

## Derogation Application

### Originator Details

|                   |  |
|-------------------|--|
| Companies         | British Gas Trading Limited                                |
| Originator's Name | (This is intentionally left blank when issued for comment) |
| Email Address     | (This is intentionally left blank when issued for comment) |
| Telephone Number  | (This is intentionally left blank when issued for comment) |
|                   |  |

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

|            |  |
|------------|--|
| Paragraph  | Schedule 30 – The Electricity Theft Detection Incentive Scheme |
| Obligation | 2020/21 Electricity Theft Detection Incentive Scheme           |

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

As a result of the current operational restrictions imposed as a result of the COVID-19 pandemic British Gas Trading Limited is requesting a time limited derogation against Schedule 30 of the DCUSA "The Electricity Theft Detection Incentive Scheme".

### 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)

British Gas Trading Limited is requesting a derogation from participating in the electricity theft detection scheme year, due to commence on 1<sup>st</sup> June 2020, until 1<sup>st</sup> August 2020. We intend to work closely with Ofgem and other Suppliers via the Theft Issues Group and if necessary, may request a further derogation in due course should operating restrictions make participating in the electricity theft detection scheme on 1<sup>st</sup> August impracticable.

Ofgem has recently issued an open letter to Suppliers setting out an enabling framework for regulatory flexibility. As a result, many Suppliers are having to de-prioritise non-safety related theft detection activity. We believe therefore a derogation from participating in the 2020/21 incentive scheme year until 1<sup>st</sup> August is a pragmatic way forward and would be happy for the Panel to consider applying this derogation to all electricity Suppliers who would be participating in the 2020/21 scheme year.

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

As the COVID-19 restrictions impact all parties we would be happy for the panel to consider applying this derogation to all Suppliers participating in the 2020/21 scheme year.

### 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:

It is currently proposed that this derogation is in place until 1<sup>st</sup> August 2020. This may need to be extended if the current operational restrictions imposed as a result of the COVID-19 pandemic are still in place.

**Timescales** - period of time for which the derogation is sought

1<sup>st</sup> June 2020, until 1<sup>st</sup> August 2020. As stated above, this may need to be extended.

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

A similar derogation request has been submitted to the SPAA to cover the gas theft detection incentive scheme

**To be completed by Panel Secretary**

|   |                           |
|---|---------------------------|
| Date Application received                 | 20 April 2020             |
| Date Application presented to DCUSA Panel | 20 <sup>th</sup> May 2020 |
| 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.