RETAIL ENERGY CODE

RECPAB_26_0630_10A - TDIS VERIFICATION CHECKLISTS

1 DEEP DIVE

Question	Criteria	Code Excerpt
1. Energy Theft Desktop Investigations		
1.1a	Do **Energy Theft Desktop Investigations** meet the requirements outlined in the definition under the REC? i.e. do they include and consider: (a) the source, date and details of the initial report of suspicion of Energy Theft	**Schedule 1 - Energy Theft Desktop Investigation**: means that the holder of an Energy Licence (or person acting on their behalf) conducts a desktop investigation to determine the potential likelihood of Energy Theft and requirements of further investigation. As a minimum the desktop investigation must include and evidence: (a) the source, date and details of the initial report of suspicion of Energy Theft;
1.1b	(b) the date of the desktop investigation and the name/ID of the person who conducted it. If the desktop investigation was fully or partly automated this should be recorded with the automation process made available on request *NB: In cases where the Energy Theft Desktop Investigation is fully or partly automated, how do you document the automation process (e.g., algorithms, rules, data sources, decision logic)? Please share the relevant documentation.*	**Schedule 1 - Energy Theft Desktop Investigation**: means that the holder of an Energy Licence (or person acting on their behalf) conducts a desktop investigation to determine the potential likelihood of Energy Theft and requirements of further investigation. As a minimum the desktop investigation must include and evidence: … (b) the date of the desktop investigation and the name/ID of the person who conducted it. If the desktop investigation was fully or partly automated this should be recorded with the automation process made available on request
1.1c	(c) if the potential Energy Theft is being investigated by or on behalf of an Energy Supplier, that the Energy Supplier is the current Registered Supplier at the time of the investigation (in which case the Supply Effective From Date and any known Supply Effective Through Date shall be recorded);	**Schedule 1 - Energy Theft Desktop Investigation**: means that the holder of an Energy Licence (or person acting on their behalf) conducts a desktop investigation to determine the potential likelihood of Energy Theft and requirements of further investigation. As a minimum the desktop investigation must include and evidence: … (c) if the potential Energy Theft is being investigated by or on behalf of an Energy Supplier, that the Energy Supplier is the current Registered Supplier at the time of the investigation (in which case the Supply Effective From Date and any known Supply Effective Through Date shall be recorded);

1.1d	(d) the relevant Consumer's name, address and MPAN/MPRN, and the dates of the last Change of Occupier and any known future Change of Occupier	**Schedule 1 - Energy Theft Desktop Investigation**: means that the holder of an Energy Licence (or person acting on their behalf) conducts a desktop investigation to determine the potential likelihood of Energy Theft and requirements of further investigation. As a minimum the desktop investigation must include and evidence: … (d) the relevant Consumer's name, address and MPAN/MPRN, and the dates of the last Change of Occupier and any known future Change of Occupier
1.1e	(e) any correspondence or contact with the Consumer or a third party concerning the potential Energy Theft	**Schedule 1 - Energy Theft Desktop Investigation**: means that the holder of an Energy Licence (or person acting on their behalf) conducts a desktop investigation to determine the potential likelihood of Energy Theft and requirements of further investigation. As a minimum the desktop investigation must include and evidence: … (e) any correspondence or contact with the Consumer or a third party concerning the potential Energy Theft
1.1f	(f) review of meter details, any metering work, meter readings, consumption, alerts and payment activity relevant to the investigation	**Schedule 1 - Energy Theft Desktop Investigation**: means that the holder of an Energy Licence (or person acting on their behalf) conducts a desktop investigation to determine the potential likelihood of Energy Theft and requirements of further investigation. As a minimum the desktop investigation must include and evidence: … (f) review of meter details, any metering work, meter readings, consumption, alerts and payment activity relevant to the investigation
1.1g	(g) any previous known theft investigations at the premises or linked to the Consumer	**Schedule 1 - Energy Theft Desktop Investigation**: means that the holder of an Energy Licence (or person acting on their behalf) conducts a desktop investigation to determine the potential likelihood of Energy Theft and requirements of further investigation. As a minimum the desktop investigation must include and evidence: … (g) any previous known theft investigations at the premises or linked to the Consumer

1.1h	(h) a determination that the suspicion of Energy Theft is invalid and the investigation may be closed; or that the suspicion of Energy Theft is valid and should progress to an Energy Theft Site Visit Investigation	**Schedule 1 - Energy Theft Desktop Investigation**: means that the holder of an Energy Licence (or person acting on their behalf) conducts a desktop investigation to determine the potential likelihood of Energy Theft and requirements of further investigation. As a minimum the desktop investigation must include and evidence: … (h) a determination that the suspicion of Energy Theft is invalid and the investigation may be closed; or that the suspicion of Energy Theft is valid and should progress to an Energy Theft Site Visit Investigation
1.2	Please describe how do you gain assurance that you are consistently meeting these requirements? This may include controls, reviews, monitoring or any other business processes you rely on. Please describe the scope and frequency of any monitoring (if applicable).	See above
2. Energy Theft Site Visit Investigation		
2.1a	Do **Energy Theft Site Visit Investigations** meet the requirements outlined in the definition under the REC? i.e. do they include and consider: (a) that the suspected Energy Theft has been assigned a priority status as per Paragraph 7 of the Unbilled Energy Code of Practice	**Schedule 1 - Energy Theft Site Visit Investigation**: means that the holder of an Energy Licence (or person acting on their behalf) visits the premises where Energy Theft is suspected to determine if a Confirmed Energy Theft has occurred following the completion of an Energy Theft Desktop Investigation. Multiple visits to a premises in respect of the same suspected Energy Theft shall only count as one Energy Theft Site Visit Investigation. As a minimum the site visit investigation must include and evidence: (a) that the suspected Energy Theft has been assigned a priority status as per Paragraph 7 of the Unbilled Energy Code of Practice
2.1b	(b) any known or suspected Vulnerability of the Consumer and/or any known or suspected potential hazards at the premises	**Schedule 1 - Energy Theft Site Visit Investigation**: means that the holder of an Energy Licence (or person acting on their behalf) visits the premises where Energy Theft is suspected to determine if a Confirmed Energy Theft has occurred following the completion of an Energy Theft Desktop Investigation. Multiple visits to a premises in respect of the same suspected Energy Theft shall only count as one

		Energy Theft Site Visit Investigation. As a minimum the site visit investigation must include and evidence: … (b) any known or suspected Vulnerability of the Consumer and/or any known or suspected potential hazards at the premises
2.1c	(c) that access to the metering point and installation has been gained, or for Theft in Conveyance the point of the illegal connection, and an inspection made that satisfies the nature of the initial report of the suspicion of Energy Theft	**Schedule 1 - Energy Theft Site Visit Investigation**: means that the holder of an Energy Licence (or person acting on their behalf) visits the premises where Energy Theft is suspected to determine if a Confirmed Energy Theft has occurred following the completion of an Energy Theft Desktop Investigation. Multiple visits to a premises in respect of the same suspected Energy Theft shall only count as one Energy Theft Site Visit Investigation. As a minimum the site visit investigation must include and evidence: … (c) that access to the metering point and installation has been gained, or for Theft in Conveyance the point of the illegal connection, and an inspection made that satisfies the nature of the initial report of the suspicion of Energy Theft
2.1d	(d) a photograph of the premises and a photo (or sketch) of the metering point or suspected point of illegal connection	**Schedule 1 - Energy Theft Site Visit Investigation**: means that the holder of an Energy Licence (or person acting on their behalf) visits the premises where Energy Theft is suspected to determine if a Confirmed Energy Theft has occurred following the completion of an Energy Theft Desktop Investigation. Multiple visits to a premises in respect of the same suspected Energy Theft shall only count as one Energy Theft Site Visit Investigation. As a minimum the site visit investigation must include and evidence: … (d) a photograph of the premises and a photo (or sketch) of the metering point or suspected point of illegal connection
2.1e	(e) a report of all visits made to premises including, dates, times, persons spoken to, and outcome of metering point inspection, including if theft or another issue was identified and any metering work or other remedial action undertaken	**Schedule 1 - Energy Theft Site Visit Investigation**: means that the holder of an Energy Licence (or person acting on their behalf) visits the premises where Energy Theft is suspected to determine if a Confirmed Energy Theft has occurred following the completion of an Energy Theft Desktop Investigation. Multiple visits to a premises in respect

		of the same suspected Energy Theft shall only count as one Energy Theft Site Visit Investigation. As a minimum the site visit investigation must include and evidence: … (e) a report of all visits made to premises including, dates, times, persons spoken to, and outcome of metering point inspection, including if theft or another issue was identified and any metering work or other remedial action undertaken
2.1f	(f) if Energy Theft is identified, that information has been obtained to enable an assessment of the amount of Energy that has been the subject of Energy Theft.	**Schedule 1 - Energy Theft Site Visit Investigation**: means that the holder of an Energy Licence (or person acting on their behalf) visits the premises where Energy Theft is suspected to determine if a Confirmed Energy Theft has occurred following the completion of an Energy Theft Desktop Investigation. Multiple visits to a premises in respect of the same suspected Energy Theft shall only count as one Energy Theft Site Visit Investigation. As a minimum the site visit investigation must include and evidence: … (f) if Energy Theft is identified, that information has been obtained to enable an assessment of the amount of Energy that has been the subject of Energy Theft.
2.2	Please describe how do you gain assurance that you are consistently meeting these requirements? This may include controls, reviews, monitoring or any other business processes you rely on. Please describe the scope and frequency of any monitoring (if applicable).	See above
3. TDIS Reporting		
3.1	What steps do you take to ensure that your Theft Reporting submissions are complete and accurate? This includes steps taken to verify the information used to compile the submission, steps to sense-check any anomalous values (e.g. large/small assessed losses, investigation timeframes), and steps to accurately transpose that information into the required PARC #1342 format.	Performance Assurance Reporting Catalogue #1342
3.2	Multiple visits to the same property as part of one investigation/lead are considered the same investigation. What processes have you got in place to ensure you report	**Schedule 1 - Energy Theft Site Visit Investigation**: ...Multiple visits to a premises in respect of the same

	this accurately and ensure you assign multiple visits to the same investigation? If applicable, please describe any monitoring you have in place to ensure this is accurately maintained.	suspected Energy Theft shall only count as one Energy Theft Site Visit Investigation…
4. Consumer Protection during Theft Investigations		
4.1	How do you ensure that you meet relevant REC obligations around consumer protection during theft investigations including on areas such as safety, vulnerable Consumers, communication.	See below for each area
4.1a	How do you decide/uncover where the Consumer's Premise is unsafe? What is the process for notifying the Network Operator + notifying the Network Operator/Revenue Agent in an emergency?	**Schedule 8 Paragraph 3.3**: Where, in the course of investigating actual or suspected Energy Theft an Energy Supplier identifies that a Consumer's Premises is unsafe, then the Energy Supplier or its agent shall notify the relevant Network Party, in a prompt and appropriate manner, of the unsafe situation and any actions taken. **Schedule 8 Paragraph 7.2**: Where a priority 1 situation is identified by or notified to an Energy Supplier, that Energy Supplier: (a) shall immediately notify the relevant Network Party if there is a dangerous situation that the Network Party needs to rectify; and (b) may in addition instruct its Revenue Protection Agent to attend the Premises (at the same time as the Network Party, where applicable).
4.1b	Where Vulnerability is identified during a site visit, what measures/safeguards do you apply? This should include consideration of retaining supply, clear communication, and adherence to the Theft Charter (Annex A) and Section 18 of the Code?	**Schedule 8 Paragraph 18.6**: Where a case of confirmed Energy Theft is identified, Parties must make all reasonable efforts to retain supply for a Vulnerable Consumer. It may not be reasonable to retain supply where there is a serious safety concern and/or the Consumer is a repeat offender and all reasonable efforts to prevent continued offending have been undertaken. **Schedule 8 Paragraph 18.7**: When on site, Parties must take steps to ascertain whether any person in the household is a Vulnerable Consumer. Where Vulnerability has been identified and Energy Theft is confirmed, Parties must ensure

		that appropriate measures are taken, including consideration of whether to Cut-Off or Disconnect supply and recover charges. **Schedule 8 Paragraph 18.8**: Parties must ensure that Vulnerable Consumers are appropriately informed and fully aware of any action being taken. For example, this may include using an interpreter or ensuring that an appropriate adult is present at the site. Vulnerable Consumers must be offered the opportunity to clarify their circumstances so that this can be taken into account by Parties when deciding what actions should be taken.
4.1c	Does the desktop and site investigation process include a mandatory check for known or suspected Vulnerability status of the Consumer, and is this recorded and flagged for subsequent stages?	**Schedule 8 Paragraph 18.8**: Each Party shall take reasonable steps to ascertain who in the household might be a Vulnerable Consumer...
4.1d	Do you have a dedicated telephone number for reported theft? Where is the number publicised/available?	**Schedule 8 Paragraph 5.1**: Network Parties and Energy Suppliers to this Code of Practice shall have an appropriate reporting process in place to enable individuals to inform them of suspected interference. This should include a telephone number for reporting such information, which should be widely publicised.
4.1e	Where a consumer switched Supply during Energy theft investigation, how have you communicated to the incoming Supplier about the incomplete investigation? What details were shared?	**Schedule 8 Paragraph 8.3**: If a Consumer switches Energy Supplier before Theft is confirmed, the outgoing Energy Supplier shall advise the incoming Energy Supplier of the incomplete investigation. Where the incoming Energy Supplier requests further details, only facts (and not opinions) shall be shared. Any information transferred should be subject to the Parties' data protection policies and procedures.
4.1f	What monitoring/policies have you got in place to ensure your chosen Revenue Protection Agent meets the Code Requirements? E.g. (how do you ensure they leave the correct information to the consumer, does not mislead the consumers about the scope of their statutory powers etc)	**Schedule 8 Paragraph 8.2**: Each Energy Supplier (...) shall ensure that: (a)its Statutory Powers are only exercised where it (or its Revenue Protection Agent) reasonably believes that there is sufficient evidence to prove (on the balance of probabilities) that a Relevant Offence has been committed;

		(b)its Statutory Powers are only exercised where it (or its Revenue Protection Agent) reasonably believes that there is sufficient evidence to prove (on the balance of probabilities) that the Relevant Offence was committed by the current Occupier (or owner) of the Premises; (c)neither it (nor its Revenue Protection Agent) misleads Consumers about the scope of the Party's Statutory Powers;
4.1g	Investigation outcome: what steps do you follow/prescribe to stop the Energy Theft continuing and to make the site safe as soon as reasonably practicable, in accordance with Section 11.1(b)	**Schedule 8 Paragraph 11.1**: (b) take appropriate steps to stop the Energy Theft continuing and make safe as soon as reasonably practicable.
4.1h	What policies/local work instructions do you have on how you communicate with the consumer about this.	**Schedule 8 Paragraph 9.3**: Each Party shall clearly explain to the Consumer the reason why evidence is being collected and the basis on which the Party is acting.
4.1i	What advice/contact are you giving consumers if a disconnection is being performed.	**Schedule 8 Paragraph 10.3b**: Each Network Party and each Energy Supplier shall ensure that: (b)Consumers are informed, following a make safe, Disconnection of who to contact in order to find out how to get the supply reinstated.
5. General Theft Policies & Other Code Requirements		
5.1	How do you ensure that you meet relevant REC obligations around theft processes during theft investigations.	See below for each area
5.1a	Are individuals conducting desktop investigations appropriately trained, authorised, and competent, and is there a system for verifying and recording their competence?	**Schedule 8 Paragraph 2.1j**: Energy Theft should only be investigated by a person possessing appropriate skill, experience, and authorisation
5.1b	How do you monitor the reports made to you and track whether they have been acted upon?	**Schedule 8 Paragraph 3.4**: Energy Suppliers and Network Parties shall (and shall ensure that their agents shall) act on reports made to them regarding Energy Theft for which they have responsibility in accordance with this Code of Practice (or Energy Licences or Law), and take the appropriate steps required of them in respect of such Energy Theft (whether required of them under this Code of Practice, their Energy Licence or Law).
5.1c	What do you define as reasonable steps under the Code when it comes to unregistered sites?	**Schedule 8 Paragraph 4.1**: The Network Party shall take all reasonable cost-effective steps to identify and investigate

		Unregistered Consumers with the intention of resolving such cases of Unregistered Consumers (by an Energy Supplier agreeing an Energy Contract and becoming the Registered Supplier).
5.1d	How do you ensure you complete this within the required timeline (1 WD)?	**Schedule 8 Paragraph 6.10**: Where the Energy Supplier is providing information to the Network Party in respect of incidents arising as a result of Energy Theft, the Energy Supplier shall provide such information not later than the next Working Day after becoming aware of the same.
5.1e	Is an initial assessment of urgency and potential safety concerns conducted as part of the desktop investigation, and is a priority status (1, 2, or 3) assigned and recorded in accordance with Section 7 of the Code?	**Schedule 8 Paragraph 7.1**: On receipt of information, Parties must assess whether or not there is a serious safety concern or other reason for urgency, with priorities being assigned as below: (a) priority 1 – evidence of Energy Theft where there is a serious safety concern or other reason for urgency; (b) priority 2 - evidence of Energy Theft where there is no serious safety concern or other reason for urgency; and (c) priority 3 - information giving cause for suspicion that Energy Theft may have taken place (but not priority 1 or priority 2).
5.1f	Please share how you ensure that deadlines are met for each priority pathway as per Code requirements?	**Schedule 8 Paragraph 7.4**: The responsible Energy Supplier shall complete each case as soon as is reasonably practicable, and in accordance with the relevant priority assigned to such case in accordance with paragraph 7.1, being no later than the timescales set out in the table below: <u>Visit premises</u> Priority 1 - in any event within 1 Working Day for electricity and 2 Working Days for gas. Priority 2 - Within 20 Working Days for electricity, not defined for gas Priority 3 - Within 30 Working Days for electricity, not defined for gas. <u>Resolve</u> Priority 1 - 20 working days for electricity, 80 working days for gas

		Priority 2 - 40 working days for electricity, 80 working days for gas Priority 3 - 90 working days for electricity and 80 working days for gas
5.1g	What policies/LWIs you have in place that you rely on to demonstrate theft, including what minimum evidentiary standard do you rely on?	**Schedule 8 Paragraph 9.2**: Where a Supplier (or its Revenue Protection Agent) suspects that Energy Theft (other than Theft in Conveyance) has occurred, that Party (or such agent) shall collect and retain such evidence as it reasonably considers necessary to demonstrate that such Energy Theft has occurred.
5.1h	Investigation outcome: what steps do you prescribe/have in place to identify the perpetrator?	**Schedule 8 Paragraph 11.1**: In the case of a Confirmed Energy Theft, the Energy Supplier or Network Party shall: (a)seek to identify the Perpetrator (in most cases the Consumer is likely to be the Perpetrator but this may not be the case); and

2 SAMPLES

2.1 CONFIRMED ENERGY THEFT

1. Indication of Theft	
1.1	Does the evidence substantiate that the Supplier can reasonably determine, on the balance of probabilities and taking into account all of the evidence then available, one or more instances of Energy Theft has occurred.
2. Desktop Investigation	
2.1	Evidence that there is an indication of theft via a desktop review of consumption levels
3. Site Visit	
3.1	Evidence there was a site visit where access was successful
3.2	In cases where you did not obtain photographic evidence of the theft (e.g. the on-site agent provided a sketch of the theft), how did you determine on the balance of probabilities that Energy Theft had occurred
4. Evidence of Theft	
4.1	Photographic evidence of the theft, such as an illegal connection/bypass or meter tampering
5. Sample Reason	
5.1	If this sample was selected as a high risk, do we have sufficient evidence to determine the party complied with the REC obligations?

2.2 ENERGY THEFT SITE VISIT INVESTIGATION

1. Energy Theft Site Visit Investigation	
1.1a	Do **Energy Theft Site Visit Investigations** meet the requirements outlined in the definition under the REC? i.e. do they include and consider: (a) that the suspected Energy Theft has been assigned a priority status as per Paragraph 7 of the Unbilled Energy Code of Practice
1.1b	(b) any known or suspected Vulnerability of the Consumer and/or any known or suspected potential hazards at the premises
1.1c	(c) that access to the metering point and installation has been gained, or for Theft in Conveyance the point of the illegal connection, and an inspection made that satisfies the nature of the initial report of the suspicion of Energy Theft
1.1d	(d) a photograph of the premises and a photo (or sketch) of the metering point or suspected point of illegal connection
1.1e	(e) a report of all visits made to premises including, dates, times, persons spoken to, and outcome of metering point inspection, including if theft or another issue was identified and any metering work or other remedial action undertaken
1.1f	(f) if Energy Theft is identified, that information has been obtained to enable an assessment of the amount of Energy that has been the subject of Energy Theft.
2. Sample Reason	
2.1	If this sample was selected as a high risk, do we have sufficient evidence to determine the party complied with the REC obligations?

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2.3 ENERGY THEFT DESKTOP INVESTIGATION

1. Basis for TDIS Payment	
1.1	Did the Party complete this investigation in response to an ETTOS tip-off? *NB: As per Schedule 7 Appendix 3 Section 4.3, if the investigation is in response to an ETTOS tip-off then only a Desktop investigation is required to qualify for payment.*
2. Energy Theft Desktop Investigations	
2.1a	Do **Energy Theft Desktop Investigations** meet the requirements outlined in the definition under the REC? i.e. do they include and consider: (a) the source, date and details of the initial report of suspicion of Energy Theft
2.1b	(b) the date of the desktop investigation and the name/ID of the person who conducted it. If the desktop investigation was fully or partly automated this should be recorded with the automation process made available on request *NB: In cases where the Energy Theft Desktop Investigation is fully or partly automated, how do you document the automation process (e.g., algorithms, rules, data sources, decision logic)? Please share the relevant documentation.*
2.1c	(c) if the potential Energy Theft is being investigated by or on behalf of an Energy Supplier, that the Energy Supplier is the current Registered Supplier at the time of the investigation (in which case the Supply Effective From Date and any known Supply Effective Through Date shall be recorded);
2.1d	(d) the relevant Consumer's name, address and MPAN/MPRN, and the dates of the last Change of Occupier and any known future Change of Occupier
2.1e	(e) any correspondence or contact with the Consumer or a third party concerning the potential Energy Theft
2.1f	(f) review of meter details, any metering work, meter readings, consumption, alerts and payment activity relevant to the investigation
2.1g	(g) any previous known theft investigations at the premises or linked to the Consumer
2.1h	(h) a determination that the suspicion of Energy Theft is invalid and the investigation may be closed; or that the suspicion of Energy Theft is valid and should progress to an Energy Theft Site Visit Investigation
3. Sample Reason	
3.1	If this sample was selected as a high risk, do we have sufficient evidence to determine the party complied with the REC obligations?