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Margaret Coaster Smarter Markets 9 Millbank London SW1P 3GE

27th October 2011

Dear Ms. Coaster,

RE: Tackling gas theft (Ref. 112/11)

Teccura is a company that identifies theft and associated consumption anomalies that utilities cannot identify themselves. We do not benchmark, use the billing database to look for process errors or use simple comparators to pick up outliers.

We independently predict the consumption for each commercial property by identifying all the usage components and predicting the demand placed upon those components. This process picks up all the missing consumption whether it is unbilled through theft or another unintentional error.

We welcome Ofgem's proposals to tackle gas theft and consider the National Revenue Protection Service (NRPS) to offer the most potential to help reduce the incidence of gas theft. A central cross-supplier and transporter database would facilitate theft reduction as it allows for the identification of theft across the entire customer base, including the discovery of customers who frequently switch suppliers to avoid detection and prosecution. The creation of the NRPS would vastly improve the current situation where there are significant differences between suppliers in their approach to theft detection.

A single central database is the most cost-effective way to tackle theft since resources and processes would be streamlined. Having one organisation deal with the complete end to end process from data analysis to debt recovery ensures consistency in service and customer treatment standards. The NRPS should also be able to offer services and expertise that suppliers (particularly smaller ones) do not have available to them in-house, such as field investigation and debt recovery.

I would like to thank you for your consideration of our points above and would be delighted to discuss them and any specific examples you may require in more detail.

Yours Sincerely,

Beatty

Ian Beattie, Chairman