RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0292 – ENERGY SUPPLIERS PHOTOS OF THEFT TO NETWORKS

On 21 August 2026 the Code Manager issued a consultation to industry to seek feedback on the Change Report (For Consultation) for R0292.

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	21 August 2026
RESPONSIBLE COMMITTEE	REC Change Panel
LEAD ANALYST	Caroline Freimuller

DATE CONSULTATION ISSUED	21 August 2026
RESPONSE DEADLINE	14 September 2026

Question 1:	Do you agree with the proposed solution? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK (DNO & IGT)	We agree with the proposed solution that has been put forward by the Code Manager, and acknowledge the positive changes made from the legal text that was presented in the Party Impact Assessment i.e. "Where the Energy Supplier (or its Revenue Protection Agent) becomes aware of any suspected" as opposed to "Where the Energy Supplier (or its Revenue Protection Agent) discovers or suspects" – this places a greater emphasis on the Energy Supplier to take action when needed.	Thank you for your comments.
E.On Next (Energy Supplier)	Yes, we do.	Thank you for your comments.
National Grid Electricity Distribution (DNO)	Yes. We agree with the proposed addition of a new clause within Schedule 8, that will see the obligations placed on DNOs as a result of the implementation of R0253 mirrored for Energy Suppliers.	Thank you for your comments.
SSE Energy Supply Limited (Energy Supplier)	SSE agrees with the proposed solution.	Thank you for your comments.
Utilita Energy (Energy Supplier)	In principle we agree with the proposed solution requesting photos be sent on request. However, the legal text states the photographs must be shared via SDEP without providing the specific means for this to be completed leaving this open to potential ambiguity and assumption.	Thank you for your comments. We will consider the need for any guidance of how to share via SDEP.

UK Power Networks (DNO)	Yes.	Thank you for your comments.
Northern Powergrid (DNO)	Yes.	Thank you for your comments.
SP Energy Networks (DNO)	Yes, SP Energy Networks are supportive of this change	Thank you for your comments.

Question 2:	Do you agree with the proposed implementation approach (Big Bang)? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK (DNO & IGT)	We agree with the 'Big Bang' Implementation Approach that has been suggested by the Code Manager and have no concerns with this being taken forward.	Thank you for your comments.
E.On Next (Energy Supplier)	Yes.	Thank you for your comments.
National Grid Electricity Distribution (DNO)	Yes, we agree that this is a suitable implementation approach.	Thank you for your comments.
SSE Energy Supply Limited (Energy Supplier)	Yes.	Thank you for your comments.
Utilita Energy (Energy Supplier)	Yes, due to there being no technical elements to this change big bang implementation is appropriate.	Thank you for your comments.
UK Power Networks (DNO)	Yes.	Thank you for your comments.
Northern Powergrid (DNO)	Yes.	Thank you for your comments.
SP Energy Networks (DNO)	Yes, we are supportive of the proposed implementation approach.	Thank you for your comments.

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**
BUUK (DNO & IGT)	W generally agree with the Code Managers assessment of the costs and benefits of the Change. We would emphasise that it is good practice to capture evidence of a suspected criminal offence at the earliest opportunity.	Thank you for your comments.
E.On Next (Energy Supplier)	Yes, we do.	Thank you for your comments.
National Grid Electricity Distribution (DNO)	Yes. We agree that implementation costs are likely to be minimal (if any) and there are a number of benefits to DNOs, as listed in the Change Report.	Thank you for your comments.
SSE Energy Supply Limited (Energy Supplier)	Yes.	Thank you for your comments.
Utilita Energy (Energy Supplier)	Yes.	Thank you for your comments.
UK Power Networks (DNO)	Yes.	Thank you for your comments.
Northern Powergrid (DNO)	Yes.	Thank you for your comments.
SP Energy Networks (DNO)	Yes, we believe that there should be minimal costs for this change.	Thank you for your comments.

Question 4:	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**
BUUK (DNO & IGT)	We agree that the Change should be subject to Self-Governance, mirroring *R0253 – Theft – DNO/Networks Not Providing Photos*.	Thank you for your comments.
E.On Next (Energy Supplier)	Yes.	Thank you for your comments.
National Grid Electricity Distribution (DNO)	Yes, Self-Governance approval is appropriate.	Thank you for your comments.
SSE Energy Supply Limited (Energy Supplier)	Yes.	Thank you for your comments.
Utilita Energy (Energy Supplier)	Yes.	Thank you for your comments.
UK Power Networks (DNO)	Yes.	Thank you for your comments.
Northern Powergrid (DNO)	Yes.	Thank you for your comments.
SP Energy Networks (DNO)	Yes.	Thank you for your comments.

Question 5:	Do you agree with the Code Manager's recommendation that this Change Proposal should be approved for implementation on 26 February 2027? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK (DNO & IGT)	We agree with the recommendation.	Thank you for your comments.
E.On Next (Energy Supplier)	Yes.	Thank you for your comments.
National Grid Electricity Distribution (DNO)	Yes, as long as there are no delays to the Proposal Plan. With the appeal window open until 16th December 2026, followed by the Christmas period, this is likely to leave only two months for parties to prepare for implementation. This is quite a tight turnaround time given that there were requests at the Impact Assessment stage for a lead-time of at least 3 months. That said, we should be able to make the necessary plans within the allocated timeframe in order to facilitate the implementation of this change at the earliest possible opportunity.	Noted. Thank you for your comments.
SSE Energy Supply Limited (Energy Supplier)	Yes.	Thank you for your comments.
Utilita Energy (Energy Supplier)	Yes.	Thank you for your comments.
UK Power Networks (DNO)	Yes.	Thank you for your comments.
Northern Powergrid (DNO)	Yes.	Thank you for your comments.

SP Energy Networks (DNO)	Yes, we are supportive of the implementation date of 26/02/2027.	Thank you for your comments.

Question 6:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK (DNO & IGT)	No further comments.	Thank you for your comments.
E.On Next (Energy Supplier)	Not at this time.	Thank you for your comments.
National Grid Electricity Distribution (DNO)	No further comments.	Thank you for your comments.
SSE Energy Supply Limited (Energy Supplier)	No.	Thank you for your comments.
Utilita Energy (Energy Supplier)	No.	Thank you for your comments.
UK Power Networks (DNO)	The intent of the change is fully supported. However, if the objective is to better facilitate identification, sharing of information, correction and recovery of energy theft, then the wording supporting provision of information to DNOs and GDNs should be much more aligned with the wording proposed for provision of information to Suppliers. Section 6 contains 9 x clauses concerning the provision of information by Network Operators to Suppliers and 6.4 in particular is very specific: "If the Network Party (or its Revenue Protection Agent) becomes aware of any suspected or actual incidence of Energy Theft which is not Theft in Conveyance, the Network Party shall ensure that the Supplier is notified of such incidence and provided with all relevant information…"	Thank you for your comments. The Code Manager believes the drafting is sufficient to allow the proper sharing of information where it is relevant to do so. The Code Manager welcomes examples from Parties where this may not be the case.

	We have only identified 1 x clause in respect of Suppliers passing information to Network Operators and 6.10 is demonstrably weaker in intent: “Where the Energy Supplier is providing information to the Network Party in respect of incidents arising as a result of Energy Theft, the Energy Supplier shall provide such information not later than the next Working Day…” Addressing this imbalance and ensuring a sufficiently overt requirement to notify DNOs and GDNs will better facilitate the mitigation of energy theft. Network Operators need confidence that they are reliably informed of actual or suspected Theft in Conveyance such that they can request the photographs being the subject of R0292 where not proactively sent.	
Northern Powergrid (DNO)	No.	Thank you for your comments.
SP Energy Networks (DNO)	No additional comments.	Thank you for your comments.