

## Gap Site Audits (April to November 2025)

### Problem Statement

The process by which wholesalers identify gap sites is not prescribed by the codes. Gap sites represent a revenue shortfall for retailers and a missed opportunity to benefit from the market for customers who are otherwise eligible.

Associated risk or issue	Customer Impact
VC001 Customers cannot benefit from the market because they are a gap site (customer eligibility issues)	6 – High Impact

### Potential audit

This audit would review wholesalers' processes to identify and enter gap sites into the market, to assess how effectively wholesalers register gap sites. We would, among other aspects, look at gap sites being entered as new connections (non-compliant behaviour). The audit would include a review of the gap sites incentive schemes' application and evaluate effectiveness and consistency of approval/rejection criteria across wholesalers.

### Other factors

- An internal piece of analysis identified instances of SPID registrations with Effective From Date several years in the past entered as New connections.
- It is important to bring focus on gap sites after the substantial number of deregistrations driven by the Data Assurance programme, to ensure that eligible premises are registered after ineligible premises are deregistered.

### Outcome

Included in 2025-26 planned audits