RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0212 PROTECTING CRIMESTOPPERS AND THEIR CONTACTS

On 23 May 2025 the Code Manager issued a consultation to industry to seek feedback on the Preliminary Change Report for R0212.

The purpose of this document is to consolidate the responses and for the Code Manager to answer any questions raised within those responses.

DOCUMENT VERSION	1.0
RESPONSE TYPE	NON-CONFIDENTIAL
DATE ISSUED	19/06/2025
RESPONSIBLE COMMITTEE	Change Panel
LEAD ANALYST	Flo Monea

DATE CONSULTATION ISSUED	23/05/2025
RESPONSE DEADLINE	16/06/2025

Question 1:	Do you agree with the proposed solution? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Networks (Distribution Network Operator)	Yes, SPEN are supportive of this proposal.	Noted. Thank you for your response.
National Grid Electricity Distribution (Distribution Network Operator)	We are inclined to agree with the proposed solution. Our only caveat to this is in the wording around timescales in the legal wording within paragraph 6.2A. It says "…within a reasonable time." Is this too vague?	Thank you for your response. It is recognised that the time required could depend on a case-by-case scenario. Therefore, no specific time SLA was proposed. The expectation is that if a Party is required to disclose ETTOS Service Data, then the ETTOS Service Provider should be notified as soon as practically possible.
ScottishPower Energy Retail Limited (Energy Supplier)	We express our support for the proposed enhancements to the ETTOS platform recognising the value they may bring to improving the service. We also note that Crimestoppers does not believe a breach of the service has occurred to date over the last 12 months. If there have been specific behaviours that have prompted concern or scrutimy, we recommend that these be clearly identified and submitted to the Code Manager for assessment. It would be more appopriate for the relevant parties to collaboratively review such incidents rather than overaching amendments to the Code.	Noted. Thank you for your response.

SSE Energy Supply Ltd (Energy Supplier)	SSE agree with the solution.	Noted. Thank you for your response.

Question 2:	Do you agree with the proposed implementation technique? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Networks (Distribution Network Operator)	Yes	Noted. Thank you for your response.
National Grid Electricity Distribution (Distribution Network Operator)	We agree with this proposed implementation technique.	Noted. Thank you for your response.
ScottishPower Energy Retail Limited (Energy Supplier)	No comments	Noted. Thank you for your response.
SSE Energy Supply Ltd (Energy Supplier)	SSE agree with the proposed implementation technique	Noted. Thank you for your response.

Question 3:	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**
Scottish Power Energy Networks	Yes	Noted. Thank you for your response.

(Distribution Network Operator)		
National Grid Electricity Distribution (Distribution Network Operator)	We agree with the Code Managers assessment that this should be subject to Self-Governance approval by the REC Change Panel.	Noted. Thank you for your response.
ScottishPower Energy Retail Limited (Energy Supplier)	Yes, we agree that the change should be subject to self-governance approval.	Noted. Thank you for your response.
SSE Energy Supply Ltd (Energy Supplier)	SSE agree this change should be subject to self governance.	Noted. Thank you for your response.

Question 4:	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**
Scottish Power Energy Networks (Distribution Network Operator)	Yes	Noted. Thank you for your response.
National Grid Electricity Distribution (Distribution Network Operator)	Yes, we are happy to agree for the implementation date.	Noted. Thank you for your response.
ScottishPower Energy Retail Limited (Energy Supplier)	Yes, we agree with the Code Manager's recommendation to approve the implementation of the Change Proposal on 07 November 2025.	Noted. Thank you for your response.
SSE Energy Supply Ltd (Energy Supplier)	SSE do not have an issue with the proposed November implementation date, but as this is a minor change it could be implemented in October to align with REC0173, where potentially more ETTOS leads will be worked upon.	Thank you for your response. As R0173 implementation date is proposed to be amended under R0259, this is not yet approved. Therefore, to ensure there are no risks around the implementation, the Code

		Manager still recommends 7 November 2025 to implement R0212.

Question 5:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Networks (Distribution Network Operator)	No other comments	Noted. Thank you for your response.
National Grid Electricity Distribution (Distribution Network Operator)	Nothing further to add.	Noted. Thank you for your response.
ScottishPower Energy Retail Limited (Energy Supplier)	No further comments	Noted. Thank you for your response.
SSE Energy Supply Ltd (Energy Supplier)	SSE would like some clarity on the time required to inform Crimestoppers of any ETTOS data disclosure. SSE do not intend disclosing any ETTOS information, but as this is to allow the opportunity for legal action, this could be a lengthy process.	Thank you for your response. It is recognised that the time required could depend on a case-by-case scenario. Therefore, no specific time SLA was proposed. The expectation is that if a Party is required to disclose ETTOS Service Data, then the ETTOS Service Provider should be notified as soon as practically possible.