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THEFT ISSUES GROUP
DRAFT MEETING NOTES

MEETING	**RECTIG_25_1126**
DATE	**26 November 2025, 10:00am**
LOCATION	**Microsoft Teams**

Attendee	Representing	Initials
Anne Jackson (Chair)	REC Code Manager	AJ
Aleksis Butler	BUUK	AB
Ethan Seagar	BUUK	ES
Andy Clasper	Cadent	AC
Melissa English	Cadent	ME
Kirsty Maddock	National Grid	KM
Helen Chandler	Northern Gas	HC
Laurie Edwards	Northern Gas	LE
David Roberts	SPEN	DR
Elaine Carr	SPEN	EC
Lisa Warnock	SGN	LW
David Mitchell	SGN	DM
Blanka Lemka	UKPN	BL
Paul Hart	UKPN	PH
James Humphris	British Gas	JH
Adam McNae	Brook Green	AM
Jennie Smy	Drax	JS
Jen Stevenson	E.ON	JSt
Victoria Burkett	E.ON Next	VB
Andy Channing	EDF	AC
Megan Cetera	Octopus	MC

David Lewis	Scottish Power	DL
Ollie Kyriacou	Smartest Energy	OK
Valeria Wright	SO Energy	VW
Virginie Veyrenc	SO Energy	VV
Charles Anarfi	SSE	CA
Claire Kane	SSE	CK
Danielle Gibson	SSE	DG
Anne Stevens	UGP	AS
Ben Clark	Utilita	BC
Carly East	Utilita	CE
Leah Read	Valda	LR
Olga Batsari	Wales & West Utilities	OB
Tom Stuart	Wales & West Utilities	TS
Andrew Green	Waters WYE	AG
Matt Cogram	Elexon	MCo
Oliver Barnes	UKRPA	OBa
Scott Manson	Seeka	SM
Lynne Fallon	Retail Energy Code Company	LF
Andrew Waghorn	REC Code Manager	AW
Chelsea Evans	REC Code Manager	CE
Eve Marriner	REC Code Manager	EM
Francine Peyroux-Sissoko	REC Code Manager	FPS
Glenn Sheern	REC Code Manager	GS
James Hardy	REC Code Manager	JHa
Lydia Bentley	REC Code Manager	LB
Paul Witton-Dauris	REC Code Manager	PWD

James Rees (Secretary)	REC Code Manager	JR

1 WELCOMES AND INTRODUCTIONS

The Chair welcomed attendees to the meeting of the Theft Issues Group (TIG) and encouraged open discussion, engagement and questions. The Chair informed members that Slido would be used for the TIG meeting in an anonymous way, to help provide more collaboration and engagement.

2 CONFIRMATION OF THE AGENDA

RECTIG Members noted the contents of the agenda. One Any Other Business (AOB) item was raised at this time and Members were informed that they could raise further AOB later if needed.

3 APPROVAL OF THE PREVIOUS MINUTES

The Chair invited attendees to provide comments on the draft minutes of the meeting held on 29 October.

JR explained that one comment had been raised on the previous minutes ahead of the meeting, clarifying that Martin Brailsford represents the United Kingdom Revenue Protection Association (UKRPA), rather than Talan.

No further comments were raised and the minutes were approved for Final publication.

4 R0253 – THEFT DNO/NETWORKS NOT PROVIDING PHOTOS

LB provided Members with an update on R0253, found on slides 6-13 of the meeting pack.

LB reminded Members that this Change had been discussed at the previous meeting. The Change relates to whether Network Parties, i.e., Distributor Network Operators (DNOs) and Gas Transporters (GTs) should be required to take photographs of suspected Energy Theft when attending sites, or where photographs are not possible, to provide a sketch. The rationale for this proposal is that Suppliers often struggle to make claims against the Theft Detection Incentive Scheme (TDIS), due to a lack of visual evidence, which is a requirement for successful claims.

LB summarised the responses to the Party Impact Assessment (PIA), which received 15 responses, seven from Network Parties and eight from Suppliers. The PIA aimed to understand the costs for Network Parties, the benefits for Suppliers, and any implementation and operational considerations.

- Eight Parties supported the proposal (mostly Suppliers), while Network Parties generally opposed it, primarily due to concerns around the mandatory nature of the obligation. Some respondents suggested the proposal with caveats, such as opposition to the sketch requirement or a desire to revisit evidentiary standards.
- Three Network Parties estimated implementation costs of up to £10,000, four said it would cost nothing, and two could not quantify the cost. Suppliers were unable to provide quantified benefits, although they indicated intangible benefits, such as improved evidence for claims.
- Network Parties indicated that at least six months would be needed to implement the required organisational changes.

LB told TIG members that based on the above factors, the provisional Code Manager minded-to position for R0253 was at this time to recommend rejection on the basis of the cost-benefit test for the proposed solution not being met.

Key Discussion Points

A TIG member spoke about the challenges posed by a mandatory obligation. They explained that if their organisation failed to meet the requirement (by not providing a photograph or sketch in any given case), they would have to declare that failure as a non-compliance, which would require explanation to the Board and Stakeholders. They emphasised that the primary obligation of Network Party engineers is to make sites safe, and that making sketches or taking photographs could be impractical or may even pose a risk to safety in some situations. They stated that the proposed solution creating a mandatory obligation is therefore problematic and suggested that a 'reasonable endeavours' approach to the obligation would be more appropriate.

Another TIG member supported these points and added that Suppliers should also be obligated to provide photographs to DNOs when they encounter Energy Theft, as the issue is not one-sided. They noted that a related Change Proposal I0292 – Obligate Energy Suppliers to provide evidence of Theft to Network Parties was being considered to address this.

Another TIG member agreed with these points. They stated that requiring a sketch rather than a written report would drive the wrong behaviours, and that producing hand-drawn sketches falls outside an engineer's training. They suggested that a detailed written report would be more useful than a basic sketch.

Another TIG member acknowledged that there are cases where photographs cannot be taken and agreed that a caveat should be included in any mandatory requirement. The Lead Analyst responded by saying that the sketch requirement was introduced to address this scenario. The TIG Member expressed frustration at having to request photographs when they are available, suggested that a streamlined process would be preferable where Network Parties send any photo that they take as a matter of course.

Another TIG member agreed with the concerns around compliance and suggested that the obligation could be conditional, such as 'mandatory when safe to do so'. They proposed that engineers should be able to provide a reason when photographs cannot be taken.

Governance and Alternative Solutions

A TIG member suggested that in the absence of a photograph, a statement from an expert witness, such as a Network Engineer, should be sufficient evidence of Theft. They stated that a detailed description from an expert should carry as much weight as a photograph.

The Chair explained that the current evidentiary standards for the TDIS claims require photographic or sketch evidence. They noted that nine of the fifteen respondents supported reviewing these standards, and that a new Change Proposal could be raised to consider alternative forms of evidence, such as expert statements.

Slido Polls and Group Sentiment

To gauge members preferences, Slido polls were conducted on several options:

- Whether to reject the proposal or retain it with a non-mandatory obligation.
- Whether to raise a new issue to review evidentiary standards for Theft Claims

The results indicated an even split, with a slight preference for further Consultation and revision, rather than outright rejection. There was also support for reviewing the evidentiary standards, to allow for more flexibility in the types of evidence accepted.

Outcomes and Next Steps

Members agreed that further Consultation was needed, and that alternative solutions should be considered. LB confirmed that a paper would be issued for Consultation in December 2025, summarising the feedback and proposing revised solutions or alternatives.

5 I0265 – THEFT CALCULATOR USAGE AND SUITABILITY ASSESSMENT

FPS provided an update on the information request regarding issue I0265 – Theft Calculator Usage and Suitability Assessment, found on slides 17-23 of the meeting pack. The information request was opened for six weeks following an extension as agreed by TIG members on 29 October. In total, eight responses were received and given the sensitive topic, all responses were kept confidential. Respondents unanimously shared that the REC Theft Calculators require improvement, even when they are not currently facing access issues. Two respondents shared that they only use an alternative calculator when submitting assessments for TDIS whilst four shared they use a mix of the REC Theft Calculators and an alternative calculator or their own estimated calculations. The key themes raised in the information request were:

- System barriers, as only Windows based laptops/desktops support macros and all Excel functions are required to use the REC Calculators. Hence compatibility issues with Google Apps, Mac and Tablets are making it difficult or even impossible to use the REC Calculators;
- Calculators not being adapted to certain types of theft leading to having to estimate a minimal theft amount, for cannabis farms, rogue meter installs and in cases where networks don't provide enough details on the property to the supplier for instance;
- An outdated I&C appliance and property lists, such as desktops, monitors, printers, and betting offices, car repairs, recycling centres;
- Tamper types not covered, such as partial bypass and electromagnetic interference;
- New technologies not covered, such as EV chargers, heat pumps and solar panels; and
- Equipment not covered, such as data mining and sunbeds.

Other points raised were that the guidance documentation is too lengthy and not always user-friendly, and that it can be difficult to know where to find the theft Calculators on the REC Portal. It was also worth noting that the clamp meter readings option on the REC Calculator does not seem to be used by some respondents due to system restraints, lack of information or having a more accurate calculation available. Respondents also shared that a regular review of tampers would be essential in a world where renewables and emerging technologies are more present in both I&C and domestic properties. They also shared that having a system that would avoid parties making manual calculations would solve possible discrepancies when reporting. Another suggestion was to incorporate EAC (Estimated Annual Consumption), AQ (annual Quantity) and EPC (Energy Performance Certificate) to help with accuracy.

Slido was used to gather attendees' views and feedback on the responses received in the information request and their own experiences with the REC Theft Calculators. All TIG attendees agreed that the Calculators need improvement and updating as the key themes shared reflecting their own experiences and challenges with the tool. They also shared other improvements they believed could be implemented and made further comments on this issue, including removing the use of macros, not using an Excel spreadsheet for the tool, looking into changing the regions to match the ECOES GSP groups, and collaborating with Xoserve who are reviewing their own calculator.

Parties were informed that the REC PAB is supportive of a redesign, incorporating new technologies, such as AI tools. Further input and solution requirements will be gathered before an Impact Assessment is conducted.

6 I0187 – SCHEDULE 8 REVIEW AND BEST PRACTICE GUIDANCE DEVELOPMENT

JHa introduced this agenda item by explaining that the group was continuing its review of REC Schedule 8, which sets out the obligations and best practice guidance for Parties involved in Energy Theft investigations and reporting. The review aimed to clarify responsibilities, improve operational processes, and ensure the Schedule remains practical and relevant for all Parties.

JHa noted that the review had been ongoing for several months, with good progress made on various issues and suggestions. The focus for this meeting was on three specific clauses, 6.16, 6.19 and 6.9.

Clause 6.16 – Contact Information for Theft Matters

JHa presented clause 6.16, which currently requires each Supplier to provide the Code Manager with contact details for Theft matters. This includes the Supplier name, MPID, contact name, department, telephone, and email for both primary and escalation contacts.

Members discussed whether the Code Manager should also obtain operational contacts information from Network Operators, in addition to Suppliers, for Theft and unregistered site matters. There was broad agreement that having comprehensive contact lists for both Network Parties and Supplier would improve communication and efficiency.

JHa also raised the issue of whether the heading of the clause, currently ‘Exchange of Information between Energy Suppliers’ was too misleading or narrow. Members felt that the heading should be changed to better reflect the inclusion of the Code Manager and Network Operators. Several alternative headings were suggested, such as ‘Exchange of Information between Parties and the Code Manager’ or ‘Exchange of Information for Theft and Unregistered Site Matters’. Members leaned towards a heading that clearly indicated the involvement of all relevant Parties.

Clause 6.19 – Use of the Theft Contacts Register

Clause 6.19 states that Energy Suppliers and Network Parties should use the published Theft Contacts Register when there are no other applicable avenues to report matters relating to Theft, Revenue Protection or Untraded Energy.

JHa asked whether there should be a separate set of operational contacts for managed sites or new connection queries, distinct from Theft contacts. Members agreed that having separate contacts list or clearly defined subcategories within a single register would help avoid misrouting and ensure that queries reach the appropriate person.

There was also a discussion about the structure of the contact register. Members supported a two-tier structure, distinguishing between different types of contacts, such as Theft contacts and unregistered site contacts. Some Members suggested that a three-tier structure might be beneficial for large organisations with more complex operations.

JHa proposed updating the wording of Clause 6.19 to replace ‘when there are other applicable avenues’ with ‘where the use of SDEP may not be appropriate or possible’, to provide greater clarity and align with operational practice. Members supported this change, noting that SDEP is not always used for a variety of reasons.

Clause 6.9 – Reporting Suspected Energy Theft

Clause 6.9 requires Energy Suppliers to record and pass on details of suspected Energy Theft relating to Consumers for whom they are not responsible, to the Network Party by the end of the next working day.

JHa asked whether this clause should be amended so that reports are passed to the registered Supplier or Network Party, rather than only to the Network Party. Members agreed this this amendment would improve clarity and ensure that reports reach the correct party.

There was also support for restructuring the clause so that responsibilities to Network Parties and Suppliers are set out in their respective sections. This would make the Schedule easier to read and help Parties understand their obligations without having to read the entire document.

Members suggested splitting out the onward reporting requirements to registered Suppliers versus Network Parties, to further improve clarity and avoid misinterpretation.

Throughout the review, JHa used Slido to gather feedback from Members on specific questions related to each clause. The polls showed strong support for the proposed amendments and changes, with most Members agreeing that the Schedule should be restructured for clarity, contacts lists should be comprehensive and well organised, and the wording of key clauses should be updated to reflect current operational practice.

A TIG member raised the point that Parties have an obligation to update their operational contacts when there is a change, and also to check annually that the contact information is correct. The Chair clarified that there is no restriction on using the same name for different contacts, as long as the relevant contact is provided for each reason.

JHa noted that there are ongoing REC changes to expand the use of SDEP and make it more widely available to all Parties. Feedback from the Schedule 8 review would be incorporated into these Changes. JHa confirmed that the feedback provided today would be used to inform the redrafting of REC Schedule 8. A full redlined version of the Schedule would be circulated for PIA early in 2026, allowing all Parties to review the amendments and provide further comments.

Members agreed that restructuring the Schedule by party type, such as part A for Suppliers, part B for Network Parties, would make it easier to follow and ensure that all obligations are clear. There was also consensus that contact lists should be regularly reviewed and updated, and that the wording of key clauses should be amended to reflect current practice.

7 ANY OTHER BUSINESS

7.1 THEFT TARGET METHODOLOGY

AW flagged that a Consultation on the Theft Target Methodology (TTM) for 2026/27 Theft targets would be issued soon.

8 CHANGE UPDATE

JHa provided Members with the Change Update, found on slide 47 of the meeting pack.

9 FUTURE MEETINGS

The Chair confirmed the next meeting will be held on 28 January 2026, no meeting will be held in December.

The Chair thanked attendees for their input and closed the meeting.