RETAIL ENERGY CODE

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THEFT ISSUES GROUP

RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

No.	RISK	NOTES	MITIGATION
R01	There is a risk that the perception that the investigation of theft is not commercially viable continues and that some organisations may only complete the bare minimum to meet obligations.		
R02	There is a risk of potential damage to reputation including individual Parties, RECCo/Code Manager and industry as a whole.		
R03	There is a risk that if the industry cannot agree on a scheme, albeit an imperfect one, a new scheme will never be introduced, and any potential benefits will never be realised.		
R04	There is a risk that a newly introduced scheme could drive unwanted behaviour or result in unintended consequences.		
R05	There is a risk of consequences for Network partners if Suppliers don't address issues.	This can have an unintended consequence for costs on Network parties.	

R06	There is a risk of resource capacity constraints where an increase in theft detections and remedial works are required.		
R07	There is a risk that certain types of theft are not effectively and appropriately investigated to the required volumes as they are more difficult to identify.		
R08	There is a risk that the savvier and more knowledgeable base of perpetrators including rogue traders become increasingly ahead of industry.		

No.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
A01	There is an assumption that the TIG and any subsequent Change Proposals will work to overcome identified disincentives.	Certain Suppliers see theft as a cost and any future Change Proposals need to remove the negatives for finding theft. There needs to be a benefit for proactively working to decrease theft.	
A02	There is an assumption that any Change Proposals will not require any Licence or cross-code changes.		This will be validated following an agreement on the scope of any future Change Proposals.
A03	There is an assumption that any future changes will work to drive the correct behaviour.	The TIG will work to ensure that solutions promote the following.	

		- All theft requires the same level of investigation. - Safety should be more important than profit. - Safety should be the priority and at the forefront of all incentives.	
A04	There is an assumption that any costs associated with the detection or non-detection of theft is funded through industry and therefore Consumers.	The industry must be seen to spend Consumer funds wisely.	
A05	There is an assumption that any future scheme would be simple to administer both for the REC Code Manager and Parties.		
A06	There is an assumption that any future incentive scheme would appropriately socialise costs and allow the appropriate cost recovery.		
A07	There is an assumption that any future solutions would operate within the original principles of what TDIS intended to achieve.		
A08	There is an assumption that any future solution would reward and value good practice on safety.		
A09	There is an assumption that billing fraud will be confirmed as in or out of scope of TIG.		

A10	There is an assumption that consideration will be given on how to incentivise/reward activity that identifies theft actions like rogue traders/electricians.		

No.	ISSUE	NOTES	HOW TO PROGRESS
I01	TDIS - short term	This may entail small incremental improvements to the way the current scheme is administered.	I0173 – Improvements to the Theft Detection Incentive Scheme
I02	TDIS – medium term or long term	Change within TDIS or entirely different incentive scheme/replacement.	
I03	Revenue Protection Service	Early thoughts: - Create minimum standard of investigation in market. Are the standards fit for purpose? - Confirmation on whether all Parties are required to utilise the service or provide it themselves - available to all but not needed to be used by all. - Consistent centralised point of theft. - Collate information/leads/confirmations from different organisations – better data to identify trends.	I0176 – Creation of an Energy Theft Detection and Resolution Body

		- Allows Parties who have isolated and sporadic theft incidents to have ready resource to access. - Confirmation on whether this will be National or Regional.	
I04	Reasonable Endeavours	Early thoughts: - Confirmation on whether the current scheme under GT Licence could be scaled up again. - Confirmation on whether this would be focussed on Suppliers and adapted to be dual-fuel. - Confirmation on whether this would run alongside a TDIS Scheme.	I0175 – Introducing a Reasonable Endeavours Scheme within the REC
I05	Review of minimum standards	Early thoughts: - Review of Unbilled Energy Code of Practice. - Create clear guidance of expectations e.g. job card template. - If processes are in the same format, this will make it easier to move into a centralised function.	I0187 – Schedule 8 Review and Best Practice Guidance development

No.	DEPENDENCY	NOTES	STATUS