

<u>Ofgem Consultation - Draft criteria for authorising the disposal of electricity meters under</u> <u>Schedule 6, Paragraph 6 and Schedule 7, Paragraph 11 of the Electricity Act 1989</u>

Response from E.ON

General Comments

We welcome the proposal from Ofgem and the NMO and appreciate the underlying motivation to make the process easier for suppliers to detect and prevent the theft of electricity.

The suggested general authorisation seems logical and proportionate and we support its introduction.

Do you have any comments on the proposal to issue a general authorisation?

We welcome the move by Ofgem and the NMO to propose a general authorisation for suppliers. The current legislative arrangements in Schedule 6 and 7 of the Electricity Act present a degree of overlap between the 2 organisations and therefore we think it is sensible for a combined co-ordinated approach.

The current requirements in the Act present an onerous administrative burden to suppliers and to Ofgem and the NMO and therefore this proposal is pragmatic and sensible,

Do you have any comments on the specific criteria for the proposed general authorisation set out in Annex 1?

These seem a sensible set of requirements for a supplier to follow.

We would highlight a potential issue with the proposed requirement "3. The Relevant Supplier has notified the relevant police force and (where applicable) any other Relevant Authorities of why the Relevant Meter was removed." From our experience when we notify the relevant police force their assumption is that we are making a complaint.

If we are not notifying them of a proven incident then they will often not record the details or provide formal acknowledgement. It may therefore be difficult for us to provide formal reference evidence of compliance with this specific requirement.

Do you have any other comments on the proposals set out in this letter?

We have no additional comments to make regarding the proposals.