RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED IMPACT ASSESSMENT RESPONSES

I0292 OBLIGATE ENERGY SUPPLIERS TO PROVIDE PHOTO EVIDENCE OF THEFT IN CONVEYANCE TO NETWORK PARTIES

On 10 July 2026 the Code Manager issued an impact assessment to industry to seek feedback on the proposed solution for I0292 Obligate Energy Suppliers to provide photo evidence of Theft in Conveyance to Network Parties.

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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RESPONSE TYPE	**NON-CONFIDENTIAL**
DATE ISSUED	04 August 2026
RESPONSIBLE COMMITTEE	REC Change Panel
LEAD ANALYST	Caroline Freimuller

DATE IMPACT ASSESSMENT ISSUED	10 July 2026
RESPONSE DEADLINE	31 July 2026

Question 1:	Do you have any comments on the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	We welcome the proposed amendments to Schedule 8 – Unbilled Energy Code of Practice.	Thank you for your comments.
BUUK (Distribution Network Operator and Gas Transporter)	The proposed solution provides a suitable obligation on the Energy Supplier to provide evidence of Theft in Conveyance. We have natural concerns with the potential provision of sketches (as was the case for R0253 Theft – DNO/Networks not providing photos), however, we understand that this would be unlikely in most cases and is part of the Energy Theft definition within Code.	Thank you for your comments.
UK Power Networks (Distribution Network Operator)	This is a sensible addition to mirror the obligation being placed on DNOs. We would suggest that photos (or visual representations) would be better sent proactively. Our other comment concerns the proposed Legal Text. This is especially pertinent if the "on request" element is to be retained; please see our note under Q5.	Thank you for your comments. This wording is a duplicate of that being introduced under R0253, the Code Manager intends to keep these obligations equal.
Northern Powergrid (Distribution Network Operator)	This is a logical change proposal to reciprocate the equivalent obligation on DNOs in R0253.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	We are happy with the proposed solution.	Thank you for your comments.
Anonymous (Energy Supplier)	The proposed solution seems sensible, and the wording of sharing photos "upon request" is important. There is not a simple mechanism	Thank you for your comments.

	currently for these photos to be shared proactively for every case, so providing photos on a request basis is appropriate. Additionally, in a number of cases, when theft in conveyance has been found this would be called through to the DNO/GT from site to attend and rectify. Therefore the DNO/GT should assign resources as appropriate and send an agent to site to make the site safe, and will then have their own photos of the tampering present.	The tamper may be altered before the Network Party are able to attend so photographic evidence captured by the Energy Supplier would show what was found when it was discovered.
ScottishPower Energy Retail (Energy Supplier)	No, we agree with the proposed solution	Thank you for your comments.

Question 2:	Do you agree the proposed solution addresses the problem statement? If not, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Yes, we agree.	Thank you for your comments.
BUUK (Distribution Network Operator and Gas Transporter)	*"There are cases where Energy Suppliers (or its Revenue Protection Agent) have provided the Network Parties with minimal information and no photos which results in additional time for Energy Theft Desktop Investigations and additional costs where jobs are raised for attendance that aren't always needed."* We agree that the proposed solution would address the problem statement. Having a photo of what the site looks like prior to any in-person assessment undertaken by our field force team is beneficial. It would grant us the opportunity to be greater prepared for a site visit.	Thank you for your comments.
UK Power Networks (Distribution Network Operator)	Yes.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	We agree that photographs will help resolve the problem statement, but we are not certain on the benefits sketches would provide.	Thank you for your comments. Sketches are an accepted part of the evidence pack for theft, and is also included within the obligation being introduced under R0253. it also allows for something to be

		submitted should it be too difficult/dangerous to take a photo whilst on Site.
Anonymous (Energy Supplier)	Yes	Thank you for your comments.
ScottishPower Energy Retail (Energy Supplier)	Yes	Thank you for your comments.

Question 3:	Are there any alternate solutions that would better meet the needs of the problem statement?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Not that we are aware of at this stage.	Thank you for your comments.
BUUK (Distribution Network Operator and Gas Transporter)	No, being provided with a photograph is the best solution to understanding safety implications and gathering evidence.	Thank you for your comments.
UK Power Networks (Distribution Network Operator)	No.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	No	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	No.	Thank you for your comments.
Anonymous (Energy Supplier)	No.	Thank you for your comments.
ScottishPower Energy Retail (Energy Supplier)	N/a	n/a

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**
National Grid Electricity Distribution (Distribution Network Operator)	We believe so.	Thank you for your comments.
BUUK (Distribution Network Operator and Gas Transporter)	Yes, in the scope of this particular issue, though it does raise the potential need for Gas Transporters to access SDEP.	Thank you for your comments. The legal text has been written so that SDEP is not mandatory if both Parties agree otherwise. The Code Manager is looking at onboarding Gas Transporters to SDEP under R0162, nothing that this in on hold until the outcome of I0285 is known.
UK Power Networks (Distribution Network Operator)	Yes.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	We believe all relevant scenarios have been captured.	Thank you for your comments.
Anonymous (Energy Supplier)	Yes	Thank you for your comments.
ScottishPower Energy Retail (Energy Supplier)	N/A	n/a

Question 5:	Do you have any comments on the proposed legal text?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	No, we are happy with the proposed legal text.	Thank you for your comments.
BUUK (Distribution Network Operator and Gas Transporter)	We note that currently Gas Transporters cannot access SDEP. The legal text states that other "appropriate and mutually acceptable means of exchange" can be used, deferring to paragraph 6.6 of the Unbilled Energy Code of Practice. We welcome this inclusion but would also encourage the potential access of SDEP to Gas Transporters to be explored.	Thank you for your comments. Please see the Code Manager response to Q4.
UK Power Networks (Distribution Network Operator)	Yes. The text reads: "The Energy Supplier shall make such photographic evidence or visual representation available to the relevant Network Party either upon request or proactively." Whilst obligations to inform DNOs exist elsewhere within the REC the current drafting raises the question of whether the DNO is actually aware of the situation and this could be more explicit within 6.11A. We also suggest that it would be more efficient for photos to be sent proactively. On which basis the Legal Text could read: "The Energy Supplier will inform the relevant Network Party and will make such photographic evidence or visual representation as part of that notification."	Thank you for your comments. This wording is a duplicate of that being introduced under R0253, the Code Manager intends to keep these obligations equal. The Code Manager would only looking at amending both paragraphs to only be proactively, and amending paragraph 6.5 is not within the scope of this Change Proposal. Assuming I0292 is approved, a change could be raised to amend both obligations to send the evidence proactively.

Northern Powergrid (Distribution Network Operator)	Yes. Suggested amendments to the draft legal text in red. The amendments align with the reciprocal proposal in R0253. *6.11A Where the Energy Supplier (or its Revenue Protection Agent) discovers or suspects Theft in Conveyance, the Energy Supplier shall make all reasonable endeavours to record photographic evidence of the actual or suspected Theft in Conveyance (provided that it is safe to do so). If it is not possible to record such photographic evidence, the Energy Supplier shall make all reasonable endeavours to produce a sketch (or similar visual representation) of the actual or suspected Theft in Conveyance. The Energy Supplier shall make such photographic evidence or visual representation available to the relevant Network Party either upon request or proactively. Unless another appropriate and mutually acceptable means of exchange is to be used (in compliance with Paragraph 6.6), the Energy Supplier shall send this via the Secure Data Exchange Platform*	Thank you for your comments. Both of these amendments have been made.
SSE Energy Supply (Energy Supplier)	We would suggest removing references to sketches, we do not believe the use of sketches necessarily improves understanding of the issue at site and do not believe it is appropriate to mandate their usage in the REC Schedule.	Thank you for your comments. A wider review of theft within the REC would be required for this as sketches are mentioned as acceptable evidence within the definition for Confirmed Energy Theft. Sketches are also mentioned within the legal text being introduced under R0253 and the Code Manager intends to keep these obligations equal.

		Assuming I0292 is approved, a new change could be raised to review this in its entirety within the wider context of the REC.
Anonymous (Energy Supplier)	No	Thank you for your comments.
ScottishPower Energy Retail (Energy Supplier)	No	Thank you for your comments.

Question 6:	What lead time would be required for your business to implement the proposed solution? Please provide justification.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	We would need to ensure we have an adequate process in place for receiving, recording and storing the photographic evidence/sketch, and roll out the staff training/update of LWIs needed to accompany the operational process. Taking this into account, we would require a minimum of 3-6 months to implement the proposed solution.	Thank you for your comments.
BUUK (Distribution Network Operator and Gas Transporter)	None.	Thank you for your comments.
UK Power Networks (Distribution Network Operator)	None.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	3 months	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	We will require time to inform our agents and implement a process internally, so a period of 6 – 8 weeks would be sufficient.	Thank you for your comments.
Anonymous (Energy Supplier)	None. Photos are taken of all tampering on site, where Theft in Conveyance or otherwise, so these are already available on request.	Thank you for your comments.
ScottishPower Energy Retail (Energy Supplier)	3 months lead time.	Thank you for your comments.

Question 7:	Are you aware of any constraints on when this change can be delivered?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	No.	Thank you for your comments.
BUUK (Distribution Network Operator and Gas Transporter)	None, we are able to receive photos now.	Thank you for your comments.
UK Power Networks (Distribution Network Operator)	No.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	No	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	No.	Thank you for your comments.
Anonymous (Energy Supplier)	SDEP can't be used by GTs, so any gas theft in conveyance photos shared will be reliant on the requesting party having the correct contact details for each supplier.	Thank you for your comments. The Code Manager is looking at onboarding Gas Transporters to SDEP under R0162, nothing that this in on hold until the outcome of I0285 is known.
ScottishPower Energy Retail (Energy Supplier)	No	Thank you for your comments.

Question 8:	Do you foresee any risks to your qualification or migration plans to be delivered as part of MHHS implementation caused by the delivery of this change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	N/a.	n/a
BUUK (Distribution Network Operator and Gas Transporter)	None.	Thank you for your comments.
UK Power Networks (Distribution Network Operator)	No.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	No	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	No.	Thank you for your comments.
Anonymous (Energy Supplier)	No	Thank you for your comments.
ScottishPower Energy Retail (Energy Supplier)	N/A	n/a

Question 9:	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**
National Grid Electricity Distribution (Distribution Network Operator)	Although we would need to consider costs involved in establishing our internal operational process (including staff training and the updating of LWIs/documentation), we would expect these costs to be minimal. Therefore, we would suggest that B) Up to £9,999 is the most appropriate bracket based on current estimations.	Thank you for your comments.
BUUK (Distribution Network Operator and Gas Transporter)	A) Nil.	Thank you for your comments.
UK Power Networks (Distribution Network Operator)	Nil.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	A) Nil.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	B) Up to £9,999	Thank you for your comments.
Anonymous (Energy Supplier)	Nil	Thank you for your comments.
ScottishPower Energy Retail (Energy Supplier)	We can't accurately forecast costs at this stage.	Thank you for your comments.

Question 10:	Do you identify any benefits to your business or the energy market through the implementation of the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Yes. We would benefit from the receipt of photograph/s (or a sketch) as this would form part of our case file depicting initial evidence of the theft in conveyance from the discovering party. We would also find it useful to have clear evidence of the energy theft assembly in question, and any information relating to the site itself, so that we can be fully prepared ahead of our visit.	Thank you for your comments.
BUUK (Distribution Network Operator and Gas Transporter)	Having a photo of what the site looks like prior to any in-person assessment undertaken by our field force team is beneficial. It would grant us the opportunity to be greater prepared for a site visit. It is also good practice to capture evidence of a suspected criminal offence at the earliest opportunity.	Thank you for your comments.
UK Power Networks (Distribution Network Operator)	Yes. We would expect more referrals by Suppliers and the provision of photos enables better desktop validation and efficient dispatch of field investigation resources. It should lead to more safety and network integrity situations being resolved and more supplies regularised reducing non-technical losses and associated costs borne by other parties.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes. Accompanying a suspected theft in conveyance report with photographs will greatly enhance the initial desk top investigation and allow the field staff to be aware of what they will find on site.	Thank you for your comments.

SSE Energy Supply (Energy Supplier)	Possible benefits to the energy market if it helps to identify theft, but not specifically to us as a supplier.	Thank you for your comments.
Anonymous (Energy Supplier)	No	Thank you for your comments.
ScottishPower Energy Retail (Energy Supplier)	N/A	n/a

Question 11:	Taking into consideration both the costs and the benefits seen, do you consider this change should be made?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Yes. We believe that implementation costs will be minimal and the change would be beneficial to DNOs/GTs as it would encourage efficiency by allowing early preparation.	Thank you for your comments.
BUUK (Distribution Network Operator and Gas Transporter)	Yes, we believe this change should be made.	Thank you for your comments.
UK Power Networks (Distribution Network Operator)	Yes. We would see this as an express clarification of what should already be happening.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	We have no issues with this change being introduced.	Thank you for your comments.
Anonymous (Energy Supplier)	Yes	Thank you for your comments.
ScottishPower Energy Retail (Energy Supplier)	Yes	Thank you for your comments.

Question 12:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	No further comments.	n/a
BUUK (Distribution Network Operator and Gas Transporter)	N/A	n/a
UK Power Networks (Distribution Network Operator)	No.	n/a
Northern Powergrid (Distribution Network Operator)	No	n/a
SSE Energy Supply (Energy Supplier)	No.	n/a
Anonymous (Energy Supplier)	No	n/a
ScottishPower Energy Retail (Energy Supplier)	N/A	n/a