RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED IMPACT ASSESSMENT RESPONSES

R0253 – THEFT - DNO/NETWORKS NOT PROVIDING PHOTOS

On 16 October 2025 the Code Manager issued an impact assessment to industry to seek feedback on the proposed solution 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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RESPONSIBLE COMMITTEE	Change Panel
LEAD ANALYST	Lydia Bentley

DATE IMPACT ASSESSMENT ISSUED	16 October 2025
RESPONSE DEADLINE	07 November 2025

Question 1:	Did you attend the Theft Issues Group on 30 July 2025?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution Network Party	Yes	Thank you.
Northern Gas Network Network Party	No	Thank you.
Ovo Energy Supplier	No, OVO was not present at the Theft Issues Group in July	Thank you.
Eon Next Energy Supplier	Yes we did attend this meeting,and found the output useful around the updates on this issue	Thank you.
SSE Energy Supply Ltd Energy Supplier	Yes	Thank you.
BUUK Network Party	Yes.	Thank you.
Anonymous Network Party	No	Thank you.
Northern Powergrid Network Party	No. NPg is not represented at the TIG.	Thank you.
Anonymous Energy Supplier	Yes, a member of our organisation attended.	Thank you.

SGN Network Party	No	Thank you.
SP Energy Networks Network Party	SPEN were unable to attend the workgroup on 30 July 2025, however, have attended subsequent sessions where this has been discussed.	Thank you.
Cadent Network Party	No but I did attend on 29 Oct.	Thank you.
Wales & West Utilities (WWU) Network Party	No	Thank you.
Scottish Power Energy Supplier	Yes, representation from our Revenue Protection team attended the Theft Issues Group on 30th July 2025	Thank you.

Question 2:	Do you have any comments on the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution Network Party	The proposed solution defines that in the event of a Network Party Representative not being able to take a photograph of the Energy Theft, they should instead submit a sketch. We have a number of concerns regarding this: 1. The proposed solution recognises that in some instances, the safety risks will be so great that it is not possible to take a photograph. In some of these situations, the engineer's life could be threatened, therefore we would seriously question whether they would be able to recall enough (possibly at the end of that day) to enable them to provide a thorough and detailed sketch that would constitute admissible evidence. 2. We are aware that the option to provide a sketch in the absence of a photograph has been included due to the fact that the definition of a confirmed Energy theft dictates that a sketch is sufficient evidence, however we would question why a detailed written report could not also be offered as an option for providing evidence? We fail to see how a sketch is any more reliable than a written report. 3. Our Engineers work tirelessly day in, day out. We feel that asking them to complete a sketch to be used as evidence for a Supplier's TDIS claim would be putting them under too much pressure. Some may feel uncomfortable in doing this and/or lack confidence; they may also	Thank you for your feedback. Based on this feedback, and other feedback from Network Parties detailing the operational challenges and complexities that would arise from implementing the obligation as proposed on a mandatory basis, the Code Manager has changed the legal drafting accordingly. The updated proposed solution instead requires Network Parties to take a photo or a sketch on an "all reasonable endeavours" basis rather than a mandatory basis.

	worry about the level of accuracy and detail in the sketch if the visit was particularly stressful and/or several hours before they get time to complete the sketch. On some days, their workload may so intense that they struggle to find the time. In addition, it should be considered that from a time/labour perspective, it is not just about the time it takes to complete the sketch, it is also the time it takes to circulate the sketch to the relevant parties who then need to organise, associate with the corresponding details, assess who the sketch needs to be sent to, upload to SDEP and save/record the details. We attended the REC Theft Issues Group Meeting on 29/10/2025 where a possibility of changing the proposed legal drafting was discussed, to include an obligation for Network Parties to send photos/a sketch in every case of an Energy Theft site visit, rather than only doing so in response to Suppliers, as and when they request the information (as the proposed legal drafting currently states). Seeing as there could potentially be thousands of these situations which would almost certainly impose new procedures/processes and a considerable additional workload upon Network Parties, consequently incurring costs in doing so, we do not feel it would be fair to create this obligation when there is absolutely no financial benefit for Network Parties. We do not feel that it would be unreasonable for Suppliers to have to request the information that they need to complete their TDIS claims.	
Northern Gas Network Network Party	At NGN, the health and safety of our operators is our highest priority and by mandating them to take photographs at certain sites could expose them to potential injury, and similar risks are likely to arise if they are asked to produce site sketches. NGN therefore considers the	Thank you for your feedback. Based on this feedback, and other feedback from Network Parties detailing the operational challenges and complexities that would arise from

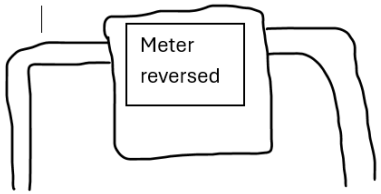
	inclusion of a reasonable endeavours clause to be a more practical and safer approach.	implementing the obligation as proposed on a mandatory basis, the Code Manager has changed the legal drafting accordingly. The updated proposed solution instead requires Network Parties to take a photo or a sketch on an "all reasonable endeavours" basis rather than a mandatory basis.
Ovo Energy Supplier	We fully support the proposals. The provision of photographic evidence will enable us to more effectively identify and take action against instances of Energy Theft.	Thank you.
Eon Next Energy Supplier	I agree with the proposed solution, it sets out the requirements well and will help Suppliers record theft correctly and accurately assess the impact this theft has had enabling them to recover the associated costs.	Thank you.
SSE Energy Supply Ltd Energy Supplier	SSE supports the proposed solution, but we feel the theft investigation could be sped up by the DNO sending the photographs to the supplier without being requested to do so. We would also like to see the obligation on DNOs widened for them to take photographs of any tampering evidence whilst on site, not just in the process of making the metering asset safe.	Thank you.
BUUK Network Part	As a DNO and IGT, we are already taking photos where we believe there to be a theft of gas. Though we understand that the use of sketches is already contained in the current definition of Confirmed Energy Theft, we do not feel that realistically this is a reliable or accurate option.	Thank you for your feedback. Based on this feedback, and other feedback from Network Parties detailing the operational challenges and complexities that would arise from implementing the obligation as proposed on a mandatory basis, the Code Manager has

		changed the legal drafting accordingly. The updated proposed solution instead requires Network Parties to take a photo or a sketch on an "all reasonable endeavours" basis rather than a mandatory basis.
Anonymous Network Party	We are supportive of the proposed solution & believe it will mitigate the problem statement; however we feel that additional guidance is required regarding the submission of evidence. What would be the expected SDEP process type to use? PT0075 Theft (Elec) General Enquiry or PT0031 Contract Manager (Elec) General Enquiry. Our preferred option would be PT0075, although neither have an industry SLA for resolution, it would prevent queries being missed or lost and would prevent overuse of PT0031. As GTs, DNOs, IGTs and IDNOs may all have different sharing arrangements, we believe that an agreed alternative process to SDEP needs to be clearly set out to prevent Suppliers requesting differing communication methods which could unnecessary complexities. We also believe it would be beneficial to clearly set out what information is expected to be contained in the notification to inform of possible energy theft.	The Code Manager has intentionally not mandated a means by which evidence may be shared outside of SDEP in order to allow Parties to reach mutually agreeable bespoke bi-lateral arrangements.
Northern Powergrid Network Party	Yes. As referenced in Q3, the statement regarding the proposed solution in section 8 that "Network Parties need to consider the safety of the Metering Asset as their foremost priority" is not entirely correct. Network Parties' foremost priority is to ensure that all of their assets (not just those assets that fall within the definition of "Metering Asset") are not unsafe and/or are not being used in an unsafe way.	Thank you for your feedback. Based on this feedback, and other feedback from Network Parties detailing the operational challenges and complexities that would arise from implementing the obligation as proposed on a mandatory basis, the Code Manager has

	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. 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. 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.*"	changed the legal drafting accordingly. The updated proposed solution instead requires Network Parties to take a photo or a sketch on an "all reasonable endeavours" basis rather than a mandatory basis.
Anonymous Energy Supplier	The proposed solution is sensible. Network Parties see theft on site and it is useful for all parties involved to see photos of the tampering so we can understand what has happened on site and retain evidence of the tampering. For suppliers specifically, this will be useful to allow the submission of a case to TDIS as a confirmed theft. At present, we are not able to submit	Thank you.

	these as confirmed cases of theft due to the lack of photographic evidence and the tampering being removed when we get to site.	
SGN Network Party	We are concerned that the proposed solution could potentially put our staff safety at risk by placing an obligation on them to take photo's when on site, we would like to suggest that an obligation of reasonable endeavours is placed upon us to provide photographic evidence. We would also like to point out that there is the potential that evidence of a theft situation may have been removed before we arrive at site so it will not always be possible to provide any meaningful photos.	Thank you for your feedback. Based on this feedback, and other feedback from Network Parties detailing the operational challenges and complexities that would arise from implementing the obligation as proposed on a mandatory basis, the Code Manager has changed the legal drafting accordingly. The updated proposed solution instead requires Network Parties to take a photo or a sketch on an "all reasonable endeavours" basis rather than a mandatory basis.
SP Energy Networks Network Party	SPEN are supportive of a formalised process for the provision of photographic evidence in the event of a theft case, however, have concerns around the requirement to provide a sketch. We believe that the request for provision of a sketch serves no valid purpose and could be open to interpretation, we would suggest that the requirements of TDIS submissions is reviewed and that in the absence of photographic evidence other evidence can be provided (either statement/proforma) detailing what was found at site by the DNO	Thank you for your feedback. Based on this feedback, and other feedback from Network Parties detailing the operational challenges and complexities that would arise from implementing the obligation as proposed on a mandatory basis, the Code Manager has changed the legal drafting accordingly. The updated proposed solution instead requires Network Parties to take a photo or a sketch on an "all reasonable endeavours" basis rather than a mandatory basis.
Cadent Network Party	The proposed solution appears to require a photo or a sketch to be included with every submission of a potential theft of gas provided by Gas Transporters where there is a registered supplier.	Thank you for your feedback. Based on this feedback, and other feedback from Network Parties detailing the operational challenges

	Gas Transporters would usually find such occurrences of potential supplier responsible theft whilst carrying out works such as service replacement, GS(I&U)R site visits, gas safety visits etc. During these visits, engineers frequently operate in environments where taking a photo or drawing a sketch is not feasible due to aggressive consumer behaviour, threats of violence, imperative of ensuring site safety first and working in confined spaces etc. There will clearly therefore be occasions where photos cannot be taken. Additionally, gas installations where theft takes place can be more susceptible to gas leaks and other dangerous occurrences. As a gas transporter, our primary concern is safety, and emergency engineers are required to prioritise the safeguarding of life and property over ancillary tasks such as taking photos or drawing sketches. During discussion at TIG on 29 Oct, it became apparent that the purpose of the sketch, in place of a photo, was simply to allow the Supplier to enter the case into TDIS. It was clarified that a written report from a DN (no matter how good a quality or how detailed) would not be evidence enough for TDIS. Our engineers are not selected nor trained on the quality of their drawing skills and as such, sketches are likely to be rudimentary, at best, and may also need to be carried out by internal teams later, following receipt of the engineers written or verbal report.	and complexities that would arise from implementing the obligation as proposed on a mandatory basis, the Code Manager has changed the legal drafting accordingly. The updated proposed solution instead requires Network Parties to take a photo or a sketch on an “all reasonable endeavours” basis rather than a mandatory basis.

	 It is our view that the insistence on a sketch—even a rudimentary one (as above)—rather than a more detailed report, from a professional organisation, undermines the principle of evidence quality, and risks encouraging minimal compliance over substantive reporting. I.e. there is an unintended consequence risk that parties may prioritise the production of basic and rudimentary sketches to ensure compliance, over compiling more meaningful written reports. Our field devices already provide for engineers to enter free text (but not sketches), and the ability to provide a written report (as evidence of supplier responsible theft) would allow for a more seamless implementation. In addition, a requirement which enforces a rigid compliance standard (photo or sketch in 100% of cases) allows no lee way on the Transporter before they become non-compliant with the schedule. This cannot be good governance. We are aware that when the issue was first raised by Eon, they appear to have recognised that photos would not be available in every instance and seemed to provide for a solution in which reports from Transporters	

	(being from a “professional/reliable source”) should suffice for the purposes of TDIS. We would question why REC do not believe that the original solution provided by Eon is appropriate?	
Wales & West Utilities (WWU) Network Party	We do not support the solution as it is not practical. There should be a general carve out in these obligations regarding only doing something where it is safe to do so. We must ensure the safety of our colleagues. Theft related calls can be very hostile situations and obtaining evidence can aggravate these situations. The engineer’s responsibilities when attending such calls are safeguarding life and property and they will prioritise making the gas supply safe above all else. In doing this the engineer must turn their back on the customer in order to work on the equipment. This can put the engineer in a vulnerable position and therefore they will make safe as quickly as possible to reduce their risk. Requiring the engineer to produce a sketch of a suspected theft, in a van, after being in a potentially stressful situation and in wet weather conditions, is not practical. The quality of sketch would be inconsistent and unusable for the required purpose. To note, WWU engineers record data electronically for GDPR purposes. It is also not clear why a sketch provides more or better information than a written report. The benefit over a sketch is not made and therefore the proposal has no merit. WWU will not knowingly put their engineers in situations where personal safety is at risk, nor will it contravene safety procedures for the purpose	Thank you for your feedback. Based on this feedback, and other feedback from Network Parties detailing the operational challenges and complexities that would arise from implementing the obligation as proposed on a mandatory basis, the Code Manager has changed the legal drafting accordingly. The updated proposed solution instead requires Network Parties to take a photo or a sketch on an “all reasonable endeavours” basis rather than a mandatory basis.

	of obtaining evidence. We are prepared to fail a REC obligation rather than putting our people at unnecessary risk. Is there evidence of false claims being submitted to TDIS? Is there evidence of erroneous theft reports from GTs to Suppliers that requires such evidence being required?	
Scottish Power Energy Supplier	The solution is welcomed; obligating DNOs to take photographic or, if not possible, sketched evidence helps close a critical gap in supporting supplier claims under TDIS. However, we seek clarification on Minimum evidentiary standard. For consistency and to avoid dispute, guidance should define what constitutes adequate photographic or sketch evidence (e.g. Before/after images, meter serial number, visible bypasspoint).	Thank you.

Question 3:	Do you agree the proposed solution addresses the problem statement? If not, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution Network Party	Whilst we do not necessarily entirely agree with the practicalities of the proposed solution, we do agree that largely, the redlined text in the Change Proposal Report v1.0 would address the problem statement. That said, for the reasons stated in our answer to question 2, we do not feel that the provision of a sketch would be a practical or reliable alternative to the provision of a photograph. We feel that a detailed report in the absence of a photograph would be just as (if not, more so) beneficial than a sketch in the likely few occurrences that a photograph cannot be obtained.	Please refer to response to Q2.
Northern Gas Network Network Party	We agree with the problem statement.	Thank you.
Ovo Energy Supplier	Yes	Thank you.
Eon Next Energy Supplier	Yes, the proposed solution addresses the problem statement.	Thank you.
SSE Energy Supply Ltd Energy Supplier	Yes, SSE agrees the proposed solution meets the problem statement.	Thank you.
BUUK Network Part	Yes, in that we believe that reasonable steps should be taken to provide photos, which we are already doing, but we do not feel making a sketch a mandatory backup where a photo is not possible is a suitable option.	Please refer to response to Q2.

	If we are not able to gain access or are unsure where a meter is then a photo or a sketch would not be able to be provided.	
Anonymous Network Party	Yes, we believe this will address the problem statement and by utilising SDEP as the communication method, this would also allow for reporting to be available, providing useful data and insights relating to energy theft. However, this would only be possible if PT0075 process type was utilised as reporting is not available for queries raised via Contract Manager	Please refer to response to Q2.
Northern Powergrid Network Party	Yes, in principle. However, as noted in our response to Q2. the problem statement is not entirely correct. i.e. the purpose of the DNO's visit is not to make only the Metering Asset safe. The purpose of the visit is to ensure that all of the DNO's assets are not unsafe and/or are not being used in an unsafe way.	Please refer to response to Q2.
Anonymous Energy Supplier	Additionally, it should be considered as to if the confirmation of theft from a network party in itself can be considered as evidence. Engineers are experts in metering/ supply set ups and know what energy theft looks like. Parties already email suppliers from party email addresses to advise of theft itself. If suppliers then go to the site and the direct evidence of theft has been removed, but there are signs of possible previous interference (unproven suspicion) then a screenshot of the email from the network party should be considered as evidence of theft in absence of photos. Using this existing email mechanism, instead of insisting on signatures/ stamps of approval within networks will make this a less arduous process for network parties by not implementing the need for extra layers of governance/bureaucracy.	Please refer to response to Q2.

SGN Network Party	We agree with the problem statement.	Thank you.
SP Energy Networks Network Party	SPEN agree that the proposed solution addresses the problem where photographic evidence is obtainable, but as above we are not supportive of a manual sketch being mandated.	Please refer to response to Q2.
Cadent Network Party	Please see response to question 2	Please refer to response to Q2.
Wales & West Utilities (WWU) Network Party	No, we believe that the evidence requirements that enable Suppliers to make TDIS claims is the real issue and needs to be explored.	Please refer to response to Q2.
Scottish Power Energy Supplier	Yes, we agree that the proposed solution addresses the problem statement	Thank you.

Question 4:	Are there any alternate solutions that would better meet the needs of the problem statement?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution Network Party	If providing information on confirmed Energy Thefts to the Energy Theft Unit (ETU)/Referral Assessment Service (RAS) was to become compulsory, could consideration be given to the possibility of creating a central repository of information (including photographs) which Suppliers could then request to assist them with their TDIS applications? This would then mean that Network Parties would only have to upload the information once, rather than to the ETU/RAS and Suppliers separately, thus allowing multiple parties to benefit from the same upload of information whilst streamlining the required workload for Network Parties.	Please refer to response to Q2.
Northern Gas Network Network Party	NGN believes that a solution to the problem statement could be a statement to provide all obtainable evidence, which may or may not include photographic evidence depending on the situation experienced during the site visit.	Please refer to response to Q2.
Ovo Energy Supplier	No	Thank you.
Eon Next Energy Supplier	This solution gives code that the DNO/Networks need to produce photos for suppliers, to help suppliers not only achieving the TIS but this evidence is vital in prosecuting and in discussion with customers/complaints	Please refer to response to Q2.

SSE Energy Supply Ltd Energy Supplier	We are not aware of any at this time.	Thank you.
BUUK Network Part	It may be that where a photo is not taken, a more detailed report could be included with the option of attaching a drawing, rather than it being mandatory.	Please refer to response to Q2.
Anonymous Network Party	N/A	Thank you.
Northern Powergrid Network Party	Not aware of any.	Thank you.
Anonymous Energy Supplier	As stated in response to question 3, this in tandem with the photos would cover the majority of circumstances.	Thank you.
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.	Please refer to response to Q2.
SP Energy Networks Network Party	SPEN believe that the provision of photographic evidence is an acceptable solution, but believe that there is a requirement for a review of the TDIS to ensure appropriate evidence can be submitted where photographic evidence is not available, we are not supportive of the provision of a manually created sketch and would suggest that other options are available for the Supplier to be able to submit as support for theft identification submissions.	Please refer to response to Q2.
Cadent Network Party	Cadent do currently provide photos where available and will continue to do so. We believe that Eons original solution should be reinstated and as a professional organisation, our written reports of potential theft, in	Please refer to response to Q2.

	absence of a photo, should be deemed evidence enough for inclusion within the TDIS arrangements.	
Wales & West Utilities (WWU) Network Party	We believe that a written report will provide the necessary evidence where a photograph cannot be obtained for safety reasons	Please refer to response to Q2.
Scottish Power Energy Supplier	We do not propose any alternate solutions. However, to improve evidential consistency, we suggest an introduction of a simple evidence pack template (Photo, sketch, short field notes).	Thank you.

Question 5:	Do you think we have identified and considered all processes and scenarios that may be impacted through the implementation of the proposed change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution Network Party	We do not feel that the scenario of increased workload for Network Parties has been sufficiently and appropriately considered. The implementation of the proposed change would inevitably mean that Network Parties have to create new and/or amend existing procedures and processes to obtain the information that is required and deliver it to the correct Supplier on potentially thousands of occasions at no cost benefit. The fact that the possibility of making it an obligation upon Network Parties to do this is being deliberated suggests that the level of additional workload upon Networks may not have been duly considered.	Please refer to response to Q2.
Northern Gas Network Network Party	The implementation may have consequential impacts on other processes or scenarios. NGN is obligated to respond to reported gas emergencies by attending uncontrolled gas escapes within one hour and controlled escapes within two hours in over 99% of cases; exceeding the minimum performance requirement of 97%. Introducing additional administrative tasks, such as producing site sketches that may be misinterpreted, could jeopardise NGN's ability to meet these critical response obligations. NGN would welcome substantive supporting evidence that justifies the requirement to provide photographs for every site visit.	Please refer to response to Q2.

Ovo Energy Supplier	Yes	Thank you.
Eon Next Energy Supplier	Yes, As a Supplier we would welcome all the information to be passed accurately from the DNO to help us resolve the theft case from a supplier obligation. Without this change there is no obligation for DNOs to provide valuable information to the Supplier to enable them to investigate fully and to be able to record this correctly within our REC obligations. Providing photos at the point the DNO is on site will enable Suppliers to build a case for prosecution or to provide the right information to the new REC theft referral scheme.	Thank you.
SSE Energy Supply Ltd Energy Supplier	The suggested DNO obligation to take photographs of all suspected energy theft would cover all potential scenarios	Thank you.
BUUK Network Part	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.	The Code Manager has intentionally not mandated a means by which evidence may be shared outside of SDEP in order to allow Parties to reach mutually agreeable bespoke bi-lateral arrangements.
Anonymous Network Party	As mentioned above, clearly setting out an alternative means of communicating possible energy theft with photos other than SDEP to prevent unnecessary complexities	The Code Manager has intentionally not mandated a means by which evidence may be shared outside of SDEP in order to allow Parties to reach mutually agreeable bespoke bi-lateral arrangements.

Northern Powergrid Network Party	There should be a reciprocal obligation on Energy Suppliers i.e. if the Energy Supplier provides information as a result of the requirement in paragraph 6.10 of schedule 8, "Provision of Information from Energy Suppliers to Network Parties", the Energy Supplier should also include appropriate photographic evidence if a site visit has been made. We would propose that the relevant part of paragraph 6.10 reads: "… *the Energy Supplier shall provide such information, including photographic evidence or visual representation, not later than* …"	The Code Manager welcomes this feedback, and would encourage the respondent to raise this as a new issue for consideration, but regrets that this will not be considered within R0253 as it is deemed to be out of scope.
Anonymous Energy Supplier	Yes	Thank you.
SGN Network Party	There are additional processes to be considered as this change will not deliver the desired benefits as we can see issues arising with the quality of sketches and how they will be communicated back to the relevant party. We can see parties raising concerns about the content of the sketch as a sketch will be the individual's interpretation of the situation therefore two people may have opposing views. 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	Please refer to response to Q2.
SP Energy Networks Network Party	We have not identified any additional processes or scenarios.	Thank you.
Cadent Network Party	A 100% requirement for a photo or sketch, rather than the provision of a photo, where available, or a written report will have clear implications on internal operating processes. For instance, further work would be required to understand how this change will impact internal policies and	Please refer to response to Q2.

	procedures which would likely require updating following internal change control processes. There will be impacts upon internal systems, average job durations, data retention policies (inc deletion of photos etc), and engineer briefings/training. It isn't as simple as just saying "everybody has a phone these days so just take a photo".	
Wales & West Utilities (WWU) Network Party	There will be additional overheads and effort required by the back office due to procedural changes and the subsequent increase of workload for the back-office metering team in liaising with engineers and suppliers	Thank you.
Scottish Power Energy Supplier	[-]	-

Question 6:	What lead time would be required for your business to implement the proposed solution? Please provide justification.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution Network Party	Approximately 3-6 months. This is taking into consideration the time it would take to assess, plan and implement any new procedures required/amend existing practices, roll out training/education to those business areas that these new procedures would impact, and update internal policies in accordance with the implemented changes.	Thank you. The Code Manager will allow a 6 month lead time based on feedback from Party Impact Assessment respondents.
Northern Gas Network Network Party	A minimum of two months lead time to implement this proposed solution will be needed.	Thank you. The Code Manager will allow a 6 month lead time based on feedback from Party Impact Assessment respondents.
Ovo Energy Supplier	We would not require any lead time to implement the proposed solution	Thank you. The Code Manager will allow a 6 month lead time based on feedback from Party Impact Assessment respondents.
Eon Next Energy Supplier	None, as a supplier we would be able to upload a case as theft and complete the relevant investigation to complete accurate rebill of charges caused due to the theft.	Thank you. The Code Manager will allow a 6 month lead time based on feedback from Party Impact Assessment respondents.
SSE Energy Supply Ltd Energy Supplier	As this change is using SDEP, SSE would need no more than a month update our processes.	Thank you. The Code Manager will allow a 6 month lead time based on feedback from Party Impact Assessment respondents.

BUUK Network Part	We are already taking and providing photos where it is safe to do so.	Thank you. The Code Manager will allow a 6 month lead time based on feedback from Party Impact Assessment respondents.
Anonymous Network Party	3-6 months to allow the creation of internal documentation, process map, briefing packs and to deliver briefing sessions to the required teams	Thank you. The Code Manager will allow a 6 month lead time based on feedback from Party Impact Assessment respondents.
Northern Powergrid Network Party	3 months. To review and change process where necessary, brief out and embed.	Thank you. The Code Manager will allow a 6 month lead time based on feedback from Party Impact Assessment respondents.
Anonymous Energy Supplier	No lead time.	Thank you. The Code Manager will allow a 6 month lead time based on feedback from Party Impact Assessment respondents.
SGN Network Party	We would need a minimum of two months lead time to implement this proposed solution.	Thank you. The Code Manager will allow a 6 month lead time based on feedback from Party Impact Assessment respondents.
SP Energy Networks Network Party	SPEN would require a minimum of 6-month lead time.	Thank you. The Code Manager will allow a 6 month lead time based on feedback from Party Impact Assessment respondents.
Cadent Network Party	No timescales are proposed at the moment although outside of a winter period may be preferable. We would note that implementing this change may not be as straightforward as REC appear to believe as we have a large field force	Thank you. The Code Manager will allow a 6 month lead time based on feedback from Party Impact Assessment respondents.

	which will require briefings, potential system/device changes, impact on average job times etc.	
Wales & West Utilities (WWU) Network Party	6-months lead time would be required to brief engineers and to set up internal processes.	Thank you. The Code Manager will allow a 6 month lead time based on feedback from Party Impact Assessment respondents.
Scottish Power Energy Supplier	N/A	Thank you. The Code Manager will allow a 6 month lead time based on feedback from Party Impact Assessment respondents.

Question 7:	Are you aware of any constraints on when this change can be delivered?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution Network Party	No.	Thank you.
Northern Gas Network Network Party	No	Thank you.
Ovo Energy Supplier	No	Thank you.
Eon Next Energy Supplier	No, are not aware of any constraints and would welcome the change to be implemented as soon as possible.	Thank you.
SSE Energy Supply Ltd Energy Supplier	No	Thank you.
BUUK Network Part	No	Thank you.
Anonymous Network Party	No	Thank you.
Northern Powergrid Network Party	No	Thank you.
Anonymous Energy Supplier	No	Thank you.

SGN Network Party	No	Thank you.
SP Energy Networks Network Party	We have not identified any constraints on delivery of this, other than the time required to roll out training to staff and identify relevant resource.	Thank you.
Cadent Network Party	We would like to emphasise the complexity and large scale of change this would require internally, and the governance required to navigate the change as drafted. Allowing a written report, in absence of a photo, would make internal compliance simpler as we already provide these currently.	Thank you.
Wales & West Utilities (WWU) Network Party	No	Thank you.
Scottish Power Energy Supplier	At this moment, we have not identified any material constraints.	Thank you.

Question 8:	Do you foresee any risks to your MHHS implementation, qualification or migration plans caused by the delivery of this change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution Network Party	No.	Thank you.
Northern Gas Network Network Party Network Party	N/A	Thank you.
Ovo Energy Supplier	No	Thank you.
Eon Next Energy Supplier	No, we do not believe this would impact the MHHS programme.	Thank you.
SSE Energy Supply Ltd Energy Supplier	No	Thank you.
BUUK Network Part	No	Thank you.
Anonymous Network Party	No	Thank you.
Northern Powergrid Network Party	No	Thank you.
Anonymous Energy Supplier	No	Thank you.
SGN Network Party	N/A	Thank you.

SP Energy Networks Network Party	N/A – as a DNO we are already qualified and supporting migration to MHHS.	Thank you.
Cadent Network Party	N/A	Thank you.
Wales & West Utilities (WWU) Network Party	N/A	Thank you.
Scottish Power Energy Supplier	We have not identified any.	Thank you.

Question 9:	Would implementing the proposed solution incur any costs to your business? If so, please provide details breaking down design/build/test costs and on-going costs. If preferable, please indicate which of the below ranges your costs may fall:A) Nil; B) Up to £9,999; C) Between £10,000 and £49,999; D) Between £50,000 and £99,999; or E) more than £100,000.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution Network Party	B – Up to £9,999	Thank you.
Northern Gas Network Network Party	A - £0	Thank you.
Ovo Energy Supplier	A - £0	Thank you.
Eon Next Energy Supplier	No, it would save us as we are chasing for photos which is unproductive and causes duplication.	Thank you.
SSE Energy Supply Ltd Energy Supplier	B – Up to £9,999	Thank you.
BUUK Network Part	This is likely to be A – Nil	Thank you.
Anonymous Network Party	[No Response]	Thank you.
Northern Powergrid Network Party	A) No direct additional costs.	Thank you.
Anonymous Energy Supplier	A - £0	Thank you.

SGN Network Party	SGN has not identified any costs associated with this change.	Thank you.
SP Energy Networks Network Party	This change would incur additional costs to our business in terms of training and additional administration tasks relating to this process. We are at this point not able to commit to clear costs, however indicative costs would be 'up to £9,999'. Further work will be required to assess this figure.	Thank you.
Cadent Network Party	No detailed analysis on costs or a quantification of impact on internal process is available at the moment but a 100% requirement for a photo or sketch will clearly increase engineer and back-office staff costs, an increase in job duration, may potentially need upgraded equipment to process photos/sketches inc data storage/transmission etc	Thank you.
Wales & West Utilities (WWU) Network Party	Difficult to assess, but probably B to initially implement. If a workplace injury claim occurred as a result of this change then E would the low end of the impact.	Thank you.
Scottish Power Energy Supplier	Minimal costs are expected from a supplier perspective.	Thank you.

Question 10:	Do you identify any benefits to your business through the implementation of the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution Network Party	No. Whilst we fully understand the benefit of, and are wholly committed to tackling Energy Theft in whatever way we can, this Change would not offer any benefits to our organisation. In fact, there is likely to be a negative cost benefit for us as a Network Party if our interpretation of this Change Proposal and associated proposed solution is correct.	Thank you – This feedback has prompted the Code Manager to re-consider the proposed solution and make amendments as needed.
Northern Gas Network Network Party	None	
Ovo Energy Supplier	Yes, the provision of photographic evidence of energy theft will support Suppliers efforts to meet TDIS targets.	Thank you.
Eon Next Energy Supplier	This solution gives code that the DNO/Networks need to produce photos for suppliers, to help suppliers not only achieving the TDIS but this evidence is vital in prosecuting and in discussion with customers/complaints	Thank you.
SSE Energy Supply Ltd Energy Supplier	Additional theft details Improved data to calculate the volume of theft	Thank you.
BUUK Network Part	No, this would be BAU.	Thank you.

Anonymous Network Party	N/A	Thank you.
Northern Powergrid Network Party	Yes. Exchanging better information with the Energy Suppliers will be of benefit to all.	Thank you.
Anonymous Energy Supplier	Yes, currently ~90% of the tip-offs received from network parties can't be claimed as confirmed thefts in TDIS due to evidence being removed by DNOs and no evidence retained. Implementation will mean these TDIS costs can be recovered and that REC has a better view of all confirmed cases of theft in the data they hold, building a better understanding of theft at an industry level.	Thank you.
SGN Network Party	No	
SP Energy Networks Network Party	We have not identified any additional benefit to our business through the implementation of the proposed solution.	Thank you.
Cadent Network Party	No benefits identified just additional risk imposed on attending engineers and additional costs for no apparent benefit to Suppliers.	Thank you.
Wales & West Utilities (WWU) Network Party	No, GTs would only be negatively impacted.	Thank you.
Scottish Power Energy Supplier	The solution could serve to improve TDIS returns, faster decision making on confirmed energy thefts, improve sector reputation in tackling theft and reduction in disputes due to insufficient evidence.	Thank you.

Question 11:	Taking into consideration both the costs and the benefits seen by your organisation, do you consider this change should be made?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution Network Party	No.	Thank you.
Northern Gas Network Network Party	No, NGN already provides photographic evidence when it is safe to do so.	Thank you.
Ovo Energy Supplier	Yes	Thank you.
Eon Next Energy Supplier	Yes, we believe this would benefit both supplier and DNO when identifying theft to ensure that all documentation was evidenced correctly to be able to successfully prosecute people who are committing theft and for suppliers to effectively resolve any complaints effectively.	Thank you.
SSE Energy Supply Ltd Energy Supplier	SSE supports the implementation of this change	Thank you.
BUUK Network Part	Yes, we are already undertaking this work, though we don't agree with the sketch element	Thank you.
Anonymous Network Party	Yes	Thank you.

Northern Powergrid Network Party	Yes.	Thank you.
Anonymous Energy Supplier	Yes	Thank you.
SGN Network Party	No, however we are currently able to provide photographic evidence where available through other avenues other than SDEP.	Thank you.
SP Energy Networks Network Party	While we are supportive to this change in principle, we are not supportive of the provision of a manually created sketch. Our preference would be for photographic evidence or a statement.	Thank you.
Cadent Network Party	In its current form, this change should not be made. Were it amended to include photos, sketches **OR** written reports, we would be likely to support it for many of the reasons stated above, mainly the diminished value of a sketch over a written report.	Thank you.
Wales & West Utilities (WWU) Network Party	No, we believe this is the wrong solution to address the problem statement.	Thank you.
Scottish Power Energy Supplier	Yes, we agree this change should be made.	Thank you.

Question 12:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution Network Party	We would like to clarify that as a Network Party, our first concerns would be the safety of the equipment on site and the safety of our staff. Therefore, there are some instances where taking a photo will not be a priority, or may not even be possible. This could be the same in regards to producing a sketch as our engineers may not remember precise details when faced with a situation where their lives may be in danger and so may be unwilling to commit to submitting a potentially inaccurate sketch. For this reason, we do not feel that a mandatory obligation should be enforced on Network Parties to provide this information.	Please refer to response to Q2.
Northern Gas Network Network Party	We strongly believe that the details provided by our operators should be considered in circumstance where it is not safe to provide photographic evidence.	Please refer to response to Q2.
Ovo Energy Supplier	No	Thank you.
Eon Next Energy Supplier	No further comments.	Thank you.
SSE Energy Supply Ltd Energy Supplier	No.	Thank you.
BUUK Network Part	No.	Thank you.

Anonymous Network Party	The proposed addition to section 6 of REC Schedule 8, states: The Network Party shall make such photographic evidence or visual representation available to the relevant Energy Supplier upon request. What do you mean by 'upon request'? Is there a timeframe for how long photographic evidence should be available for? Would there be instances where an Energy Supplier could request evidence of a potential theft at times other than on the back of a reported theft notification received? Would there be the ability to request another photo? If they feel the one received is not up to standard ?	Please refer to response to Q2.
Northern Powergrid Network Party	No.	Thank you.
Anonymous Energy Supplier	This proposal appears to be straightforward. In the majority of circumstances, network parties will capture photographic evidence of theft and share it via email to the relevant supplier, alongside the standard notification that an instance of theft has been identified and resolved. Suppliers can be flexible regarding unsafe scenarios where the necessary speed of action prevents the taking of photographs. In such cases, email communication from the Network Party could serve as sufficient evidence of theft.	Please refer to response to Q2.
SGN Network Party	We strongly believe that a statement of fact from our First Call Operatives should be considered in those circumstance where we are not able to provide photographic evidence.	Please refer to response to Q2.

SP Energy Networks Network Party	None	Thank you.
Cadent Network Party	It isn't totally clear within the drafting that the requirement for a photo is following the **initial** site visit carried out for another purpose i.e GS(I&U)R, safety etc. It could be read that following a report from a member of the public, at a property with a supplier, that rather than pass this straight over to the supplier, the Transporter needs to attend site, take a photo and supply to the Supplier. Maybe the drafting just needs to be clearer.	Please refer to response to Q2.
Wales & West Utilities (WWU) Network Party	No	Thank you.
Scottish Power Energy Supplier	No further comments	Thank you.