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Richard Hume  
Utility Regulator  
Queens House  
14 Queen Street  
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30 August 2018

by email

Dear Richard,

**Notice and Consultation on Energy Theft Codes of Practice Licence Modifications**

Power NI welcomes the opportunity to respond to the Utility Regulator's (UR's) Notice and Consultation on Energy Theft Codes of Practice Licence Modifications.

As you will be aware Power NI responded to the consultation in relation to the Energy Theft Code of Practice and is an active participant in the industry working groups designing the market procedures. While the proposed modification simply give effect to the Code it would be helpful for licensees to have clarity on the timing of implementation and what change control procedures will surround the Code and the eventual Market Procedures.

Additionally, Power NI would like to take this opportunity to highlight that the proposed Power NI licence amendment places the requirement to be compliant with the Theft of Electricity Code of Practice in the Power Procurement Business section of Power NI's licence. This is clearly inappropriate and therefore Power NI would recommend that the licence condition is not introduced as a new Condition 70 but rather as a new Condition 34A.

Yours sincerely

William Steele  
Power NI