



Monday 30 April 2012
Harpal Bansal
Smarter Markets
Ofgem
9 Millbank
London
SW1P 3GE

**E.ON Energy Solutions
Limited**

PO Box 7750
Nottingham
NG1 6WR
www.eonenergy.com

Colette Baldwin
T 02476 181382

colette.baldwin@eonenergy.com

Dear Harpal

Tackling Gas Theft Consultation

Further to your letter of 27th April, I am providing our response on the proposed licence conditions only, and will provide responses to the remainder of the consultation separately in accordance with the revised timetable.

Please find attached our appendix document which provides specific comments on the licence clauses.

We are supportive of the introduction in the improvements of the detection and prevention of the theft of gas, but we are unhappy that the licence conditions would appear to offer enhanced levels of protection to customers who are stealing based on a categorisation of the customer without considering the context in which the theft occurs. (Theft from existing prepayment meters or repeat offenders all seem to have been disregarded.) All suppliers operate under the existing licence requirements and codes of practice relating to consumer protection, particularly for our most vulnerable customers, and it would appear that these new conditions are placing restrictions on our ability to get these customers back onto normal contractual arrangements. Having to fit prepayment meters may not be the best choice for all customers in

E.ON Energy Solutions
Limited
Registered in
England and Wales
No 3407430

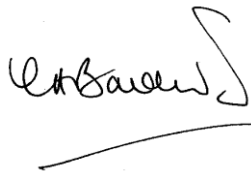
Registered Office:
Westwood Way
Westwood Business Park
Coventry CV4 8LG

all circumstances; and it removes our discretion to offer alternative payment methods.

There would also appear to be unnecessary duplication of requirements which are already provided for elsewhere in the licence or provisions already within existing legislation. In some cases the more detailed level of operational requirements should be confined to the Code of Practice that will be introduced into SPAA under regulated change proposals currently being drafted.

I hope you find our comments helpful, and if you need any additional information, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Colette Baldwin', with a horizontal line underneath it.

Colette Baldwin
Senior Regulatory Analyst

Attached: [Appendix](#)