

## **DCUSA DCP 225 Theft Risk Assessment Service – Party Obligations**

### **Appendix 1 – EDF Energy Comments**

We are supportive of the change and understand the necessity of implementing supplier governance arrangements within the SPAA and DCUSA to coincide with the signing of the TRAS contract. However, we still feel that there are a number of data issues that will need to be addressed in advance of data being exchanged with the TRAS service provider.

In particular:

#### **Supply Block**

- It is unclear how the multiple MPAN flag will work? For example, if there are multiple MPANS should only the main mpan and associated consumption be populated or should all multiple mpans supplied be populated with the flag set to “Y”?
- We are still unsure which part of a suppliers portfolio should be included: I.e. live on supply only? Energised/de-energised? Half Hourly and Non Half Hourly? Unmetered Supply? I would assume that the TRAS Service Provider would want details of all sites supplied irrespective of status but other suppliers make take a different interpretation and so further clarification within the Schedule would seem sensible.

#### **Consumption Block**

For the sake of clarity, we would like to point out that there will be a number of scenarios where consumption data is unavailable or is likely to be based on the EAC / AQ value as opposed to recent meter readings taken by the supplier.

The definition in the Supply Licence is such that it would be difficult for the TRAS Service Provider to identify whether the consumption value provided relates to actual meter readings or a historic default value.

We felt it was important to highlight this now given the reliance of the solution on consumption data to generate theft leads.

Firstly, the assumption is that the Annual Consumption value is based on the “Annual Consumption Details” definition in the Supply Licence. I.e. the value that a Supplier is obliged to include on a domestic customer bill. This definition states that the value can be either:

- The quantity of electricity or gas consumed during the last 12 months if the supplier has held a contract with the customer for at least 12 months and has obtained actual meter readings which can reasonably be considered to cover the whole 12 month period, or;
- If the supplier has not held a contract for 12 months or hasn’t had actual meter readings, the suppliers “best estimate” of what the customer would be expected to consume during a 12 month period

So in the event that a supplier hasn’t been supplying for a full 12 months or hasn’t had actual meter readings then the “Annual Consumption” value would likely be based on the historic EAC or AQ value as opposed to any recent actual meter readings. This would not be apparent to the TRAS Service Provider.

Additionally, there are a few other scenarios where a default value may have to be applied. These are:

- For non domestic sites, suppliers don't have the same Supply Licence requirement to include consumption data on the customers bill. Therefore, for non domestic customers this value is likely to be based on the historic EAC / AQ.
- Suppliers would likely only have an "Annual Consumption" value after they have billed a customer. So if a customer has recently transferred and has not yet been billed then the value would likely have to be defaulted to the EAC / AQ value.

Therefore, as well as the Annual Consumption data item, we feel that there may be some value in including the EAC and AQ values as additional data items. This may help to provide further clarity to the TRAS service provider in the event that Annual Consumption either cannot be populated or has been defaulted to the EAC / AQ value.

Finally, we also consider that further definition may be required for the following data items:

- In the consumption block – are bill to date and annual consumption for NHH MPANs only, and the monthly breakdown below for HH only?
- For the HH monthly consumption marked as 'T' and described as current month, we assume what the TRAS Service Provider actually wants is the most recent consumption which is likely to be data from the previous month?

#### **Meter Block**

- Meter Type - It is unclear what is actually wanted here as the electricity "J" data item and gas RGMA data item are not comparable. Presumably the service provider would want to know what type of metering is present at the property, i.e. prepayment, credit etc? If this is the case then the gas data item A0085 would be more appropriate.