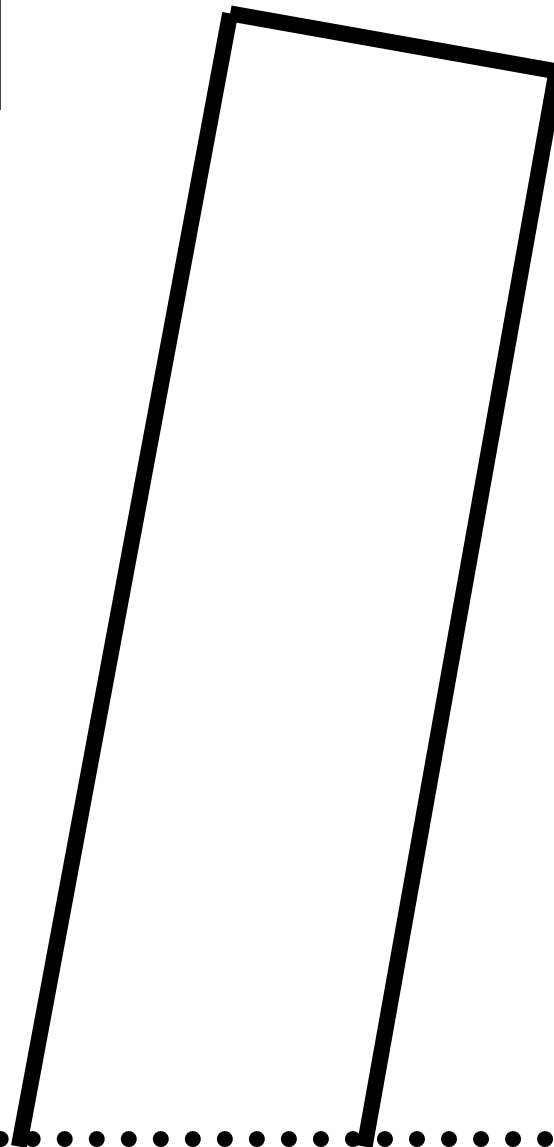


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# **“Why ‘Pisa’ about with AQs & RbD?”**

## **A formal Response to Ofgem ref 57/06**

Box Ten Ltd Opinions:  
Buy **Patent GB2309086**  
to avoid ‘fate’ for AQs!  
Leaning Tower of Pisa’s  
Tilt = Ten degrees!



**AQs and other Data Handling MEDIOCRITY: it allegedly might take some people less time, and others might ignore it, until ... !**  
**CONCLUSION: RbD isn’t fit for purpose unless Patent bought.**

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**Some of the Essential Phrases / Alphabet Soup – a short Glossary:**

<b>AQ of gas / guess</b>	Annual Quantity, often in <b>kWh</b> (see below) of <i>gas</i> consumed by a <b>customer</b> . Actually Quite a <i>guess</i> , as well as a “gas”, because it’s estimated <i>before</i> the consumption takes place! <b>AQ</b> is currently based on alleged historical usage, and is derived from meter readings taken at irregular intervals, perhaps. Our <u><i>Patent GB2309086</i></u> titled <u><i>“Utility Metering Arrangement”</i></u> of course overcomes this problem, by facilitating the accurate taking of meter readings at the precise end of each ‘Accounting Period’, e.g. 1 year. Hence this Response.
<b>AQ Review</b>	Shippers should <b>Review</b> the estimated Annual kWh consumption number each and every year – co-incidentally! But do they do it jointly with <b>customers</b> ?
<b>Customers (Gas)</b>	Are contractual parties responsible for the offtake of gas at a relevant Supply Point BUT surprisingly don’t seem to be parties to <b>UNC</b> . <i>This means that customers cannot propose Modifications, even if – under protest – the risk of theft is transferred to customers, and away from the LDZ operator!</i>
<b>DNO</b>	Distribution Network Operator, who operates the electricity “Wires System” – used by (electricity) Suppliers to supply Retail Customers with electricity.
<b>GSPGCF</b>	Grid Supply Point Group Correction Factor – a “fudge factor” used to cover up electricity theft from, and maladministration by, <b>DNO(s)</b> – & other errors, etc.
<b>IGTs</b>	Independent Gas Transporters; operate independent “Pipes”, i.e. not <b>LDZs</b> .
<b>kWh</b>	kiloWatt-hour; unit of energy. Often loosely called “a Unit” – see below!
<b>LDZ</b>	Local Distribution Zones are local monopoly low-pressure pipeline systems that deliver gas to final users and <b>IGTs</b> . 12 LDZs take gas from the <b>NTS</b> high-pressure transmission system for onward distribution at lower pressures.
<b>MPAN</b>	Meter Point Administration Number, of an electricity customer. Supply point number that appears on an electricity bill (has a big “S” for Supply, on left).
<b>MPR</b>	Meter Point Registration [Number], of a gas customer. A potential “false friend”, as confusingly this could mean “Maximum Power Required” for electricity! It’s analogous to <b>MPAN</b> . [Some Wags refer to: “ <b>S &amp; M</b> ”!].
<b>MPRec</b>	Meter Point Reconciliation: apparently assumes [see Appendix 4 of 57/06] that the actual consumption, obtained from the meter read, is deemed to have been consumed in the same demand profile as the allocation model. Is that sensible?
<b>NTS</b>	National Transmission System is National Grid's high pressure transmission system which consists of more than 6,400 km of pipe carrying gas at pressures of up to 85 bar (i.e. 85 times normal atmospheric pressure).
<b>Pisa</b>	Famed for its Leaning Tower. Part way through build/use, it was found to lean!
<b>RbD</b>	Reconciliation by Difference operates at the <b>LDZ</b> level, and is a method of reconciling the difference between allocated and actual energy for small supply points, which have an <b>AQ</b> of up to 73,200 <b>kWh</b> . As such it seems to us to also carry the burden of errors caused by supply points that have an <b>AQ</b> of greater than 73,200 <b>kWh</b> . Why should there be this bias, and cross subsidy?
<b>RbDASC</b>	The “Reconciliation by Difference Audit Sub Committee”.
<b>Shippers</b>	They arrange for the conveyance of gas over the distribution network to final consumers/customers. Shippers pay the Transporter their distribution charges.
<b>SSP</b>	Small Supply Points – a lazy short form of “Small NDM Supply Meter Points” perhaps – see Ofgem Document ref 57/06, page 40. See also <b>MPR</b> above.
<b>Theft</b>	Illegal abstraction of energy, when the necessary meter, etcetera, is “bypassed”.
<b>UNC</b>	Uniform Network Code (aka NGG's Network Code up to 1 May 2005): is the contractual framework for the <b>NTS</b> , <b>GDNs</b> and System Users – BUT not end customers who can’t propose anti <b>theft</b> measures apparently! Stakeholders?
<b>Unit</b>	‘Often’ 1 kWh of energy <i>as measured</i> by the meter(s) at the customer’s site.

**Cover Note and Attribution:**

The cover of this Response – the “Creaky Cartoon” – is based on, and hereby attributed to, an idea by E L Kersten and / or Lucy Kellaway, or both; please see *Financial Times*, London, page 11, 31 May 2005.

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# From: Box Ten Ltd.

P O Box Number 1010, Nottingham, NG5 8TF  
Mobile Telephone: 07973 - 110 010

2006-05-11

Sent by email to: [ndidi.njoku@ofgem.gov.uk](mailto:ndidi.njoku@ofgem.gov.uk) (Ndidi Njoku’s Tel: 020 7901 7157)

Ofgem Ref: 57/06

To: Ndidi Njoku, Industry Codes Manager  
Ofgem, 9 Millbank, London, SW1P 3GE

Dear Ndidi Njoku,

## **Response to Ofgem Consultation ‘Review of Reconciliation by Difference (RbD)’**

1. This Response, of which each statement is either an expression of opinion or a suggestion of opinion either by Box Ten Ltd, or by Don Stickland, or both, unless it can be shown to be a statement of fact, was triggered by (1) Patent GB2309086 and (2) the Consultation Document which you made available from World Wide Web with the link:  
[http://www.ofgem.gov.uk/temp/ofgem/cache/cmsattach/14554\\_RbD\\_FinalV1.1.pdf](http://www.ofgem.gov.uk/temp/ofgem/cache/cmsattach/14554_RbD_FinalV1.1.pdf)

2. Thank you for inviting this Response to your Consultation Document reference 57/06 – on the [to us] well known “Fudge Factor” aka “**RbD**” which seems to us to include the “cover up of theft of energy” from the distribution network systems – for consideration and for putting with the others on the Ofgem website. We believe Patent GB2309086 could be beneficial.

3. We basically believe that **RbD** is analogous to the similar well known “Fudge Factor” used in electricity settlements to cover up the **theft** of over a hundred million pounds a year from honest customers, i.e. the **GSPGCF**. Please see the “Some of the Essential Phrases / Alphabet Soup – a short Glossary” section on the previous page for **emboldened** key terms.

4. We regret to say that we are disappointed at the progress of Ofgem and / or the energy “Industry Participants” in the 5 years since 2001, on the matter of theft. Here’s a summary:

1. A discussion document [*Ofgem Ref 85/04*] was published in April 2004, setting out the background to the review and requesting views on the draft principles and options for how to proceed. [*Its para 1.1 set out the Ofgem commitment, of August 2001, to the review.*]
2. A seminar was held on 7 June 2004 to discuss the issues raised in the discussion document to help inform responses. [*A further document was expected, after the seminar, to be issued in September 2004, according to para 9.5 on page 45 of Ofgem Ref 85/04.*]
3. A document [*Ofgem Ref 06/05*] was published in January [2005] which provided a summary of responses to the discussion document and the outcome of the seminar, together with a commitment from the ERA (Energy Retail Association) and ENA (Energy Networks Association) to review the proposals set out in the document and report to Ofgem on their findings [*which were expected to be received by June 2005, according to para 9.4 on page 44 of Ofgem Ref 06/05*].
4. A document [*expected to be issued in Q3 2005, as per para 9.8 on page 45 of Ofgem Ref 06/05, BUT which may be*] published by Ofgem in June 2006 consulting on the proposals set out in the ERA/ENA theft report together with Ofgem’s view on the way forward.
5. A Decision document [*may be*] published by Ofgem in October 2006 [*or may be issued later in the Autumn/Winter of 2006/2007*] setting out the theft arrangements going forward.

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5. We wish to emphasise that we believe – rightly or wrongly - that the fault for the delay(s) lies with the “insiders” of the monopolistic distribution companies, rather than with the Suppliers or with the “Regulator” Ofgem. This seems to us to be evidenced by the “Report of the Theft of Energy Working Groups - April 2006” which is available on this link: <http://www.energy-retail.org.uk/papers/ElectricityandGasReportFinalVersionpdf.pdf>

6. We note that this link has no mention of the word “theft”, suggesting that they wish this topic to be low key. Given the lack of success in marketing Patent GB2309086, we aren’t surprised to find these following results when searching for words describing change:

<b>Item searched for</b>	<b>Number of Occurrences in 73 pages</b>
Innovation	nil
Data	16
Handling	nil
Patent	nil
GB2309086	nil
Substation	nil
Feeder	nil
Monitoring	4

7. Indeed, this joint ERA and ENA document promised so much, but seems to us to have delivered so little, apart from a detailed analysis of the various Codes – thus suggesting that “theft” was not properly considered during the rush to achieve the Privatisation timetable! There is the revealing “Page 3” item that states QUOTE There should be further consideration of the different arrangements for dealing with theft in conveyance in gas and electricity in order to decide whether a uniform system ought to be adopted. ENDQUOTE, and astonishingly page 54 states in part QUOTE DNO has no access to customer consumption data to use to assist in determining volume of stolen units. NB: GTs (not all) have access to the AQ. ENDQUOTE. Given that one of the background understandings of the Privatisation process was that *both the Supplier and the Distributor should have equal access to customer consumption data* – in order to avoid the “Monty Python” situation of Mrs Thatcher causing TWO electricity meters in each home – one has to ask “Why have DNOs done nothing regarding data access?” Were **all** the knowledgeable people sacked/let go?

8. SUM UP of the work of the joint ERA and ENA “Working Groups” Report: **Further work is necessary**, because ERA and ENA have not **yet** considered necessary future innovation in data handling, such as the opportunities offered by the purchase of Patent GB2309086.

9. For those of you with a strong sense of humour, we were also surprised not to be invited to the recent UKRPA (United Kingdom Revenue Protection Association) Conference which we understand was held on the 10<sup>th</sup> and 11<sup>th</sup> of May, especially as we offered to provide sponsorship – following our attendance in 2004. Could it be that some of the incumbents do not wish to see innovation in data handling, e.g. via the purchase of Patent GB2309086?

10. We understand that over 500 million pounds (£500m) worth of electricity and gas is estimated by Ofgem to have been stolen in the five years of delay since 2001! This seems to us to be over one hundred times the amount being sought for the sale of Patent GB2309086, titled “Utility Metering Arrangement”, because only £2m is being sought for the sale to each of the industries of electricity, gas, and water. This apparent meanness has diverted our focus at Box Ten, because if the Patent had already been sold, then we would have moved on to other topics. And we would not have had to continue this Campaign!

11. Of course, the implied £4m figure would be an upper limit. Any final sale figure would probably be lower, reflecting the negotiating prowess of the purchaser.

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12. Indeed, we believe that the lack of solid progress – since 2001 – on the “Ofgem commitment” reflects what we perceive to be fundamental ambiguities at the heart of the current energy trading commercial framework. These ambiguities seem to us to stem from a naïve attitude that the current framework is “good enough” because the data is so creaky that it could collapse if attention weren’t diverted from the “Important problems” to the “Urgent ones”. Unfortunately there seem to be gaps and overlaps at the heart of the commercial framework, apparently due to the lack of a hard nosed approach to defend honest customers against theft; this might be a result of that “fiscal horror” as the Institute of Taxation named “IR35”, which has caused good consultants to withdraw from the UK market. What is appalling is that this [energy theft] inevitably leads to “Market Abuse” and the concomitant raising of energy prices away from the “economic levels” that would be determined by the interplay of “Supply curves” and “Demand curves”.

13. In particular – regarding an aspect of “Security of Supply” – there seems to be a naïve attitude that criminality is not a serious problem “today” because we are now fire fighting other crises, can be ignored because it is a magnitude below the other “problems of the day”, and because the risks of consequences of the criminality can be transferred honest customers because (1) they [honest customers] cannot propose modifications to the various Codes due to the current Governance arrangements, and even if they could, (2) consumer bodies [and others] seem to be more concerned with protecting the alleged “human rights of the criminals” rather than the “human rights of the honest people”. Whilst it might be argued by the NCC and others [such as energywatch] that this approach is consistent with current Government policy – for example the release of foreign criminals to commit further serious crime here, rather than to deport them – the great British public are recently beginning to take a less tolerant view of this indolence.

14. However, we are delighted that at last the answer [to the fundamental ambiguities at the heart of the current energy commercial framework] seems to lie with the solution set for the infamous Royal Mail thefts case, where Royal Mail – as the “Distributors” of the stuff being distributed – and not the Post Office etc who “Supplied” the postage stamps – were apparently fined around 10% of profits for failing to deliver. So we believe that energy theft risk control should be firmly allocated to the monopolistic distribution activity which should manage it, and which should in turn expect all possible assistance from the supplier activity.

15. Moreover, we are further delighted that at last Ofgem seem to be attempting to catch up with the concerns indicated by us some four years ago! Please see “*DATE BRITAIN*” – *GAS TRADING TRUE-UP PROPOSAL* (Stickland, 2002) which highlighted the RbD nonsenses, and for which a full “Harvard Style” Reference is given in the Postscript of this Response.

**16. KEY POINT: Currently theft and data quality etcetera risks are transferred away from shareholders and lenders, to be carried by consumers, due to the activity of LDZ and DNO, etc, distribution network managers who ought to be managing these risks as part of their remuneration. It is important to note that the joint Ofwat/Ofgem Consultation Paper “Financing Networks”, issued in February 2006, clearly stated that “Ofwat sought to make it clear that it would not allow this [i.e. risk might be transferred from shareholders and lenders to consumers] to happen”, for example if “highly geared companies were to become subject to financial distress.”**

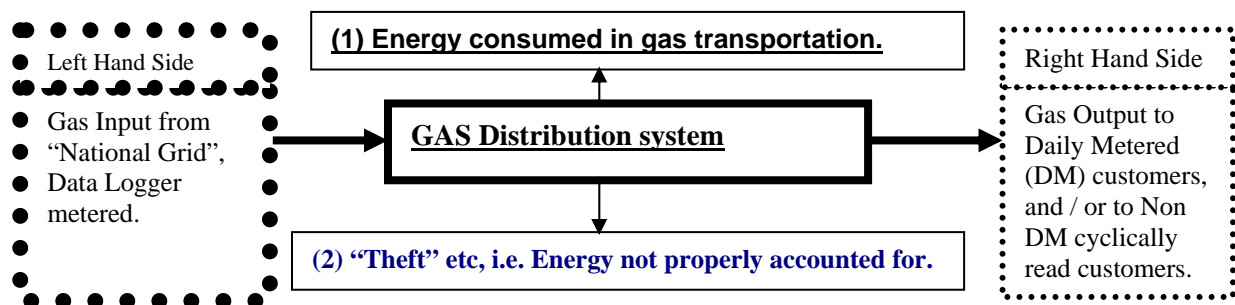
17. Another point asserted in the joint Ofwat/Ofgem Consultation Paper titled “Financing Networks”, was that “regulatory risk has diminished” and that “The regulatory risk premium in the cost of capital should go down as a result”. Unfortunately, if the Regulator(s) are perceived to be taking a lax view on theft – which appears to be confirmed by the lack of a sale of Patent GB2309086 titled “Utility Metering Arrangement” – then there may very well be a market appreciation of a new regulatory risk for lenders and shareholders, with adverse

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18. To re-inforce the point we made earlier, we perceive that this regulatory risk would be seen to be the inevitable transfer back to the distribution monopolies of the risk of theft, the costs of which are currently born by honest consumers – who are not best placed to manage this risk. As the Royal Mail case makes quite clear, this risk is best borne by the Distribution Network Operators and the LDZs. Our proposal to employ *Patent GB2309086* would, we believe, reduce that perceived regulatory risk – and lead to a reduced cost of capital.

19. Moving on, how the Patent can add value? Easily, because the lessons learnt for the electricity market are transferable, *mutatis mutandis*, to the gas market! For the electricity world Phelps (2003, Slide 3), who I gather currently works for the ENA (Energy Networks Association) expressed the traditional view “Losses are calculated as the difference between two large numbers, one of which is of questionable accuracy”. Phelps (2003, Slide 4) then explained the “*Nature of losses*” as (1) Energy consumed in transportation of electricity: (a) fixed rate of consumption, and (b) variable consumption, dependent on load carried, and also (2) Energy not properly accounted for: (c) measurement errors, (d) settlement errors, and (e) illegal abstraction [aka “theft”]. He also suggested (in Slide 15) as “*The way forward?*” an “Aim to make more radical reforms in 2010 as measurement and relative performance issues are resolved”, reflecting both that “Data – if mishandled – is hard to assess”, and also a lack of knowledge of Patent GB2309086, “Utility Metering Arrangement”, which is now explained diagrammatically below.

20. Let us consider an Energy Network as a BOX, which has inputs and outputs. Here we have a LDZ’s Gas Distribution system BOX:

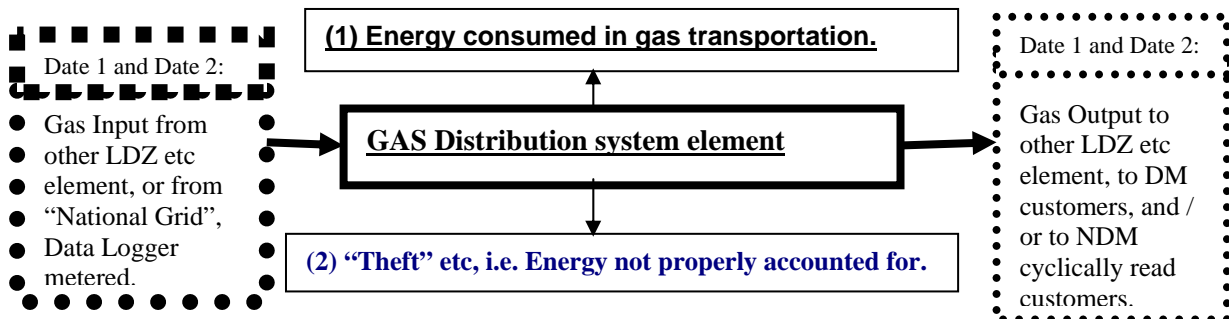


21. As in the electricity case, where Phelps (2003) could claim that the “large number” representing the annual energy input on the “Left Hand Side” was accurate, as compared with the “large number” representing the annual energy consumed by paying customers on the “Right Hand Side”, we have the similar situation for gas. This is because of the current difficulty of matching the consumptions of Domestic etc (NDM) customers, whose meters are usually read on a Quarterly Cyclic basis, with a precise “Accounting Period” of one year for the key inputs.

22. Patent GB2308096 overcomes this difficulty, by capturing the NDM (Not Daily Metered) “Year End” meter reading, by switching to another meter register on the Date of a Year-end. (It may be retrieved later, on the usual reading cycle, thus maintaining the economies there). Not only does this give a precise reading at the year one end, but it also gives a precise reading at the start of the next year too! This technique is called ‘Date Britain’, and is much cheaper than just changing ALL the meters to DM (Daily Metered). Not only that, a much reduced set of data is required! In addition, the AQ is reliably measured too!

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23. With this reduced data set (as compared with everything being DM metered) the Gas Distribution system can be analysed by each finite element (i.e. each separate feeder pipe), see the BOX below:



24. If the indicated “losses” for similar LDZ etc distribution elements (e.g. certain diameter pipes of certain materials) are compared, then “exceptional” or anomalous situations (e.g. those distribution elements with a high degree of theft, or with dangerous leakages) may be discovered. Theft and/or danger may be “predicted and prevented”, as opposed to “find and fix” now.

25. Perhaps this might avoid another 1999 Larkhall-type Gas explosion that caused four Scottish deaths, and for which Transco received a record £15m fine. The Independent reported that the case against Transco “centred on maintenance, repair and record keeping procedures ... An examination after the tragedy found that the gas main near the Findlays’ house had 19 holes; one was big enough for a man to crawl through”.

26. Having explained how [Patent GB2309086](#) may be applied, in the interest of brevity, here are our answers to the questions posed by Ofgem:

## **BoxTen’s Responses to the questions in Consultation Ref:57/06 Appendix 1:**

### **CHAPTER One: Introduction**

Questions:

**1. Given the original rationale and benefits of RbD, do you consider it remains valid under the current GB Gas arrangements?**

A.1. The BoxTen basic Response to this Question is NO, because RbD currently does not employ [Patent GB2309086](#), “Utility Metering Arrangement” and its ‘Date Britain’ application to discover waste and theft on discrete distribution feeder elements.

**2. Are the costs and benefits of the RbD process transparent to the industry, and if not what how can transparency be improved?**

A.2. The BoxTen basic Response to this Question is NO, but could be IF it employed [Patent GB2309086](#), “Utility Metering Arrangement” and its ‘Date Britain’ application to discover waste and theft on discrete distribution feeder elements.

**3. Do the various RbD related industry work groups provide sufficient governance and transparency of the RbD arrangements?**

A.3. The BoxTen basic Response to this Question is NO, because the stakeholders who are honest paying customers do not enjoy the transparency which could arise IF it (RbD)

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**4. Is there sufficient transparency of the data or the information xoserve provides to the Industry?**

A.4. The BoxTen basic Response to this Question is NO.

**5. Is the scope of the current RbD Audit appropriate?**

A.5. The BoxTen basic Response to this Question is NO, because they have made no “invitation to treat” with a view to employ Patent GB2309086, “Utility Metering Arrangement” and its ‘Date Britain’ application to discover waste and theft on discrete distribution feeder elements.

**6. Are there sufficient incentives on all parties to limit the size of RbD?**

A.6. The BoxTen basic Response to this Question is NO, because **currently** the risk of theft is transferred by the local monopoly distribution companies to “unprotected” honest customers. Only IF RbD employed Patent GB2309086, “Utility Metering Arrangement” and its ‘Date Britain’ application THEN waste and theft could be discovered on discrete distribution feeder elements.

**CHAPTER Two: RbD Issues**

Questions:

**7. Do you consider there is sufficient transparency in the operation and accuracy of industry processes such as the AQ review and shrinkage calculations?**

A.7. The BoxTen basic Response to this Question is NO; for example the failure to employ Patent GB2309086, “Utility Metering Arrangement”, and its ‘Date Britain’ application, to discover waste and theft on discrete distribution feeder elements.

**8. Do you consider the existing governance arrangements around these processes to be appropriate?**

A.8. The BoxTen basic Response to this Question is NO – there’s apparently no or insufficient customer representation, with the inevitable result that the risk of theft is transferred away from the monopolistic LDZs (who are the only parties positioned to adequately control and manage these risks), and towards the honest customers (who are not)! IF Patent GB2309086, “Utility Metering Arrangement” and its ‘Date Britain’ application were to be employed, THEN LDZs etc could be able to discover waste and theft on discrete distribution feeder elements.

**9. Do you consider there are there appropriate incentives in place on relevant parties to ensure the timeliness and accuracy of these processes?**

A.9. The BoxTen basic Response to this Question is NO.

**10. Do you consider that the timing and scope of the AQ Review is appropriate?**

A.10. The BoxTen basic Response to this Question is NO IF Patent GB2309086, “Utility Metering Arrangement” and its ‘Date Britain’ application were to be employed, THEN all AQs could be determined on the same time basis!

**CHAPTER Three: Wider Considerations**

Questions:

**11. What would the likely costs and benefits be of introducing Meter Point reconciliation to all supply points?**

A.11. The BoxTen basic Response to this Question is that the benefit would be to:

- \* encourage the trust of the truly honest customers (around 25% of the population).
- \* persuade the hardened dis-honest customers (around 25% of the population) not to steal.
- \* Persuade the 50% of the population of customers who can be swayed either way not to steal energy either.



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**12. What conditions would need to be satisfied in order for individual Meter Point reconciliation to be practicable?**

A.12. The BoxTen basic Response to this Question is that Patent GB2309086, “Utility Metering Arrangement” and its ‘Date Britain’ application has to be purchased and employed.

**13. Would it be feasible for shippers to choose whether their supply point should be individually reconciled or processed through RbD?**

A.13. The BoxTen basic Response to this Question is probably not, because this “looseness” might mean that Patent GB2309086, “Utility Metering Arrangement” and its ‘Date Britain’ application might not be employed.

Yours truly,

Donald Stickland, BA (Oxon), MA (Oxon), BA (Open), ACMA  
Director, Box Ten Ltd.

PS Here are the Initial References and short Bibliography

Phelps, A. (2003), representative for Aquila, *Electricity distribution losses – A DNO perspective*, presented at a Workshop held 14 April 2003, hosted by Ofgem, placed on Ofgem website 09/05/2003 [Online]. [Accessed 25 August 2005]. Available from World Wide Web: [http://www.ofgem.gov.uk/temp/ofgem/cache/cmsattach/3171\\_DNOperspectives\\_andyphelps.pdf](http://www.ofgem.gov.uk/temp/ofgem/cache/cmsattach/3171_DNOperspectives_andyphelps.pdf)

Stickland, D. (2002) “DATE BRITAIN” – *ELECTRICITY TRADING TRUE-UP PROPOSAL, 2002-09-09* on page 1, and “DATE BRITAIN” – *GAS TRADING TRUE-UP PROPOSAL, 2002-09-10* on page 2, placed on Ofgem website 09/07/2003 [Online]. [Accessed 29 August 2005]. Available from World Wide Web: [http://www.ofgem.gov.uk/temp/ofgem/cache/cmsattach/3880\\_donstickland-develop\\_price\\_controls\\_Aug2002.pdf](http://www.ofgem.gov.uk/temp/ofgem/cache/cmsattach/3880_donstickland-develop_price_controls_Aug2002.pdf)

Stickland, D. (2003) *A FORMAL RESPONSE to the Ofgem Consultation Paper titled “Electricity distribution losses – 03/03” (dated January 2003)*, placed on Ofgem website 24/03/2003 [Online]. [Accessed 29 August 2005]. Available from World Wide Web: [http://www.ofgem.gov.uk/temp/ofgem/cache/cmsattach/2567\\_Box\\_Ten.doc](http://www.ofgem.gov.uk/temp/ofgem/cache/cmsattach/2567_Box_Ten.doc)

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