority consent.</p> <p>Further consideration is needed regarding the inclusion of exempt Suppliers in the Theft Target and Theft Incentive scheme.</p> <p>The TRAS Service Provider will be asked to confirm what information would be issued to Suppliers if they only provide a list of MPXNs and details of theft investigations they have carried out.</p> <p>If this reporting is to be carried out by ElectraLink an impact assessment will be required once the reporting requirements have been agreed.</p> <p>The TRAS Service Provider will be asked to confirm at what level an exemption would have a material impact on the service.</p>
Economy Energy	Non-confidential	No	N/A
npower	Non-confidential	There is no evidence that TRAS will be more difficult for Small Suppliers and any exempted Supplier may be seen as a 'safe haven' for thieves with the wider industry picking up the costs.	Noted
Undisclosed	Confidential	We welcome this engagement, ideally it would have happened before	Noted, however the group agreed that the CPs should



		the November submission.	not be progressed urgently.
ScottishPower Energy Retail Ltd	Non-confidential	We believe a de minimis threshold should be in the SLC rather than SPAA / DCUSA as the SLC obligations still stand.	Noted, Ofgem confirmed that Suppliers would not be exempt from the Supply Licence Conditions to detect theft.
SSE	Non-confidential	<p>We do not believe that the possibility of an exemption should be used to avoid costs. There should be a degree of cost parity between suppliers. Any supplier subject to an exemption should be deploying any cost saving on other means or mechanisms to identify theft and thereby prevent 'theft' havens and support other suppliers' efforts to reduce theft in the energy sector.</p> <p>We understand that some smaller Suppliers may not yet have a theft process or policy; however we cannot lose sight of the scope of TRAS and its importance in analysing the data of all Suppliers.</p> <p>Additionally small suppliers should not be discouraged from engaging in the process if they choose, so any change must allow optionality to participate</p>	Noted
Zog Energy Ltd	Non-confidential	Being a small supplier the timescales and obligations imposed to deliver the TRAS requirement have been challenging and costly. Zog Energy has complied with its licence obligations of providing data into TRAS.	Noted