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Ofgem
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27 August 2013

Dear Chiara,

TACKLING ELECTRICITY THEFT

We are pleased to respond to Ofgem's consultation on tackling electricity theft. This response is submitted on behalf of ScottishPower's energy supply business. Our energy networks business is responding separately from a DNO perspective.

Our responses to the questions in the main consultation are in Annex 1 and our responses to the questions in the impact assessment are in Annex 2. Our main points are as follows:

- **Alignment of the gas and electricity TRAS** – We support Ofgem's proposal to introduce an electricity Theft Risk Assessment Service (TRAS), which has the potential to greatly assist suppliers in the detection and investigation of theft. We believe Ofgem should consider aligning the timescale for the development of the electricity TRAS with that for gas. Both services are likely to have similar features and could be undertaken by a single service provider, and there may therefore be scope for considerable synergies.
- **Definition of "vulnerable situations"** – The present licence drafting requires suppliers when investigating theft to identify if any individuals in the premises are in a vulnerable situation. We have no problem with this in principle, however we are concerned that the term "vulnerable situation" is open-ended and could be interpreted to include circumstances (such as lack of internet access) which are not relevant to the risk of disconnection. Our preference would be for Ofgem to retain the same wording as in the equivalent Gas licence condition, and to treat any changes in vulnerable consumer protection holistically rather than starting with electricity theft. If the "vulnerable situation" term is used in this or other contexts, we would suggest that Ofgem should either clarify its definition or provide appropriate guidance to assist suppliers in its interpretation.
- **Theft during conveyance** – The equivalent condition in the gas supply licence exempts suppliers from the obligation to take all reasonable steps to investigate suspected theft in the case of theft during conveyance (in which case the obligation lies with the relevant gas transporter). We think a similar exemption should apply in the case of electricity, since theft of electricity during conveyance is more appropriately a matter for the relevant DNO.

- **Incentives on theft detection and investigation** – We believe that, on balance, the settlement volume based incentive is the best option as it maximises consumer benefits by incentivising suppliers to target larger volumes of theft. Appropriate audit arrangements should overcome any disincentive to record and submit smaller volumes into the settlement process. It will be important to ensure that incentive rates are calibrated so suppliers can recover the costs of associated detection and investigation activities. Ofgem should also assess whether financial incentives have any unintended detrimental impacts on sharing information and best practice between suppliers.

If you have any questions regarding any aspect of this response please don't hesitate to contact me.

Yours sincerely,

A handwritten signature in blue ink that reads "Rupert Steele". The signature is written in a cursive style and is positioned above a horizontal line.

Rupert Steele
Director of Regulation

**TACKLING ELECTRICITY THEFT CONSULTATION
SCOTTISHPOWER RESPONSE**

Question 1: Do you agree with our proposals to introduce new electricity supply licence obligations in relation to theft?

Yes, we broadly agree with the proposal to introduce an overarching objective to require electricity suppliers to detect, prevent and investigate theft. This will align the objectives for electricity suppliers with those that already exist for gas. However we have some points to raise with the licence condition drafting as detailed below.

Question 2: Do you agree that our drafting proposals set out in Appendix 3 reflect the policy intent described in this chapter?

The proposed licence drafting in Appendix 3 replicates the licence obligation introduced for gas theft with the addition of new wording in paragraphs 1(b)(ii) and 11(a)(i) relating to vulnerability. Suppliers are required to:

“take all reasonable steps to identify whether the Domestic Customer and/or the occupants of those premises which are Domestic Premises ... is in a vulnerable situation, such as – but not limited to – of Pensionable Age, disabled or chronically sick”.

Paragraphs 11(c) and (d) then place restrictions on a supplier’s ability to disconnect domestic premises where it knows or has reason to believe there may be people in a “vulnerable situation”.

We understand that the reference to ‘vulnerable situation’ has been inserted to reflect Ofgem’s new vulnerability strategy which takes the view that ‘vulnerability is about the situations in which consumers are in, rather than about the individual per se’.¹ However, we are concerned that this wording could be interpreted to include a much broader range of circumstances than currently apply in gas. For example, Ofgem’s vulnerability strategy is concerned with many aspects of vulnerability, including ability to engage with the electricity market to get the best deal, and identifies a wide range of circumstances that can lead to a consumer being in a vulnerable situation:

“3.17. There are a range of circumstances that consumers can be in that can put them in vulnerable positions. These risk factors include, but are not limited to, the following.

- Personal circumstances
 - living alone
 - not having internet access
 - being on a low income
 - being unemployed or being made redundant
 - being a full-time carer
 - being a lone parent
 - leaving care for the first time
 - experiencing relationship breakdown
 - experiencing bereavement

¹ ‘Consumer Vulnerability Strategy Final decision’, Ofgem, 4 July 2013 <https://www.ofgem.gov.uk/ofgem-publications/75550/consumer-vulnerability-strategy.pdf>

- The property
 - living in a rural area and off the gas grid
 - living in private rented accommodation
 - living in a cold, inefficient home“

We think the words “such as – but not limited to” in the draft licence condition are probably intended to narrow the range of circumstances to those which are similar in nature to being of pensionable age, disabled or chronically sick. However, an alternative interpretation might view these words as meaning “for example” – in which case the much wider range of circumstances listed Ofgem’s vulnerability strategy could potentially be seen as within scope. It could be helpful to omit the words “- but not limited to” in order to clarify this.

It seems to us that the test for vulnerability (or ‘vulnerable situations’) should focus on circumstances in which the health or welfare of the individual would be particularly at risk of being harm following disconnection. Other forms of vulnerability (eg which affect the individual’s ability to engage with the energy market and get good deals) are not relevant here.

Our preference would be for Ofgem to retain the same wording as in the equivalent Gas licence condition and to treat any changes in vulnerable consumer protection holistically rather than starting with electricity theft. If the “vulnerable situation” term is used in this or other contexts, we would suggest that Ofgem should either clarify its definition or provide appropriate guidance to assist suppliers in its interpretation.

A second concern with the proposed licence drafting relates to theft of electricity during conveyance. In the corresponding gas supply licence condition, paragraph 12A.6 obliges suppliers to take all reasonable steps to investigate suspected theft, but paragraph 12A.7 exempts them from this obligation in the case of theft during conveyance, since in that case the theft is a matter for the relevant gas transporter. Ofgem has omitted this exemption from the draft electricity licence condition, but we think a similar exemption should apply, since theft of electricity during conveyance is more appropriately a matter for the relevant DNO.

Question 3: 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?

We agree with Ofgem that suppliers should in general be required to offer vulnerable customers and customers that would have genuine difficulty paying, different methods for repaying charges associated with theft in order to avoid disconnection.

In situations where theft is identified, our current policy is to offer a customer the installation of alternative metering and payment arrangements, eg installation of a PPM or the option of payments being recovered directly via Fuel Direct. However in the case of repeat offenders, where previous measures have failed, in order to preserve the safety of individual(s) residing at the property and of those living in close proximity, disconnection may be the only option. If the customer has previously interfered with or bypassed a prepayment meter, we do not consider it practicable simply to fit another one.

Where vulnerable individuals are present in premises where electricity has been stolen, a balance must be struck between protecting those individuals from the risks of disconnection and protecting all those living in their vicinity from the safety risks of ongoing theft activity.

Question 4: Do you agree that our proposed new electricity supply licence conditions should be introduced as soon as reasonably practical?

We are supportive of the new electricity supply licence conditions being introduced as soon as reasonably practicable. However, as noted above, we believe the reference to “vulnerable situations” should be omitted unless appropriate guidance or a clearer definition is provided by Ofgem.

Question 5: 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?

We believe Ofgem has accurately captured the disincentives that electricity suppliers face in relation to the costs of preventing and investigating theft and submitting data to the settlement processes. We agree that a reasonable balance has to be struck between the benefits to consumers of suppliers undertaking measures to detect and investigate theft and the costs of such measures.

We do not support financial incentive schemes which are linked to the number of thefts detected (as opposed to the volume), particularly where incentive payments are uncapped. This type of scheme, while compensating suppliers for cost incurred in investigating theft, may have the following unintended consequences:

- lead to inefficient and disproportionate levels of spend on costly investigatory activity if the true value of theft has been substantially over-estimated;
- create competitive distortions by penalising/rewarding different licensees if the prevalence of theft within their customer base (and hence their opportunity to secure financial incentives) is not reflected in the structure of the incentive scheme; and
- reduce sharing of best practice, and create a perverse incentive on suppliers to withhold information (such as new techniques for detecting theft or intelligence) if it would affect their competitive position and the amount of money they receive at the end of the period.

Question 6: Have we correctly assessed the main impacts in the accompanying draft IA? Are there additional impacts that we should consider?

As set out in our response to the questions in Ofgem’s Impact Assessment (see Annex 2 of this response), we believe the potential synergies between the gas and electricity TRASS should also be considered. In particular this may require the timescales for the development of both services to be aligned. We believe there is scope for savings with the parties who may undertake both schemes and suppliers’ systems and arrangements required to support the schemes.

We agree with Ofgem’s approach and the assumptions made in relation to the existing financial disincentives which are present for suppliers with regard to the costs of undertaking theft investigations. Opportunities for suppliers to recover costs directly associated with investigating illegal abstraction activities and consequential actions that are required to rectify them are currently limited.

However suppliers do have incentives to engage in other activities which make a significant indirect contribution to prevention and detection of theft, including procuring meter readings,

regular inspection of metering installations and statistical data analysis to uncover behavioural changes in consumption patterns.

Question 7: 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?

We believe the proposed new licence obligation on suppliers should, subject to our suggested amendments, be implemented in line with Ofgem's timescales.

The TRAS should be developed to support and enhance the data analysis work which is already undertaken by individual suppliers in their efforts to identify high quality theft leads. If operated under the correct terms of reference, the TRAS will have an important role to play in assisting the industry prevent and detect theft through:

- establishing working relationships with third party revenue protection entities;
- acting as a conduit for gathering and sharing market intelligence relating to theft activities and trends;
- co-ordinating theft targeting and investigation.

It has been widely recognised by industry that benefits could be gained by the aligning the introduction of a TRAS provider in both electricity and gas markets. This could result in cost efficiencies in the procurement process and should ensure that synergies between services provided for both fuels are realised.

The introduction of a 'tip-off line' and stolen meters database will provide a positive benefit to the prevention and detection of theft.

Question 8: Do you consider that there are alternative proposals, or variations of the combinations of the proposed policy measures that should be considered?

As mentioned above, aligning the implementation dates for the gas and electricity TRASs should be considered.

Question 9: Do you agree with our view that DNOs, for the time being, should not be included in an incentive scheme?

Yes.

Question 10: Do you agree with our view that DNOs should have licence obligations to tackle theft in conveyance?

Yes, we agree that DNOs should have licence obligations to tackle theft in conveyance. It would be particularly helpful for suppliers if this obligation extended to unregistered sites where no supplier responsibility has been recognised. However, DNOs would need to be made aware of such sites before such an obligation could reasonably apply to them.

Question 11: 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.

No

**ELECTRICITY THEFT – DRAFT IMPACT ASSESSMENT
SCOTTISHPOWER RESPONSE**

IA Question 1: Do you consider we have captured all relevant actions that, if undertaken by suppliers, can contribute to tackling electricity theft?

We believe that Ofgem has captured the actions within the Draft IA that will increase supplier opportunities to tackle theft.

We believe that further consideration should be given to the timing of the introduction of an electricity TRAS provider. Ofgem issued a direction requiring gas suppliers to procure and appoint the provider of a Gas TRAS to go live on 31 March 2014. As a consequence, the SPAA EC has appointed a project manager to assist the gas industry in procuring a service provider to undertake this role.

The electricity theft consultation proposes the implementation of an electricity TRAS by Spring of 2015. It is widely recognised that benefits could be gained by the aligning the introduction of a TRAS providers into electricity and gas markets. This should result in cost efficiencies in the procurement process and from ongoing operational synergies. Should a TRAS provider be appointed for gas in isolation, there is a risk that these cost efficiencies will not be realised. There is no guarantee that a bespoke solution for gas can be easily scaled up to accommodate the requirements for electricity without the need for IT system changes and protracted contract renegotiations with the appointed service provider, the costs for which will be paid by suppliers and their customers. In addition the customer experience would be better if there is a single telephone number to report suspected occurrences of theft. While we would expect any report of electricity theft to be passed on by the Gas Tip-Off service, there is a risk that valuable information and market intelligence will be lost. It would therefore seem sensible to align the proposed implementation dates for the electricity and gas TRAS.

Our own operational practice is that when theft is detected for one fuel, a visual inspection is made of the other metering installation in order to identify any safety risk or evidence of tampering.

An alternative proposal would be to delay the implementation of electricity TRAS Provider until an adequate period of time has elapsed to allow the gas TRAS to be appointed and the proposed solution bedded in. This would ensure that the proposed gas TRAS Theft Methodology has had time to develop and mature and therefore would lessen the impact of implementing the electricity model.

IA Question 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?

We agree with Ofgem's approach and the assumptions made in relation to the existing financial disincentives which are present for suppliers with regard to the costs of undertaking theft investigations. Opportunities for suppliers to recover costs directly associated with investigating and remedying illegal abstraction activities are currently limited.

However it should be noted that suppliers routinely undertake a range of activities which contribute significantly to the prevention and detection of theft, but which may not be regarded as direct “revenue protection” activities. These include procuring meter readings, regular inspection of metering installations and undertaking internal data analysis which may identify consumption patterns associated with theft.

IA Question 3: What do you consider to be the scale of theft in the GB electricity market?

ScottishPower is proactively engaged in theft investigation activities across the UK and we have developed third party alliances to share market intelligence and best practice and improve theft detection rates. In our view it is extremely difficult to estimate the volume of electricity theft within the UK.

There are a number of factors which can affect the level of theft in a supplier’s portfolio, including geographical location, demography and economic conditions.

Published information on meter fraud has highlighted that London, Birmingham, Manchester, Liverpool and Glasgow were particular geographic “hot spots”. ScottishPower’s revenue protection teams periodically undertake exercises which concentrate activities on particular “hot spot” areas within our portfolio. While the levels of theft detection within these areas can be high, it cannot be assumed that instances of theft are lower elsewhere. Similarly a distinction cannot necessarily be drawn between the levels of theft by domestic and non-domestic customers.

IA Question 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?

As detailed in our response to Question 3, we believe that the level of theft present within a supplier’s portfolio can vary depending on variety of factors.

IA Question 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?

When theft has been detected, our current practice is for a load check to be carried out to estimate the potential volume of electricity which has been stolen. Other issues investigated are the duration of theft, the use of the electricity supply and previous consumption patterns. An assessment is then carried out to determine the volume of stolen units and this information is passed to our settlement team to process.

IA Question 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?

When theft is detected at a property and corrective action taken, normal practice is for a future visit to be scheduled to ensure that the metering installation remains sound.

Based on revisit statistics recorded, we find repeat interference at 28% of properties where theft has been previously detected. This information is based on theft statistics for 2013 to

date. Where it is found that re-offending has occurred the customer will normally be disconnected.

IA Question 7: For each incentive measure, 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?

Each of the incentive measures has been developed to encourage suppliers to be more proactive in detecting theft and therefore pass the benefits resulting from such scheme to consumers.

We are supportive in principle of the incentive measures set out by Ofgem, however we have concerns that the introduction of a full package of measures, some of which are intended to operate together may result in unintended consequences as set out below.

Sharing information and best practice

A potential drawback of a financial incentive scheme is that it could disincentivise information sharing. An example of this would be where a supplier uncovers theft occurring at a block of flats or tenement building whose tenants have supply contracts with more than one supplier. If the supplier shares this information the other suppliers affected, this could have a detrimental impact on that supplier's comparative performance and the resultant allocation of costs and liabilities.

Introduction of a financial incentive scheme could potentially create competitive distortions by penalising/rewarding different licensees if the prevalence of theft within their customer base (and hence their opportunity to secure financial incentives) is not reflected in the structure of the incentive scheme.

Detection incentive schemes

The detection-based scheme with its fixed payment per detection does not take into account the volume of unrecorded energy which has been entered into settlement and therefore does not recognise the additional benefit that detection (and in particular settlement) of larger theft volumes of energy bring to the industry as a whole.

Settlement Volume Incentive

One of the key objectives of any theft incentive scheme should be to enter greater volumes of unrecorded units into settlement. The mechanisms for doing so are Gross Volume Correction (GVC), where the theft period extends greater than the 14 month RF window, and by imputing dummy meter exchanges.

These operations would result in an increase in the number of process actions performed by suppliers' non half hourly data collectors (NHHDCs). From November of this year, both of these operations will be subject to CP1360 'Inclusion of Audit Records for Gross Volume Correction and Dummy Meter Exchanges' and any enhanced audit or performance assurance techniques adopted in relation to theft should consider the use or amendment of these records.

While the above operations improve a supplier's ability to enter theft units into settlement, they do not overcome the financial disincentive that suppliers will incur additional settlement charges for units which they potentially will be unable to bill and recover from the customer. We believe a settlement volume incentive will help overcome these disincentives and incentivise suppliers to target the larger volumes of theft which will maximise benefits to consumers.

Settlement Cost-Sharing Scheme

The Settlement Cost-Sharing scheme was developed in the Issue 39 workgroup for which the report was compiled in Feb 2011. The majority of the group's preferred solution (as discussed within the Issue Group) was Option 3 which effectively took the unrecorded units out of the Settlement processes and any RPU amendment applied by a Revenue Protection Administrator (RPA). While it may preferable not to remove units from Settlement, the impacts and benefits of this possible approach would need to be considered more fully.

A scheme of this sort would simplify the settlement processes by removing the need for increased use of GVC and dummy meter exchanges as a result of increased theft detections. However development of the governance for a RPA operation of this sort will require significant development and guidance from Ofgem.

Enhanced audit of settlement

We believe that the enhancement of the current BSC Audit to include monitoring supplier input of theft volumes into settlement will be beneficial. We therefore concur with Ofgem's view that, without other incentive measures, an enhanced audit of settlement is unlikely to increase the level of theft detections.

Theft Risk Assessment Service (TRAS)

The TRAS should be developed to support and enhance the data analysis work which is already undertaken by individual suppliers in their efforts to identify high quality theft leads. If operated under the correct terms of reference, the TRAS will have an important role to play in assisting the industry prevent and detect theft through establishing working relationships with third party alliances, acting as a conduit for gathering and sharing market intelligence relating to theft activities and trends, and providing a vehicle for the co-ordination of theft targeting and investigation.

IA Question 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?

We agree with the incentive problems described in the consultation.

IA Question 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?

The detection-based scheme with its fixed payment per detection does not take into account the volume of unrecorded energy which has been entered into settlement and therefore does not recognise the additional benefit that detection and settlement of larger

theft volumes of energy bring to the industry as a whole. On the other hand it provides an incentive to investigate all suspected cases of theft.

The volume-based scheme, which offers an incentive payment for each unit of electricity entered into settlement, recognises the settlement volume benefit but suppliers may not be sufficiently incentivised to record low volumes of theft in the settlement process. Operating a volume based scheme supported by additional audit requirements may assist in overcoming this problem. A benefit of a volume-based scheme is that it gives a more accurate reflection of actual theft volumes and is more proportionate to consumer benefits. We believe that both schemes have their own distinct benefits as described in the consultation document. However operating a detection-based scheme with no cap also has the potential to introduce risk that a supplier will investigate theft wherever they can recover the costs of doing so, even where the volume of electricity detected is too low to justify the costs. The overall costs of operating such a scheme may be high with less additional benefit to consumers.

On balance we believe that, should a detection-based scheme be introduced, a cap on incentive payments has to be applied. For a volume-based scheme the risks to suppliers may not be as great, since the incentive rates associated with such a scheme will be applied via the current settlements process. In addition settlements accuracy will be improved with increased visibility of the true volume of stolen units.

IA Question 10: Do you consider that the cost-sharing mechanism could address the disincentive suppliers face to enter estimated stolen units into settlement?

As mentioned in our response to Question 7, we believe that the cost sharing mechanism may introduce additional risk and uncertainty for suppliers.

IA Question 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 Electricity theft address the incentive problem and improve theft investigation, detection and prevention?

Increased awareness through media campaigns and advertising of the risks presented by theft activities could aid the prevention and detection of theft. In addition, greater publicity of the proposed Tip off line and the fact that energy suppliers are being more proactive in preventing, investigating and detecting theft would also be beneficial.

IA Question 12: Do you consider that the cost and availability of services to support theft detection and investigation is a material issue for small suppliers?

We believe that costs may be a material factor for small suppliers. It is important that all suppliers can benefit from information sharing and best practice in theft investigation and detection techniques. We believe that in gas this has operated well including for small suppliers.

IA Question 13: Do you agree with our initial views on consumer behaviour in respect of energy efficiency?

Yes, we agree with Ofgem's views in respect to consumer behaviour with regard to energy efficiency.

IA Question 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?

The percentage reduction in consumption depends on the nature of the illegal abstraction and for what purpose the stolen energy has been used. Our experience is that customers who are stealing electricity do not monitor their energy usage in an effective manner and as such have no real interest in the volumes that are being consumed and any cost associated. While it is difficult to predict if a change in behaviour will occur, the accurate recording and billing of energy charges is likely to increase customers' awareness of their energy usage. As a consequence they may act in a more responsible manner and seek out energy efficiency measures which can assist them in lowering their energy consumption.

We believe that it is important that when theft is detected and curtailed, that the consumer is provided with guidance to assist them with the efficient use of electricity.

IA Question 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?

As well as addressing the economic cost of theft, incentive schemes should seek to reduce theft-related risks to health, safety and security in a cost-efficient manner. We believe it is vitally important that the principle of sharing information and best practice continues. Any incentive scheme which indirectly discourages this practice could potentially have a detrimental impact on health and safety.

IA Question 16: What incentive measure (or combination of incentive measures) do you consider would have the greatest impact on health and safety?

It is vitally important that the principle of sharing information and best practice continues. We believe that a TRAS which co-ordinates the sharing of intelligence, information and data relating to theft trends and activities will have a positive impact on health and safety.

IA Question 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?

As mentioned in the answer to Question 1, it is widely recognised that benefits can be gained by aligning the introduction of a TRAS provider to electricity and gas markets. Aligning implementation would result in cost efficiencies in the procurement process and ensure that the service description and solution is capable of processing and analysing information relating to both fuels.

As noted above, there is a risk that sharing of information and best practice could be adversely affected by the introduction of a financial incentive scheme.

IA Question 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?

We believe introduction of the new licence obligation is achievable in the timescales set out in the consultation. However, we are doubtful whether the implementation timescales for the electricity TRAS and other financial incentive schemes are realistic and achievable.

IA Question 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?

We believe that DNOs have an important role to play in tackling theft.

ScottishPower
27 August 2013