RETAIL ENERGY CODE

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01	Proposal Plan
02	Impact Assessment
03	Consultation
04	**Final Recommendation**

CHANGE REPORT

R0212 - PROTECTING CRIMESTOPPERS AND THEIR CONTACTS

DOCUMENT VERSION	1.0
PROPOSED IMPLEMENTATION DATE	7 NOVEMBER 2025
IMPLEMENTATION APPROACH	BIG BANG

RESPONSIBLE COMMITTEE	CHANGE PANEL	**CHANGE PATH**	SELF-GOVERNANCE
PRIORITY STATUS	MEDIUM	**URGENCY**	STANDARD
IMPACTED STAKEHOLDERS	ENERGY SUPPLIERS, DISTRIBUTION NETWORK OPERATORS, GAS TRANSPORTERS		

LEAD ANALYST (SOLUTION LEAD)	TECHNICAL LEAD	ASSURANCE LEAD	SUBJECT MATTER EXPERT
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OVERVIEW

This proposal seeks to clarify how the information provided to Energy Suppliers, Distribution Network Operators and Gas Transporters by Crimestoppers can be used and shared. The aim of which is to protect Crimestoppers' reputation, their anonymity guarantee, and the welfare of those who contact Crimestoppers/Stay Energy Safe.

CODE MANAGER RECOMMENDATION

The Code Manager recommends that the [Responsible Committee]:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 7 November 2025.

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BACKGROUND

1 SUMMARY

Crimestoppers is an independent charity that gives people the power to speak up and stop crime. The charity has worked closely with the Energy sector since 2016 to raise awareness of the dangers of tampering with electricity and gas meters. The Stay Energy Safe campaign, in partnership with Crimestoppers, aims to raise awareness of Energy Theft and keep people safe by educating them on the dangers it poses, the signs to spot, and encourage people to report it, 100% anonymously.

Crimestoppers is a trusted voice and plays a vital role in operating the Energy Theft Tip Off Service (ETTOS) on behalf of RECCo. The team at Crimestoppers have a significant impact, obtaining tips offs, whether over the phone or online, writing reports and securely relaying these almost instantaneously to the right Energy Supplier or Network Operator so that they may investigate potential cases.

Whilst Crimestoppers don't believe a breach has taken place, they believe there have been some incidents over the last 12 months, where suppliers have shared more information than deemed necessary and could have put anonymity of the service at risk. Therefore, Crimestoppers have proposed amendments to Schedule 7 – Energy Theft Reduction to reinforce the obligations and potential consequences for a breach of the agreement in place. This seeks to ensure the safety of the public and to protect the reputation of the Stay Energy Safe brand.

As R0212 was raised as an Issue with a proposed solution to allow for a legal review to be conducted, once this activity has been completed, this proposal progressed directly to a Change Proposal stage without the need for any solution development activity to take place.

2 PROBLEM STATEMENT

Disclosure of information passed on from Crimestoppers, to someone / parties outside of the relevant Energy company teams, can pose a serious risk to those who have reported suspected Energy Theft. This could jeopardise the trust and confidence the public have in the service and damage the reputation of the charity (Crimestoppers) and the Stay Energy Safe brand.

3 IMPACTS

CONSUMERS
All Consumers

REC SERVICE PROVIDERS
Crimestoppers

RECCO / REC CODE MANAGER
REC Performance Assurance

REC PARTIES AND SERVICE USERS

REC DOCUMENTS / PRODUCTS

Energy Suppliers	Schedule 7 – Energy Theft Reduction
Distribution Network Operators	
Gas Transporters	

MHHS
No impact

4 CROSS-CODE IMPACTS

No Cross-Code impacts have been identified.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**14-January-25**	**01-April-25**
	Solution Review	**Complete**	**Complete**
Change Proposal		**01-April-25**	**03-June-25**
	Business Case Assessment	**Complete**	**Complete**
	Consultation	**Complete**	**Complete**
	Solution Refinement	**Complete**	**Complete**
	Final Determination	July	July
Voting		**01-July-25**	**01-July-25**
	Appeal Window	July	July

6 STAKEHOLDER ENGAGEMENT

This proposal had been raised as an Issue with a proposed solution which has been reviewed by the Code Manager and Code Manager's legal counsel. As the Change Proposal is only enforcing the current practices in the industry, the Code Manager did not conduct a Party Impact Assessment.

7 PRIORITY STATUS AND URGENCY

The priority status for this Change Proposal is medium based on a weighted prioritisation score of 117 and has been assessed as a Standard Change.

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PRIORITISATION MATRIX

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Indirect	1	27	27
	Retail Markets Impact	Innovation and Market Arrangements	1	17	17
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	1	7	7
		Legal and Regulatory Compliance	1	14	14
Resource	Complexity / Effort / Duration		3	9	28
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		1	17	8
	Contribution to/ Alignment with RECCo's Forward Work Plan		2		17
Urgency *(The need to progress a change to meet a targeted date)*		Other Planned Activity	0	10	0
				Overall Priority Score (rounded)	117

Priority Status	MEDIUM
Change Proposal Type	STANDARD

SOLUTION

8 SUMMARY OF ANALYSIS UNDERTAKEN

As the scope of this proposal is to add clarity around the anonymity of the service performed by Crimestoppers and the process around it, as well as aligning the REC and the ETTOS Agreement Clauses, no analysis was performed when developing this Change Proposal.

9 PROPOSED SOLUTION

The proposed solution seeks to add clarification of the importance of maintaining Stay Energy Safe's/Crimestoppers' anonymity promise, together with the vital importance of maintaining customers and the public's safety. These proposed changes are impacting Schedule 7 ‘Energy Theft Reduction’, Annex 1.

10 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0212 can be found here.

PRELIMINARY ASSESSMENT

11 BUSINESS CASE ASSESSMENT

11.1 COSTS

As the scope of this Change Proposal is to only add clarity to REC Schedule 7, there are no costs for implementation.

11.2 BENEFITS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
TRUST AND SAFETY	Adding clarity around the anonymity of Crimestoppers and their contacts, the current and future services performed by the charity would continue to offer a secure and trusted channel for end users.

12 CASE FOR CHANGE

SELF GOVERNANCE

The Code Manager considers that there is a positive case for change for implementing this Change Proposal on the basis that the proposed solution:

- Effectively resolves the problem statement; and
- The impact of the Change Proposal not being implemented could cause reputational damage to the Stay Energy Safe brand.

13 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 23 May 2025 to obtain views on the proposed solution of R0212. In total four (4) responses were received from two (2) Energy Suppliers and two (2) Distribution Network Operations (DNOs). The key themes from these responses have been summarised and set out below.

13.1 SUMMARY OF RESPONSES

All respondents noted their support of R0212 proposal. One query for additional clarification was received from a DNO and an Energy Supplier regarding the use of 'within a reasonable time' and whether these terms are too vague. It is recognised that the time required could depend on a case-by-case scenario. Therefore, no specific time SLA was proposed. The expectation is that if a Party is required to disclose ETTOS Service Data, then the ETTOS Service Provider should be notified as soon as practically possible.

No comments or queries raised regarding the implementation technique, or the change path proposed by the Code Manager.

All respondents agreed with the proposed implementation date. One respondent queried the possibility of aligning the implementation of this Change Proposal R0212 to R0173 Improvements to the Theft Detection Incentive Scheme (TDIS). It was noted that as R0173 implementation date is proposed to be amended under R0259 Update to R0173 Implementation Date and this has not yet been approved. Therefore, to ensure there are no risks around the implementation, the Code Manager has not amended its recommendation for an implementation on 7 November 2025.

14 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link
CONSOLIDATED CONSULTATION COMMENTS AND CODE MANAGER'S RESPONSES	Link

15 GLOSSARY

TERM	DEFINITION
Energy Theft	Energy Theft Includes: (a) circumstances described in Paragraphs 5(1) (Restoration of connection without consent) and 6(1)(a) (Damage to electrical plant etc) of schedule 6 to the Electricity Act (in so far as they relate to an electricity supplier; (b) circumstances described in Paragraph 6(1)(b) (Damage to electrical plant etc) of schedule 6 to the Electricity Act; (c) circumstances described in Paragraph 11(1) (Interference with meters) of schedule 7 to the Electricity Act; (d) circumstances described in Paragraphs 10(1)(a) and 11(2) of schedule 2B to the Gas Act (in so far as they relate to a gas supplier); and (e) circumstances described in Paragraphs 10(1)(b) and 10(1)(c) of schedule 2B to the Gas Act.
Energy Theft Tip-Off Service (ETTOS)	is described in Annex 2 of the Energy Theft Reduction Schedule.