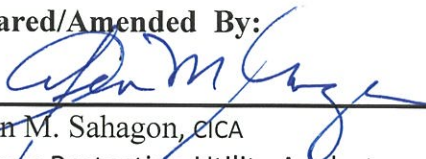





<p align="center">GUAM POWER AUTHORITY STANDARD OPERATING PROCEDURE</p>	<p>Prepared/Amended By:</p> <p> Arleen M. Sahagon, CICA Revenue Protection Utility Analyst</p> <p> Jeffrey J. Fejeran Revenue Protection Utility Investigator</p>
<p>TITLE: METER TAMPERING/ ILLEGAL POWER HOOKUP INVESTIGATING AND REPORTING PROCEDURES</p>	<p>Concurred By:</p> <p> Maripaz N. Perez, CGFM, CGAP, CICA, CIA, CFE Internal Auditor</p>
<p>NO: SOP-121 Supersedes: SOP-121, dated 2/01/17</p> <p>Page 1 of 12</p>	<p>APPROVED BY:</p> <p> JOHN M. BENAVENTE, P.E. General Manager</p> <p>Dated: JAN 4, 2019</p>

1.0 PURPOSE:

To establish uniform energy theft procedures and central system for investigating and reporting suspected and alleged meter tampering/illegal power hookup incidents.

2.0 SCOPE:

These procedures apply to all Guam Power Authority (GPA) personnel either receiving information or physically discovering a tampered meter or suspicious and unauthorized electrical power hookup.

3.0 AUTHORITY:

Under the Customer Services Rules and Regulation, Schedule 6, Section D "Fraud", GPA may refuse or discontinue service if the acts of the customer or the conditions upon his premises are such as to indicate intent to defraud GPA (e.g., meter tampering, connection without meters). Meter tampering or theft of service is punishable under Public Law 24-126 as a felony.

P.L. 24-126 is the legislation that outlines the penalties applicable to the offense of theft of electrical power. It explains and defines instances of unauthorized electrical connections; bypass; or obstruction of meter.

The law also outlines the fines for unauthorized electrical connections. Specifically, user found to have tapped into, tampered with or bypassed electrical meters to avoid consumption registration shall be subject to penalties that will be calculated at twice the amount of the estimated value of the power utilized by the illegal power connection. Said penalties are exclusive of the estimated value of the power, utilized by the illegal connection.

Users confirmed of illegal hookup or theft of electrical service can be charged and deemed guilty of a theft constituting a felony in the third degree. For GPA employees, the *Code of Conduct § 21.a* offense for "*Tampering of electric meter*" calls for the employee's dismissal.

***4.0 RESPONSIBILITY:**

The Internal Audit Office Revenue Protection Service (IAO-RPS) is responsible for implementing, updating, and ensuring compliance with this operating procedure and all personnel involved in the meter investigations. The January 2015 General Manager memorandum relative to *Responding Responsibilities to Incidence*, reiterated IAO-RPS to be responsible for responding to and investigating:

1. Meter Thefts, Tampering, or Vandalism
2. Theft of Electric Power Service or Illegal/Unauthorized Power Hookup
3. Conductor/Wire Theft

5.0 PROCEDURES:

Information regarding illegal power hookups may originate from any of the following sources: (1) physical discovery by GPA employee; (2) telephone calls; (3) walk-ins; (4) hotline, (5) website, and (6) anonymous tips.

5.1 Handling of potential or suspected meter tampering/illegal hook up by a GPA Employees from the Field:

- * Step 1: Upon discovery of a potential or apparent meter tampering/illegal hook up or theft of electrical service, the employee must immediately contact the Power System Control Center Dispatch (PSCC) Trouble Dispatcher.
- * Step 2: The Trouble Dispatch will contact IAO-RPS officials of the reported potential or apparent meter tampering/illegal hook up.
- Step 3: Communicating the discovery to PSCC Dispatch should be made discreetly so as not to alert the customer before verification by IAO-RPS. It is

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recommended that GPA employees quickly exit the premises and not hold any discussions and/or make any accusations toward anyone at the site.

As necessary, field representative employees may be asked to remain at the site until the RPS unit arrives to preserve evidence of the alleged tamper (i.e., jumpers in socket or direct tap to GPA service lines). Employee(s) will also be asked to fill out the ***“Irregular Metering / Theft of Service Report”*** (see *Attachment A*) form as part of the case file.

5.2 Handling of potential or suspected meter tampering/illegal hook up by IAO-RPS:

Upon being contacted the Trouble Dispatcher, field representatives, or receipt of hotline, the Revenue Protection Utility (RPU) Investigator and pertinent personnel will immediately conduct an on-site investigation.

The RPU Investigator will respond and investigate the reported alleged meter tampering or illegal hook up within 24 hours of notification or receipt of information. If the report is received on a weekend or a holiday, IAO-RPS personnel will respond on the next business day unless the reported condition poses safety or hazard issues.

- * Step 1: RPU Investigator personnel will conduct research of the location(s) and associated accounts(s) of the reported alleged meter tampering/illegal hook up. They will also secure the site/location map.
- Step 2: Upon confirmation of the reported meter tampering/illegal hook up, the RPU Investigator will contact the Guam Police Department (GPD).
- Step 3: RPU Investigator will photograph the condition of the meter and the immediate surroundings to include all tamper schemes utilized, as found.
- * Step 4: The RPU Investigator will contact the PSCC Trouble Dispatcher to request for deployment of Transmission & Distribution (T&D) Troubleshooters or Line crew to isolate service by removing the Authority's service wire from power pole to the customer's weatherhead.
- Step 5: The RPU Investigator will fill out the ***“Internal Audit Office - Revenue Protection Service Field Investigation Report.”*** Refer to *Attachment B*.
- * Step 6: Upon completion of GPD's onsite investigation, the RPU Investigator will proceed to remove the tampered meter and equipment (meter, seal, jumpers, etc.). Pertinent items will be secured and will remain at the custody of the IAO-RPS for evidence.

The responding crew will proceed to isolate service or remove service lines (as necessary), thus terminating electric service to further deter theft and for the safety of the community.

Step 7: In securing the meter box, the RPU Investigator will install a Service Disconnect Adaptor (SDA) and lockstrap with an RPS blue seal. The blue seal is an indicator that subject meter and corresponding account was confirmed as meter tampering/illegal hook up. The SDA and lockstrap provides a deterrent for future meter tampering and/or theft of service. When a meter is being installed for reconnection of service, the lockstrap previously installed by the RPU Investigator will be used as the same lockstrap when securing the new meter.

* 5.3 IAO-RPS monthly meter investigations from exception and specialized reports:

RPU Analyst or designated official shall review and monitor meter exception reports to investigate potential illegal hookup or theft of electrical service. These reports will be system-generated and will come from the following sources, but not limited to, MeterSense MDMS; Landis+Gyr Command Center; Customer Care & Billing (CC&B); etc. The accounts identified in the exception reports will be compiled by the RPU Analyst in preparation for the monthly meter exception reports monitoring.

* Below lists the exception reports that IAO-RPS officials will utilize. Note that these exception reports are subject to change and are not all inclusive.

- a) Tamper Alerts or Reverse Energy Alerts
- b) Reverse Rotation Detected Alerts
- c) Consuming Inactive Accounts
- d) Non-Consuming With Active Accounts
- e) Zero Consumption (GOV)
- f) Advance Grid Analytics Alerts

6.0 DEFINITION & CONDITIONS:

* 6.1 An illegal power hook-up is any connection to power lines which belong to the Government of Guam, which is made without the prior written permission of the Authority, or any power hook-up from a direct power line which bypasses or hinders meter registration. Note that the conditions below are not all inclusive.

- a) External jumpers
- b) Bypass on meter
- c) Tap ahead of meter
- d) Inverted or reversed substitution meter
- e) Manipulation of meter registration
- f) Foreign materials inside and/or around the meter
- g) Metered or Unmetered theft of service
- h) Any other unauthorized or illegal hook-up

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- 6.1 The following conditions may signify probable meter tampering or theft of service. The RPU Investigator will determine if such conditions were part of the tamper scheme upon thorough investigation of the provision and service lines. Note that the conditions below are not all inclusive.
- a) Sealing devices (seals, straps, and factory seals) compromised - cut, missing, pried, etc. An unauthorized direct bypass connected to an electric service
 - b) Non-registering meter
 - c) Jumpers in the meter socket
 - d) Damaged, tampered or vandalized meter. These conditions may be subject to "Damaged Meter Fee" upon replacement and service reconnection
 - e) Swapped Meter
 - f) Foreign materials over and/or around the meter to alter its accurate registration (i.e. magnets, foils, screens, etc.)

7.0 DOCUMENTATION:

7.1 **IAO-RPS Case Files.** IAO-RPS will maintain the official case file. Field investigators or pertinent personnel are responsible for submitting all statements, notes, evidence, and photographs along with the GPD case numbers.

* Step 1: The RPU Investigator will compile all required documents and create a case file for each confirmed Theft of Service, Meter Tampering, or Theft of Conductor/Wires investigations. The investigator will also prepare the "**Theft of Service Report**," which will be reviewed by the RPU Analyst. Refer to *Attachment C* for the form.

Step 2: Customer Services Division shall determine and calculate the amount of unbilled consumption, inclusive of investigation charges, damaged meter fee, and penalty to the customer of record. Customer Services will complete the calculation and backbill report within 10 working days of receipt of the case file from IAO-RPS personnel.

In addition to the backbill (estimated value of power utilized), GPA is authorized to charge penalties calculated twice the amount of the backbill for tampering cases. See the following for billing illustration.

Amount Backbilled:	\$ _____
P.L. 24-126 Penalty (Times X2 of Backbill):	\$ _____
Investigation Fee:	\$ _____
Damaged Meter Fee:	\$ _____
TOTAL Backbill & Penalty Fees:	\$ _____

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- Step 3: A detailed and signed calculation report of Customer Services' backbill and penalty charges will be included in the case file. The detailed backbill report will, at the minimum, be Reviewed by an independent official and then Approved by a Customer Services management team.

Customer Services officials shall be responsible for discussing the meter tampering or theft of service incident with authorized account holders, designee, or property owners where a confirmed violation was identified. The Letter or Acknowledgement Form must be signed and the original form submitted to the IAO-RPS along with proof of all required initial payments (i.e., investigation, reconnection service, and Damaged Meter fees). These information will be included as part of the case file.

- Step 4: The RPU Analyst shall review and ensure the accuracy and completeness of the case files. Each case file shall contain the following documents:
- a) Revenue Protection Service Field Investigation – Incident Report
 - b) Theft of Service Report
 - c) GPD Case Number & GPD Case Abstract or Full Report
 - d) Photographs taken from the site
 - e) Customer Services' detailed backbill and penalty charges report
 - f) Customer Services' **Letter of Acknowledgment Form** (Attachment D)
IAO-RPS to retain the original signed Letter of Acknowledgment Form as part of the case file.

- * Electrical services for any customer found with a tampered meter will be reconnected **only after** the required acknowledgement form (Attachment D) is signed/completed and all required conditions have been satisfied. Conditions include the payment of pertinent fees prior to service reconnection. These fees include but are not limited to: Investigation Fee; Damaged Meter Fee (if applicable); Reconnection/New Service Fee; Security Deposit; and any outstanding balance on the subject account.

7.2 IAO-RPS Investigations Database. The RPU Analyst or a designee will maintain and regularly update the RPS investigations database. At the minimum, the database shall track and include the following information for reporting to management, the Board, Public Utilities Commission, and other regulatory/government agencies: meter number; site/location; account number; GPD case number; findings; and penalties.

8.0 REPORTING OF METERS:

The RPU Analyst or a designee will notify Plant Accounting (for JDE Fixed Asset system); Meter Shop Section (for Customer Information System); and Customer Service Division (for Command Center) officials of stolen meters upon discovery and confirmation. The meter number, service location, and reference account number information will be reported. The reporting of stolen meters is an integral part of the meter reconciliation process to maintain proper control and accountability over the Authority's assets.

Distribution: Lists A, B, & C

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Attachment A: Irregular Metering / Theft of Service Report**GUAM POWER AUTHORITY**

ATURIDÅT ILEKTRESEDÅT GUAHAN
P.O.BOX 2977 • AGANA, GUAM U.S.A. 96932-2977

**** IRREGULAR METERING / THEFT OF SERVICE REPORT ****

Date: _____ Time: _____ Meter Number: _____

Account No.: _____ Account Name: _____

Service Location: _____ Book No.: _____

REASON FOR REPORT / CONDITION FOUND

Employee Name: _____ Employee Signature: _____

Employee Title: _____ Division: _____

Reported To: _____ Title: _____ Date: _____


Internal Audit Office - Revenue Protection Service Form
Form REVISED - January 4, 2017

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*** Attachment B: IAO-RPS Field Investigation Report**

	INTERNAL AUDIT OFFICE - REVENUE PROTECTION SERVICE			
*** FIELD INVESTIGATION REPORT ***				
Investigation Type:	<input type="checkbox"/> Theft of Power/Service	<input type="checkbox"/> Meter Theft/Vandalism	<input type="checkbox"/> Wire Theft	<input type="checkbox"/> Exception Report
Source:	<input type="checkbox"/> Hotline/Tips	<input type="checkbox"/> GPA Employee	<input type="checkbox"/> Field Discovery	<input type="checkbox"/> Other _____
Exception Report:	<input type="checkbox"/> Non-Consuming Active	<input type="checkbox"/> Reverse Rotation Detected	<input type="checkbox"/> Zero Con-GOV	
	<input type="checkbox"/> Inactive Consuming	<input type="checkbox"/> Tamper/Reverse Energy Flow Alert	<input type="checkbox"/> ACA	
Date of Investigation:			Reported By:	
Reference Customer Name:				
Service Location:				
Account No.:	Meter No.:	Reading:		
Seal Color:	Seal No.:	Other Sealing Device:		
CONDITION (As Found)				
<input type="checkbox"/> No issues on meter.	Found meter intact //	Meter registering normal	Yes / / No / /	
Vacant _____	Not in Use _____	Terminated Acct _____	Meter Change out _____	Net Metering _____
<input type="checkbox"/> Issues and exception identified.	See explanation below			
Action(s) Taken to address issues and exceptions identified.				
Removal of meter / /	Assisted by: _____		Photos: Yes / / No / /	
Service Drop Line Removal:	Entrance / /	Pole / / Transformer / /	Other / /	
Blue seal Installed No.	_____			
Evidence Secured from Investigation				
Witnesses Interviewed				
GPD Officer:	Badge No.	Case No.:		

Form Completed By:				
Jeffrey J. Fejeran, Revenue Protection Utility Investigator: _____				
Division: Internal Audit Office - Revenue Protection Service				
 * Form REVISED - April 10, 2018 *				

CODES:

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Attachment C: Theft of Service Report

RPS Case #/T: _____
Date: _____

REVENUE PROTECTION SECTION**THEFT OF SERVICE REPORT**

Account Number: _____ Meter No.: _____

Account Name: _____ KWH Rdg: _____

Service Location: _____ KWD Rdg: _____

Tampering Case: / X / Yes / / No Q-Hr Reading: Not Applicable

GPD Case Number: _____ Seal Nos.: (Old) _____ (New) _____

GPD Officer/Badge#: _____ Lock Strap Installed: // Yes // No

COMPLAINT / REPORT:**INVESTIGATORS FINDINGS / REMARKS:****ACTION TAKEN:**

Reported By/Title: _____ Date: _____

Investigated By/Title: _____ Date: _____

RPS – 02, Revised 9/2018

CODES:

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ADDED

*** Attachment C: Theft of Service Report**

RPS Case #/T: _____

Date: _____

REVENUE PROTECTION SECTION**THEFT OF SERVICE REPORT****CONCLUSION:****FINAL ACTION**

For Back Billing:

☐

YES

☐

NO

For Legal Action:

☐

YES

☐

NO

Amount Back Billing:

\$ _____

Tamper Investigation Fee:

\$ _____

Damaged Meter Fee (If Applicable):

\$ _____

Tamper Penalty Charges:

\$ _____

TOTAL CHARGES:

\$ _____

REMARKS:

Completed By: _____ Date: _____

JEFFREY J. FEJERAN
Revenue Protection Utility Investigator

Completed By: _____ Date: _____

ARLEEN M. SAHAGON
Revenue Protection Utility Analyst

RPS – 02, Revised 9/2018

CODES:

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ADDED

Attachment D: Letter of Acknowledgment Form**GUAM POWER AUTHORITY**

ATURIDÁT ILEKTRESEDÁT GUAHAN
P.O. BOX 2977 HAGATNA, GUAM U.S.A. 96932-2977

LETTER OF ACKNOWLEDGEMENT

To: **Guam Power Authority**
Customer Services Division

Date: _____

I/We, _____, do hereby acknowledge
the tampering of meter number _____, under account number
E _____, which was found on _____, at the following location:
_____.

I/We, understand that as the account holder of record, accept full responsibility for any
issues pertaining to the aforementioned meter, including any violation of Public Law
#24-126 (Tampering).

I/We, therefore, understand that any unbilled power consumption, including
charges/penalties, will be back-billed to me/us, in accordance with **Public Law #24-126**
and the **GPA Collection Policy**. Furthermore, I/we understand that power reconnection
would be contingent on my/our strict compliance with the following requirements:

- Any Inactive Accounts with outstanding balances must be paid in full or in installments covered by a Promissory Note or Deferred Payment Plan (DPA), if offered/authorized by the General Manager, Guam Power Authority.
- Full payment must be remitted for:

- Security Deposit: \$ _____
- Reconnection Fee: \$ _____
- Tampering Charges: \$ _____

Acknowledged by:

Signature: _____
Print Name: _____
SSN: _____
Date: _____

Mailing Address: _____

Signature: _____
Print Name: _____
SSN: _____
Date: _____

Contact Telephone Numbers:

Home: _____
Work: _____
Cellular: _____
Pager: _____
Other: _____

Cc: RPS MTC
Internal Auditor

(IA RPS 11/03)

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