

Representation - Draft Modification Report 0584S

Energy Theft Tip-Off Service (ETTOS) – Release of Supplier identity

Responses invited by: **5pm on 07 July 2016**

To: enquiries@gasgovernance.co.uk

Representative:	Richard Pomroy
Organisation:	Wales & West Utilities Ltd
Date of Representation:	6 th July 2016
Support or oppose implementation?	Support
Relevant Objective:	d) (i) Positive d) (ii) None f) Positive

Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

This modification gives permission for Transporters to release the identity of the Supplier for a single Supply Point in response to a request from the Energy Theft Tip off Line (ETTOS) service provider. This modification meets the requirements of the ETTOS in a proportionate way and we therefore support it. With regard to relevant objectives as the ETTOS is a service provided to Suppliers and Transporters, we see the primary benefit is to Suppliers and the efficient provision of the service enabled by this modification (relevant objective (f)) will assist in tackling theft thereby securing effective competition between Suppliers (relevant objective (d) i). We cannot see a direct benefit to Shippers under relevant objective (d) ii.

Self-Governance Statement: *Please provide your views on the self-governance statement.*

We support the self-governance status as this modification will not have a material impact on parties to the UNC, consumers or competition.

Implementation: *What lead-time do you wish to see prior to implementation and why?*

As a self-governance modification it could be implemented sixteen Business Days after determination by the Modification Panel subject to no appeals being raised. The go-live date for the ETTOS is 1 September 2016 subject to the approval of SPAA CP 16 325 by the Authority.

Impacts and Costs: *What analysis, development and ongoing costs would you face?*

None for WWU.

Legal Text: *Are you satisfied that the legal text will deliver the intent of the Solution?*

Yes

Are there any errors or omissions in this Modification Report that you think should be taken into account? *Include details of any impacts/costs to your organisation that are directly related to this.*

No

Please provide below any additional analysis or information to support your representation

For the record we note that some observers believe that this modification is substantially the same as modification 0574S. In our view this is not the case and we note the following key differences between 0584S and 0574S. We will comment more fully on these in our response to 0574S. We note that 0574S does not yet have legal text but we believe that the key elements are established.

	0584S	0574S
Parties to the contract underpinning the requirement	ETTOS, Suppliers DNOs	TRAS Suppliers
Scope of modification	Permissions	Permission plus service
Data released	Supplier ID for single Supply Points	Data on all supply points including those that do not have a Supplier
Trigger for release of data	In response to an enquiry from the ETTOS	Regular bulk release of data