RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0253 - THEFT - DNO/NETWORKS NOT PROVIDING PHOTOS

On 22 January 26 the Code Manager issued a consultation to industry to seek feedback on the Change Report (For Consultation) for R0253.

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
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RESPONSIBLE COMMITTEE	REC Change Panel
LEAD ANALYST	Lydia Bentley

DATE CONSULTATION ISSUED	22 January 26
RESPONSE DEADLINE	13 February 26

Question 1:	Do you agree with the proposed solution? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK Network Party	The proposed solution moves away from the mandatory production of sketches where photographic evidence cannot be provided, this is a welcomed move. However, there is still potential for sketches to be provided which may be unclear in what it is presenting, and this will have to be used as evidence in the absence of any photographs. This remains a concern, particularly if this will also be applied with '*I0292 – Obligate Energy Suppliers to provide photo evidence of theft to Network Parties'.* We would encourage the solution for both R0253 and I0292 to be aligned.	The Code Manager has met with BUUK and discussed their concerns directly. The Code Manager will not be modifying the solution to remove the requirement to provide sketches for three reasons. Firstly, because this is supported by the majority of Energy Supplier respondents. Secondly, the change to the obligation from mandatory to "all reasonable endeavours" will provide Network Parties with scope to not produce a sketch where it is not possible. Lastly, current definition for "Confirmed Energy Theft" refers to evidence in the form of "a photograph (or sketch)", and, therefore, the sketch obligation in the proposed solution aligns with existing requirements.
SGN Network Party	We do not agree with the proposed solution as we believe that placing an obligation on the Transporters to provide a sketch of a site when it is not possible to take a photo will prove to be problematic and time consuming. We can foresee that there will be issues with providing a	The Code Manager understands the concerns raised here relating to the sketch requirement. However, the Code Manager feels that the change in obligation from

	sketch due the varying level of quality and interpretation that will arise from a sketch which may result in more question being generated.	"Mandatory" to "all reasonable endeavours" helps mitigates these concerns.
Ovo Energy Energy Supplier	Yes, we are fully supportive of the proposals. The provision of photographic evidence will better support us to more effectively identify and take action against instances of Energy Theft.	Thank you.
Drax Energy Solutions Energy Supplier	Yes. We agree with the proposed solution however, a detailed report as an alternative approach to sketches is preferred. A clear report, detailing exactly what is at site, would help us to determine the nature of the tamper and match the information against the TDIS requirements if a photo is unobtainable.	Thank you. The Code Manager is open to exploring a change in the definition of "Confirmed Energy Theft" to allow for a written report in lieu of a photo or sketch. However, at the time of publication, no Issue or Change has been raised to explore this, and will therefore not be considered at this time in the scope of this Change.
Northern Powergrid Network Party	No. Although we agree with the principle of the proposal, we do not agree with the revised legal drafting of section 6.5. Specifically: a) We do not think that using the Secure Data Exchange Platform ("SDEP") should be the default position or that there should be a requirement to "agree" that an alternative form of communication to the SDEP is used. It should be up to the DNO to choose the method by which it sends the evidence. b) The proposed legal text in section 6.5 says "the Network Party shall make such photographic evidence or visual representation available to the relevant Energy Supplier upon request". The text should be worded such that the DNO may send it pro-actively to supplier if the DNO chooses for ease of process.	Thank you – The Code Manager acknowledges your concerns and has updated the draft legal text accordingly to address both of the points raised.

	We would propose that the relevant part of section 6.5 reads: *"The Network Party shall make such photographic evidence or visual representation available to the relevant Energy Supplier either upon request or if the Network Party considers it appropriate to do so in the circumstances. The Network Party shall send such photographic evidence or visual representation to the Energy Supplier either via the Secure Data Exchange Platform or via such other method of the Network Party's choice, always provided that such method is in compliance with Paragraph 6.6."*	
SSE Energy Supplier Limited Energy Supplier	SSE agrees with the proposed solution	Thank you.
Wales & West Utilities Network Party	We do not agree with the proposed solution for the following reasons that were raised during the workgroups and PIA. We raise them again as they have not been taken into consideration in the final solution. We have several concerns about the practicalities of requiring a field engineer to produce a sketch of a suspected theft. - Engineers often work in difficult conditions that can be exacerbated during suspected ToG calls (such as aggressive and/or hostile customers, and poor weather conditions) and that can make producing a sketch very difficult. Their priority in these scenarios is making a premise safe. - The solution is driven by the evidence requirement of TDIS rather than obtaining useful evidence to support a theft investigation. - The likelihood of low-quality sketches will not provide any more information about a suspected theft and is more likely to cause confusion	The Code Manager acknowledges that Network Party operatives face difficult conditions when visiting Sites where Energy Theft is either Suspected or Confirmed. As a result, changes were made to the legal drafting to make allowances for situations where either a photo or a sketch cannot be taken. The Code Manager modified the obligation for both the photograph and for the sketch from a "must" obligation to an "all reasonable endeavours" obligation accordingly. Regarding the choice of wording in the obligation, the Code Manager has taken legal advice on the phraseology. The Code Manager understands that there is a

	- Our engineer's focus is attending potentially high volumes of emergency calls made by members of the public. Requiring them to produce sketches is not a practical use of their time. In addition, the proposed legal text aims to place an "all reasonable endeavours" obligation on GTs however this obligation implies "best endeavours". This is not aligned with the intent of the change and is unhelpful for parties. In the event the change is approved, the legal text should be amended to "reasonable endeavours" as this is a more conventional description of the obligation, aligns with the intent, and removes ambiguity for REC parties. We understand the need to provide necessary evidence to support theft investigations and TDIS. We suggest that where a photograph cannot be obtained then a written report submitted by the GT would provide such evidence in a more pragmatic and reliable manner however this was deemed out of scope by the code manager. We suggest that the code manager needs to consider taking a broader view when investigating issues to develop the most beneficial solutions for the industry.	hierarchy of obligation, from "best endeavours" to "all reasonable endeavours", to "reasonable endeavours", in descending order of strength. As such, "all reasonable endeavours" sits in the middle of this hierarchy. As the Code Manager has already made concessions to Network Parties by changing the obligation from "must", but must equally still offer a substantive obligation to Energy Suppliers in order to make sure that their benefits are still felt, an "all reasonable endeavours" obligation makes sense as the intermediate of the non-"must" obligations. As a result, the Code Manager will not look into reducing the strength of the obligation any further by changing it to "reasonable endeavours" only. On the point about a written report, the Code Manager has raised this point with RECCo, and asked for their view on whether the definition of Confirmed Energy Theft should be changed to allow for written reports in lieu of photographic evidence. They have advised that they are not minded to support this change at this time – More details for their reasoning can be found in Section 16.2 of the Change Report.

Scottish Power Energy Supplier	Yes, we strongly agree with the proposed solution. From an Energy Supplier perspective, we welcome any REC change that strengthens Network Party (DNO/GT) obligations to capture and provide photographic or equivalent visual evidence where theft is identified or strongly suspected. This change directly addresses the evidentiary gap, where Network Parties must often make the metering asset safe, but in doing so remove evidence of tampering before suppliers can attend. This can prevent suppliers from progressing otherwise strong theft cases through the Theft Detection Incentive Scheme (TDIS). Reliable access to network-captured evidence will: • Increase the number of theft cases reaching 'Confirmed Energy Theft' status • Improve settlement accuracy and recovery of unbilled energy • Reduce the risk of theft going unrecorded due to evidence loss We encourage the final drafting to also ensure: • Clear timelines for provision of photos following site attendance • Minimum content standards (meter, bypass/tamper detail, installation context) • Clear ownership where multiple parties attend the same site (e.g. DNO & MOP)	Thank you. The Code Manager does not support expanding the scope of the drafting at this time. The Code Manager is aware that the current proposed solution has raised concerns from Network Parties, and, whilst it is our assessment that the cost-benefit test has been met based on the current drafting, it is also felt that expanding the obligation further would likely introduce more cost to Network Parties than the solution would yield in benefit.

	This will allow suppliers to embed the requirements into theft handling processes without ambiguity.	
National Grid Electricity Distribution Network Party	We agree with solution 2.0, as detailed within v1.0 of the Change Report for Consultation. This amends the proposed obligation to provide a sketch of an Energy Theft situation in the absence of photographic evidence, changing it from a mandatory obligation to a request that 'all reasonable endeavours' are made to do so.	Thank you.
Cadent Network Party	Cadent supports the requirement to provide photos where it can be done safely and this forms part of our current BAU process. The original 'Issue' as drafted by the proposer is clear as to its purpose in that entry into TDIS requires a photo and therefore changes were required to allow Suppliers to access TDIS without a photo. The proposers original drafting was "or the supplier is allowed to confirm these as a theft and count toward their targets as they have come for a professional/reliable source." We read this statement as the proposer requesting that a **written report** from Network Parties (DNs) should be acceptable to REC for Suppliers to access TDIS. Since the issue was raised, REC have amended the requirement themselves to be a sketch or a photo (all reasonable endeavours) and no longer make inference or reference to a written report (which DNs currently do provide). The current and amended change document is very clear as to its intention – the inclusion of an obligation for DNs to provide a sketch (where a photo is not available) which will allow Suppliers to enter the suspected theft into the TDIS process. If the intent of the change is to	The Code Manager has determined that the scope of this Change should be limited to how Parties may more readily meet the existing TDIS requirements, rather than looking to change those requirements themselves. Whilst it is true that the Proposer did indicate that the Code Manager may consider looking into making mandatory a requirement for Network Parties to provide photographic evidence, *or* a change to provide a written report in lieu of photographic evidence, it was felt that a change to meet existing standards was more appropriate. This has been affirmed by advice taken from RECCo, who have indicated that a change to the definition of Confirmed Energy Theft to modify the existing requirement for photographic (or sketch) evidence would not have their support at this time. More information on this

	purely support TDIS administration, we continue to question the added value of providing a rough sketch to the Supplier (or indeed REC) versus a written report from a Gas Transporter as a reasonable skilled industry professional. We note that 2 of the RECs Objectives are • to ensure the REC operates and evolves in a manner that facilitates the achievement of its mission statement;, and • to drive ***continuous improvements*** and ***efficiencies*** in the operation of the REC …… We also note the REC mission statement is to "Facilitate the ***efficient and effective*** running of the retail energy market, including its systems and processes.....through promoting ***innovation***, competition, and delivering ***positive customer outcomes***." It is our view that the provision of a sketch, (which by the very nature of the role of the person carrying out the activity and the circumstances it is likely to be carried out in), is likely to be a rudimentary one (at best) and would likely fall well short of the detail which could be provided by a DN within a written report. It is for this reason that we do not feel, even as a reasonable endeavour, that the requirement for a sketch is '**efficient'** or '**effective**', demonstrates '**continuous improvement'**, or is **innovative**. It is noteworthy that as we currently provide photos or written reports to Suppliers as a BAU process, the inclusion of a sketch would add costs	reasoning may be found in Section 16.2 of the Change Report. The Code Manager feels that on balance, when looking at the costs and benefits for all REC Parties, and Consumers, across the entire market, that the REC Objectives are met, and that a positive case for change has been made. Whilst it is acknowledged and understood that Network Parties will suffer some detriment as a result of the proposed solution, it is also felt that the perceived benefit to both Suppliers and Consumers is sufficient to offset that, and so, when looking across the entire REC, a cost-benefit test is likely to have been met.

	and inefficiency to DN processes and would therefore be negative to RECs objectives and mission statement. The only positive customer outcome a sketch would deliver would simply be in allowing a Supplier to access TDIS but we continue to question how a sketch such as the one below (AI generated) is preferable (and better meets the objectives and mission statement) over a more detailed written report and how this sketch could provide better customer outcomes overall if provided **in place** of a written report? Ultimately, we believe the proposed solution poses more detrimental impacts as measured under REC's Objectives and Mission Statement, than the scale of the "benefit" to be realised by facilitating TDIS administration. 	

	We note the obligation has also been amended to “all reasonable endeavours” and question the use of the word “all.” reasonable endeavours.” and whether it should simply read “reasonable endeavours”. In our view, the term “reasonable endeavours” is more widely used in industry regulation, and we think the addition of “all” could make compliance monitoring more complex, and blur the lines with “best endeavours”. We continue to suggest that the REC should amend 0253 to allow a photo, a sketch **or a written report**, as evidence enough for Suppliers to access TDIS. If amending the change is not possible (as previously suggested by REC) then we request REC withdraw the current change and raise another which would look to amend the TDIS entry requirements to allow a photo, a sketch **or a written report**.	
EON Next Energy Supplier	Whilst we appreciate that there may be situations where a DNO is unable to take a picture/draw a sketch due to safety concerns, we do not believe that a 'reasonable endeavours' clause is likely to increase compliance with the obligation. As discussed at the issue group, we believe there needs to be a wider review of theft obligations.	Thank you – The Code Manager has had to balance the perceived benefits to Suppliers that would result from photographic or sketch evidence with the operational burden that collecting this evidence would impose on Network Parties. As a result, the draft legal text represents a compromise position. If the obligation were still mandatory as suggested, then it is likely that proposed solution would not meet a cost benefit assessment.

SP Energy Networks Network Party	We are reassured with the revised wording in version 2 relating to reasonable endeavours to provide a sketch if photographic evidence is not feasible. While SPEN will endeavour to provide photos in relation to theft, there are scenarios where this is not feasible (as detailed in the change report)	Thank you.
Anonymous Energy Supplier	Yes	Thank you.

Question 2:	Do you agree with the proposed implementation approach of Big Bang? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK Network Party	We agree that the 'Big Bang' approach is a sensible approach for this implementation.	Thank you.
SGN Network Party	We will need a period of time to brief our operational colleagues probably at least two months as they are given month team briefs where this information could be shared. A two-month period would allow us time to generate the necessary briefing material.	Thank you – The Code Manager is proposing that this Change be considered for the November 2026 release, which would allow for the indicated lead time.
Ovo Energy Energy Supplier	Yes	Thank you.
Drax Energy Solutions Energy Supplier	[CONFIDENTIAL]	-
Northern Powergrid Network Party	Yes	Thank you.
SSE Energy Supplier Limited Energy Supplier	SSE agrees with a Big Bang approach.	Thank you.
Wales & West Utilities Network Party	Should the change be implemented, we agree with the proposed implementation approach however we request that a 6-month lead time is provided to enable parties to make the necessary internal process and training changes.	Thank you – The Code Manager is proposing that this Change be considered for the November 2026 release, which would allow for the indicated lead time.

Scottish Power Energy Supplier	Yes, we agree that a Big Bang implementation approach is appropriate. A single implementation date across all Network Parties ensures consistent evidentiary standards across the market and avoids regional inconsistencies. A phased rollout could result in a mixture of 'pre-change' and 'post-change' standards for similar theft incidents, creating uncertainty for suppliers and complicating audit and assurance. A Big Bang approach enables suppliers to: • Adjust triage rules so DNO-attended incidents are expected to include imagery • Refine case-handling and escalation where evidence is missing • Coordinate system updates (e.g., imagery reference fields) around one date We recommend an industry readiness window supported through Theft Issues Group / Change Issues Group and REC communications to ensure consistent adoption.	Thank you.
National Grid Electricity Distribution Network Party	Yes, we agree with the implementation approach of Big Bang	Thank you.
Cadent Network Party	Agree	Thank you.
EON Next Energy Supplier	Yes, we do	Thank you.
SP Energy Networks Network Party	We have no issue with a big bang approach	Thank you.
Anonymous Energy Supplier	Yes	Thank you.

Question 3:	Do you agree with the Code Manager's assessment of the costs and benefits for this change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK Network Party	We do not foresee any costs arising to this change and would agree that moving the solution to "all reasonable endeavours" is more pragmatic. However, under the benefit of '*Easier evidencing TDIS claims',* we maintain that a sketch may cause more issues that it looks to resolve. We understand that the use of sketches is already contained in the current definition of Confirmed Energy Theft, but we do not feel that realistically this is a reliable or accurate option.	Please refer to response to Q1.
SGN Network Party	SGN has not identified any costs associated with this change.	Thank you.
Ovo Energy Energy Supplier	Yes	Thank you.
Drax Energy Solutions Energy Supplier	Yes	Thank you.
Northern Powergrid Network Party	Yes	Thank you.
SSE Energy Supplier Limited Energy Supplier	We are unable to identify the costs and benefits.	Thank you.
Wales & West Utilities Network Party	No. WWU would need to implement process changes and training across operations and back-office functions in addition to time for processing the sketch that will not add value. We therefore believe the cost benefit is not well justified.	The Code Manager acknowledges the concerns raised, and understands that the proposed solution will incur cost to their

		organisation. However, the Code Manager must make a holistic assessment of cost-benefit for all Parties and Party types associated with a given Change. In this case, whilst there is cost to Network Parties, there is also benefit to Energy Suppliers, and the Code Manager would argue that on balance the benefit to Energy Suppliers outweighs the cost to Network Parties. The Code Manager would also argue that this position is supported by the indirect Consumer benefit expected to arise from a greater Supplier capacity to investigate Energy Theft, and by the concessions already made to Network Parties to soften the impacts indicated in the Impact Assessment, in the form of changes to the legal drafting.
Scottish Power Energy Supplier	Yes, we broadly agree with the Code Manager's assessment. Supplier-side costs are minimal, as the change primarily introduces an obligation on Network Parties rather than requiring suppliers to build new infrastructure. Incremental supplier costs relate mainly to adapting case-management processes and training theft teams to make full use of network-provided imagery. While benefits are difficult to quantify in advance, they are operationally significant:	Thank you.

	• Increased conversion of suspected theft into confirmed theft cases • Improved success rate under Schedule 8 evidentiary requirements • Reduced abandonment of investigations due to missing evidence • Stronger deterrence and auditability through clearer evidence trails Even small uplifts in confirmed theft volumes have a material impact on TDIS outcomes and fairness of cost allocation to honest consumers.	
National Grid Electricity Distribution Network Party	Yes, we agree. Whilst we will incur costs through ensuring that our processes, LWIs, policies, staff training and general documentation reflect the proposed changes to REC Schedule 8, we would expect these costs to be minimal.	Thank you.
Cadent Network Party	We are currently unable to identify the costs or impact of the requirement to provide a sketch although these would both invariably occur as we do not currently have the systems or processes in place to carry this activity out and deliver the outcome to REC Not mandating a sketch, and allowing suppliers to use a DN written report to access TDIS (which we already routinely provide where we	The Code Manager is open to exploring a change in the definition of “Confirmed Energy Theft” to allow for a written report in lieu of a photo or sketch. However, at the time of publication, no Issue or Change has been raised to explore this, and will therefore not

	can) would not incur additional cost but would clearly add benefit in allowing TDIS to be accessed.	be considered at this time in the scope of this Change. In the absence of such a Change or Issue, however, the Code Manager must make an assessment based on the Code as it currently exists. In this context, and based on the anticipated benefit to Suppliers arising from the proposed solution, the Code Manager believes that the cost-benefit test is met.
EON Next Energy Supplier	Yes, we do	Thank you.
SP Energy Networks Network Party	Yes, there will be cost impacts on DNO to change current processes to accommodate this	Thank you.
Anonymous Energy Supplier	Yes	Thank you.

Question 4:	Do you agree with the Code Manager's assessment of the Change Path, that this Change Proposal should be subject to Self-Governance approval by the REC Change Panel?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK Network Party	We agree with the Code Manager's assessment, that the Change Proposal should be subject to Self-Governance approval by the REC Change Panel.	Thank you.
SGN Network Party	Yes	Thank you.
Ovo Energy Energy Supplier	Yes	Thank you.
Drax Energy Solutions Energy Supplier	Yes	Thank you.
Northern Powergrid Network Party	Yes	Thank you.
SSE Energy Supplier Limited Energy Supplier	We agree with the Change Path and that the change should be subject to self-governance approval.	Thank you.
Wales & West Utilities Network Party	Yes	Thank you.
Scottish Power Energy Supplier	Yes, we agree that Self-Governance approval via the REC Change Panel is appropriate.	Thank you.

	This proposal refines operational obligations and evidence exchange processes around theft cases where Network Parties already attend site. It does not introduce fundamental market redesign, new charging, or significant consumer impacts, and it has no cross-code dependencies. Timely resolution is important because the absence of DNO-provided photos remains a live barrier to recording legitimate theft cases. Self-Governance enables faster implementation, allowing suppliers to embed improved evidence flows into their TDIS strategies, assurance plans, and theft detection frameworks.	
National Grid Electricity Distribution Network Party	Yes, we agree.	Thank you.
Cadent Network Party	Agree	Thank you.
EON Next Energy Supplier	Yes	Thank you.
SP Energy Networks Network Party	We agree that this should be self governance.	Thank you.
Anonymous Energy Supplier	Yes	Thank you.

Question 5:	Do you agree with the Code Manager's recommendation that this Change Proposal should be approved for implementation on 06 November 2026? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK Network Party	We agree with the Code Manager's recommendation.	Thank you.
SGN Network Party	Yes	Thank you.
Ovo Energy Energy Supplier	Yes	Thank you.
Drax Energy Solutions Energy Supplier	Yes	Thank you.
Northern Powergrid Network Party	Yes	Thank you.
SSE Energy Supplier Limited Energy Supplier	We agree with the implementation date of 6 November 2026	Thank you.
Wales & West Utilities Network Party	For the reasons set out in response to question 1, we do not believe the proposal should be implemented. If the change is implemented, then a 6-month lead time should be afforded to impacted parties to make the necessary internal changes.	Thank you.
Scottish Power Energy Supplier	Yes, we broadly support the proposed implementation date of 06 November 2026. This provides sufficient lead time for Network Parties to: • Update operational guidance and training	Thank you.

	• Implement safe and consistent evidence capture processes • Align evidence-sharing routes (SDEP or agreed alternatives) • Ensure GDPR-compliant handling, retention, and transfer From a supplier perspective, earlier implementation would unlock benefits sooner, but we recognise that networks may require time to configure devices and procedures. To maximise the uplift in recorded theft outcomes, we would welcome: • Early confirmation of final legal drafting baselines • Industry guidance on minimum evidential expectations • Alignment with TDIS reporting periods to monitor improvement If parties can be ready earlier without compromising quality or safety, consideration of an earlier go-live would be supported	
National Grid Electricity Distribution Network Party	Yes, we agree with the proposed implementation date. This should allow adequate time to ensure our processes, LWIs, policies, staff training and general documentation reflect the changes made.	Thank you.
Cadent Network Party	For the reasons stated within question 1, this Change Proposal should not be implemented as it does not meet the REC Objectives or Mission Statement and could be argued it is in fact negative to both.	Thank you.
EON Next Energy Supplier	We do not have any concerns on the implementation date, however, if it can be delivered earlier, we would welcome this.	Thank you.

SP Energy Networks Network Party	Yes	Thank you.
Anonymous Energy Supplier	Yes	Thank you.

Question 6:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK Network Party	N/A	-
SGN Network Party	We believe that a solution to the problem statement could be a statement from our First Call Operative detailing what they found on site if it is not possible to provide photographic evidence. Before any change is made, we would like to see substantial evidence from the suppliers to document why this change should be made as we are currently unable to quantify the extent of the problem.	Thank you. The Code Manager is open to exploring a change in the definition of "Confirmed Energy Theft" to allow for a written report in lieu of a photo or sketch. However, at the time of publication, no Issue or Change has been raised to explore this, and will therefore not be considered at this time in the scope of this Change. However, it should be stated that the Code Manager engaged RECCo for their view on whether such a change may be viable, and they do not support it. Further details of their view may be found in Section 16.2 of the Change Report. The Code Manager feels that the points put forward by Supplier respondents to the Party Impact Assessment are indicative of the need for the proposed solution from an evidentiary perspective.

Ovo Energy Energy Supplier	No	Thank you.
Drax Energy Solutions Energy Supplier	[CONFIDENTIAL]	-
Northern Powergrid Network Party	We made similar comments about the legal text referenced in Q1 in our impact assessment response to this change. RECCo used a stock answer response for this and for other comments made by other parties. We believe this stock answer did not address our points satisfactorily. Therefore, we have restated them in Q1 and would appreciate either incorporation or a reason why RECCo decided they were not appropriate to include.	The Code Manager would like to apologise for not addressing this feedback adequately in the first instance. The comments provided by Northern Powergrid in respect of the legal drafting have since been adopted and incorporated, and we are thankful for the feedback.
SSE Energy Supplier Limited Energy Supplier	Long term, we would expect any party visiting a site where theft is suspected to record photographic evidence.	Thank you.
Wales & West Utilities Network Party	There are no explicit instructions of what a sketch should include and this may lead to ambiguity and inconsistencies.	Thank you – The Code Manager is open to exploring the possibility of developing guidance as part of the release activities.
Scottish Power Energy Supplier	We strongly support R0253 as a key enabler of more effective theft detection and reporting under TDIS. To maximise its impact, we recommend complementary implementation guidance covering: • Minimum evidence standards (meter serial visibility, bypass/tamper detail, context) • Timeliness expectations for provision of imagery post-visit	Thank you.

	• Clear interface rules: file formats, naming conventions, linkage to incident/ETTO IDs • Consistency across all Network Parties to avoid uneven supplier outcomes • Governance through REC assurance routes where persistent non-compliance occurs • Feedback loops via TIG so suppliers and networks can refine evidence quality over time Evidence capture must always remain secondary to operative safety, consistent with the 'all reasonable endeavours' approach. Overall, this change is strongly aligned with improving theft detection volumes, strengthening evidential standards, supporting fairer cost allocation, and enabling suppliers to meet TDIS objectives more effectively.	
National Grid Electricity Distribution Network Party	No further comments.	Thank you.
Cadent Network Party	Nothing further to add.	Thank you.
EON Next Energy Supplier	No	Thank you.
SP Energy Networks Network Party	We support the review of the current TDIS evidence requirements. We feel that there merit in ensuring that where theft has taken place the Supplier should be able to provide appropriate evidence, and provision	Thank you.

	should be included where there is confirmation from the DNO (even if there is no photographic or sketch evidence	
Anonymous Energy Supplier	No.	Thank you.