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28 August 2013

Tackling electricity theft – Consultation

Dear Chiara,

npower welcomes the opportunity to respond to the above consultation. We also welcome the new measures to improve the current situation; in particular, we support Ofgem's goal that revised arrangements should aim to reduce the overall cost of theft to the ultimate benefit of honest customers. It is, therefore, essential that any schemes are proportionate and properly targeted.

As you may be aware, npower is actively participating in the ongoing development of the gas and electricity theft codes of practice and the gas Theft Risk Assessment Service (TRAS). We support the principle that all measures should apply equally to all industry parties.

Our detailed responses to the Ofgem consultation and impact assessment questions are contained in appendices 1 and 2. Appendix 3 contains our options for an incentive scheme.

There are also some specific points, which we wish to make:

I. **Electricity TRAS** We support the principle that measures to tackle gas and electricity theft should be equal. We are particularly concerned about the proposed implementation timeframe for the electricity Theft Risk Assessment Service (TRAS), particularly given the likely late implementation date of the gas equivalent. There is a clearly an implicit requirement and a desire to implement TRAS in a cost effective and efficient manner; as such we would suggest that Ofgem consider two options as alternatives to the proposed timeframe:

    a. Align implementation dates of gas and electricity TRASes, thereby introducing a single energy TRAS. This could save industry and (therefore customer) costs and improve overall service capability. This would also mitigate the potential risk of a successful gas TRAS provider either inflating costs for electricity TRAS or perhaps not bidding for the contract. This is our preferred option.
    b. Do not introduce electricity TRAS until the industry has had sufficient time to fully understand the operational delivery and consequent benefits and costs of a gas TRAS service, enabling electricity TRAS to be applied on an optimised basis.
    c. Finally, we have reservations concerning the proposed requirement to investigate every TRAS theft lead, as opposed to allowing the supplier prioritise (as in Gas TRAS).

Permitting a third party to dictate expensive revenue protection activities would be inefficient and more costly, with the additional financial burden being passed on to the honest customer.

II. **Customer Vulnerability** The definition of vulnerability should be the same as in the current gas theft supply licence condition. Please see our answer to question 2 of the consultation document in Appendix 1.

III. **Health and Safety** The health and safety of customers, other residents, neighbours and industry operatives has to be of paramount importance when dealing with situations where energy theft is involved To that effect we support the DCUSA electricity theft code of practice principle of de-energising any consumer who repeatedly tampers. This is the right thing to do for the safety and wellbeing of the consumer and others living nearby, who may unknowingly be at risk.

The role of the Health and Safety Executive (HSE) is important here and industry has sought clarification on whether DNOs can delegate to other industry parties powers of de-energisation for safety reasons.

IV. **Unregistered Customers** We mean here those consumers taking electricity without being registered to a supplier. It is npower's view that consumers in this situation should be required to obtain a valid supply contract. DNOs should have the power to compel such consumers to enter a supply contract with an energy supplier.

V. **Retail Market Review** There is still a lack of clarity regarding the installation of prepayment meters as an alternative to disconnection and whether or not this is a change to the terms and conditions of supply that would constitute a unilateral variation of a customer's contract, requiring suppliers to give notice of the former's right to terminate their contract and change supplier. This would be a retrograde step and put the thief in a more favourable position than the honest customer.

VI. **Incentive Schemes** In our answers to questions 7 and 8 and the accompanying appendix 3, we suggest two options in how settlement units could be treated when a theft is detected. We suggest a more traditional option, where the units are entered into settlement, which would require amendments to the existing BSC requirement. We also pose an alternative that removes the existing obligation and creates both an incentive for suppliers to detect theft and a deterrent to those who may choose to steal. We would welcome wider discussion on these points.

VII. **Point of Law** There has to come a point where persistent thieves suffer the consequences of their actions, rather than, in effect, being bailed out by honest customers (including the honest customer struggling to pay). Yes, we agree that suppliers need to take a more proactive stance, but we believe that additional actions could be undertaken to help tackle electricity theft. We would like to see heavier consequences for electricity theft, including more police engagement and greater enforcement of the law. Our view is that the existing criminal laws need to be enhanced.

VIII. **Broken Meter Seals** We believe there should be more severe consequences for electrical contractors who do not follow the correct procedures regarding de-energisation and re-energisation of industry metering systems, and who instead break meter/supply seals and remove the fuse when performing their work, causing adverse impacts on theft detection and health and safety.

IX. **Standards of Conduct (SOC)** With the requirement to treat customers fairly, it is hoped that suppliers will not be prevented from taking necessary and proportionate action in circumstances where an offence has been committed.

We would welcome the opportunity to discuss these points further with you before you decide on final policy measures, particularly around the incentive scheme and potential alternatives.

Yours sincerely

Paul Tonkinson
Regulation

Appendix 1: Response to Consultation Questions
Appendix 2: Response to Impact Assessment Questions
Appendix 3: Settlement Options

Appendix 1: Response to Consultation Questions

Q1. Do you agree with our proposals to introduce new electricity supply licence obligations in relation to theft?
Yes. npower welcomes the proposed new measures for electricity theft and their alignment with those introduced in gas last year. We support Ofgem's aim that revised arrangements should reduce the overall cost and incidence of theft to the benefit of honest customers.

We have reservations concerning the proposed requirement to investigate every Theft Risk Assessment Service (TRAS) theft lead, as opposed to allowing the supplier prioritise (as with the gas TRAS). Permitting a third party to dictate potentially expensive revenue protection activities would be inefficient and more costly, with the additional financial burden having to be passed on to the honest customer.

Q2. Do you agree that our drafting proposals set out in Appendix 3 reflect the policy intent described in this chapter?
Yes, in general, although we do have some comments on the wording in the licence. In defining vulnerability, it goes further than the existing gas equivalent licence condition. The gas provision defines vulnerability by reference to the existing customer groupings consistent with SLCs 26 and 27 in the supply licence; namely of those who are of pensionable age; disabled; and chronically sick. To have a more onerous definition in electricity compared to gas, when the latter's provision works perfectly well seems overburdening. Ofgem must consider the impact of this approach on suppliers' ability to support those most in need where theft is discovered.

While there is a brief mention in the document why a wider definition has been introduced, the phrase 'vulnerable situation' is not defined. It would leave matters to Ofgem's discretion and interpretation in any appraisal of or investigation into suppliers' application of this part of the proposed licence condition. .

We strongly recommend therefore that the definition used in the gas licence vis-à-vis vulnerability should be copied exactly for electricity.

Q3. Do you consider that electricity suppliers should be required to offer vulnerable customers and customers that would have genuine difficulty paying, different methods for the repayment of charges associated with electricity theft as an alternative to disconnection?
Yes. However, while legislation (including the supply licence) is not meant to pass moral judgement or to draw such a distinction, dealing with gains by theft in the same way as dealing with debt appears to treat the thief (who ignores the shared obligations and responsibilities we have towards one another) more favourably than the honest debtor.

Because of the serious health and safety impacts associated with electricity theft, we believe that disconnection has to be a realistic option in instances of multiple meter tampering. Although we have an obligation to assist vulnerable customers, any safety risk posed to customers, other consumers, contractors and agents as a result of repeated tampering has to be of paramount importance.

Q4. Do you agree that our proposed new electricity supply licence conditions should be introduced as soon as reasonably practical?
Not necessarily; perhaps not until the gas equivalent has proven itself.. In addition with regards to the electricity TRAS, we believe that the implementation timescale, as it currently stands, is unrealistic.

In relation to theft investigation process, suppliers, having had experience of applying the gas equivalent licence condition, are already likely to be following the same approach for electricity when investigating electricity theft. There is, then, no pressure to introduce the conditions quickly.

In circumstances where the launch dates of the gas TRAS and electricity TRAS are to be kept separate, we recommend leaving a longer time delay between the implementation of each service than is presently planned, to give all industry parties the chance to learn from the implementation of the gas TRAS. The electricity TRAS should not be introduced until the gas equivalent has been tried and tested, and is shown to be working effectively.

However, our preferred option would be to postpone the implementation of the gas TRAS and implement both TRAS services simultaneously. This would have significant advantages in terms of efficiency and cost of implementation:

- Firstly, economies of scale could be realisable by combining TRAS applications and processes common to both fuels, thus avoiding unnecessary duplication wherever possible.
- Secondly, the industry is likely to want the same third-party organisation to be responsible for both the gas and electricity TRAS. If the tender and launch dates were kept separate, then the successful applicant organisation for gas might be tempted to exploit any inherent advantage by charging a disproportionately greater fee to all industry parties to implement subsequently the electricity TRAS.

As a result, the overall implementation cost could be reduced by launching both services together.

Q5. Do you agree with our approach to conducting the draft IA, the assumptions that we have made and the outcome of our analysis in the accompanying draft IA?
Yes. However, while we support the intent of the IA and agree with its goals, we would suggest that industry data may not yet be sufficient for this purpose.

We would emphasise that whichever measure or package of measures is implemented should be as efficient and cost-effective as possible, with safety the underpinning priority.

Q6. Have we correctly assessed the main impacts in the accompanying draft IA? Are there additional impacts that we should consider?
Yes. Nonetheless, we believe it should be emphasised that better detection of theft will reduce costs for honest consumers and reduce safety concerns.

However, we would challenge the assertion that small suppliers would be impacted more than the larger suppliers, since group correction smearing in settlements is distributed according to market share. We would therefore be interested in hearing the arguments behind this claim.

Q7. Which, if any, of the proposed policy measures (or package of policy measures) to support theft investigation, detection and prevention should be implemented and why?
Firstly and self evidently, the benefits of any measure must exceed the cost, thereby minimising the initiative's impact on honest customers. Secondly, and key to tackling theft across the industry as a whole, is creating a disincentive to those who may choose to steal, which must be combination of a strong detection risk and appropriate consequences (please see the answer to question IA1 below). The cost of expensive supplier incentive schemes/other industry mechanisms may actually detract from what is spent physically identifying theft. We believe there are two options that would better enable the realisation of these two principles. We have outlined these options within appendix 3 and would welcome the opportunity to discuss them in more detail with Ofgem and the wider industry.

If a robust and cost effective method can be derived by the industry to enter, reliably, the correct volume of stolen energy into the settlement process, then this should be the basis of any incentive scheme. Failing this, a detection-based scheme would be more appropriate.

We believe strongly that any measure should apply equally to all suppliers as those who steal will naturally migrate to any supplier where there is a decreased chance of detection, the cost being picked up by all honest customers. For these reasons, if a formal incentive scheme is implemented, we believe it should be both capped and that the supplier costs should be settled at the end, not upfront. This would avoid smaller suppliers being disadvantaged.

Q8. Do you consider that there are alternative proposals, or variations of the combinations of the proposed policy measures that should be considered?
We believe the option suggested in appendix 3: (option 2: EAC correction only) not only removes one of the disincentives facing suppliers, but also acts as an incentive measures to increase theft detection.
We would welcome again the opportunity to discuss this in more detail with Ofgem and the wider industry as an alternative to that which has been proposed.

Q9. Do you agree with our view that DNOs, for the time being, should not be included in an incentive scheme?
No. We believe that DNOs should also be included in a fair and transparent incentive scheme. Their obligations should be linked in with those of suppliers, whilst maintaining the established separation between roles (i.e. broadly speaking, suppliers are responsible for financial integrity, whereas DNOs are responsible for physical integrity).

DNOs previously had a financial incentive to investigate theft which has now stopped. There seems to be asymmetry arising from the assumption that DNOs will proactively investigate theft simply by having a licence condition, whereas suppliers are deemed to require an incentive scheme.

Q10. Do you agree with our view that DNOs should have licence obligations to tackle theft in conveyance?
Yes. To maintain consistency, if suppliers are required to have a licence condition covering theft which is not in conveyance, it is consistent that DNOs should have licence conditions to detect, investigate and resolve theft in conveyance, both for tackling any tampering with the DNO network and for dealing with unregistered customers. This would complement and dovetail with suppliers' obligations in this area.

By unregistered customers we are referring to consumers with safe and industry compliant metering installations who are consuming electricity without being registered to a supplier. We believe that consumers in this situation should ultimately be required to enter a valid supply contract as - if left unresolved - the financial impact to honest customers (through group correction smearing) is the same as electricity theft. It is also our view that DNOs do not have the necessary powers to incentivise those consumers who refuse to sign up with an energy supplier, which is contrary to those of gas transporters dealing with exactly the same issue. This topic is being discussed in the DCUSA Standing Issues Groups under issue number 028. We request that Ofgem consider the recommendations of this group.

We believe that DNOs should also have licence conditions to assist suppliers in the detection and investigation of theft, particularly when the former are the first industry party at the site of an alleged incident. This could include providing information to suppliers about instances of meter tampering and checking leads from suppliers who find and report an unsafe meter and installation.

On a related point, the industry has written to the HSE (though the DCUSA agreement) seeking clarification on whether DNOs can delegate powers of de-energisation for reasons of safety to other industry parties. We believe the current state allows for unsafe situations to exist for longer than is necessary given that a suitably trained and competent operative is often present, prior to the DNO being able to exercise their powers. We ask that Ofgem support our stance in this.

Q11. Are you aware of any alternative proposals to support DNOs in tackling theft in conveyance that should be considered? If so, please provide further details.
There are smart-grid initiatives that may help resolve this, such as secondary sub-station metering that shows detail at a more granular level.

The industry may also want to consider whether DNOs could be included as parties to the electricity TRAS, and given equivalent licence conditions to suppliers'.

Appendix 2: Response to Impact Assessment Questions

IA 1. Do you consider we have captured all relevant actions that, if undertaken by suppliers, can contribute to tackling electricity theft?
Yes, we agree that suppliers need to take a more proactive stance. But we believe that additional actions could be undertaken to help tackle electricity theft on an enduring basis. We would like to see heavier consequences for electricity theft, more police engagement and greater enforcement of the law.

Our view is that civil criminal offence laws are insufficient, and need to be enhanced. The legal definitions for energy theft need to be more robust; in particular with regards to the scope and meaning of the term "abstracting of energy" (section 13 of the Theft Act 1968). The consumer offence is also too vague, and therefore needs clarifying. Greater supplier powers are needed to deal with customers who flagrantly flout the law; for example, perhaps by obliging landlords to make sure their properties are fit for purpose, and making them fully or partially responsible for any illegal activity relating to energy theft taking place in their property. Such measures would help suppliers mitigate financial loss, but would also create a strong deterrent effect. In parallel to this, greater enforcement is required to clamp down on existing criminal practices. We regret that there is currently little or no co-operation with the local police and crime commissioners, and would like to see Ofgem promoting relationships with these and their police forces to facilitate prosecutions.

Suppliers (and DNOs) have limited legal remedies to deal with cases when contractors working on another party's behalf (for example, a local authority) break meter/supply seals and remove the main fuse when performing their work. We believe there should be more severe consequences for electrical contractors who do not follow the correct procedures regarding de-energisation and re-energisation of industry metering systems. Their actions have an adverse impact on any theft detection activity, potentially pose safety risks to other parties visiting the site, and might, in extremis, lead to the customer being suspected or wrongly accused of theft.

IA 2. Do you consider our approach to the draft IA suitable for demonstrating the current commercial disincentives and challenges suppliers face to tackle theft? If not, what alternative approach would you suggest to be best?
Whilst we support the intent of the IA and agree with its goals, we would suggest that industry data may not yet be sufficient for this purpose.

However, we do agree that there is a commercial disincentive to tackle theft, and support Ofgem's goal to remove it.

IA 3. What do you consider to be the scale of theft in the GB electricity market?
We are unable to answer this.

IA 4. Do you consider that there is material difference in the prevalence of electricity theft between suppliers' customer portfolio? What factors drive any considered difference in theft distribution?
Yes, there is a difference. Electricity theft is often connected to cannabis cultivation, as already highlighted in the consultation document. Cannabis farms are most prevalent in urban environments in certain geographical areas.

A high proportion of offenders use prepayment meters, most likely because these are not read as frequently by agents as credit meters.

IA 5. When theft has been detected, what actions do you take to ensure accurate estimates of the volume stolen and to ensure stolen units are entered into settlement?
We consider the information returned by the revenue protection (RP) service and make an assessment based on this. We then try to ensure the responsible parties are billed for the correct consumption. Currently, however, the process to enter lost units into settlements is not fit for purpose – please refer to the answer to Consultation Question 7 for details.

IA 6. What is your estimate of the re-offending rates? Are there any actions you take to prevent re-offence at a premise where theft is detected?
Our estimate of re-offending rates is 50%; however, it is difficult to place an accurate figure due to frequent changes of tenancy or supply. We believe that a significant number of people who tamper subsequently re-offend as there is no incentive not to. Please refer to our views in the answer to Question IA1 regarding criminal offence laws.

Certain types of business are more likely to re-offend.

To attempt to prevent electricity theft from recurring, we can fit security devices to the meter, such as collars and anti- tamper blocks. However, switching to avoid detection is common. We would be in favour of working with the wider industry to better use preventative measures to reduce the switching risk.

IA 7. For each incentive measures, are the proposed compliance measures sufficient to ensure suppliers conduct investigations to satisfactory standards and thereby protect consumer interests? In addition to the proposed new Revenue Protection Code of Practice on theft investigation being developed under the DCUSA, are there any further measures that should be introduced to help address any perceived weakness?
In principle, yes. But this would depend on the details of implementation.

IA 8. Do you consider the incentive problem described in the consultation to be a reasonable representation of the issues and challenges suppliers face to tackle theft?
Yes, but suppliers also face additional disincentives and challenges:

- Suppliers have limited legal powers to deal with cases when contractors break meter/supply seals and remove the fuse when performing their work (please refer back to our views in Question IA1);
- Revenue protection faces health and safety risks;
- Suppliers face the risk of an impact to their reputation and brand image when disconnecting re-offending customers, for example when specific cases are mentioned in the media.

IA 9. To what extent do you consider the detection-based and the volume-based incentive schemes are likely to establish and realise targets for theft detection that are proportionate to the potential consumer benefits? Do you have any views on the two variations (cap/no cap) of each of those incentives schemes?
Please refer back to our views in the answer to Consultation Question 7 above.

Generally, we feel that we would need the fine detail of the proposed targets to verify whether these are realistic and proportionate to the potential consumer benefits.

IA 10. Do you consider that the cost-sharing mechanism could address the disincentive suppliers face to enter estimated stolen units into settlement?
We would raise doubts on whether such a cost-sharing mechanism would differ from the existing Group Correction Factor, from the point of view of the honest customer. This may defeat the object of putting units into settlement (please refer back to our views in the answer to Consultation Question 7 above).

IA 11. Do you consider that additional or alternative measures to the three incentive measures, to the enhance audit and to the TRAS are needed to address the incentive problem and improve theft investigation, detection and prevention?
Please refer back to our views in the answer to Consultation Question 7 and Question IA1 above. We would emphasise that the implemented measures need to be fair and transparent. It may be necessary to consider different schemes by sector, perhaps according to profile class.

IA 12. Do you consider that the cost and availability of services to support theft detection and investigation is a material issue for small suppliers?
It is a material issue for all suppliers, both small and large.

We would challenge the assertion that small suppliers would be more impacted than the larger suppliers, since group correction smearing in settlements is distributed according to market share. We would therefore be interested in hearing the arguments behind this claim.

We note that DNOs may have difficulty operating a revenue protection (RP) service in a smart world, and may consequently remove these RP services, to the detriment of most suppliers, particularly those who do not operate their own RP service.

IA 13. Do you agree with our initial views on consumer behaviour in respect of energy efficiency?
Yes, although there is not enough evidence to support that this is true in all cases.

IA 14. What percentage reduction in consumption would you expect customers to make when an illegal electricity supply is detected? To what extent do you consider that this would result from a response to increased costs and/or an increased propensity to invest in energy efficiency measures?
We are unable to answer this question, as the real level of consumption during the theft time-span can only be estimated. We would assume that a reduction in consumption takes place after theft has been detected and dealt with. However, customers may not have the means to decrease their usage, especially if they own poor-quality or old and inefficient electrical appliances and cannot afford to purchase energy-efficient replacements. Local agencies such as social services may be able to identify whether this is an issue. We suggest that there may be a way to address any such issues through ECO.

IA 15. Do you consider the proposed incentive measures would have any direct or indirect impacts on health and safety others than the areas discussed in this draft IA?
We believe that the proposed incentive measures could potentially improve health and safety. However, through organised crime, people may take further safety risks to hide evidence of theft, which could result in more staff and agents being put at (a safety) risk.

IA 16. What incentive measure (or combination of incentive measures) do you consider would have the greatest impact on health and safety?
We consider that whichever combination of measures detects the most theft will also have the greatest benefit in terms of health and safety.

IA 17. Do you consider there are other risks or unintended consequences of the proposed policy measures not discussed in this draft IA? What alternative policy measures do you consider could address these risks?
Whatever measures are implemented, it is essential that their benefit outweighs the cost for honest customers.

IA 18. Do you consider that the implementation timescale for our proposals is realistic and achievable? If not, what do you consider to be a realistic timeframe? What additional measures, if any, do you consider should be undertaken to secure implementation within a reasonable timeframe?
Not necessarily. Please refer to the answer to Consultation Question 4 above for our views on the implementation timescale for the TRAS service.

Any incentive scheme should be managed by an independent third party, and we would suggest delaying the implementation of any incentive measures until after the electricity TRAS is functional. This would ensure the quality and accuracy of any data used to set targets for the incentive scheme.

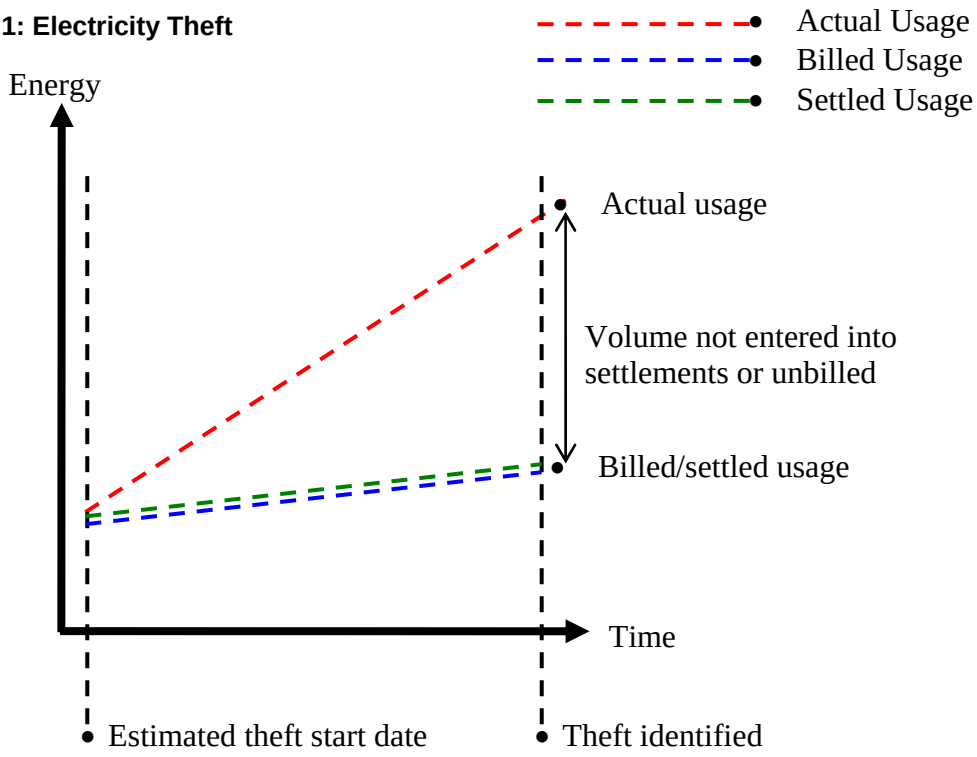
IA 19. Do you consider that our approach to enhancing obligations on DNOs would provide more focussed action on tackling theft in conveyance? If not, what do you consider to be an alternative approach?

Yes, however additional incentives and obligations should be placed on DNOs to effectively tackle other aspects of theft, in addition to theft in conveyance. These are outlined in our answer to Consultation Question 9 above.

Appendix 3: Settlement Options

Figure 1 shows the general principle behind energy theft. The complete volume used by an individual is neither billed by the supplier nor entered into the settlement process. This 'under' settlement is ultimately paid for by all customers as a result of the settlement smearing process.

Figure 1: Electricity Theft



Complications with any solution for correctly settling this volume:

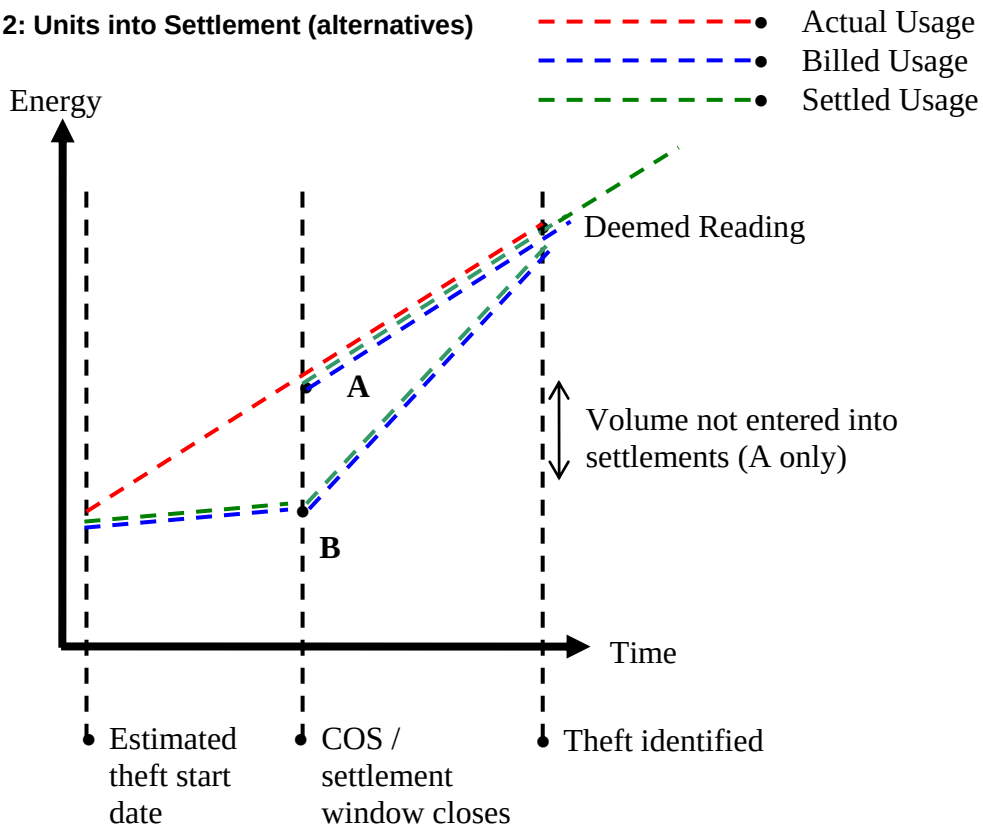
- Consumers who are stealing commonly switch suppliers to avoid detection, particularly early on in the supplier investigation process.
- Suppliers have no powers to object to thieves who choose to switch during a theft investigation.
- The forthcoming DCUSA Code of Practice promotes best practice to inform the gaining supplier of any incomplete theft investigations.
- The settlement window closes after 14 months, preventing volume from being entered into settlement past that point.
- By its very nature, assessing the volume and start date of a theft will generally be an estimation.

Note – With any options suggested an accurate forward-looking EAC correction may be required.

Option 1: Units into Settlement

Alignment of billed and settled volume. Supplier requests the NHH DC deem (estimate) reads at the estimated theft start-date and at the date when the theft was confirmed (e.g. removal of the tampered meter). The advance between the two periods would create the appropriate volumes for settlement purposes and supplier billing. Figure 2 presents alternatives to help address known complications when using this method (A&B).

Figure 2: Units into Settlement (alternatives)



Point A: DC deems historically to COS point, correcting the reading to align with 'estimated' actual consumption.

Benefits:

- Some volume is entered into settlements.

Risks:

- Pre-COS volume is not settled. This could be considerable if the consumer has recently switched.
- This may be a manually intensive process and would need changes to the BSC before it is robust
- Consumers who steal are allowed significant protection by switching between suppliers.

Point B: Deems total estimated volume back to COS.

Benefits:

- All volume is entered into settlements.
- Consequences for stealing are not mitigated by switching, therefore acting as a deterrent.

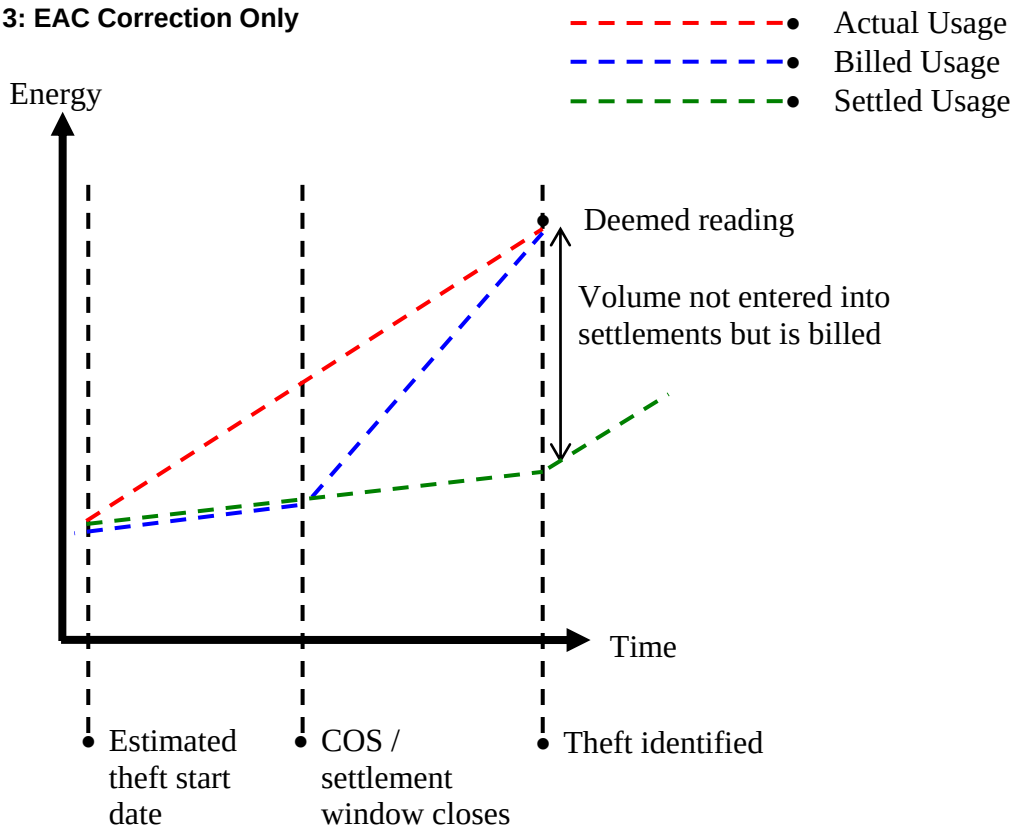
Risks:

- Supplier is responsible for settling consumption outside of his supply period.
- This could be a very complex process with additional BSC costs.
- This may be a manually intensive process and would need changes to the BSC before it is robust
- This creates a disincentive to detect theft soon after COS.

Option 2: EAC Correction Only

Supplier bills volume relating to the entire energy theft and correct forward looking. The entire volume of the theft is billed by the current supplier. The pre-detection settled volume is unchanged. The forward-looking EAC is corrected by the NHHDC. This would require a change to the existing BSC obligation.

Figure 3: EAC Correction Only



Benefits:

- This acts as an incentive for suppliers to detect theft within their portfolio for existing customers and new gains equally.
- Removes a large part of the Supplier disincentive to investigate theft.
- Consequences for stealing are not mitigated by switching, therefore acting as a deterrent.
- No other incentive scheme is required. Avoids implementation cost of settlement based incentive schemes, including the potential audit function.
- Low implementation cost.

Risks:

- No additional volume is entered into settlements.
- Will require a test in law to confirm the legality of billing this volume.

Glossary

BSC – Balancing and Settlement Code
COS – Change of Supplier
DC – Data Collector
DCUSA – Distribution Connection Use of System Agreement
DNO – Distribution Network Operator
EAC – Estimated Annual Consumption
NHH – Non Half Hourly
TRAS – Theft Risk Assessment Service