RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED INFORMATION REQUEST RESPONSES

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

On 13 March 2026 the Code Manager issued an information request to industry to seek feedback on the Issue 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	26 June 2026
RESPONSIBLE COMMITTEE	REC Change Panel
LEAD ANALYST	Caroline Freimuller

DATE INFORMATION REQUEST ISSUED	13 March 2026
RESPONSE DEADLINE	07 April 2026

Question 1:	Do you often get call outs to sites where there is suspected or confirmed Theft in Conveyance?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK (Distribution Network Operator and Gas Transporter)	n/a	n/a
Norther Powergrid (Distribution Network Operator)	n/a	n/a
National Grid Electricity Distribution (Distribution Network Operator)	n/a	n/a
E.ON Next (Energy Supplier)	We do receive call outs for sites but only for electricity and the numbers are extremely low. If we do not supply the property then we refer them to the network. The Revenue Protection agent would report to the DNO and provide the photo.	Thank you for your comments.
ENGIE (Energy Supplier)	No. Based on defining “Theft in Conveyance” as being when a theft occurs at a site where the Distribution business is responsible for the Supply and not the Supplier, we do not get this type of call out.	Thank you for your comments.

Question 2:	As a high level overview, what is the process followed for reported Theft in Conveyance events?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK (Distribution Network Operator and Gas Transporter)	n/a	n/a
Norther Powergrid (Distribution Network Operator)	n/a	n/a
National Grid Electricity Distribution (Distribution Network Operator)	n/a	n/a
E.ON Next (Energy Supplier)	We would refer to the network. The Revenue Protection agent goes to site, they report to DNO/GT and advise supplier (where its our responsibility of supply)	Thank you for your comments.
ENGIE (Energy Supplier)	We do not have a defined process for Theft in Conveyance events as we do not get call outs for this reason.	Thank you for your comments.

Question 3:	Do you keep records or retain data relating to Theft in Conveyance?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK (Distribution Network Operator and Gas Transporter)	n/a	n/a
Norther Powergrid (Distribution Network Operator)	n/a	n/a
National Grid Electricity Distribution (Distribution Network Operator)	n/a	n/a
E.ON Next (Energy Supplier)	Where there are photographs, we retain them along with the job sheet. We retain for 7 years as per our data retention policy and add to any queries we have open.	Thank you for your comments.
ENGIE (Energy Supplier)	We do not get call outs for this reason.	Thank you for your comments.

Question 4:	When attending a Site where there is Theft in Conveyance, what evidence is collected?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK (Distribution Network Operator and Gas Transporter)	n/a	n/a
Norther Powergrid (Distribution Network Operator)	n/a	n/a
National Grid Electricity Distribution (Distribution Network Operator)	n/a	n/a
E.ON Next (Energy Supplier)	We receive a statement from the engineer and photographs. The job sheet contains the responsibility of site, meter asset information, and details of the issue found and also details how the site was left.	Thank you for your comments.
ENGIE (Energy Supplier)	We have not had any recent experiences of this.	Thank you for your comments.

Question 5:	Is this evidence shared with Network Parties?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK (Distribution Network Operator and Gas Transporter)	n/a	n/a
Norther Powergrid (Distribution Network Operator)	n/a	n/a
National Grid Electricity Distribution (Distribution Network Operator)	n/a	n/a
E.ON Next (Energy Supplier)	We retain and share to DNO/GT and other parties on request. If evidence is not required, the lead will still be reported.	Thank you for your comments.
ENGIE (Energy Supplier)	We have not had any recent experiences of this.	Thank you for your comments.

Question 6:	Do you have the facility to take photographs? Would this lead to any further issues?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK (Distribution Network Operator and Gas Transporter)	n/a	n/a
Norther Powergrid (Distribution Network Operator)	n/a	n/a
National Grid Electricity Distribution (Distribution Network Operator)	n/a	n/a
E.ON Next (Energy Supplier)	Yes, we do not foresee this leading to any further issues.	Thank you for your comments.
ENGIE (Energy Supplier)	This would be something we would have to discuss with our metering and revenue protection agents.	Thank you for your comments.

Question 7:	Are there any associated costs with providing evidence by photograph?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK (Distribution Network Operator and Gas Transporter)	n/a	n/a
Norther Powergrid (Distribution Network Operator)	n/a	n/a
National Grid Electricity Distribution (Distribution Network Operator)	n/a	n/a
E.ON Next (Energy Supplier)	No	Thank you for your comments.
ENGIE (Energy Supplier)	There would likely be additional charges from our metering and revenue protection agents.	Thank you for your comments.

Question 8:	As a Supplier, does the SDEP work as the standard method of delivery for photographic evidence?	
RESPNDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK (Distribution Network Operator and Gas Transporter)	n/a	n/a
Norther Powergrid (Distribution Network Operator)	n/a	n/a
National Grid Electricity Distribution (Distribution Network Operator)	n/a	n/a
E.ON Next (Energy Supplier)	We would see this as the most appropriate method of sharing evidence.	Thank you for your comments.
ENGIE (Energy Supplier)	This would be a feasible method, yes.	Thank you for your comments.

Question 9:	As a Network Party, do you want to receive images from Suppliers for Theft in conveyance?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK (Distribution Network Operator and Gas Transporter)	Yes, we would want to receive images from a Supplier for Theft in Conveyance. 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. To ensure that the photo is usable in any investigation / reporting, we would encourage there to be defined, consistent requirements as to what is needed to be photographed. This will alleviate the risk of inconsistency in quality and detail with said photographs. There may be value in creating a guidance piece on what is expected in terms of photographs being taken in incidences of Theft in conveyance.	Thank you for your comments.
Norther Powergrid (Distribution Network Operator)	Yes. It helps set the scene for what we may encounter and also help us understand the supply arrangement. Photographs provide enhanced information to a written report.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Yes. It would be really helpful if photographs could be provided as this would form part of the evidence that we would hold for situations involving theft in conveyance.	Thank you for your comments.
E.ON Next (Energy Supplier)	n/a	n/a
ENGIE (Energy Supplier)	n/a	n/a

Question 10:	As a Network Party, does the SDEP work as the standard method of delivery for photographic evidence?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK (Distribution Network Operator and Gas Transporter)	Currently, Gas Transporters cannot access SDEP so we would want to ensure any proposed means of contact has the ability to attach photos whilst remaining GDPR compliant.	Thank you for your comments.
Norther Powergrid (Distribution Network Operator)	Yes, though this should not preclude using other forms of communication e.g. email.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Yes, SDEP would be an acceptable method of delivery for photographic evidence. We would also be happy to accept email (to a specified email address) as a method of delivery, if there are situations where this is more convenient.	Thank you for your comments.
E.ON Next (Energy Supplier)	n/a	n/a
ENGIE (Energy Supplier)	n/a	n/a

Question 11:	Would receiving photographic evidence contribute to internal investigations?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK (Distribution Network Operator and Gas Transporter)	Yes, we could see a reduction in emergency response costs as we would be able to ascertain damage to network before dispatching engineers via desktop assessment. This would be a beneficial contribution to our internal investigations.	Thank you for your comments.
Norther Powergrid (Distribution Network Operator)	Yes. Not all theft in conveyance investigations result in a site visit by us. Some can be resolved via telephone or through correspondence. Having photographs of situations reported by supplier's agents will help.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Potentially, yes.	Thank you for your comments.
E.ON Next (Energy Supplier)	Potentially, there is a wider issue with the wording within the schedule which has been discussed at industry. We believe there needs to be an amendment to the schedule so that photographic evidence and sketches are not the only requirements. An engineers report should also be evidence for theft.	Thank you for your comments. This is out of scope of this Issue. The Code Manager will discuss internally if this can be looked at under the scope of I0187 Schedule 8 Review and Best Practice Guidance Development, or whether a new Issue/Change Proposal would need to be raised.
ENGIE (Energy Supplier)	n/a	n/a

Question 12:	Is there anything additional you would like to add?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK (Distribution Network Operator and Gas Transporter)	n/a	n/a
Norther Powergrid (Distribution Network Operator)	During the change proposal R0253 we commented that this reciprocal obligation should also be in place for suppliers. It was out of scope for R0253 so we welcome this new change proposal.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	No further comments.	n/a
E.ON Next (Energy Supplier)	As alluded to in question 11, we believe there needs to be an amendment to the requirements for energy theft and an engineers expertise should also be included as 'allowed evidence'	Thank you for your comments.
ENGIE (Energy Supplier)	As a non-domestic supplier we do not have recent experience of our agents being called out where there has been theft in conveyance, the theft call-outs we have generally come from Crimestoppers or from agents reporting suspected meter tampers, downstream of the DNO infrastructure. We are uncertain as to the need for this modification.	Thank you for your comments.