RETAIL ENERGY CODE

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

CHANGE REPORT

R0292 OBLIGATE ENERGY SUPPLIERS TO PROVIDE PHOTO EVIDENCE OF THEFT IN CONVEYANCE TO NETWORK PARTIES

DOCUMENT VERSION	V1.0
PROPOSED IMPLEMENTATION DATE	26 February 2027
IMPLEMENTATION APPROACH	Big Bang

RESPONSIBLE COMMITTEE	Change Panel	**CHANGE PATH**	Self-Governance
PRIORITISATION CATEGORY	Standard	**URGENCY**	Standard
IMPACTED STAKEHOLDERS	Energy Suppliers, Network Parties		

LEAD ANALYST (SOLUTION LEAD)	**SUBJECT MATTER EXPERT**
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OVERVIEW

This Issue seeks to introduce an additional clause for Suppliers that have attended Sites with suspected or actual Energy Theft in Conveyance to share and store evidence of the tampering to be made available to Network Parties upon request.

CODE MANAGER RECOMMENDATION

The Code Manager recommends that the REC Change Panel:

- **APPROVE** that this Change Report contains sufficient information to proceed to Consultation, noting the Code Manager Minded-to Position below.

The Code Manager Minded-to Position is to recommend that the REC Change Panel:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 26 February 2027.

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BACKGROUND

1 SUMMARY

This Change Proposal was raised by a Distribution Network Operator (DNO) to ensure that the transfer of evidence found during Energy Theft investigations is appropriately stored and shared with Network Parties.

REC Change Proposal R0253 Theft - DNO/Networks not providing photos was raised proposing that Network Parties provide photos of theft/meter tampering to Energy Suppliers when they attend to make the Site safe so the Energy Supplier has the evidence of Confirmed Energy Theft. R0253 was approved by the REC Change Panel on 03 March 2026 for implementation on 06 November 2026.

This Change Proposal has been raised to expand on these obligations and look at Energy Suppliers also providing evidence they have of Theft in Conveyance to the Network Party.

2 PROBLEM STATEMENT

There are cases where Energy Suppliers (or its Revenue Protection Agent) have provided the Network Parties with minimal information and no photos following Site visits for Theft in Conveyance, which results in additional time for Energy Theft Desktop Investigations and additional costs where jobs are raised for attendance that aren't always needed.

3 IMPACTS

CONSUMERS
No direct impact

REC PARTIES AND SERVICE USERS
DNOs
Gas Transporters (GTs)
Energy Suppliers

REC DOCUMENTS / PRODUCTS
Schedule 8 – Unbilled Energy Code of Practice

MHHS
There is no impact to MHHS from this Change Proposal.

4 CROSS-CODE IMPACTS

No cross-code impacts have been identified for this Change Proposal.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**03 Feb 26**	**25 Sep 26**
	Solution Analysis	February	March
	Solution Development	March	March
	Legal Review	March	April
	Information Request	March	April
	Information Request Review	April	May
	Party Impact Assessment	July	August
	Business Case Assessment	August	September
	Solution Refinement	August	September
Change Proposal		**26 Sep 26**	**30 Nov 26**
	Consultation	September	October
	Solution Refinement	October	November
	Final Determination	November	November
Voting		**01 Dec 26**	**01 Dec 26**
	Appeal Window	02 Dec 26	16 Dec 26

There is a gap in this Proposal Plan between the information request being reviewed and the Party impact assessment beginning.

This is due to the Code Manager having to reallocate resource between Change Proposals and as this Change Proposal has been designated a Prioritisation Category of Standard, it had a period of work being paused.

6 STAKEHOLDER ENGAGEMENT

This Change Proposal was raised after discussions within the Theft Issues Group on 29 October 2025.

7 PRIORITISATION CATEGORY AND URGENCY

7.1 PROPOSER REVIEW

This Change Proposal was submitted prior to 29 May 2026, the implementation of the Ofgem Code Prioritisation Harmonisation. There was no requirement for the Proposer to provide their review of the Prioritisation Category and Urgency when this was Change Proposal was submitted.

7.2 CODE MANAGER REVIEW

The Code Manager proposed this Change Proposal be given an Urgency Status of Standard and a Prioritisation Category of Standard.

The Code Manager believes this Change Proposal:

- Does not meet the Ofgem criteria for Urgency;
- Has a weak alignment to the Strategic Direction Statement as it has limited or no SDS relevance when compared to other Standard changes;
- Has low importance as it delivers limited or niche benefits compared to other Standard change; and
- Has a medium complexity.

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SOLUTION

8 SUMMARY OF ANALYSIS UNDERTAKEN

An information request was run from 13 March 2026 to 07 April 2026, to determine whether other Network Parties other than the proposer would find benefit from this Change Proposal and to get preliminary views from Energy Suppliers on how often they attend Site for Theft in Conveyance.

Five responses were received from three Network Parties and two Energy Suppliers. The non-confidential responses are available on the REC portal here.

All Network Parties confirmed they would see benefit from receiving photographs from Energy Suppliers. One Energy Supplier confirmed they very rarely attend Site due to Theft in Conveyance, while the other confirmed they have never attended Site due to Theft in Conveyance. The Code Manager expects minimal impact from this Change Proposal on Energy Suppliers.

9 PROPOSED SOLUTION

This Change Proposal would see the addition of a new clause within Schedule 8 – Unbilled Code of Practice as below:

> *6.11A Where the Energy Supplier (or its Revenue Protection Agent) becomes aware of any suspected or actual incidence of 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.*

This legal text is purposefully as similar as possible to the approved legal text under R0253 Theft - DNO/Networks not providing photos, to ensure the obligations being placed on Energy Suppliers and Network Parties are equal.

10 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0292 can be found here.

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PRELIMINARY ASSESSMENT

11 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

11.1 SERVICE PROVIDER IMPACT ASSESSMENTS

No Service Provider impact assessment was required as part of this Change Proposal.

11.2 REC PARTY IMPACT ASSESSMENTS

A Party impact assessment was conducted from 10 July 2026 to 31 July 2026. In total seven responses were received from four DNOs (one of which also responded as a GT) and three Energy Suppliers. The non-confidential responses have been published here.

ENERGY SUPPLIERS	• All Energy Suppliers agreed with the proposed solution and believed it should be implemented. • One Energy Supplier queried the inclusion of sketches. The Code Manager has not removed this from the legal text as it is included within the R0253 approved legal text and sketches are allowable evidence for Confirmed Energy Theft within the definition of Schedule 1 Interpretations and Definitions. The Code Manager believes a wider review would be required under a separate Issue or Change Proposal regarding sketches and Energy Theft, and encourages any Parties who wish to raise that to do so. No further comments were received on the proposed legal text. • No alternate solutions or processes and scenarios that have not been considered were identified. No risks were identified to MHHS qualification and migrations plans. • One Energy Supplier confirmed their required no lead time to implement this Change Proposal, one confirmed they required six to eight weeks and the last confirmed they required three months. • The only constraint that was identified around this Change Proposal is that GTs currently cannot access the Secure Data Exchange Platform (SDEP), and while the legal text does not mandate the use of SDEP it will require GTs to have correct contact details for Energy Suppliers. The Code Manager is looking at onboarding GTs to SDEP under R0162, noting that this is on hold until the outcome of I0285 is known. • One Energy Supplier confirmed they saw the costs for implementing this Change Proposal as £0, another as less than £10,000 and the last did not feel they could forecast costs. • No benefits to Energy Suppliers were identified from the implementation from this Change Proposal, but one Energy

	Supplier did confirm they saw benefits to the wider energy market in helping to identify Energy Theft.
NETWORK PARTIES	• All Network Parties agreed with the proposed solution and believed it should be implemented. • One Network Party queried why the legal text included both "upon request or proactively" and suggested it should be changed to just proactively. The Code Manager has not made this edit to remain aligned with the R0253 legal text which also contains this language, but has suggested if this Change Proposal is approved a new change could be raised which would amend the legal text of both obligations. The Code Manager believes amending any legal text being introduced under R0253 would be out of scope of this Change Proposal, and there is a need for the obligations to remain aligned. Two typographical errors were identified, which have been corrected. No further comments were received on the proposed legal text. • No alternate solutions or processes and scenarios that have not been considered were identified. No risks were identified to MHHS qualification and migrations plans. • Two Network Parties confirmed their required no lead time to implement this Change Proposal, one confirmed they required three months and the last confirmed they required three to six months. • The only constraint that was identified around this Change Proposal is that GTs currently cannot access the SDEP, and while the legal text does not mandate the use of SDEP it will require GTs to have correct contact details for Energy Suppliers. The Code Manager is looking at onboarding GTs to SDEP under R0162, noting that this is on hold until the outcome of I0285 is known. • Three Network Parties confirmed they saw the costs for implementing this Change Proposal as £0, with the last confirming theirs as less than £10,000. • All Network Parties identified benefits from the implementation from this Change Proposal as having clearer evidence for case files for Theft in Conveyance, helping enhance desktop investigations, providing greater awareness of what will be at Site for operatives and knowing what the Site looked like at the point of discovery.

11.3 SUMMARY OF AMENDMENTS MADE FOLLOWING IMPACT ASSESSMENT

SECTION	AMENDMENT	REASON
Where the Energy Supplier (or its Revenue Protection Agent) discovers or suspects Theft in Conveyance,	Where the Energy Supplier (or its Revenue Protection Agent) becomes aware of any suspected or actual incidence of Theft in Conveyance,	Amended to be identical to the wording used within R0253.
the Energy Supplier shall make all reasonable endeavours to record photographic evidence of actual or suspected Theft in Conveyance	the Energy Supplier shall make all reasonable endeavours to record photographic evidence of the actual or suspected Theft in Conveyance	Addition of "the" at the request of a Party.
If it is not possible to such photographic evidence,	If it is not possible to record such photographic evidence,	Addition of "record" which was missing from the sentence.

12 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

There are no risks, issues, assumptions or dependencies associated with this Change Proposal.

13 BUSINESS CASE ASSESSMENT

13.1 COSTS

There are no central system costs identified with the implementation of this Change Proposal.

Six of seven respondents to the Party impact assessment confirmed if they foresaw costs from the implementation of this Change Proposal. These were as no costs (four of six respondents) or as less than £10,000 (two of six respondents).

13.2 BENEFITS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
ADDITIONAL EVIDENCE FOR THEFT IN CONVEYANCE CASE FILES	The provision of photographs or sketches from Energy Suppliers who attend Site for suspected or actual Theft in Conveyance to the relevant Network Party will provide additional evidence for the Network Party to add their case file. This will strengthen the evidence for or against Theft in Conveyance and should assist in the correct outcome to be reached from the investigation.

PROVIDE EVIDENCE OF THE SITE WHEN IT WAS DISCOVERED	Site visits for theft often require the agent on Site to do work or make changes to make the Site safe. If this is the Energy Supplier, when this is reported to the Network Party the Site may be in a different state than it was upon discovery when their operative arrives. Photographic evidence of the state of the Site when it was discovered, before any changes were made due to safety, will be very valuable pieces of evidence for theft investigations.
PROVIDE NETWORK PARTIES WITH INFORMATION PRIOR TO THEIR SITE VISIT	Where an agent from the Energy Supplier arrives first on Site, photographs from this agent being provided to the Network Party will allow their Meter Operative to have an understanding of the situation at Site before they attend. This should result in fewer failed Site visits, as they will know if any specialist equipment is required or if it is a multi-person job before they reach the Site and this can be booked/planned for appropriately.

13.3 COST BENEFIT ANALYSIS

As there are no central systems costs, no to minimal costs to Parties and three intangible benefits associated with this Change Proposal, the Code Manager believes there is a positive case for change.

14 CASE FOR CHANGE

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

- Is both viable and implementable, and effectively resolves the problem statement;
- Has no associated central system costs, and no to minimal Party costs;
- Has proportionate effort required for implementation;
- Provides additional evidence for Theft in Conveyance case files for Network Parties;
- Provides evidence of the state of the Site as the point of discovery of Theft in Conveyance; and
- Provides Network Parties with more information prior to them attending Site.

15 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link
CONSOLIDATED IMPACT ASSESSMENT RESPONSES	Link
RELATED CHANGE(S)	R0253 Theft - DNO/Networks not providing photos

16 GLOSSARY

TERM	DEFINITION
Confirmed Energy Theft	means that the holder of an Energy Licence (or person acting on their behalf) reasonably determines that, on the balance of probabilities and taking into account all of the evidence then available, one or more instances of Energy Theft has occurred. Such a determination may not be made unless sufficient evidence is held to substantiate the occurrence of Energy Theft, including (as a minimum): (a) an indication of theft via a desktop review of consumption levels; and (b) a report of a site visit where access was successful; and (c) photographic (or sketch) evidence of the theft, including illegal connection/bypass or meter tampering.
Distribution Network Operator	means a person holding an Electricity Distribution Licence.
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.

TERM	DEFINITION
Energy Theft Desktop Investigation	means that the holder of an Energy Licence (or person acting on their behalf) conducts a desktop investigation to determine the potential likelihood of Energy Theft and requirements of further investigation. As a minimum the desktop investigation must include and evidence: (a) the source, date and details of the initial report of suspicion of Energy Theft; (b) the date of the desktop investigation and the name/ID of the person who conducted it. If the desktop investigation was fully or partly automated this should be recorded with the automation process made available on request; (c) if the potential Energy Theft is being investigated by or on behalf of an Energy Supplier, that the Energy Supplier is the current Registered Supplier at the time of the investigation (in which case the Supply Effective From Date and any known Supply Effective Through Date shall be recorded); (d) the relevant Consumer's name, address and MPAN/MPRN, and the dates of the last Change of Occupier and any known future Change of Occupier; (e) any correspondence or contact with the Consumer or a third party concerning the potential Energy Theft; (f) review of meter details, any metering work, meter readings, consumption, alerts and payment activity relevant to the investigation; (g) any previous known theft investigations at the premises or linked to the Consumer; and (h) a determination that the suspicion of Energy Theft is invalid and the investigation may be closed; or that the suspicion of Energy Theft is valid and should progress to an Energy Theft Site Visit Investigation.
Gas Transporter	means a person holding a Gas Transporter Licence which requires that person to become a Party to this Code.
Meter Operative	means an individual who attends a Site as an employee, agent or subcontractor acting on behalf of a MEM, AMI, EMO, SIP, ASP or DNO.
Metering Asset	shall have the same meaning as Metering Equipment.
Network party	means a Party which is either a Distribution Network Operator or a Gas Transporter.
Secure Data Exchange Platform	means the portal of that name which forms part of the Secure Data Exchange Service.