



Utility Regulator Notice and Consultation on Energy Theft Codes of Practice Licence Modifications

July 2018

Phoenix Natural Gas Ltd. (“**PNGL**”) welcomes the opportunity to respond to the notice and consultation on the Energy Theft Codes of Practice licence modifications presented by the Utility Regulator (“**UR**”) following publication of the Code of Practice for the Theft of Gas in March 2018.

As UR notes, PNGL and other licensees in the gas sector set up the Gas Theft Working Group (“**GTWG**”) as a pro-active measure to develop the industry procedure ahead of this licence modification taking effect. As UR attends the GTWG in an observer capacity, it is aware of the progress that has been made and therefore PNGL would welcome continued engagement with UR over the coming weeks to ensure that the implementation date for the licence modification and the industry procedure are aligned.

PNGL has two minor comments on the licence modification itself.

Firstly the reference to the “*General Consumer Council*” should be replaced with “*Consumer Council for Northern Ireland*” for consistency with the rest of PNGL’s Licence.

Secondly, for transparency, the sentence “*In order to comply with the obligations of the Code of Practice for the Theft of Gas, the Licensee shall establish and comply with procedures to facilitate the prevention, detection, investigation and managing the outcome of investigation into the theft of gas.*” should be removed from paragraph 3 given that this is not the definition of “*Code of Practice for the Theft of Gas*” itself. PNGL suggest that this sentence is included as a separate paragraph, i.e. paragraph 3, with the definitions then becoming paragraph 4.