

DIF 77 and 78 Sub Group - Meeting 01

12 June 2025 at 14:00 - Web-Conference

Attendee	Company
Working Group Members	
Kathy Mullins [CM]	Eon Next
Clare Manning [CM2]	Eon Next
Komal Brown [KB]	Scottish Power Retail
Ladie Adekanle [LA]	Scottish Power Retail
Leah Read [LR]	Valda Energy
Charles Anarfi [CA]	SSE
Drew Johnstone (DJ)	NPg
Code Administrator	
Andy Green [AG]	Chair

1. Administration

Recording

- 1.1 The Chair asked members if they were comfortable for this Working Group to be recorded. No members objected to this request. The purpose of this recording is purely to aid the Technical Secretariat in producing an accurate report of the meeting. The recording will be deleted after 15 Working Days.

Competition Law Guidance and Terms of Reference

- 1.2 The Working Group reviewed the “Competition Law Guidance” and “Terms of Reference”. All Working Group members agreed to be bound by the Competition Law Guidance for the duration of the meeting and agreed to the Terms of Reference.

2. Purpose of the Meeting

- 2.1 The Chair set out that the purpose of the meeting was to walk through the high-level process steps for the two issue and then agree next steps.
- 2.2 He noted that DIF 77 was to tackle how the meter bypass notification process could be improved and similar DIF 78 was looking into the issues that generators being fitted can cause.
- 2.3 The Chair provided the Sub-Group with an update on both theses DIFs and noted that initially these were investigated via sperate DIFs, which were DIF 69 and DIF 70

3. DIF 77 Meter Bypasses

- 3.1 The Chair started by recapping on what the previous DIF for this issue had identified. He noted that an RFI had been issued, and it was highlighted that most meter bypasses take place because a customer has called the DNO because their meter has gone off supply.
- 3.2 Most cases were for PPM (pre-payment) or PAYG (pay as you go)meters and the engineers had identified that there was some form of vulnerability on site which meant the customer needed to be put back on supply quickly, so a bypass is carried out.
- 3.3 It was also highlighted that most of these appointments are raised out of normal hours.
- 3.4 The Chair noted that it had been identified during the previous discussion for DIF 70 that there was an Ofgem change in flight which was seeking to place an obligation on suppliers to have a 24-hour emergency service.
- 3.5 This change had since been implemented and is now live and forms part of a supplier’s licence conditions.
- 3.6 The Chair drew attention to the fact that RFI that was raised for DIF 70 mentioned that this obligation was coming however, some supplier parties that responded to the RFI noted that they already had a 24-hour emergency line yet were still seeing meter bypasses happening on non-faulty meters.

- 3.7 This meant that whilst this new license condition on suppliers is helpful, it wouldn't completely eradicate meter bypass installations.
- 3.8 The first part of the process discussed was what happens when a customer calls to report an issue with the meter. CM2 and KB stated that they'd take actions to discuss the questions that are asked when a customer calls to report loss of supply within their organisations.

ACTION 01/01: Sub-Group members to discuss internally what processes are followed and which questions are asked when a customer contacts them to tell them they are off supply.

- 3.9 As a lot of calls for loss of supply were driven by PPM or PAYG meters it was noted that the advice a customer is given when calling to raise an issue is key and as such, clear and incisive questions need to be asked.
- 3.10 It was also noted that during an appointment to investigate loss of supply, there is a second opportunity for these questions to be asked to ensure that a meter bypass happens only when it is the absolute last resort and that customers are given correct advice.
- 3.11 It was agreed to review the advice given on site visits as well.
- 3.12 The Sub-Group then discussed what happens once a meter bypass is completed.
- 3.13 It was agreed that when the bypass is completed, the engineer must be clear to the customer that a bypass has been carried out and that they must contact their supplier to have it removed.
- 3.14 It was also agreed that there should be some form of notice sent from the DNO to the supplier to inform the supplier that a bypass had been carried out.
- 3.15 It was noted that if a customer is informed clearly that a bypass has been carried out, and that they need to contact their supplier to have it removed as soon as possible, this would then protect a supplier from any potential billing standards or billing code risks, as the customer is aware that the bypass is only a temporary measure.
- 3.16 It was also stated that if the customer didn't contact the supplier, these should be handled using the theft procedures.
- 3.17 CM advised the Sub-Group that there are currently two notifications in SDEP that could be used by a DNO to inform a supplier when a bypass has been carried out. It was explained that these two notifications are PT0075 which is the theft electric notification and PT0076 which is the gas notification.
- 3.18 It was stated that these notifications are only available to certain market participants and that DNOs may not have access to send these messages. It was believed however that it wouldn't be a huge change in SDEP to make these messages available to all relevant parties.
- 3.19 It was also queried if it would be possible to have an SLA in place that would obligate a DNO having to send the notification within a certain number of days after the bypass had been completed. 5 working days was noted as a reasonable number of days for DNOs telling a supplier a bypass has been carried out on a site.

- 3.20 It was highlighted that the SDEP messages that had been noted, and any process to obligate an SDEP message being sent would require changes to the REC. It was also highlighted that if the messages aren't open for DNOs to use currently, the REC would also need to be involved in making the necessary changes.
- 3.21 An action was taken by AG, KB and LA to discuss the above with the REC report back to the DIF 77&78 Sub-Group on what the REC have advised.

ACTION 01/02: The Secretariat, KB and LA to contact the REC to discuss if the P0075 and PT0076 messages can be used for this process and if these messages are available to DNOs to send to suppliers.

- 3.22 It was also suggested that it would be useful if a card could be left on site with a customer when a bypass is carried out that explains the process the customer would need to follow to have the bypass removed.
- 3.23 A Sub-Group member also noted that it would be helpful if the engineer could take photos of the bypass and issue these with the SDEP notice so the supplier is clear on what work has been carried out by the engineer.
- 3.24 It was noted that any sort of guidance document to support parties in this process would need to be a cross-code endeavour rather than being drafted by one code. It was agreed to raise the creation of a guidance document with the REC to ensure the appropriate people are involved in any guidance that is given.

ACTION 01/03: The Secretariat to contact the REC and discuss the creation of a guidance document.

4. DIF 78 Use of Generators

- 4.1 KB opened this part of the Sub-Group by explaining the issue that generators being installed can cause.
- 4.2 It was noted that these mainly occur in the new connections process, particularly on larger housing developments where the developer wants to get customers into properties when the properties haven't been connected to the grid.
- 4.3 CA also highlighted that there are also cases of generators being fitted if there are major faults on site and in some rare cases, a generator can be fitted after theft has been identified and meters have been removed.
- 4.4 It was noted; however, that these are very rare and as the DNOs install these generators themselves, there is some awareness.
- 4.5 It was noted that there were two parts to this issue. The first one being it can impact settlements if the supplier isn't notified a generator has been fitted or removed. In some cases, the generator is removed, the site connected to the grid, but the supplier doesn't get informed and assumes that the site is still being powered by the generator.
- 4.6 This leads to customers getting free energy which can cause settlement issues in the future.

- 4.7 The second issue is of a health and safety nature as there is no guarantee that the generator can provide the required power to the site.
- 4.8 It was noted by CM that suppliers could change their processes and Ts and Cs to state that meters will not be fitted until the site is ready to be connected to the grid.
- 4.9 It was agreed that in the scenarios where a developer fits their own generator, the developer is well within their rights to fit a generator and doesn't have to really adhere to any processes within any energy codes. It was noted they'd still need adhere to health and safety codes, but the energy industry was very limited on what they could do to obligate developers to inform a supplier if and when they fit a generator.
- 4.10 It was highlighted that the REC are currently reviewing the end-to-end new connections process so this issue could be included in the REC review.

ACTION 01/04: The Secretariat to contact the REC and discuss this issue and if its anything that the end-to-end REC review of the new connections process could support.

- 4.11 It was suggested that an RFI into this issue to see if it was still a problem and how widespread it was could be useful.
- 4.12 It was agreed to wait for the REC conversation to take place though before sending any RFI to ensure that there isn't any crossover or duplication of work between the two codes.

5. Approach and Next Steps

- 5.1 The group agreed to reconvene after discussing these DIFs with the REC and so the next meeting date will be agreed via doodle poll.

6. Any Other Business

- 6.1 The Chair asked the group whether there were any other items of business to discuss. There were no other items raised.

7. Attachments

- Attachment 1 DIF 70_Collated RFI Responses
- Attachment 2 DIF 71 Collated RFI Responses

New and Open Actions

Action Ref.	Action	Owner	Update
01/01	Sub-Group members to discuss internally what processes are followed and which questions are asked when a customer contacts them to tell them they are off supply.	Chair	New Action
01/02	The Secretariat, AG and LA to contact the REC to discuss if the P0075 and PT0076 messages can be used for this process and if these messages are available to DNOs to send to suppliers	Chair	New Action
01/03	The Secretariat to contact the REC and discuss the creation of a guidance document.	Chair	New Action
01/04	The Secretariat to contact the REC and discuss this issue and if its anything that the end-to-end REC review of the new connections process could support.	Chair	New Action