RETAIL ENERGY CODE

ENERGY THEFT TRAINING

MODULE FOUR –

ENERGY THEFT SITE VISIT INVESTIGATION

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Energy Suppliers are required to carry out a site visit where access was successful for an Energy Theft to be confirmed and qualify for payments under the **Theft Detection Incentive Scheme (TDIS)**. Visits must include photograph or sketch evidence of any illegal connection, bypass or meter tampering.



Energy Suppliers are entitled to receive 50% of the **Theft Detection Value (TDV)** for completing a qualifying Energy Theft Site Visit investigation, even if no Energy Theft is confirmed.



The Schedule 1 definition of Energy Theft Site Visit Investigation provides **a breakdown of steps required** during a site visit. Although they are not TDIS participants, this remains relevant for Network Operators, as the definition covers all types of theft investigation including Theft in Conveyance.



All REC Parties must comply with Schedule 8, which sets out **rules for site visits**, gaining access to premises, conducting investigations, and interacting with consumers where Energy Theft is suspected or Confirmed.

WHO ATTENDS SITE?

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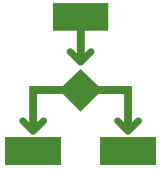
People sent to investigate Energy Theft need appropriate **skills, experience and authorisation**, whether employed directly by you or contracted through a service provider.



Third-party service providers (revenue protection agents) offer theft investigation services. The services offered can differ (ranging from visual inspections only to full meter replacement), so it's important you select a service that meets your needs, balancing consumer experience, theft detection effectiveness, efficiency and cost, while ensuring code compliance.



Your policies and contract should clearly define when third-party investigators are expected to contact you during an investigation and clarify **which party is responsible for making key decisions.**



Whether they attend site directly or employ third-party services, Energy Suppliers must ensure processes followed **meet the requirements for an Energy Theft Site Visit Investigation** and Confirmed Energy Theft to claim under the TDIS as well as comply with obligations under Schedule 8.



PREPARING FOR THE SITE VISIT

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Once a desktop review concludes that a site visit investigation is needed, **all relevant information gathered** during the review should be sent to the person conducting the visit.

Creating a **standardised investigation pack** helps ensure consistency. The pack should include:

CONSUMER DETAILS
Name, changes in occupancy, move in/out dates, other context

MPAN/MPRN

METER INFORMATION
Installation date, type, size/phases

PREMISES DETAILS
Address, property type, meter location, access information, business hours (if applicable), concerns about accuracy

VULNERABILITIES
Priority Services Register (PSR) information/other relevant account notes

INITIAL SUSPICION REPORT
including the reason, date, and source of the referral (ETTOS reports should remain strictly confidential)

HAZARDS
e.g., dogs, meters at height, or other security and safety considerations

PREVIOUS THEFT HISTORY
at the property or linked to the consumer

PRIORITY STATUS

OTHER RELEVANT DATA AND DOCUMENTS
Relevant consumption data, smart alerts, payment history, correspondence, and any photos showing suspected interference

Because the pack contains personal and criminal offence data, **you must ensure it is transmitted securely** to investigators or service providers.

DEFINING THE SITE VISIT INVESTIGATION

Energy Theft Site Visit Investigation is a **defined term** in REC Schedule 1. The definition details the minimum requirements that must be included and evidenced to be considered an Energy Theft Site Visit Investigation and to qualify for any relevant TDIS incentive payments as determined by the Theft Target Methodology category 3 document.

The definition includes an introductory paragraph - followed by six required sections (a–f) that specify what must be obtained and documented during a site visit.

TDIS Qualification

The definition sets out the minimum requirements that must be met if an investigation is to qualify for any relevant TDIS incentive payments – so be sure that these are captured!

Collect Your Evidence

You must decide how the investigator will record, store and return evidence collected on-site. Using handheld devices with specialist software can support real-time uploads, mandatory data fields, and structured prompts to reduce missing information. Consider the use of body-worn cameras, taking care to review privacy, data storage, and retention requirements.

THE DEFINITION

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REC Schedule 1

Energy Theft Site Visit Investigation

means that the holder of an Energy Licence (or person acting on their behalf) visits the premises where Energy Theft is suspected to determine if a Confirmed Energy Theft has occurred following the completion of an Energy Theft Desktop Investigation. Multiple visits to a premises in respect of the same suspected Energy Theft shall only count as one Energy Theft Site Visit Investigation. **As a minimum the site visit investigation must include and evidence:**

…

(A) ASSIGNING A PRIORITY STATUS

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As a minimum the site visit investigation must include and evidence:

(a) that the suspected Energy Theft has been assigned a priority status as per Paragraph 7 of Schedule 8 - Unbilled Energy Code of Practice

When an Energy Supplier receives information about suspected Energy Theft, they must first assess whether the case presents a serious safety concern or any other reason for urgent action. This table determines the priority level, which in turn sets the required actions and response times. It is acknowledged that longer timescales shall have to apply where access to a Premises is delayed by circumstances outside of the Energy Supplier's control . (including where a warrant is needed to obtain access).

Priority Assignment	**Actions to be Taken**	**Visit the Premises** Attend and take reasonable steps to gain access	**Resolve** Gain access, investigate and act (does not include assessment of unrecorded units)
1 Evidence of Energy Theft where there is **a serious safety concern** or other reason for urgency	The Supplier shall immediately notify the relevant Network Party if there is a dangerous situation that the Network Party needs to rectify and may in addition instruction its Revenue Protection Agent to attend the Premises	Reasonable steps to attend at the same time as the Network Operator (where applicable), in any event within one Working Day (electricity) or two Working Days (gas).	20 Working Days for electricity and 80 Working Days for gas
2 Evidence of Energy Theft where there is **no serious safety concern** or other reason for urgency	The Party must review any information it receives and, if further action is required, refer the case to its Revenue Protection Agent as soon as reasonably practicable.	Within 20 Working Days for electricity, not defined for gas	40 Working Days for electricity and 80 Working Days for gas.
3 Information giving **cause for suspicion** that Energy Theft may have taken place (not priority 1 or 2)	The Party must review the information it receives and, if it identifies that further action is required, refer the case to its Revenue Protection Agent as soon as reasonably practicable.	Within 30 Working Days for electricity, not defined for gas.	90 Working Days for electricity and 80 Working Days for gas.

(B.1) VULNERABILITIES

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As a minimum the site visit investigation must include and evidence:

(b) any known or suspected Vulnerability of the Consumer and/or any known or suspected potential hazards at the premises

Before conducting an Energy Theft Site Visit Investigation, you must check the account for any Vulnerable Consumer indicators, and you must share these with the investigator. Indicators may include:

- PSR Status
- Age
- Disability
- Chronic Illness
- Difficulty Paying

During the investigation, investigators should look for signs of vulnerability, and if needed, they should wait for an appropriate adult or interpreter to ensure the consumer is properly supported. Signs might include:

- Mobility Aids
- Key Safes
- Medication
- Issues Communicating
- Young Children
- Mention of Carers

All vulnerability-related observations must be documented, as they inform decision-making during the investigation.

Schedule 8 and the Theft Charter require that Parties provide **appropriate treatment of Vulnerable Consumers**, including ensuring staff have suitable vulnerability awareness training.

Make all reasonable efforts to retain supply for Vulnerable Consumers, this may not be possible where serious safety concerns exist, or the consumer is a repeat offender despite reasonable interventions. If the supply is cut off or disconnected, where applicable, you must provide the Consumer with contact details of Social Services so they can get help. Parties can also notify Social Services of any welfare concerns so support can be arranged.

(B.2) HAZARDS

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As a minimum the site visit investigation must include and evidence:

(b) any known or suspected Vulnerability of the Consumer and/or any known or suspected potential hazards at the premises

Before carrying out a site visit investigation, check the account for **known hazards or risks** and pass this information to the investigator. In high-risk situations attendance may only be appropriate with police support. In other cases, specialist third parties (e.g. dog handlers, environmental health) may be required due to hazards.

During the visit, the investigator should complete a **dynamic risk assessment**, supported by training in hazard identification and conflict management. Warning signs might include:



Investigators must also ensure there is a **safe exit route**, **maintain vehicle accessibility**, and **avoid becoming trapped**. The suitability of **lone working** should always be assessed; working in pairs may be safer in some situations. **Personal alarms** or recording devices may also be used to alert specialised services and raise the alarm if an unsafe situation arises.

(C) GAINING ACCESS

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As a minimum the site visit investigation must include and evidence:

(c) that access to the metering point and installation has been gained, or for Theft in Conveyance the point of the illegal connection, and an inspection made that satisfies the nature of the initial report of the suspicion of Energy Theft



To complete a site visit investigation, investigators **must gain physical access** to the meter/point of suspected illegal connection. Advance notice can give a consumer the opportunity to hide evidence. It is therefore strongly **recommended that visits are conducted as cold calls**. In some cases, investigators may observe the property from a distance first to corroborate information.



On approach, investigators must **identify themselves** and state on whose behalf they are attending; photographic company ID with an employee number is sufficient.



If access cannot be gained during the call, you must decide whether issuing notice or requesting an appointment is appropriate, or whether further unannounced attempts should be made. **Where a consumer refuses access or does not engage at all, a warrant of entry will be required**, and the reasons for refusal should be documented.



At the meter, **investigators should begin with a visual inspection**. Further steps may include isolating the supply to check whether power or gas flow remains, removing the meter for full inspection, checking connections, and taking technical measurements such as electrical load or gas flow tests.



Even where no visible issues are found, investigators must assess whether evidence aligns with the initial suspicion of theft (for example, unexplained low consumption in a property). The person conducting the site visit must have sufficient experience, equipment and expertise, with both technical and investigative skills, including the ability to ask **relevant questions** on site.

(D) PHOTOGRAPHIC EVIDENCE

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As a minimum the site visit investigation must include and evidence:

(d) a photograph of the premises and a photo (or sketch) of the metering point or suspected point of illegal connection

Photographic evidence is a critical component of the site visit investigation.



Investigators should begin by taking **a clear and identifiable photo of the premises exterior**, while completing their dynamic risk assessment.



Upon arrival, they must take comprehensive photographs of the **metering installation**, including serial numbers, main fuse, ECV and condition of all components. Evidence should include wide-angle shots and close-up images of terminals, inlets/outlets, conductors/tails, etc.



Additional photos should be taken to corroborate **other aspects of the investigation**, such as clamp-meter readings, polarity checks, letters left or what condition something you may have needed to move was left.



Photograph **how the installation was left**, including new or existing meters, resealing, or any disconnections carried out, as a record for future reference.



Videos may be used to show layout or context, ideally with a narrative explaining what is being recorded. Investigators must take care not to inadvertently capture people, or unrelated personal items.

Schedule 8 requires Network Operators who identify suspected theft to collect sufficient evidence for the responsible party. Change Proposal R0253 aims to ensure they take reasonable photographic evidence wherever safe, making it available to Suppliers. Meter installers may also provide photographs of tampered installations as evidence.

If photographs cannot be taken, evidence must instead rely on the written account of the attending investigator, which must include a sketch to qualify for TDIS.

(E) SITE VISIT REPORTS

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As a minimum the site visit investigation must include and evidence:

(e) a report of all visits made to premises including, dates, times, persons spoken to, and outcome of metering point inspection, including if theft or another issue was identified and any metering work or other remedial action undertaken

A thorough record must be kept of all visits and activities carried out during an investigation. This includes:

Dates and times of every visit (arrival and departure) and the type of visit (e.g. appointment, warrant), including whether it was the first or subsequent attempt.

Details of people spoken to onsite, what was said, and who else was present.

Document any physical evidence, such as the meter or cables, that are removed and store appropriately**.**

Findings from the inspection, including whether theft, a fault, or no issue was identified. Investigators must follow all reasonable lines of enquiry to determine, on the balance of probabilities, whether energy has been taken illegally, even if theft is not actively occurring.

Actions taken onsite, such as replacing the meter, disconnecting supply, or requesting DNO attendance. Full details must be recorded for any meter exchange, removal of physical evidence, or work carried out. The method of disconnection must be documented because it determines what the consumer must do to be reconnected.

Rationale and authority for disconnection, including safety issues, statutory powers, decisions made, and considerations relating to vulnerability. Suppliers must be notified immediately of any disconnection and any associated vulnerabilities.

If an existing meter remains in situ, **all checks completed and full meter readings** including all rates and prepayment balances.

Any installation-related details that **may affect future work** should also be documented.

Any **correspondence or information left** for the consumer, regardless of whether access was gained. This is essential for evidencing statutory visits and complying with Schedule 8 Section 10 regarding information requirements for consumers.

(F) ASSESSMENT OF LOSSES

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As a minimum the site visit investigation must include and evidence:

(f) if Energy Theft is identified, that information has been obtained to enable an assessment of the amount of Energy that has been the subject of Energy Theft.

Loss assessment can be carried out during the visit or afterwards using information gathered. Investigators must collect and document data to enable an accurate calculation of unrecorded units, including establishing the start date of the theft. Where calculation tools are required, the REC Theft Assessment Calculators must be used. Ideally, historic consumption data is available but is not always reliable. Investigators should collect additional information such as:

 Appliance lists (where the consumer permits)	 Heating fuel used, which may differ from what is available
 Clamp meter readings (noting this reflects usage only at that moment)	 Property characteristics - not limited to number of bedrooms, insulation, opening hours, floor area, ventilation
 Property type (domestic or commercial)	 Cannabis cultivation indicators (grow-room equipment, timers, or room dimensions)

Investigators must gather information that helps determine when the theft began for example, installation dates for direct-to-mains appliances, date an electric car purchased, occupancy history, move-in dates, vacancy periods, and tenancy information.

The data needed will depend on the specific scenario - investigators must understand what is required to ensure the assessment is accurate. The REC Theft Calculator and Guidance should guide the framework for what information to collect during and after the site visit.

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KNOWLEDGE CHECK

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Congratulations, you have completed Module 4!

Please complete the Knowledge Check to ensure you have understood the key messages from this module.

