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NON-CONFIDENTIAL CONSOLIDATED IMPACT ASSESSMENT RESPONSES

R0234 – INTRODUCTION OF AN ENERGY THEFT REFERRAL ASSESSMENT SERVICE UNDER THE REC

On 7 March 2025 the Code Manager issued an impact assessment to industry to seek feedback on the proposed solution for R0234.

The purpose of this document is to consolidate the responses and for the Code Manager to answer any questions raised within those responses.

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LEAD ANALYST	Flo Monea

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Question 1:	Do you have any comments on the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Brook Green Supply (Energy Supplier)	We believe that establishing the Referral Assessment Service (RAS) as a new REC service will be beneficial in tackling energy theft.	Noted. Thank you for your response.
Scottish Power Energy Networks (Distribution Network Operator)	SPEN are supportive of the proposed solution.	Noted. Thank you for your response.
Anonymous (Energy Supplier)	A closer working relationship between the police and energy industry within energy theft situations is very important. As an industry we are unfortunately continuing to see energy theft situations which put members of the public at risk, and face difficulty in accessing support from the police to help rectify these situations. The introduction of a RAS and ETU is a positive step forwards in improving the working relationship and understanding between the police and energy industry. Having this direct and specialised path to report energy theft to the police is important in ensuring cases are treated seriously and triaged by a group with more specialised knowledge and understanding of energy theft, thereby reducing the risk of case dismissal. That being said, one aspect which this proposal fails to adequately address is the cost of this	Thank you for your response. A detailed breakdown of the costs and funding associated can also be found on RECCo's Outline Business Case: Proposal to create a new energy theft enforcement service in partnership with the City of London Police

	service to suppliers and networks. The legal drafting refers to proportionate costs being passed to energy suppliers, but it is unclear as to what the range of cost could be. We understand that the specific cost may not be known at this time, but it is important for an estimated range to be provided to enable an understanding on the impact on suppliers and networks before further work is completed. This information is instrumental in allowing parties to understand the cost-benefit of this approach, and therefore being able to make an informed decision regarding support for R0234.	
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	SSE as a non-domestic only supplier do not have any theft cases that would warrant forwarding to the RAS and ETU. In order to achieve value for money and act as a deterrent to the type of theft SSE investigate, we would like to see the type of cases referred to the RAS expanded beyond the more serious cases outlined in the proposals. If this was to happen, we would also require the case assessment to be changed so that all participants had cases that were investigated by the ETU. The cost of the RAS and the ETU represents further theft expenses to SSE on top of the cost investigating theft and TDIS charges. We would like to review the cost effectiveness of the RAS after twelve months and if SSE are not having any cases accepted by the ETU, we would have the ability to withdraw from the scheme at this point. To mitigate the additional costs of the RAS, we would like REC to investigate reducing the TDIS pots to meet some of the costs.	The volume and nature of referrals will be kept under review during the operation of the service. To expand the remit of the ETU beyond the "more serious cases" would stretch resources. It could also cause delays in responding to the referrals the ETU is expected to investigate, such as Organised Groups completing meter swaps, professional enablers and repeat offenders. Scaling up resource within the ETU to facilitate broader investigations criteria would incur further cost within the sponsored agreement. Those cases that do not meet the Strategic Threat Assessment criteria for the ETU can still be reported to the appropriate local Police service for further investigation. Referrals will be assessed and forwarded according to risk, there is therefore no

		guarantee that each referring Party would see an equal allocation of referrals submitted. Regardless, all referring Parties will benefit from resolved cases due to the avoided socialised cost of the theft. A 12-month trial period would not sufficiently evidence the impact of what is essentially a dedicated investigative Unit to enhance deterrent and produce prosecution reports to the relevant judiciary. It could be 12-months before a Court Trial is heard. Given the evidence of rising energy theft we do not believe it prudent to scale back on TDIS targets / pots at this time. Following the November 2022 ASE Event, dedicated police response was discussed in line with current theft practices as a solution to provide a deterrent and positive prosecution outcomes - not to allow a scaling down of any other initiatives within the Theft Reduction Strategy. Please refer to the CBR within the Economic Case within the Outline Business Case, Pg. 16.
National Grid Electricity Distribution (Distribution Network Operator)	As a DNO, we are committed to supporting any efforts made towards attempting to mitigate financial and/or safety related challenges for the energy industry, of which Energy Theft is clearly a significant one. Therefore we would be in support of a service which provides an	Noted. Thank you for your response.

	opportunity to pass on information that would hopefully lead to a reduction in theft and potential prosecutions, which would ultimately act as a deterrent.	
Scottishpower Energy Retail Ltd (Energy Supplier)	Our response to this consultation must be reviewed along with our response to R0233 –Introduction of the Energy Theft Unit under the REC. Although it makes sense to introduce a Referral Assessment Service (RAS) under the REC to ensure an effective operation of the Energy Theft Unit, we have reservations on the current proposals to introduce an Energy Theft Unit (ETU) and a Referral Assessment Service (RAS) under the REC. For the reasons which we have set out in our response to R0233, we do not believe that the ETU and RAS proposals should be taken forward in their current form at this time. In addition, we would like to see full details of how RAS would perform key roles stated in this consultation. Before committing to these services, we would like the REC team to arrange workshops to talk through the process from data collection, verification to the case being handover to the ETU. We believe that the implementation date for R0233 and R0234 changes should be changed to Feb 2026 to allow the REC team to complete all the work that is required to provide detailed information to the Suppliers. The workshops should cover the following discussion topics: - Referral Mechanism: how the urgent referral process will work in practice - Referral processing and Assessment – proposed scoring matrix and key acceptance criteria - Referral Management system – decision to be made on if this is going to be a standalone	RECCo will look to facilitate workshops to ensure Party understanding following the approval of R0234. These would include further discussion on the E2E service that the RAS will provide, with that further level of confidence and assurance from the Regulator having been achieved. Of course, the processes and Cat 3 documentation for referral submission will continually be improved as lessons are learned from a 'live' service.

	system or be part of a wider Energy Theft data portal and how this will be managed and maintained. - Performance management and reporting – Reporting is very important in this process to understand the effectiveness of ETU and RAS service. We need more information on how this will be managed and the frequency of the reporting	

Question 2:	Do you agree the proposed solution addresses the problem statement? If not, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Brook Green Supply (Energy Supplier)	Yes. The various roles of the RAS, as stated in the impact assessment, align well with addressing the problem statement.	Noted. Thank you for your response.
Scottish Power Energy Networks (Distribution Network Operator)	We believe that the proposed solution would address the problem.	Noted. Thank you for your response.
Anonymous (Energy Supplier)	The problem statement - The introduction of the ETU provides the mechanism to prosecute and add a significant deterrent previously missing from the theft landscape. To ensure an effective operation of this unit, the referrals should include standardised data by introducing the Referral Assessment Service (RAS). RAS will assess, triage and co-ordinate theft referrals received from industry parties.	It is foreseen that a cohesive Launch Campaign will alert other police force areas to the existence of the Energy Theft Enforcement Service. Once in existence the RAS, in collaboration with the ETU, can look to open a common channel or contact within each Force area, to further raise awareness but also to secure an ongoing point of contact for mutual aid purposes, as the ETU carry out

	The proposed solution partially addresses the problem statement, but is missing some key aspects which would enable a more holistic approach. We are supportive of the fact that, with police buy-in, this will allow a more simple and effective route to prosecution and/or charging. Currently the effectiveness of prosecution and/or charging is dependent on the knowledge and understanding of energy theft within each individual police force. Having a nation-wide unit based in the City of London police will ensure the cases are investigated by people with the additional knowledge and skills to ensure all appropriate cases are progressed towards prosecution, acting as a deterrent for energy theft. One aspect which has not been addressed is if this centralised unit will also outreach to local forces to improve partnerships with energy theft visits to site. A key problem which energy theft stakeholders encounter is ensuring adequate police presence on site and their support during investigations. Reports may not make it to the RAS or ETU if supplier or network investigations cannot be completed due to lack of availability or support from the police to keep the peace during visits/warrants. It is important that this central unit also completes training/outreach/awareness programmes to local forces to ensure this approach is holistic.	their investigations across different police jurisdiction areas. Providing training to other Force areas would be time-consuming and does not guarantee an uplift in priority for those Force areas - hence a dedicated ETU to at least guarantee some response and positive outcomes. Organised crime groups and professional enablers operating across Force boundaries will be guaranteed a consistent investigative approach by the ETU removing the possibility of area crime prioritisation bias.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	SSE agree that the solution as outlined does meet the problem statement, but we require a more detailed solution.	Noted. Thank you for your response.
National Grid Electricity Distribution (Distribution Network Operator)	We appreciate that the Energy Theft Unit (proposed in R0233) is likely to operate more efficiently upon receipt of consistent, accurate information and complete evidence to support claims, therefore we would agree that establishing the Referral Assessment Service (RAS)	Noted. Thank you for your response.

	as a new REC service for this purpose would be helpful in terms of providing effective assistance/engagement.	
Scottishpower Energy Retail Ltd (Energy Supplier)	Although we agree that to ensure an effective operation of the ETU, introduction of RAS is required, but for the reasons which we have set out in our response to R0233 and question no 1 in this consultation, we do not believe that the ETU and RAS proposals should be taken forward in their current form at this time.	Noted. Thank you for your response.

Question 3:	Are there any alternate solutions that would better meet the needs of the problem statement?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Brook Green Supply (Energy Supplier)	The proposed solution is efficient enough to meet the needs outlined in the problem statement.	Noted. Thank you for your response.
Scottish Power Energy Networks (Distribution Network Operator)	We have not identified any other solution that would better meet the needs of the problem statement.	Noted. Thank you for your response.
Anonymous (Energy Supplier)	It should be considered as to if the RAS, in terms of someone from REC reviewing every case, is needed before referral to the ETU. If the case acceptance criteria is clear, defined and simple to follow then there shouldn't be any doubt from suppliers/networks as to if their case is eligible or not. REC should consider whether creating the RAS is necessary, or if it is adding unnecessary levels of governance and cost	The ETU will not have access to the historical and ongoing TDIS/ETTOS data that RECCo holds. This data will be crucial to the RAS in providing a rich resource of potential corroborative evidence to strengthen referrals. The RAS will also provide the reporting and success factors output of the

	to the process. This should be consulted on with industry with clarity on how the objective quantifiable acceptance criteria will work in practice. Additionally, it seems sensible that the police should be responsible for triaging reports, as they are the individuals who are trained and skilled in understanding UK law. If RAS would be adding a scoring matrix set by ETU, then it could be more efficient for the ETU to complete the scoring themselves.	full service following the end of Year 2. The RAS will continually monitor effectiveness and efficiency of referrals, ETU activity - including outcomes - driving continuous efficiencies and improvements within processes and the sponsored agreement itself. Considering this, the Code Manager believes the RAS is a crucial and necessary element of the service.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	Please refer to our comments in Q1.	Noted. Thank you for your response.
National Grid Electricity Distribution (Distribution Network Operator)	Not at this stage.	Noted. Thank you for your response.
Scottishpower Energy Retail Ltd (Energy Supplier)	We have no comment to make.	Noted. Thank you for your response.

Question 4:	Do you think we have identified and considered all processes and scenarios that may be impacted through the implementation of the proposed change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Brook Green Supply (Energy Supplier)	Yes	Thank you for your response.

Scottish Power Energy Networks (Distribution Network Operator)	We have not identified any additional areas that may be impacted.	Noted. Thank you for your response.
Anonymous (Energy Supplier)	No. One consideration which is still missing is the public perception of suppliers/networks and how this could pay into parties' decisions on if to report or not. Even if this service is available, some parties may be unwilling to report due to the concerns of public backlash from seeking prosecution for customers. It needs to be considered what the public response to this could be, and the potential level of press risk and legal action from customers could be to parties if they decide to follow this route of reporting and prosecution. Additionally, it is unclear how much additional work this will create for reporting parties once a report has been submitted. It would be beneficial to understand what would be expected of reporting parties if a case is taken on by the police. This includes; level of involvement needed from parties' legal teams, the likelihood of cases resulting in trial and the time it will take to get from case raise to resolution.	Is it expected that early communication on the launch of the ETU in collaboration with the CoLP and Parties will be drafted to ensure that the intended prosecution outcomes are the known Organised Groups, Professional Enablers and Repeat Offenders - and not the individual customers experiencing financial vulnerability or hardship. As per the current obligations, these individuals should be supported compassionately by the relevant supplier. Parties will retain discretion on whether to submit referrals to the RAS or not. The expectations on any Party when a report has successfully been received by the Courts, is like that of any criminal proceeding. There would be a E2E chain of evidence from referral to criminal charge. As such, Parties would be required to provide statement evidence and potentially evidence at Court proceedings. No solid expectations on the period of time required to secure a conviction can be made, however the RAS would

		summarise for purposes of the Year 2 evaluation report.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	Is the rejection by the Raas (or you can appeal) the end of that case? If it is rejected on appeal – does this mean that the suppliers pursue the case? We believe it would be beneficial for this to be explored.	There will be an appeal process in place. Following a rejection on appeal, the next steps are to be determined on a case-by-case scenario. It is envisioned that the ETU will provide guidance and support on the level of information and content of a referral before a formal rejection is provided.
National Grid Electricity Distribution (Distribution Network Operator)	More detail may be required in terms of the referral process itself, in particular exactly how a referral should be submitted given the level of information required. We note that a referral will need to be uploaded via the REC portal however in order for this to happen, we would need to provide additional access to the Portal to other business areas and would therefore need to review our internal business processes to ensure alignment.	Noted. Thank you for your response.
Scottishpower Energy Retail Ltd (Energy Supplier)	As suggested in our response above, industry workshops should be arranged to discuss further impacts other than identified as part of this consultation.	Noted. Thank you for your response.

Question 5:	Do you believe the solution appropriately accounts for the industry's move to the new MHHS arrangements?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Brook Green Supply (Energy Supplier)	[N/A]	
Scottish Power Energy Networks (Distribution Network Operator)	We do not believe that this solution will have any impact on the MHHS Arrangements.	Noted. Thank you for your response.
Anonymous (Energy Supplier)	N/A - The move to MHHS does not seem relevant to this problem statement or solution.	Noted. Thank you for your response.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	This will not have any impact on the MHHS arrangements.	Noted. Thank you for your response.
National Grid Electricity Distribution (Distribution Network Operator)	Yes, we believe so. As the industry moves closer to the new MHHS arrangements and the smart meter uptake increases, meaning less and less meter inspections/property visits, further measures (such as this) will be required to prevent energy theft.	Noted. Thank you for your response.
Scottishpower Energy Retail Ltd (Energy Supplier)	We have no comment to make.	Noted. Thank you for your response.

Question 6:	Do you agree with the chosen communication market message/flows set out in this solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Brook Green Supply (Energy Supplier)	[N/A]	
Scottish Power Energy Networks (Distribution Network Operator)	Yes	Noted. Thank you for your response.
Anonymous (Energy Supplier)	N/A - we do not have sufficient clarity from the documents to comment on this.	Noted. Thank you for your response.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	We believe no flow is required.	Noted. Thank you for your response.
National Grid Electricity Distribution (Distribution Network Operator)	Unless we are mistaken, we don't believe there are any market messages/data flows involved in the solution so this is not applicable.	Noted. Thank you for your response.
Scottishpower Energy Retail Ltd (Energy Supplier)	Industry workshop is required to review the spreadsheet provided with this consultation along with the process suppliers would be expected to follow.	Noted. Thank you for your response.

Question 7:	Do you have any comments on the proposed legal text?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Brook Green Supply (Energy Supplier)	No	Noted. Thank you for your response.
Scottish Power Energy Networks (Distribution Network Operator)	We have identified no issue with the legal text.	Noted. Thank you for your response.
Anonymous (Energy Supplier)	No	Noted. Thank you for your response.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	As mentioned in Q1 SSE would like the ability to withdraw from the scheme at yearly intervals if it was not providing value for money.	Following the Year 2 review of the service, a decision will be made to extend the service beyond Year 3 or not. It is not a practicable option for this to be an elective service.
National Grid Electricity Distribution (Distribution Network Operator)	No comments.	Noted. Thank you for your response.
Scottishpower Energy Retail Ltd (Energy Supplier)	We have no further comments to make on this proposal at this time	Noted. Thank you for your response.

Question 8:	What lead time would be required for your business to implement the proposed solution? Please provide justification.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Brook Green Supply (Energy Supplier)	[N/A]	
Scottish Power Energy Networks (Distribution Network Operator)	We would not require a standard lead time for this change. There are no system changes associated with this, and any referrals can be submitted via the portal which parties have access to. We would support a lead time of the soonest availability as this is in the best interests of the industry.	Noted. Thank you for your response.
Anonymous (Energy Supplier)	It is not possible to give a response to this question at this time, due to a lack of clarity regarding the time it will take for a case to reach completion if accepted by the ETU.	Noted. Thank you for your response. It cannot be determine the period of time from referral to conviction, due to the investigative complexities and workings of Criminal Proceedings.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	As this change has minimal system impact SSE does not require any lead time to implement this proposal.	Noted. Thank you for your response.
National Grid Electricity Distribution (Distribution Network Operator)	As per our answer to question 4, we will require further information on the referral process itself in order to assess what internal processes are needed. At that point we will be better placed to provide an answer to this question. Should this change proposal progress to consultation	Noted. Thank you for your response.

	stage and on the assumption that more information will be provided then, we will endeavour to provide a more detailed estimate.	
Scottishpower Energy Retail Ltd (Energy Supplier)	As mentioned in our response to question 1, we do not believe that the ETU and RAS proposals should be taken forward in their current form at this time. The implementation date should be postponed to February 2026 to give the REC team time to complete all the work that is required to take this forward.	Noted. Thank you for your response.

Question 9:	Are you aware of any constraints on when this change can be delivered?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Brook Green Supply (Energy Supplier)	No	Noted. Thank you for your response.
Scottish Power Energy Networks (Distribution Network Operator)	We have not identified any constraints on when this can be implemented.	Noted. Thank you for your response.
Anonymous (Energy Supplier)	No	Noted. Thank you for your response.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	No	Noted. Thank you for your response.

National Grid Electricity Distribution (Distribution Network Operator)	No, other than that it should align with the Energy Theft Unit proposed in R0233.	Noted. Thank you for your response.
Scottishpower Energy Retail Ltd (Energy Supplier)	Please see our response to question no 8	Noted. Thank you for your response.

Question 10:	Do you foresee any risks to your MHHS implementation, qualification or migration plans caused by the delivery of this change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Brook Green Supply (Energy Supplier)	No	Noted. Thank you for your response.
Scottish Power Energy Networks (Distribution Network Operator)	We have identified no associated risks to MHHS.	Noted. Thank you for your response.
Anonymous (Energy Supplier)	No, as above we are not clear on the links and ask for further clarity.	Noted. Thank you for your response.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	No	Noted. Thank you for your response.
National Grid Electricity Distribution (Distribution Network Operator)	No, we do not expect the delivery of this change to affect our MHHS qualification or migration plans.	Noted. Thank you for your response.

Scottishpower Energy Retail Ltd (Energy Supplier)	We do not foresee any risks to the MHHS implementation, qualification or migration plans by the delivery of this change.	Noted. Thank you for your response.

Question 11:	Would implementing the proposed solution incur any costs to your business? If so, please provide details breaking down design/build/test costs and on-going costs. If preferable, please indicate which of the below ranges your costs may fall: A) Nil; B) Up to £9,999; C) Between £10,000 and £49,999; D) Between £50,000 and £99,999; or E) more than £100,000.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Brook Green Supply (Energy Supplier)	We do not anticipate any additional costs to our business by implementing this change.	Noted. Thank you for your response.
Scottish Power Energy Networks (Distribution Network Operator)	We do not envisage large scale costs in light of this change, costs would be made up mainly in relation to the implementation of a new process to cover this change and the internal communication and staff training that would support this. We do not anticipate any system changes.	Noted. Thank you for your response.
Anonymous (Energy Supplier)	It is not possible to give a clear figure on the cost implications of this proposed solution at this stage. This is due to a lack of clarity around the service costs to suppliers and timeframes on the expected time to resolution of a case that is accepted by the ETU.	Noted. Thank you for your response.

SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	B) Up to £9,999;	Noted. Thank you for your response.
National Grid Electricity Distribution (Distribution Network Operator)	Please see our answers to question 4 and 8 as this applies. Further detail on the referral process is required to provide an estimation, however we would expect incurred costs to be minimal. Should this change proposal progress to consultation stage and on the assumption that more information will be provided then, we will endeavour to provide a more detailed estimate of costs at that stage.	Noted. Thank you for your response.
Scottishpower Energy Retail Ltd (Energy Supplier)	E – More than £100,000 – this would include cost of managing this process plus the industry cost	Noted. Thank you for your response.

Question 12:	Do you identify any benefits to your business through the implementation of the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Brook Green Supply (Energy Supplier)	Considering the minimal theft within our portfolio, the benefits of this change implementation remain neutral for us.	Noted. Thank you for your response.
Scottish Power Energy Networks (Distribution Network Operator)	We are unable to quantify any benefits currently,	Noted. Thank you for your response.

Anonymous (Energy Supplier)	The implementation of this solution will help to ensure that we can keep our customers and their communities' safe through increased deterrent to commit theft.	Noted. Thank you for your response.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	SSE do not see any benefit from the proposal based on the criteria of cases outlined. The type of theft that SSE encounters would not be deterred by the publicity of prosecutions for the serious theft cases outlined.	Noted. Thank you for your response.
National Grid Electricity Distribution (Distribution Network Operator)	Not directly, however a reduction in energy theft would provide further confidence in safety levels for any visiting engineers/field teams and improved consumer confidence in the industry overall.	Noted. Thank you for your response.
Scottishpower Energy Retail Ltd (Energy Supplier)	We do not see any benefits at this stage	Noted. Thank you for your response.

Question 13:	Taking into consideration both the costs and the benefits seen by your organisation, do you consider this change should be made?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Brook Green Supply (Energy Supplier)	Yes, we support the progress and implementation of this change.	Noted. Thank you for your response.
Scottish Power Energy Networks (Distribution Network Operator)	We believe that there is benefit in making this change.	Noted. Thank you for your response.

Anonymous (Energy Supplier)	Yes, but only with a clear explanation of the costs of this service to suppliers and networks being shared. Without this information, it is not possible to have a full objective picture of the costs and benefits, and thus understand if the benefits outweigh the costs.	Noted. Thank you for your response.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	SSE does not support the change as is currently outlined but this change could be a positive with some amendments being made.	Noted. Thank you for your response.
National Grid Electricity Distribution (Distribution Network Operator)	Yes. As stated previously, we are committed to supporting any efforts made towards attempting to mitigate financial and/or safety related challenges for the energy industry.	Noted. Thank you for your response.
Scottishpower Energy Retail Ltd (Energy Supplier)	As mentioned in our response to question 1, we do not believe that the ETU and RAS proposals should be taken forward in their current form at this time	Noted. Thank you for your response.

Question 14:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Brook Green Supply (Energy Supplier)	No	Noted. Thank you for your response.
Scottish Power Energy Networks (Distribution Network Operator)	No other comments	Noted. Thank you for your response.

Anonymous (Energy Supplier)	No	Noted. Thank you for your response.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	No	Noted. Thank you for your response.
National Grid Electricity Distribution (Distribution Network Operator)	Will there be an obligation on the RAS to pass the information on to the ETU within a specified period of time? In order for the RAS to continue to effectively assess severity, risk level and potential impact, evaluate potential risks, advise on public communication or deterrent strategies and conduct preliminary investigations, will a certain level of training/qualification be required, that they are obligated to update regularly?	On completion of the initial triage and assessment, referrals will be made as soon as possible thereafter from the RAS to the ETU. The RAS will triage and assess referrals based on the perceived scope, severity and safety issues to consumers/the public. Public communications will be drafted in collaboration with the CoLP and Parties to ensure a mutually agreed approach, messaging and coherence.
Scottishpower Energy Retail Ltd (Energy Supplier)	We have no further comments to make on this proposal at this time.	Noted. Thank you for your response.