RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0263 – SHARING CONFIRMED ENERGY THEFT WITH THE BSCCO

On 15 August 2025, the Code Manager issued a consultation to industry to seek feedback on the Change Report (For Consultation) for R0263.

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	09 September 2025
RESPONSIBLE COMMITTEE	REC Change Panel
LEAD ANALYST	James Hardy

DATE CONSULTATION ISSUED	15/08/2025
RESPONSE DEADLINE	09/09/2025

Question 1:	Do you agree with the proposed solution? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply Limited (Energy Supplier)	SSE agrees with the proposed solution as it restores the theft data sharing obligations to the pre-REC framework transfer.	Thank you for your response.
ScottishPower Energy Retail Limited (Energy Supplier)	We welcome the proposal to allow the Code Manager to share confirmed energy theft data with the BSCCo. We acknowledge that the proposed process could assist the BSSCo in strengthening the quality and robustness of audit trails in relation to the identification and measurement of theft related impacts on settlements. However, it would be beneficial for the Code Manager to provide clarity regarding the scope and granularity of the data that it intends to share with the BSCCo. Given the sensitivity of the information typically involved in theft investigations, it is important that parties are given sufficient assurances concerning the exact nature of the data fields that will be disclosed and the extent to which such information would be anonymised or aggregated before transfer to the BSSCo. This is because the data in the file is extremely sensitive and our understanding of BSCCo's interests are limited to the volume involved rather than individuals and we do not consider it to be neither necessary nor prudent to share within the context of the GDPR to provide extraneous data.	Thank you for your response. The Code Manager has provided clarity on the scope of the data that would be shared within the Change Report, specifically acknowledging that the data would be shared with the BSCCo for settlement purposes. The purpose of this Change Proposal is to ensure that the REC Framework accurately reflects the requirement for the Code Manager to maintain a process for sharing confirmed Energy Theft data. This proposal does not seek to define or amend the specifics of that process. Instead, it ensures that the REC Framework includes the necessary provisions to support such a process, aligning with the approach previously established under DCUSA.

Question 2:	Do you agree with the Code Manager's recommendation that this Change Proposal should be approved for implementation on 07 November 2025? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply Limited (Energy Supplier)	As this change has no impact on SSE processes or systems, we agree with the implementation date of the next major release.	Thank you for your response.
ScottishPower Energy Retail Limited (Energy Supplier)	We do not agree with implementation date because of reasons set out in Q1.	Thank you for your response. The Code Manager notes that it is unclear how the comments provided in response to Question 1 would affect the proposed implementation date, or why the suggested date of 07 November would be considered unsuitable. The Code Manager would be happy to discuss this further should the respondent wish to provide additional context or clarification.

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**
SSE Energy Supply Limited (Energy Supplier)	Whilst SSE has no issue with sharing the theft data, we would question if the benefits as outlined can be realised, due to the accuracy of the volumes of energy that will be reported as stolen. As such, we are unable to quantify the benefits of sharing the consumption data volumes, as it is not known how accurate the cases of theft and the largely estimated volumes are likely to be.	Thank you for your response. The Code Manager believes the benefits can be realised and will review this post-implementation to ensure this Change Proposal is meeting its purpose.
ScottishPower Energy Retail Limited (Energy Supplier)	We have no comments.	Thank you for your response.

Question 4:	Do you agree with the Code Manager's Case for Change? If not, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply Limited (Energy Supplier)	This change restores the TRAS and SPAA processes, and so we agree with the case for change.	Thank you for your response.
ScottishPower Energy Retail Limited (Energy Supplier)	We agree with the case for change. However, please see our response to Q1.	Thank you for your response. Please see the Code Manager's comments for Q1.

Question 5:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply Limited (Energy Supplier)	This change proposal will, hopefully, enhance the case for suppliers to provide accurate theft volumes, which is something we know the REC is already looking into.	Thank you for your response.
ScottishPower Energy Retail Limited (Energy Supplier)	N/A	