

**Codes of Practice for the
Trinidad and Tobago
Electricity Commission
(T&TEC)**

March
2022

This document represents the RIC's Final Decision on the Codes of Practice for the Trinidad and Tobago Electricity Commission. The Codes of Practice are essentially a set of customer-related standards, policies, procedures and practices that T&TEC is required to adhere to when dealing with specific consumer issues.

**FINAL
DECISION**

TABLE OF CONTENTS

SECTION I	1
BACKGROUND	1
Purpose of this Document.....	1
Scope.....	1
Structure of the Document.....	1
SECTION II.....	2
THE CODES.....	2
1.0 PROVISION OF PRIORITY SERVICES FOR PEOPLE WITH SPECIAL NEEDS.....	2
1.1 Building Accessibility.....	2
1.2 Identification of Service Provider’s Personnel	2
1.3 Redirection of Bills.....	3
1.4 Large Print Needs	3
1.5 Advice on the Use and Consumption of Electricity	3
2.0 PROCEDURES FOR DEALING WITH CUSTOMERS IN DEFAULT	4
2.1 Procedure for Determining Customers in Payment Difficulties.....	4
2.3 Payment Difficulties	5
2.4 Deferred Payment Plans.....	5
3.0 DISCONNECTION PROCEDURES AND POLICIES.....	7
3.1 Disconnection of Customer’s Service.....	7
3.2 T&TEC’s Obligations Before Disconnection.....	8
3.3 Limitations on Disconnection.....	8
3.4 Reconnection	9
3.5 Timeframe for Reconnection	9
4.0 RETROACTIVE BILLING POLICY	10
4.1 Culpability of Service Provider	10
4.2 Culpability of Customer.....	10
4.3 Recovery of Overcharges – Payments due to the customer.....	11

4.4 Recovery of Undercharges – Payments due to T&TEC	11
4.5 Procedure for Notifying Customers.....	12
4.6 Application of Retroactive Billing.....	12
5.0 PROVISION OF ACCURATE BILLING, RANGE AND ACCESSIBILITY OF PAYMENT METHODS.....	13
5.1 Billing Components	13
5.2 Minimum Time for Payment of a Bill	14
5.3 Frequency of Payments.....	14
5.4 Payments in Advance.....	14
5.5 Payment Methods	14
6.0 HANDLING OF COMPLAINTS.....	15
6.1 Methods for Lodging Complaints/Enquiries	15
6.2 Stages of the Complaints Handling Process	15
6.3 Complaints and Disputes Resolution Policy.....	16
6.4 Review of Complaints Handling Policy and Procedures.....	16
7.0 CONTINUOUS CUSTOMER EDUCATION	17
7.1 Obligation to provide information on the Codes of Practice.....	17
7.2 Contents of a Customer Education Code.....	17
8.0 PROCEDURES FOR ENTERING PREMISES	19
8.1 Procedures for Entering Premises.....	19
9.0 ADMINISTRATIVE PROCEDURES AND CHARGES RELATED TO ELECTRICITY THEFT	21
9.1 Investigation and Action.....	22
9.2 Billing Charges for Electricity Theft	22
9.3 Reconnection of Supply	22
9.4 Additional Measures	22
SECTION III.....	24
MONITORING AND EVALUATION OF THE CODES	24
Appendix 1.....	25

SECTION I

BACKGROUND

The Regulated Industries Commission (RIC) is the economic regulator of the electricity, water and wastewater sectors in Trinidad and Tobago and is responsible for regulating prices, and standards for services, amongst other functions. The Codes of Practice (Codes) for the Trinidad and Tobago Electricity Commission (T&TEC) are essentially a set of customer-related standards, policies, procedures and practices that T&TEC is required to adhere to when dealing with specific consumer issues.

On 11th August 2021, the RIC published for public consultation, the “*Review of the Codes of Practice for the Trinidad and Tobago Electricity Commission (T&TEC)*”. Some areas of the 2018 Codes were proposed for revision, and a new code for electricity theft was included. The RIC considered the responses received from its public consultation exercise, specifically those responses from the public and T&TEC, and subsequently published on its website “*RIC’s Final Position on the Codes of Practice.*” That document outlined the rationale underlying the RIC’s final position regarding the specific Codes.

Purpose of this Document

This document is published to provide guidance to T&TEC about the manner in which they should apply the Codes, and for the information of all stakeholders so that they are aware of the RIC’s Final Decision on the Codes of Practice for T&TEC.

Scope

The revised Codes will generally apply to all customer classes except for the Procedures for Dealing with Customers in Default, COP 2.1-2.4, which will only apply to Residential (Rate A) customers.

Structure of the Document

The rest of this document consists of two (2) sections:

Section II presents the revised Codes; and

Section III discusses how the RIC intends to monitor and evaluate the Codes.

SECTION II

THE CODES AND COMPLIANCE

The Codes were rearranged and codified for ease of reference. To ensure compliance and consistency in the delivery of service, T&TEC must provide the appropriate training to all employees and contractors, who should be held to an acceptable level of professional conduct at all times. In addition, internal responsibilities must be assigned for the implementation, management, communication and monitoring of the Codes of Practice to ensure customers receive acceptable levels of service.

1.0 PROVISION OF PRIORITY SERVICES FOR PEOPLE WITH SPECIAL NEEDS

The elderly, persons with disabilities, and the chronically ill face challenges in their daily activities to access public services. T&TEC, where possible, must attempt to facilitate the special needs of these customers. In an effort to ensure the facilitation of the special needs of these customers, T&TEC is required to adhere to the following Codes:

➤ **CODE: COP 1.1 - Building Accessibility**

T&TEC must modify its buildings, especially its Customer Service Centres, to facilitate easy access for the physically challenged and elderly persons by building ramps at entrances. In addition, tactile signs for the visually impaired should be installed in keeping with best practices where possible.

➤ **CODE: COP 1.2 - Identification of Service Provider's Personnel**

Suitable arrangements should be made to ensure that customers have confidence that all visits are made by bona fide representatives of T&TEC for legitimate purposes. Where practicable, several identification methods must be utilised when T&TEC's personnel (or persons acting on behalf of T&TEC) conduct site visits. These should include identification cards and uniforms issued by T&TEC and vehicles carrying the name and logo of the company. Where possible, large print as

a substitute for identification cards should be used in the case of customers who are visually impaired. T&TEC must make available upon a customer's request the option of security passwords as an additional security measure for entering the customer's property. For non-emergency matters, T&TEC must seek access at times reasonable¹ and convenient to customers. These customers must be informed, where possible, in advance of the date and time of the visit, and the name of the T&TEC employee who will be visiting.

➤ **CODE: COP 1.3 - Redirection of Bills**

The option of redirecting bills to a nominated third party must be provided, including information on the procedures to be followed.

➤ **CODE: COP 1.4 - Large Print Needs**

When requested by a special needs customer, T&TEC must provide a large-print version of the Customer Education Code, free of charge. See COP 7.1 -7.2 below for more details on the Customer Education Code.

➤ **CODE: COP 1.5 - Advice on the Use and Consumption of Electricity**

T&TEC must offer and provide information and advice to all customers, particularly to special needs customers² on:

- a. how to reduce electricity costs; and
- b. the typical running costs of major domestic appliances.

¹ Reasonable time may be considered during 7.00 am to 6.00 pm for non-emergency matters.

² A special needs customer is a person who may have disabilities such as visual and hearing impairment, or have reading and learning challenges or who may need additional help with communication and decision making.

2.0 PROCEDURES FOR DEALING WITH CUSTOMERS IN DEFAULT

NOTE: The Procedures for Dealing with Customers in Default will apply to Residential customers only.

This Code is not intended to promote or facilitate customers who may be trying to avoid their payment and obligations to T&TEC, as non-payment can seriously impact T&TEC's financial viability. There is, however, a balance to be struck between recovering the outstanding balances and dealing compassionately with those customers who genuinely find themselves in financial difficulty. The overall objective is to encourage empathy and to explore ways of managing the debt problems more effectively. T&TEC must, where possible and appropriate, inform its customers of any assistance payment programmes available from the Government of Trinidad and Tobago (e.g. the Utilities Assistance Programme).

➤ **CODE: COP 2.1 - Procedure for Determining Customers in Payment Difficulties**

T&TEC must have policies and procedures in place for distinguishing customers in hardship from those who are delinquent. Its internal assessment processes must be designed to facilitate early identification of a customer experiencing hardship using objective criteria such as the customer's previous payment history, usage and suitability for the Utilities Assistance Programme. It is the customers' responsibility to contact T&TEC if they anticipate that payment of a bill by the "due" date may not be possible.

➤ **CODE: COP 2.2 - Procedure for Contacting Customers in Default**

T&TEC must implement a customer-friendly procedure for contacting customers in default. In this regard, T&TEC must:

- a. be proactive in attempting to contact indebted customers directly by either bill message (the section of the bill marked "IMPORTANT TO NOTE"), letter, telephone, electronic mail, multi-platform messaging App (e.g. WhatsApp), text messaging, or personal visit. T&TEC may supplement other mediums to contact indebted customers. The manner of the interaction should not be oppressive or threatening;

- b. utilise trained and experienced staff to deal professionally with customers to negotiate payment arrangements which take into consideration the customer's circumstances; and
- c. contact customers either by letter, telephone or any other appropriate medium, where possible, requesting that they visit T&TEC within twelve (12) calendar days after the bill due date to negotiate payment arrangements to avoid disconnection.

➤ **CODE: COP 2.3 - Payment Difficulties**

Where the customer has been identified as experiencing payment difficulties, T&TEC must offer, on a case-by-case basis, alternative payment arrangements consistent with the customer's capacity to pay, which may include:

- a. offering payment options to enable the customer to maintain supply while managing their debts;
- b. advising on concessions or low-income assistance programmes that may be available to the customer to assist with financial hardship;
- c. offering to extend the "due" date for the payment of bills for some or all of an amount owed;
- d. offering to waive or suspend interest payments on outstanding amounts; and
- e. providing general energy efficiency and conservation information as a strategy to reduce high bills.

➤ **CODE: COP 2.4 - Deferred Payment Plans**

T&TEC must offer residential customers who have been identified as experiencing payment difficulties, or upon a request from the customer, at least the following instalment payment options:

- a. an interest-free instalment plan under which a residential customer is given more time to pay a bill or to pay arrears (T&TEC may not offer an instalment plan if the customer has, in the last 12 months, had one (1) plan cancelled for non-payment); **and**
- b. an arrangement under which the customer may make (smaller) payments in advance towards future bills.

If after T&TEC's internal assessment, a residential customer is identified as being delinquent, T&TEC may apply interest charges to the instalment plan.

T&TEC must monitor the residential customer's compliance with the plan.

An instalment plan must:

- i. specify the period of the plan;
- ii. specify the payment terms and amount to be paid per instalment, duly taking into account the customer's consumption needs and ability to pay;
- iii. specify the minimum down payment (down payment being no less than 30%); and
- iv. show how the instalment payment is calculated.

3.0 DISCONNECTION PROCEDURES AND POLICIES

Disconnection is an inherent component of any utility's operations, and may become necessary for various reasons³. Usually, the main reason for disconnection is the non-payment of recent bills that are due, and in arrears. Arrears are considered to be money outstanding on a customer's account owed after the due date. Unfortunately, disconnections have the potential of becoming contentious if not addressed appropriately. Therefore, T&TEC's disconnection policy must be sensitive and be initiated as a measure of last resort.

➤ **CODE: COP 3.1 - Disconnection of Customer's Service**

1. Disconnection for Non-payment

Customers may be disconnected if they have not paid their bill or have not adhered to an agreed payment plan with T&TEC.

To avoid disconnection, a customer:

- a. may request an instalment plan or other payment option; and
- b. must agree to an instalment plan or other payment option as indicated by T&TEC.

2. Disconnection for other reasons

A customer may be disconnected when:

- a. the customer requests a disconnection;
- b. the customer uses or supplies electricity illegally (e.g. supplying electricity through an extension cord either to or from another property);
- c. the customer tampers with, or permits tampering with, any meter or associated equipment;
- d. T&TEC reasonably believes that failure to disconnect will, or is likely to cause serious damage to property or safe operation of the network; or
- e. there is an emergency.

³ The various reasons for disconnection are provided in Code 3.1 – Disconnection of Customer's Service

➤ **CODE: COP 3.2 - T&TEC's Obligations Before Disconnection**

Before disconnecting the customer's supply, T&TEC must provide the customer with the reason for the disconnection and the necessary action required by the customer to reconnect the supply. This information must be provided via a letter, text messaging, electronic mail, or multi-platform messaging app (e.g. WhatsApp).

Before disconnecting the customer's supply for non-payment under COP 3.1(1) above, T&TEC must:

- a. make its best efforts to contact the customer directly by at least two (2) mediums advising of the arrears, with not less than twelve (12) calendar days' notice of its intention to disconnect (Final Notice, see Appendix I) and cautioning that if disconnected, the customer will incur additional costs (disconnection and reconnection fees);
- b. verify the "disconnection list" to determine whether the outstanding amount is still due before dispatching the disconnection crew.

➤ **CODE: COP 3.3 - Limitations on Disconnection**

1. Disconnection for non-payment must not take place:
 - a. on a Friday
 - b. after 3:00 pm. of any other day;
 - c. on the weekend, on a public holiday or on the day before a public holiday;
 - d. where the amount in dispute is subject to an unresolved complaint in accordance with the RIC Act or T&TEC's complaint policy; or
 - e. the amount owed by the customer is less than the service deposit.
2. In instances where a customer is absent or where the meter on the property is not accessible, T&TEC may disconnect at the pole.

➤ **CODE: COP 3.4 - Reconnection**

A disconnected supply must be promptly reconnected:

- a. where T&TEC has wrongfully disconnected the customer;
- b. where T&TEC has failed to comply with the disconnection procedures;
- c. when an agreement has been reached between the customer and T&TEC on a deferred payment plan, and the receipt of any down payment required under the plan;
- d. when T&TEC has received payment of arrears for which the service was disconnected, and the approved disconnection and reconnection fees; and
- e. after confirmation that the reasons for disconnection no longer exists.

➤ **CODE: COP 3.5 - Timeframe for Reconnection**

- a. Where a customer's supply has been disconnected, and the reason for disconnection no longer exists, the customer must be reconnected within 24 hours; and
- b. Customers disconnected in error must be reconnected within eight (8) hours and should be issued a written apology within five (5) working days by T&TEC.

4.0 RETROACTIVE BILLING POLICY

Billing errors are not common, and there are instances when a retroactive adjustment becomes necessary to correct the error resulting from either over-billing or under-billing the customer's account. This error correction may affect all classes of customers in the billing system. The extent of the retroactive billing will be dependent on situations where either T&TEC or a customer is culpable, as defined in COP 4.1 and COP 4.2. However, there must be fairness and equity to both parties in terms of the retroactive period applied.

The Retroactive Billing Policy applies to all classes of customers. These Codes provide information regarding instances where billing errors occur and the procedure for correcting the error is via retroactive adjustments.

➤ **CODE: COP 4.1 - Culpability of Service Provider**

T&TEC is deemed culpable when:

- a. billing classification is incorrect;
- b. previous meter readings or meter constant⁴ is incorrect;
- c. the meter has stopped or malfunctioned for reasons other than tampering, and estimated readings are used for billing; and
- d. meter readings are not taken on time.

➤ **CODE: COP 4.2 - Culpability of Customer**

The customer is deemed culpable when:

- a. the meter is inaccessible for reading, repair, inspection, replacement or disconnection;
- b. the installation has been tampered with; and
- c. there has been a change in usage without informing T&TEC (e.g. domestic to commercial).

T&TEC must notify the customer of their culpability as soon as it has been discovered. If T&TEC fails to provide proper notice, the customer can only be billed for a maximum of one (1) year.

⁴ The meter constant is identified on the T&TEC bill as "Meter Multiplier"

➤ **CODE: COP 4.3 - Recovery of Overcharges – Payments due to the customer**

An overcharge may occur when T&TEC bills a customer for electrical energy, more than what was due⁵ or more than what was actually consumed.

Where a customer is overcharged, the following conditions will apply:

- a. T&TEC must inform the customer in writing, within ten (10) working days of becoming aware of the error through its internal process; and
- b. In instances of a billing error where the customer has been overcharged, and T&TEC is aware of the error, the overcharged amount must be credited to the customer's account in full from the date of the overcharge and reflected in the customer's next bill.

➤ **CODE: COP 4.4 - Recovery of Undercharges – Payments due to T&TEC**

An undercharge may occur when T&TEC bills a customer for less electrical energy than what was due or less than what was actually consumed. The undercharging can occur when T&TEC or the customer is culpable.

1. Where a customer is undercharged but not culpable, T&TEC may recover the undercharges under the following conditions:
 - a. where the period of undercharging is less than one (1) year, the customer must be billed only for that period, and where the period of undercharging is greater than one (1) year, the customer must be billed only for a maximum of one (1) year; and
 - b. where the customer is allowed to pay the amount to be recovered through a flexible payment plan equal to the period in which undercharging occurred or up to a maximum of one (1) year, excluding interest charges.
2. Where a customer is undercharged but culpable, T&TEC may recover the undercharged amount under the following conditions:
 - a. the recovery of the undercharges shall be limited to amounts accrued to a maximum of four (4) years;
 - b. the customer may be billed for any reasonable additional costs incurred to recover the amount, including late payment fees; and

⁵ For example, where the customer rate classification may be incorrect (Residential Rate A, Commercial Rate B or Industrial Rate D)

- c. the recovery of the undercharges shall be limited to amounts accrued to a maximum of one (1) year in instances where T&TEC has failed to provide proper notice under COP 4.2.

NOTE: Matters related to electricity theft are addressed separately under COP 9.1 below.

➤ **CODE: COP 4.5 - Procedure for Notifying Customers**

- a. For retroactive adjustments involving more than three (3) billing periods, T&TEC must notify the customer in writing, clearly stating the reasons, the period and the quantum of the retroactive billing, and request that the customer visits or contacts their office within three (3) weeks of the date of the letter to discuss the matter, failing which the retroactive billing would be applied; and
- b. Upon being contacted by the customer, T&TEC must provide the required clarification on the proposed retroactive billing and advise the customer that a payment plan may be entered into when the adjustment is applied.

➤ **CODE: COP 4.6 - Application of Retroactive Billing**

Retroactive Billing will be applied when:

- a. the adjustment has been discussed with the customer, or
- b. the customer has not responded to T&TEC's invitation to discuss the matter within the three (3) weeks provided.

T&TEC or the customer has the right to refer the matter to a competent body (e.g. RIC or Court) for resolution in the event of a dispute over the charges.

5.0 PROVISION OF ACCURATE BILLING, RANGE AND ACCESSIBILITY OF PAYMENT METHODS

A utility bill must provide important information to customers, including the cost, period of the service, tariffs and consumption. Additionally, T&TEC must provide a range of payment methods, outlined below, to help customers make informed decisions. These Codes provide customers with essential information regarding their bills and the range and payment options available.

➤ **CODE: COP 5.1 - Billing Components**

Customers are entitled to prompt and regular bills and should receive adequate information on their accounts from T&TEC.

1. T&TEC must ensure that bills include the following:
 - a. account number;
 - b. name of the account holder;
 - c. mailing and service address;
 - d. bill date;
 - e. rate (customer classification);
 - f. whether the bill is based on an estimated or actual reading;
 - g. meter number and the date meter readings were taken;
 - h. units of electricity consumed;
 - i. the tariff structure;
 - j. components of billing charges (VAT, interest, credit, customer fee or any other components affecting the billing);
 - k. payment due date;
 - l. the various payment methods available; and
 - m. T&TEC's contact information (address, telephone, e-mail, and internet address).

2. Any changes in tariffs must be explained and communicated clearly in an accompanying insert in the first bill issued after implementation. This may be an electronic notice, where the customer has chosen this method of billing.

➤ **CODE: COP 5.2 - Minimum Time for Payment of a Bill**

Unless otherwise agreed with the customer, the “due” date specified in the bill must not be less than twelve (12) calendar days after the date T&TEC issued the bill.

➤ **CODE: COP 5.3 - Frequency of Payments**

Customers must be allowed to pay weekly, fortnightly, monthly, or as outlined by T&TEC’s standard methods of predetermined payments.

➤ **CODE: COP 5.4 - Payments in Advance**

T&TEC must, at the request of a customer, accept payment in advance. This payment must be no greater than the total value of two (2) previous bills.

➤ **CODE: COP 5.5 - Payment Methods**

T&TEC must offer at least the following payment methods to customers:

- a. in person at any of the offices or designated payment outlets;
- b. by mail;
- c. by electronic payment portals, e.g. T&TEC’s Customer Web Access (CWA) System; and
- d. by direct debit under a payment arrangement agreed between the customer and T&TEC.

6.0 HANDLING OF COMPLAINTS

T&TEC provides an essential service, and dealing with customer complaints is an important part of that service. A robust complaint handling system is necessary to resolve complaints and satisfy customers and is also useful to improve services where necessary. A crucial element of improving and maintaining customer satisfaction is building strong and positive customer relationships. As part of its focus on building positive customer relationships, T&TEC must comply with its policies and procedures for handling complaints⁶, which should reflect best practices for accessibility, fairness, accountability, efficiency, and effectiveness. The system must be reviewed periodically to identify areas for improvement and address any systemic issues that create poor customer service.

➤ **CODE: COP 6.1 - Methods for Lodging Complaints/Enquiries**

The process for submitting complaints must be simple, clear and concise, and adequate systems must be established for customers to make a complaint. T&TEC must provide several avenues by which a customer can lodge a complaint, including:

- a. Telephone – Customers must be provided with relevant telephone contacts and hours of service. In cases where the service is unattended, a recorded message must be made available.
- b. Letter – The postal address for written complaints, including appropriate contact names, must be provided.
- c. E-mail address – The e-mail address must be listed.
- d. In-person visit to offices - The location of all of T&TEC’s Customer Service Centres must be provided.
- e. Any other medium deemed appropriate by T&TEC.

➤ **CODE: COP 6.2 - Stages of the Complaints Handling Process**

The complaints handling process should include the following steps:

- a. Initial contact by the customer;

⁶ Compensation claims arising from breaches under the Guaranteed Standards are to be dealt with according to established procedure.

- b. Acknowledgement of the complaint;
- c. Investigation of the complaint;
- d. Notification of resolution of the complaint;
- e. Internal escalation if the customer is dissatisfied; and
- f. Other.

The classification “other” allows T&TEC some flexibility to include other stages of the process. Some steps of the complaints process may be excluded depending on the nature of the complaint.

➤ **CODE: COP 6.3 - Complaints and Dispute Resolution Policy**

1. T&TEC’s complaints and dispute resolution policy must:
 - a. provide for a customer to receive a substantive response within fifteen (15) working days of receipt of the formal complaint⁷;
 - b. describe the steps that T&TEC will take to investigate and resolve a complaint and the timeframe within which each step is expected to be completed;
 - c. indicate the remedy/remedies that are available to the customer on the resolution of the complaint, which may include but are not limited to an apology, an explanation, and remedial action; and
 - d. have a complaint escalation process with a clear timeframe that gives a customer the right to escalate the complaint to a higher level within the T&TEC’s management structure.
2. T&TEC may consider a dispute resolved if:
 - a. the complainant has been informed of its decision;
 - b. the complainant has not sought further review, and ten (10) working days have elapsed; and
 - c. the complainant has not lodged the complaint with the RIC or another external body.

➤ **CODE: COP 6.4 - Review of Complaints Handling Policy and Procedures**

T&TEC must review its complaints handling process every three (3) years, make amendments as appropriate, and seek the RIC’s approval before implementing any material change to its operations.

⁷ Exceptions may be complaints pertaining to legal/ownership issues, which require additional time for investigation.

7.0 CONTINUOUS CUSTOMER EDUCATION

Customer education is important as it informs the public about their rights, responsibilities, and the available redress mechanism. In addition, it also provides information on services that are available and the policies and procedures used by T&TEC, which guide its decision-making in providing its services. T&TEC may introduce new (or amend) existing policies and procedures which impact the public. Therefore, it is necessary to maintain a continuous customer education programme to keep its customers and the public informed of its services and relevant policies and procedures. T&TEC must develop and issue a “Customer Education Code” to inform, educate and sensitise all customers about its services, policies and procedures and the rights and responsibilities of T&TEC and its customers. T&TEC must ensure that the Customer Education Codes are in plain and clear language.

These Codes provide customers with information on the services offered by T&TEC and the policies and procedures that guide the delivery of those services. It also includes information on customers’ rights and responsibilities.

➤ **CODE: COP 7.1 - Obligation to provide information on the Codes of Practice**

T&TEC must:

- a. make the Codes of Practice and the Customer Education Code readily available on its website;
- b. display and make available upon request copies of the Customer Education Code in a brochure format at all its offices; and
- c. Educate and remind customers about the existence of these Codes of Practice at least once a year.

➤ **CODE: COP 7.2 - Contents of a Customer Education Code**

The Customer Education Code must contain at least:

1. the rights and responsibilities of T&TEC in the provision of services to customers, such as:
 - a. the right to fair and equitable treatment by T&TEC;
 - b. the right to non-discrimination concerning access, pricing and quality of service;

- c. the right to complete and accurate information on its services, electrical safety, quality of service standards and any other information reasonably required by customers;
 - d. the right to obtain redress from T&TEC via a fair and expeditious complaint handling process; and
 - e. the right to privacy and to have confidential information respected and protected.
2. Information to customers outlining their responsibilities to:
- a. provide adequate and accurate information when requesting T&TEC's services and inform T&TEC of any changes in their contact information;
 - b. inform T&TEC of any change in their use of electricity which may alter or hamper the agreed terms and conditions of their present service;
 - c. pay their bill on time;
 - d. allow identified and authorised employees of T&TEC to enter their premises for purposes related to the supply of electricity;
 - e. not use electricity unlawfully via illegal connections or tampering with the meters or any other device;
 - f. not use electrical equipment in such a manner as to cause unusual voltage fluctuation or other disturbances that may cause harm to the T&TEC's system or other customers;
 - g. inform T&TEC of defective equipment or the existence of any unsafe situation or where necessary, maintain or improve the infrastructure as required to avoid disruption in service or damage to property; and
 - h. inform T&TEC of any priority services or special needs or requirements for its services.

8.0 PROCEDURES FOR ENTERING PREMISES

T&TEC must be cognisant of customers' concerns, especially about crime and illegal activity, and exercise due regard when it is necessary to enter their premises. Section 37 of the T&TEC Act gives T&TEC the power to enter properties, cut trees, erect lines and other apparatus. However, T&TEC must have regard to the rights of property owners and occupiers and must exercise due diligence when discharging its statutory obligations. T&TEC must ensure that its employees and contractors are aware of the contents of this Code and will comply with it at all times.

This Code provides information to customers regarding the procedures to be followed by T&TEC to enter premises.

➤ **CODE: COP 8.1 - Procedures for Entering Premises**

T&TEC may find it necessary to enter a customer's premises to carry out its statutory obligations; however, this should be done at reasonable times or at a time mutual agreed with the customer, except in cases of emergency to protect life and property. The following guidelines should be observed:

1. Where practicable, T&TEC should utilise several methods of official identification for its employees and agents who are required to enter into someone's property to conduct their work. These may include the following:
 - a. An identification card showing the company name, the employee/contractor name, a reference number and a colour photograph of the individual;
 - b. Marked vehicles used by T&TEC (carrying its logo), where possible, for visits to customer's premises;
 - c. Employees wearing clothing, where possible, indicating that they are from T&TEC;
2. As far as practicable, where entry unto a private property is necessary, suitable notice⁸ should be issued to the property owner/occupier;

⁸ Suitable notice may be considered 48-72 hours in non-emergency matters. This notice may be given via the most appropriate medium (in person, telephone, writing, text) for the situation.

3. Employees or persons acting on behalf of T&TEC should enter the customer's premises when allowed by the customer/occupier/owner or where suitable notice provided to the customer/owner has elapsed; and
4. T&TEC will ensure that its employees or persons acting on its behalf are held to an acceptable level of professional conduct at all times. Such persons should have full regard for the concerns of customers and use appropriate and courteous language. In addition, due care and respect for the customers' property must be observed.

NOTE: While it is not a requirement of the Code, T&TEC should issue an authorisation letter to their contractors and insist that their contractors wear clothing indicating the name of the contracting company to ensure consistency with COP 8.1.

9.0 ADMINISTRATIVE PROCEDURES AND CHARGES RELATED TO ELECTRICITY THEFT

Electricity theft or “current stealing” occurs when a person deliberately consumes electricity without lawfully paying for it. Electricity theft is a matter of serious concern as it is a significant contributor to T&TEC’s non-technical losses⁹ or commercial losses. It deprives T&TEC of revenue, affects the quality of supply, increases the load on generating stations, affects the tariff imposed on genuine customers, and compromises the safety of the customer/perpetrator and their premises. Section 72 of the T&TEC Act provides guidance to T&TEC as follows “*every person who maliciously or fraudulently abstracts, causes to be wasted or diverted, consumes, or uses any electricity, is guilty of simple larceny and shall be punishable accordingly.*”

Electricity theft can occur either through authorised connections such as meter tampering, bypassing a meter, or unauthorised connections such as tapping T&TEC’s overhead lines or a neighbour’s service leads, and self-reconnection of a supply without consent. These illegal connections are dangerous and can result in an unsafe supply, which can cause burns, shocks, fires, serious injury or even death.

In view of the serious implications associated with electricity theft, the RIC has introduced a new Code of Practice – “Administrative Procedures and Charges Related to Electricity Theft”, to deter individuals from this illegal activity. It also provides information that should guide T&TEC in addressing this matter from an administrative perspective to recover rates and charges.

NOTE: All policies and procedures related to legal action by T&TEC to recover outstanding monies are outside the scope of this document.

⁹ Non-technical losses, at times called commercial losses, arise when energy is delivered to customers but no revenue is collected by the utility for the delivered energy. These losses are usually as a result of measurement errors, recording errors, and theft

➤ **CODE: COP 9.1 - Investigation and Action**

The following would apply:

- a. When T&TEC suspects or has been informed that a customer/perpetrator may be engaged in electricity theft, an immediate investigation should be initiated.
- b. Once T&TEC confirms that a customer/perpetrator is engaged in electricity theft, the electricity supply must be disconnected as soon as possible, either from the pole or meter/splitter, whichever is deemed necessary at the time to prevent further electricity theft.
- c. If present, the customer/perpetrator must be informed of the prospect of legal and administrative action to be taken by T&TEC regarding the incident.
- d. Following the disconnection, T&TEC must advise the customer in writing, stating clearly the reason for the disconnection and the charges associated with the incident of electricity theft. The notice should include the daily average, period and the quantum of the undercharged billing and any additional cost. The notice should include a request for the customer to visit or contact its offices within three (3) weeks of the date of the letter to discuss the matter.

➤ **CODE: COP 9.2 – Billing Charges for Electricity Theft**

The following would apply when determining billing charges:

- a. In the instance where T&TEC can determine with a reasonable degree of certainty, through its meter reading analysis, the date the electricity theft commenced, T&TEC would be entitled to recover the full amount of the undercharges.
- b. In the instance where T&TEC cannot determine with a reasonable degree of certainty, through its meter reading analysis, the date the electricity theft started, the recovery of the undercharges shall be limited to a maximum of four (4) years.
- c. T&TEC is allowed to bill the customer for any reasonable additional costs incurred to recover the amount, including interest charges.
- d. The customer would not be entitled to any payment plan administered by T&TEC.

➤ **CODE: COP 9.3 – Reconnection of Supply**

Reconnection would occur only when the following conditions are satisfied:

- a. when T&TEC receives full payment of the consumption charges for which the service was disconnected, as well as any investigative and administrative charges associated with current stealing, and the approved disconnection and reconnection fees;
- b. after confirmation by T&TEC that the reasons for disconnection no longer exists; and
- c. The submission of a valid Inspection Certificate from the Government Electrical Inspectorate, when deemed necessary by T&TEC. The Inspection Certification must be issued after the date of the discovery of the incident.

➤ **CODE: COP 9.4 – Additional Measures**

The following additional measures may apply:

- a. If the customer fails to make full payment, T&TEC is entitled to recover all money owed related to electricity theft through legal action under Section 95 of the T&TEC Act, which states, *“any fee, expenses, or other moneys recoverable under this Act or under the Regulations or Bye-laws, recovery of which is not otherwise specially provided for, shall be a civil debt recoverable summarily without limit of amount.”*
- b. Where the perpetrator is not a customer, all money owed related to electricity theft will be recovered through legal action as (a) above.
- c. Where practicable, T&TEC should monitor the customer to ensure there are no repeat offences of electricity theft.

SECTION III

MONITORING AND EVALUATION OF THE CODES

Monitoring and evaluation of the Codes of Practice for T&TEC are crucial in tracking their implementation and measuring their effectiveness, and are useful tools for determining whether the Codes are meeting the objectives, and when revision may be necessary. Monitoring and evaluation can be used to demonstrate that the Codes have had a measurable impact on expected outcomes and have been implemented effectively.

The RIC will utilise a revised framework to monitor T&TEC's implementation of the Codes of Practice (2022) to ensure compliance. Customer complaints will continue to be a critical element of this framework. The RIC is committed to providing reports to the public on this aspect of T&TEC's performance. The RIC will periodically conduct a survey to determine customers' perceptions of the effectiveness of the Codes of Practice.

APPENDIX I

Flowchart of Disconnection Process

