

# Temporary Disconnection Monitoring and Enforcement Process Pilot

## Background

Scottish Water is currently piloting a process for enforcement action against customers who have reconnected themselves following temporary disconnection. The pilot process below expands on the Disconnection Document and sets out the actions involved for Scottish Water and Licensed Providers.

## Scottish Water Identification of Illegal Reconnection

### Step 1

After becoming aware of a potential unauthorised reconnection, Scottish Water will ask the Licensed Provider to confirm whether there has been a change of tenancy at the premises since it was temporarily disconnected.

### Step 2

If there has been a change of tenancy, Scottish Water will update the CMA to indicate that the Supply Point is connected, effective from the date of tenancy change advised by the Licensed Provider.

### Step 3

If there has not been a change of tenancy, the Licensed Provider may request that Scottish Water proceed with the enforcement process. The costs associated with any enforcement activities will be invoiced to the Licensed Provider, in accordance with the Wholesale Charges Scheme.

Where requested to proceed with the enforcement process, Scottish Water will visit the premises to inspect the connection. If reconnection has taken place, Scottish Water will:

- a) On the first occasion, temporarily disconnect the supply again, leave a warning notice with the customer and issue a copy by recorded delivery, warning of the intention to survey for permanent disconnection and recover costs from the customer via their Licensed Provider in the event of any further interference with the disconnection.
- b) On the second occasion, temporarily disconnect the supply again and survey for permanent disconnection. A warning notice will be left with the customer and issued by recorded delivery, warning of the intention to proceed with permanent disconnection and recover costs from the customer via their Licensed Provider or take legal action in the event of any further interference with the disconnection.
- c) On the third occasion, depending on the findings of the permanent disconnection survey conducted at Step 3 (b):
  - i. If the survey indicated that permanent disconnection is feasible, Scottish Water will permanently disconnect the supply. A warning notice will be left with the customer and issued by recorded delivery.
  - ii. If the survey indicated that permanent disconnection is not feasible, Scottish Water will disconnect as far as possible and pursue legal action in the event of any further interference with the supply.

## LP Identification of Illegal Reconnection

Where an LP believes a customer has carried out an unauthorised reconnection they should raise a Temporary Disconnection Case on the LP Customer Portal.

To enable correct routing and tracking of these cases the following options and details must be provided:

Service: Temporary Disconnection

Service Reason: SW Temporary Disconnection (Non payment)

Reason for Request: Disconnection request

LP Own Reference: include "illegal" in the reference

Initiate Refused Access Process: Yes

Additional info: use this to let Scottish Water know it's an illegal reconnection which is to follow the Enforcement process. Provide the case number for the last temporary disconnection.

The above process will apply from Step 3

### **Monitoring of Temporary Disconnections**

Following any of the enforcement actions above, the premises will be subject to increased monitoring to detect any further interference with the supply by the customer. As the majority of businesses are not able to operate without a water supply it is anticipated that this monitoring will be limited in duration until either the customer settles their retail bills and the Licensed Provider requests a reconnection or the property is vacated.

The level of monitoring will vary depending on the assessed risk of unauthorised reconnection and will include the following escalating actions:

- Visit by Scottish Water's meter reading contractor (used for reading domestic meters and sub-meters) on their routine meter reading schedule.
- Scheduled visit by Scottish Water field staff or Delivery Partners to check disconnection (by exception for higher risk properties).
- Installation of data logging equipment to alert unauthorised consumption.