

DCUSA DCP 209 Request For Information Responses – Collated Comments

Company	Confidential?	Question One - <i>Distributors: How many unregistered sites are you aware of, that are connected to your network(s) where the customer is presently consuming energy?</i>	Working Group Response
British Gas	Non-Confidential	N/A	
ENWL	Non-Confidential	We have currently identified 150 unregistered sites.	Noted.
GTC	Non-Confidential	Unfortunately this is difficult to determine with the level of information available. We have under 30000 MPANs currently unregistered on both the ETCL & IPNL licences. Out of these I am only able to identify 5 MPANS which are potentially consuming units without a registered supplier based on data flows. I suspect that the number is higher than this however but our volumes will be skewed by the New Connections nature of our work.	Noted.
Anonymous 1	Confidential	N/A	
Scottish Power Energy Retail	Non-Confidential	N/A	
SP Distribution/ SP Manweb	Non - Confidential	We have 11887 unregistered sites on our system, 811 have Half Hourly LLFC's. We don't have counts of how many of these are consuming energy.	Noted.
Northern Powergrid	Non - Confidential	At start of business of 27/06/2014 we have 1,424 (444 NE & 980 YE) unregistered sites for our Northeast and Yorkshire licence areas where we believe the connection is consuming energy and should be registered with a supplier.	Noted.
UKPN	Non-	In the past 12 months we were made aware of 552 cases of	Noted.

	Confidential	unregistered sites.															
WPD	Non-Confidential	For the MPAS team we currently have 26 mpans under review. For the Revenue Protection team figures from Jan 01st 2014 – 27th June 2014 are as follows: We have corrected 9 unregistered customers. Investigated 18 direct to mains connections where no supplier was present. 15 of these cases were confirmed interference. There are currently around 10 unregistered customer investigations ongoing. Until the investigation is completed we will not know if they are genuine unregistered customers or not.	Noted.														
Company	Confidential?	Are you able to split the volumes of such unregistered sites by the different scenarios in the table at Attachment 1 to this RFI?	Working Group Response														
British Gas	Non-Confidential	N/A															
ENWL	Non-Confidential	The volume of unregistered sites split by volume are; <table><tr><th>Scenario</th><th>Volume</th></tr><tr><td>4</td><td>31</td></tr><tr><td>5</td><td>12</td></tr><tr><td>6</td><td>37</td></tr><tr><td>8</td><td>38</td></tr><tr><td>9</td><td>31</td></tr><tr><td>Total</td><td>150</td></tr></table>	Scenario	Volume	4	31	5	12	6	37	8	38	9	31	Total	150	Noted.
Scenario	Volume																
4	31																
5	12																
6	37																
8	38																
9	31																
Total	150																
GTC	Non-Confidential	Unfortunately we are unable to split this down further	Noted.														
Anonymous 1	Confidential	N/A															
Scottish Power Energy Retail	Non-Confidential	N/A															

SP Distribution/ SP Manweb	Non - Confidential	This was not achievable due to timescales and resources. However, I think the bulk of ours would exist because the mpan was requested by a supplier and the supplier has to pursue registration.	Noted.
Northern Powergrid	Non- Confidential	Scenario 1 = 1,320 – The majority of unregistered sites fall into this category and includes a number where the specific detail of how the site has ended up as unregistered may not be known. Scenario 4 = 104	Noted.
UKPN	Non- Confidential	The scenarios provided do not wholly align to the way in which we collate statistics but we have estimated the percentage split of volumes across our categories: <ul style="list-style-type: none"> • Unregistered MPAN (Direct to Main) – 10% • Unregistered MPAN (Stolen Meter) – 5% • No MPAN (Direct to Main) – 25% • No MPAN (Stolen Meter) – 47% • Disconnected MPAN – 13% 	Noted.
WPD	Non- Confidential	See attached – we are able to identify the root cause of 22 of the 63 mpans under review, but for the majority we are unable to determine the cause or they are still under investigation.	Noted.
Company	Confidential?	Question Two - All Parties: Please briefly set out your current process for managing unregistered consumers in each of the scenarios?	Working Group Response
British Gas	Non- Confidential	1. We would point them back to whoever had arranged the fitting of the meter to set them up with an account or if they wanted to be supplied by BG we would pass them to the Specialist Referral Team for domestic supplies and BGB Sales for Commercial.	Noted.

		<ol style="list-style-type: none"> 2. Pass details to DNO 3. Pass details to DNO unless we had installed the meter and/or initiated creation of the Mpan 4. Pass details to Specialist referrals or appropriate new supplies team to follow through. 5. Pass details to Specialist referrals or appropriate new supplies team to request re-instatement of Mpan and then follow through to conclusion. 6. Pass details to Specialist referrals or appropriate new supplies team to request an Mpan and then follow through to conclusion. 7. Pass details to Specialist referrals or appropriate new supplies team to follow through. 8. Dealt with as abstraction providing we own any original Mpan; if not we would pass it to the DNO. 9. Pass details to Specialist referrals or appropriate new supplies team to follow through. <p>Pass details to Specialist referrals or appropriate new supplies team to request an Mpan and then follow through to conclusion.</p>	
ENWL	Non-Confidential	<p>We have a number of processes dependent upon the scenario encountered.</p> <p>In the first instance we need to determine whether this is a connection made (adopted) by the company or not. To do this we review internal systems and connections processes together with site visits, where necessary, in order to determine what has occurred and what course of action needs to take place. The ultimate aim is to ensure that where a connection has been made there is an MPAN with a registered supplier and where an unauthorised connection has been made this is disconnected and, if applicable, a new connection requested, processed and a registered</p>	Noted.

		<p>supplier associated with it.</p> <p>Connection made</p> <p>In this instance the internal processes have fallen down. They can fall into one of three cases:</p> <ul style="list-style-type: none"> • Address No MPAN (Scenario's 6,7,9 and 10) ; • New MPAN (no registered supplier) (Scenario's 1,2,3,and 4); and • MPAN disconnected in error. (Scenario 5) <p>Connection not made</p> <p>An unauthorised connection has been made to our network. (Scenario 8)</p> <p>In all instances (apart from MPAN disconnected in error) theft in conveyance occurs. The MPAN disconnected in error may result in either:</p> <ul style="list-style-type: none"> • the supplier retaining the connection (i.e. undertake a MAP04 to reverse the disconnection); or • a new MPAN being raised if the supplier believes their contract with the customer has ended. <p>In the first instance it must be noted that the contract end date may not always be the disconnection date. We have instances where suppliers have continued to bill the customer beyond the disconnection date. Our distribution system captures instances of reading advances on disconnected MPANs.</p> <p>The latter instances would result in theft in conveyance between the contract end date and the new supplier being registered.</p>	
GTC	Non-Confidential	We do not currently have a formalised process for handling unregistered customers.	Noted.
Anonymous	Confidential	>New connection Process failed	Noted.

1		<p>Further detail from customer so issue could be investigated, register where contract in place</p> <p>>Illegal but safe theft in conveyance This would be referred back to the DNO</p> <p>>Illegal but deliberate tampering If not registered to ourselves, these would not be handled but referred back DNO</p> <p>>MPAN requested by Supplier. Supplier to pursue registration. Investigation would take place by team while liaising with DNO again register where contract in place</p> <p>>Disconnected in error - MAP 04 Would be Investigated by teams and register where possible. This may be an issue for very old supplies.</p> <p>>Needs new MPAN and new process Again Investigation by team while liaising with DNO again register where contract in place</p> <p>>If meter fitted under Supplier instruction We have not seen any examples of this occurring</p> <p>>Illegal - new connection process not followed, including connections to 'split' multi-occupancy premises': Liaise with the DNO, other sources of theft could identify this scenario e.g.. RPS, and also other Industry processes.</p> <p>Impact would be against 3rd Parties. Landlords, but the numbers are minimal.</p> <p>>Authorised connection (not illegal)- DNO failed to raise MPAN - Supplier asks DNO for an MPAN The teams would pursue via the current Industry processes in place.</p> <p>>Process failure - needs an MPAN and a new agreed process</p>	
---	--	--	--

		Investigation would take place by team while liaising with DNO again register where contract in place	
Scottish Power Energy Retail	Non-Confidential	<p>Scottish Power Energy Retail (SPERL) has a number of measures in place to identify and resolve unregistered consumers which include:</p> <ol style="list-style-type: none"> 1. New Connections Sales - through their relationship with builders. Builders confirm site completed and sales will verify that all flows received successfully. 2. New Connection Change of responsibility.... – 1st occupier moves in and completes change of responsibility from builder. Checks will verify if meter details received and registered. 3. New Connection team will actively chase electricity flows if gas flows have been received for dual fuel site. 4. New Connections - Analysts responsible for ensuring flows that failed are worked as part of flow management team 	Noted.
SP Distribution/ SP Manweb	Non - Confidential	In the past, we have emailed our supplier contacts to ask them to register any mpans we know they requested via D0168 flows.	Noted.
Northern Powergrid	Non-Confidential	<p>Generally, the process for managing unregistered consumers depends how we have identified the premises as being unregistered as this will influence the process for resolving the issue.</p> <p>Scenario 1 – If the new connections process failed then the customer is likely to request an MPAN using the contact details they have for our Network Connections department.</p>	Noted.

		<p>Scenario 2 – If we receive information from a customer/Revenue Protection (RP), we would investigate if there is an existing MPAN for the address and request a site visit to be carried out by our RP function. noting that the customer may not be present when site visit takes place. When information is received back from RP we would raise an MPAN and issue a letter out to the customer to advise them to contact their chosen supplier to begin the registration process. If no response is received a subsequent letter is sent to encourage the customer to either respond or contact their chosen supplier direct. If still no response is received a further two letters are issued to the customer.</p> <p>Scenario 3 - Same as scenario 2 however during RP visit they will carry out the necessary physical work to ensure the site is safe.</p> <p>Scenario 4 - Supplier requests MPAN through our new connections registration function (NCAS) via a D0168 dataflow. Once created the MPAN will be supplied back to the supplier via D0169. Following this, weekly schedules are collated by our staff and issued out to suppliers to urge them to register the records. They are continually updated and monitored until they are resolved or supplier advises the MPAN is no longer required.</p> <p>Scenario 5 - If an unregistered MPAN is disconnected in error, we would not process a MAP04 and instead we would create a new MPAN through our New Connections process. The MAP04 process is only used if a record has already been previously trading with a supplier. If a traded MPAN is disconnected in error a MAP04 is carried out however we can only carry out changes 14 months retrospectively.</p>	
--	--	---	--

		<p>Scenario 6 – Customer contacts our Metering point administration service (MPAS) and enquires “who is my supplier”. If the team are unable to locate an MPAN for the address they would request one to be raised through our new connections team. The MPAN would then be communicated to the customer via telephone call. If the record remains unregistered a letter would be issued to the customer to encourage them to contact the supplier of their choice to initiate registration. Once contact is made with the supplier, they would issue the relevant information via dataflow (D0055) to register the MPAN.</p> <p>Scenario 7 – If a meter is fitted under supplier instruction we would assume the supplier was going to register the site which would mean no follow up required from DNO.</p> <p>Scenario 8 – A similar approach compared to scenario 2. We would raise an MPAN and issue a letter out to the customer to advise them to contact their chosen supplier to begin the registration process. If no response is received a subsequent letter is sent to encourage the customer to either respond or contact their chosen supplier direct. If still no response is received a further two letters are issued to the customer.</p> <p>Scenario 9 - In the event our authorised connection process fails, the customer would either contact our Network Connections department to advise they do not have an MPAN and at that time the MPAN would be requested for via our new connections department. The other scenario would be the customer would contact the supplier of their choice and the MPAN would be raised</p>	
--	--	---	--

		<p>via scenario 4.</p> <p>Scenario 10 – We currently have three processes in which an MPAN can be requested, namely:</p> <ul style="list-style-type: none"> • From our Network Connections function following physical connection, • supplier request via a D0168 dataflow; and • customer request via our customer relations centre. 	
UKPN	Non-Confidential	<p>The process is similar for all scenarios. A full revenue protection investigation is undertaken collating all relevant information in line with the DCUSA RP CoP. The RP officers will attempt to speak to the occupiers, landlord or lettings agent and explain the situation. A letter is also left on site setting out the next steps. Immediate de-energisation will take place under ESQCR 26 where serious safety concerns arise.</p>	Noted.
WPD	Non-Confidential	<p>We investigate to ascertain if this is because a MPAN was disconnected in error at some time in the past, because an MPAN was never created or because the MPAN exists but has never been registered.</p> <p>The process splits into three here:</p> <ol style="list-style-type: none"> 1. If the MPAN was disconnected in error then, following discussion with the Customer and with the supplier registered at that time, we either re-instate it on MPAS (using the MRA MAP04 process) or create a new MPAN. In the latter case the process 2 below begins. 2. When a new MPAN needs to be created we do this and inform the Customer they need to ask a supplier of their choice to register it. We then monitor the situation to 	Noted.

		<p>ensure the MPAN is subsequently registered following up with the Customer and their chosen supplier as needed.</p> <p>3. Where an unregistered MPAN already exists we inform the Customer they need to ask a supplier of their choice to register it. We then monitor the situation to ensure the MPAN is subsequently registered following up with the Customer and their chosen supplier as needed.</p> <p>Alternatively If Revenue Protection are involved our usual process is to make contact with the consumer of the premises where we suspect an unregistered supply, when contact is made we inspect the meter and establish if an MPAN needs raising or if an existing MPAN can be given to the customer. We leave a letter with the customer and offer assistance in getting their supply registered. A revisit to the premises is set for 2 weeks. If the customer has made no effort to establish contact with a supplier then we leave a notice for disconnection of the supply. We arrange a revisit for around 28 days' time to meet with the customer again. In this period the customer usually has obtained a supplier</p>	
Company	Confidential?	Question Three - . DNO's: (a) Do you send letters to unregistered customers to request them to register with a Supplier and do customers reply to such letters? Do you have processes for follow-up?	Working Group Response
British Gas	Non-Confidential	N/A	
ENWL	Non-Confidential	<p>Yes, we send out letters to customers once the site has been identified as not having a registered Supplier or on an unauthorised connection.</p> <p>The response is a Supplier registering against the MPAN the DNO</p>	Noted.

		<p>provided to the customer.</p> <p>Yes, we have follow-up processes.</p> <p>A more detailed response was provided in the RFI response to DIF028. However the relevance of such a question is challenged from the perspective of the intent associated with this change. The intent is to ensure that we get unregistered customer into a registered status so it is essential who has responsibility under each of the scenario's identified in order to progress this CP.</p>	
GTC	Non-Confidential	<p>We do not have this process currently in place for our electricity customers.</p> <p>We do have a process however for our gas distribution business which primarily focusses on commercial supply points however where it has become necessary to follow the process for domestic customers it has been really successful. We have a 4 stage letter process which explains who we are and what the issue is and each stage explains what the next steps will be if the situation is not rectified.</p>	Noted.
Anonymous 1	Confidential	N/A	
Scottish Power Energy Retail	Non-Confidential	N/A	
SP Distribution/ SP Manweb	Non - Confidential	Letters have been sent to customers of Unmetered Supplies. The customers have replied but the suppliers often refuse to register the mpans when there is a small EAC.	Noted.
Northern Powergrid	Non - Confidential	Yes, letters are issued to customers who we believe have a supply that requires registration. If a customer responds to our letter confirming who their nominated supplier is, we then issue a copy of the letter to the nominated supplier to assist with registration. If no	Noted.

		response is received from the customer following first issue, we would then initiate a second letter, if still no response received we would arrange with our third party contractor for a site visit. Following results received back from our third party contractor we would then issue out a further 2 letters informing the customer we have carried out a site visit and urge them to get in touch with their chosen supplier.	
UKPN	Non-Confidential	As per Q2, letters are left by the RP officers at the time of the site visit. We do not generally receive any written replies.	Noted.
WPD	Non-Confidential	Letters are not sent as a matter of course – we generally contact the customer by telephone or email – however we have used letters on certain occasions	Noted.
Company	Confidential?	(b) Please briefly set out your current process for follow-up with such customers.	Working Group Response
British Gas	Non-Confidential	N/A	
ENWL	Non-Confidential	We place the obligation on the customer to appoint a Supplier of choice were a Supplier cannot be identified as being involved in the process. We will not contact the Supplier on the customer's behalf as the contract is between the customer and the Supplier and we do not want to be nor should we be 'piggy in the middle'.	Noted.
GTC	Non-Confidential	N/A	
Anonymous 1	Confidential	N/A	
Scottish Power Energy Retail	Non-Confidential	N/A	

SP Distribution/ SP Manweb	Non - Confidential	See supplier issue above.	Noted.
Northern Powergrid	Non - Confidential	If the customer provides a positive response indicating that the site is ready to be registered and has named a chosen supplier, we would issue the proforma completed by the customer to the chosen supplier on a monthly basis. If the supplier advises they are unable to progress with registration, we would then contact the customer by telephone or letter to advise them they need to contact the supplier directly to initiate the registration as we are unable to progress further.	Noted.
UKPN	Non- Confidential	The premise is monitored in terms of the establishment of registered MPANs and a legitimate electricity supply. Premises which take no action may be subject to a further RP visit.	Noted.
WPD	Non- Confidential	Each MPAS member of staff is responsible for any unregistered mpans they come across during their general work and they will follow these up with the customer/ supplier at regular intervals. preclude	Noted.
Company	Confidential?	(c) How successful/efficient is the issuing of these letters in terms receiving responses from customers?	Working Group Response
British Gas	Non- Confidential	N/A	
ENWL	Non- Confidential	When we have written to customers requesting they appoint a Supplier of choice we obtain 100% response rate.	Noted.
GTC	Non- Confidential	N/A	
Anonymous 1	Confidential	N/A	
Scottish	Non-	N/A	

Power Energy Retail	Confidential		
SP Distribution/ SP Manweb	Non - Confidential	As above	Noted.
Northern Powergrid	Non - Confidential	Of all the letters issued to customers for unregistered sites, we have a success rate of 27% response. Some of these responses may contain a chosen supplier and some may not. On occasions where the customer has not nominated a supplier follow up is made to advise we are unable to assist with registration unless they provide a nominated supplier. Recorded delivery letters are issued to try to encourage the customer to acknowledge the letter and hopefully assist with a prompt resolution.	Noted.
UKPN	Non-Confidential	The success-rate is disappointing low.	Noted.
WPD	Non-Confidential	As rarely used – unable to comment	Noted.
Company	Confidential?	Question Four - <i>In terms of communicating with unregistered customers do you have any suggestions for best practice for the DCP 209 Working Group?</i>	Working Group Response
British Gas	Non-Confidential	As a supplier we are unable to force consumers to enter into a contract with us. We believe DNOs should send a series of letters to unregistered customers with increasing strength of wording. Ultimately we believe DNOs can threaten disconnection if the consumer refuses to agree a contract with a supplier under section Section 17 of the Electricity Act 1989 which provides an exception to make a connection to their network where it is unreasonable to do so.	Noted.
ENWL	Non-Confidential	In Scenario's 1,2,3,8,9 the DNO will notify the customer of the MPAN and details of how to choose a supplier of their choice. It is	Noted.

		<p>for the customer to contact the Supplier directly to arrange this.</p> <p>In Scenario's 1, 4, 5, 6 and 7 where a Supplier is identified as being involved in the process then that Supplier must register against the MPAN. Once this has been completed discussions with the customer maybe required to cover any Theft in Conveyance periods.</p>	
GTC	Non-Confidential	N/A	Noted.
Anonymous 1	Confidential	<p>We rely on the customer contacting us stating that they have no registered supplier, Customers do call to find out who they are supplied by this can be identified via Industry systems with the correct permissions. If the customer wants us as a supplier the process is continued from there.</p> <p>Lettering/phone calls are also carried out – however the success of this is minimal and the DNOs are notified of these.</p> <p>Suppliers/DNOs could also have a 'what to do' section on their website to help customers who find themselves in this situation.</p> <p>The group could take a steer from the ongoing work in the Gas Industry with regards to unregistered customers.</p>	Noted.
Scottish Power Energy Retail	Non-Confidential	N/A	
SP Distribution/ SP Manweb	Non - Confidential	We would welcome any guidance, in order to register these customers.	Noted.
Northern Powergrid	Non - Confidential	<ul style="list-style-type: none"> • Standard format of letters to be agreed by all parties. • Agreed industry timescales for resolution i.e. how long between letters / supplier resolution. • Clarify what escalation options are available to DNO's to 	Noted.

		<p>resolve the issue if no response is received from customers and we believe there is energy being used at the site.</p> <ul style="list-style-type: none"> • Establish whether DNO's can de-energise or disconnect an unregistered customer where no response is received, e.g. following multiple communications. • Clarify situations where we would not de-energise or disconnect a customer, e.g. Vulnerable customers 	
UKPN	Non-Confidential	As an industry we need to better address some of the barriers faced by those who wish to arrange a traded MPAN for their premise. We must also be mindful that we are dealing with a tremendous range of individuals from those who genuinely wish to get everything fixed to those who wish to pervert the process.	Noted.
WPD	Non-Confidential	Whilst establishing an industry process would be a positive step – this should not preclude the DNO contacting the customer by whichever method they chose or dictate the narrative of any letters as they may not be appropriate in all cases.	Noted.
Company	Confidential?	<p>Question Five - Suppliers:</p> <p><i>(a) Where a distributor notifies you of an unregistered customer who has indicated willingness to form a supply contract with you, do you have processes for follow-up?</i></p>	Working Group Response
British Gas	Non-Confidential	<p>Where we are contacted directly by customers we have a process to deal with these customers and arrange for registration.</p> <p>Our Specialist Referrals team do follow up individual cases where our own revenue protection unit refers sites to them where they have indicated a willingness to be registered to British Gas</p>	Noted.
ENWL	Non-Confidential	N/A	Noted.
GTC	Non-	N/A	Noted.

	Confidential		
Anonymous 1	Confidential	<p>Current available Industry processes are used and these are followed up with the customer.</p> <p>We currently have lettering and phone call processes in place to follow up and work with DNOs who have processes to identify these in place.</p> <p>We contact the customer where they have stated they wish to be supplied by npower – however the onus is on the customer and we have seen minimal success with these processes</p>	Noted.
Scottish Power Energy Retail	Non- Confidential	The Distributor would contact a SPERL specialist team with notification of an unregistered customer. On receipt of this notification from the DNO a representative from SPERL would then contact the customer to confirm details and register the MPAN once a contract (or deemed contract) has been agreed.	Noted.
SP Distribution/ SP Manweb	Non - Confidential	N/A	
Northern Powergrid	Non - Confidential	N/A	
UKPN	Non- Confidential	N/A	
WPD	Non- Confidential	N/A	
Company	Confidential?	(b) Please briefly set out your current process for follow-up with such customers; and	Working Group Response
British Gas	Non- Confidential	These customers would be followed up by letter and phone call	Noted.

ENWL	Non-Confidential	N/A	
GTC	Non-Confidential	N/A	
Anonymous 1	Confidential	As above we adopt the current Industry processes available to register a contract, we send multiple letters/literature to site (name of the customer/occupier) Phone calls are made where a telephone number has been provided. Feedback is then provided to the DNO on the success of these.	Noted.
Scottish Power Energy Retail	Non-Confidential	<p>We normally deal with 2 types of scenarios where customers are not registered.</p> <p>No Meter at Site These will be visited by SPERL's Revenue Protection provider who will call at the property in question, take all necessary details (Name, date of entry, landlord etc.) and install a meter at that time. Details are then cascaded to our billing team who in turn will request an MPAN and register the site.</p> <p>Meter at Site Domestic - A SPERL representative will contact the customer and offer a contract. The difficulties are related to whenever there is any significant backdating of billing. Where the customer is a recent tenant and willing then this is largely successful and the MPAN is created. Our sales team would then make contact with the customer and enter into contractual negotiations. Once agreed we would appoint agents and bill. Non Domestic - SPERL will carry out a full investigation and will then inform the customer they have 7 days to register or we will recall and disconnect. This normally works successfully without the need for a further visit to disconnect after 7 days</p>	Noted.

SP Distribution/ SP Manweb	Confidential	N/A	
Northern Powergrid	Non - Confidential	N/A	
UKPN	Non-Confidential	N/A	
WPD	Non-Confidential	N/A	
Company	Confidential?	(c) How successful/efficient is this in terms receiving responses from customers?	Working Group Response
British Gas	Non-Confidential	This does seem to work for isolated instances but this team is not resourced to deal with large volumes	Noted.
ENWL	Non-Confidential	N/A	
GTC	Non-Confidential	N/A	
Anonymous 1	Confidential	There is a very low success rate in receiving responses from the customers.	Noted.
Scottish Power Energy Retail	Non-Confidential	Less of an issue for I&C customers as there is a higher likelihood for debt collection and disconnection. However this can be less successful for domestic properties	Noted.
SP Distribution/ SP Manweb	Confidential	N/A	
Northern Powergrid	Non - Confidential	N/A	
UKPN	Non-Confidential	N/A	

WPD	Non-Confidential	N/A	
Company	Confidential?	Question Six - Suppliers: (a) In what scenarios, if any, would you request an MPAN, and then not register the customer?	Working Group Response
British Gas	Non-Confidential	We do have occasions where customers (mainly business) ask us to request an MPAN to be created but then do not carry out the work or get a better quote for the work required from a different supplier. We have seen some issues with the interpretation of G87/2 in some cases.	Noted.
ENWL	Non-Confidential	N/A	
GTC	Non-Confidential	N/A	
Anonymous 1	Confidential	This scenario is rare through the New Connections process, but highlighted that it would be the customer who requests the MPAN in this instance... <ul style="list-style-type: none"> An example would be a building contractor who builds properties, requests a number of MPANs and then does not see the build through, then these would be dormant. Then in the same situation, a builder may request for example 10 MPANs for 10 houses, but then decides to change the property into two dwelling (flat), but not request an extra MPAN and supply 	Noted.
Scottish Power Energy Retail	Non-Confidential	We do not believe that this scenario would happen for domestic and SME customers. Our understanding is that for I & C customers this is an unlikely scenario as we would typically only do this for existing customers building new properties (e.g. retail chain). Therefore it is unlikely that this would not conclude between requesting the MPAN and registering. However this scenario is	Noted.

		more likely for domestic property builders.	
SP Distribution/ SP Manweb	Non - Confidential	N/A	
Northern Powergrid	Non - Confidential	N/A	
UKPN	Non- Confidential	N/A	
WPD	Non- Confidential	N/A	
Company	Confidential?	(b) In what scenarios, if any, would you request an MPAN, fit a meter and then not register the customer?	Working Group Response
British Gas	Non- Confidential	This should never happen	
ENWL	Non- Confidential	N/A	
GTC	Non- Confidential	N/A	
Anonymous 1	Confidential	This would not be possible as the Agents would need to be appointed before the meter is fitted – so registration would need to be completed first.	Noted.
Scottish Power Energy Retail	Non- Confidential	This should not happen in any known scenario. A meter cannot be installed without requesting a MOP to carry out a visit and this cannot happen without first appointing a MOP. A MOP cannot be appointed unless we are the registered supplier.	Noted.
SP Distribution/ SP Manweb	Non - Confidential	N/A	
Northern Powergrid	Non - Confidential	N/A	

UKPN	Non-Confidential	N/A	
WPD	Non-Confidential	N/A	
Company	Confidential?	DNOs: (c) In what scenarios, if any, would you fit a meter for an MPAN without a registered Supplier?	Working Group Response
British Gas	Non-Confidential	N/A	
ENWL	Non-Confidential	Never	
GTC	Non-Confidential	We do not fit meters	Noted.
Anonymous 1	Confidential	N/A	
Scottish Power Energy Retail	Non-Confidential	N/A	
SP Distribution/ SP Manweb	Non - Confidential	N/A	
Northern Powergrid	Non - Confidential	We do not normally fit meters as this is obviously a supplier led MOP activity, however, some of our rapid response staff carry a small number of meters to manage urgent situations under limited circumstances e.g. for vulnerable customers with faulty meters outside normal working hours. It is very unlikely, but possible, that we could inadvertently fit a meter for a vulnerable customer that also happened to be unregistered.	Noted.
UKPN	Non-	This is an exceptionally rare occurrence. Our RP agent will only do	Noted.

	Confidential	this where the existing stolen/tampered meter is seriously unsafe and the significant vulnerability of the occupants guides us away from our normal immediate de-energisation response.	
WPD	Non-Confidential	None – As a DNO we do not fit meters	Noted.
Company	Confidential?	<i>Question Seven - The Working Group would welcome suggestions from DCUSA Parties on best practice to prevent unregistered sites being created and any suggestions for resolving unregistered customers that might be used to develop best practice. Your response can relate to the scenarios in the attached table or on the management of unregistered customers in general.</i>	Working Group Response
British Gas	Non-Confidential	<p>We believe DNOs are in the best position to resolve unregistered sites.</p> <p>We are happy to work with DNOs to help resolve unregistered sites but ultimately suppliers hands are tied if a consumer refuses to enter into a contract with any particular supplier. We believe the process that DNOs use to issue MPANs should be reviewed. We can only assume that some of these scenarios may occur when UIPs fit meters and services without ensuring a supplier is registered to the site.</p>	Noted.
ENWL	Non-Confidential	For each DNO to ensure that the Connections process has the necessary controls in place to minimise instances of unregistered customers and identifies areas within the business where instances may occur, for example Call Centre enquiries were a customer requests their MPAN and the business cannot find one, equally we need to ensure we manage Supplier requests for MPANs and follow-up on a regular basis to ensure they register against that MPAN and not just bill the customer separately. It is the responsibility of both parties to ensure that their processes are robust and were instances of scenario's identified exist they should	Noted.

		<p>seek to minimise their processes going forward.</p> <p>We see this question as irrelevant to this CP since we should just be identifying obligations on Supplier or DNO to progress the registration of an MPAN.</p>	
GTC	Non-Confidential	N/A	
Anonymous 1	Confidential	<p>The electricity industry should take a steer from the ongoing work within the gas industry where customers are notified of their unregistered status and given time and guidance to arrange a supply contract. Should this not be forthcoming the customer must be given an ultimatum and potentially lose the supply.</p> <p>Other customers are paying for this energy which is inherently unfair.</p>	Noted.
Scottish Power Energy Retail	Non-Confidential	<p>Considerations should be given to close tracking of the site requirements with robust controls in place to monitor supply number linked to the site.</p> <p>We believe that the focus on the causes of unregistered customers and efforts to reduce numbers by prevention should be our initial consideration. Alternatively mirror the effective solution adopted by the Irish whereby a DNO installs a PP meter with a limited amount of credit thereby 'self-disconnecting' if they do not register with a Supplier within a specified time.</p>	Noted.
SP Distribution/ SP Manweb	Non - Confidential	We have carried out a Phased MPANs Project in order to prevent unregistered sites being created, where the release of mpans is controlled & restricted until builds are completed.	Noted.
Northern Powergrid	Non - Confidential	<ul style="list-style-type: none"> Ensure suppliers only request the creation of a new MPAN once a contract is in place, not on initial contact with the customer. 	Noted.

		<ul style="list-style-type: none"> • It would be useful to capture the end customers contact details when requesting for MPANs for non-postal addresses. This would assist with follow up as on many occasions we contact the customer and they are not responsible for the site. • Refine the New Connections MPAN request form to ensure all relevant information is captured prior to the MPAN being raised. (Make some fields mandatory) 	
UKPN	Non-Confidential	<p>DCUSA parties are not generally responsible for the creation of unregistered sites. In terms of aspects that we can influence on a preventative basis we would highlight:</p> <ul style="list-style-type: none"> • Tight control of D0168 MPAN generation processes • Tight control of logical D0132 requests 	Noted.
WPD	Non-Confidential	<p>A list of supplier contacts which DNO's can provide to the customer to contact or for the DNO to contact on behalf of the customer would be beneficial – As generally customers find it very difficult to contact the correct person within an organisation who can arrange the registration for them.</p>	Noted.