

Electric Ireland's response to Energy Theft CoP

Second Consultation Paper

Electric Ireland welcomes the opportunity to respond to this second consultation. We believe that the proposals in this paper will have a positive impact on the management of energy theft and the minimisation of its consequences for all energy consumers.

We are supportive of the proposals to have separate Energy Theft CoPs for gas and electricity and to have a combined code between suppliers and network operators for each sector.

We agree with the proposed revisions to the high level design, governance and compliance arrangements for the codes. The Codes of Practice on Energy Theft will be improved by the proposed changes, the amendments to the principles underpinning the Energy Theft CoP, the principles relating to reporting, costs and vulnerable customers and the revised definition for vulnerable customers.

We note in relation to 2.58 - Principle 2: Costs: *That Procedures for costs that are considered to be included in this CoP are costs associated with the theft such as unbilled units of the energy and administration costs. Costs associated with disconnection or reconnection of premises are dealt within the DNOs' Connection Policies.*

We are happy with this on the assumption that its intent is to avoid any double collection of the disconnection charge?. Conversely, if this is not the case, any charges associated with disconnection should be recoverable costs?