



INTERNAL TRIAGE ONLY — Sample data — Not Ofgem-approved. This report identifies potential billing exceptions requiring supplier review, not established breaches. Requires independent energy-regulatory review and testing against real billing records.

1,840 accounts analysed · 8 potential exceptions flagged · £15,285 at risk

Sample data only — not real customer data

Summary of findings

Statutory schemes in scope	2
Customer accounts analysed	1,840
Exceptions identified	8
SLC 21BA potential exceptions — back-billing beyond 12 months	4
SLC 21B potential exceptions — estimate issued after an actual read	2
PSR potential exceptions — vulnerable customer with no DNO link	2
Exceptions requiring tariff data before pricing	2
Total exposure at risk	£15,285

Exceptions identified

Account ref	SLC	Days overdue	Risk (£)	Issue description
ACC-4471-XX92	SLC 21BA	512	£4,820	No actual read since 21 Mar 2025; 17 estimated bills issued.
ACC-8830-XX14	SLC 21BA	448	£3,615	Back-billed 16 months of consumption beyond the 12-month limit.
ACC-1207-XX63	SLC 21BA	397	£2,940	Estimated billing run continued after failed meter access visits.
ACC-6654-XX08	SLC 21BA	371	£1,780	Actual read outstanding for 371 days on a live NHH supply point.
ACC-3392-XX55	SLC 21B	96	£1,240	Estimated read dated after a valid actual read on the same MPAN.
ACC-7718-XX31	SLC 21B	63	£890	Two estimates issued following a customer-submitted actual read.
ACC-5029-XX77	PSR	154	Tariff required	Vulnerability flagged internally; no matching DNO PSR registration.
ACC-9146-XX20	PSR	88	Tariff required	Medical dependency recorded; MPRN absent from

Account ref	SLC	Days overdue	Risk (£)	Issue description
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DNO PSR extract.

SLC 21BA = 12-month backbilling limit. SLC 21B = billing based on meter readings. An estimated bill after an actual reading needs more context before it becomes a breach. Detection and triage only.

Methodology & Limitations

Exact SLC citations	SLC 21BA — 12-month backbilling limit. SLC 21B — Billing based on meter readings.
Customer scope	Domestic customers, and microbusiness customers where the supplier applies the same backbilling protection. Non-microbusiness I&C accounts are out of scope.
Rule logic	SLC 21BA: IF the account is still being charged AND there is no actual meter reading in the last 365 days (or no actual reading at all) THEN flag a potential 12-month backbilling exception. SLC 21B: IF an actual meter reading exists for the account AND a later bill on the same account is based on an estimated reading THEN flag a potential meter-reading-basis exception for review.
Required input fields	account_ref (or mpan) — account identifier mpan — supply point number reading_date — date of the reading / bill line reading_type — actual or estimated consumption — kWh on the line unit_rate — £/kWh (optional; falls back to the published cap) standing_charge — £/day (optional)
Calculation behind "£ at risk"	£ at risk = (consumption × unit rate + standing charge as supplied on the row) × 1.05 (5% domestic VAT). The standing charge is taken as the value on the billing line; it is not re-multiplied by a number of days, so where a file carries a daily rate the figure understates exposure. VAT is applied at the 5% domestic/qualifying rate — non-domestic supplies at 20% VAT are not modelled. Where the file carries no rate, the most common tariff in the file is used; failing that, the published Ofgem cap rate, and the row is marked as an estimate.
Treatment of exceptions	Every flag opens as 'potential exception — needs supplier review'. Nothing is auto-closed, auto-refunded or reported to any regulator by this app. The supplier confirms, dismisses or escalates each row against its own billing records.
Known limitations	SLC 21BA carve-outs are not modelled: back-billing protection does not apply where the delay is attributable to the customer (obstructed access, refused appointments), to theft of energy, or to other conduct outside the supplier's control. Flags must be reviewed against those facts. SLC 21B allows an estimated bill where an actual reading could not reasonably be obtained. The engine cannot see meter-reading attempts, appointment history or industry data flows, so estimate-after-actual flags are deliberately over-sensitive and are triage candidates, not findings. Input is limited to account_ref, mpan, reading_date, reading_type, consumption, unit_rate and standing_charge. Meter type, profile class, settlement class, change-of-tenancy and change-of-supplier events are not ingested, so smart/traditional meter context and account-start dates cannot be taken into account. Reading type is derived from the text in the file: anything containing 'est' is treated as estimated, everything else as actual. Customer-own-reads and deemed reads are not distinguished. Detection and triage only. It does not replace regulatory judgement.
Testing status	Tested on sample data only, not yet tested against real billing records.

Chain verified: 128 records, hash intact