

UNC Distribution Workgroup Minutes
Thursday 25 June 2020
via Teleconference

| Attendees | | |
|---------------------------|-------|------------------------|
| Alan Raper (Chair) | (AR) | Joint Office |
| Helen Bennett (Secretary) | (HB) | Joint Office |
| Kate Elleman | (KE) | Joint Office |
| Andy Clasper | (AC) | Cadent |
| Carl Whitehouse | (CW) | Shell Energy |
| David Mitchell | (DM) | SGN |
| Debbie Mulinganie | (DMu) | UK BP |
| Ellie Rogers | (ER) | Xoserve |
| Emma Bill | (EM) | Cornwall Insight |
| Gareth Evans | (GE) | ICoSS |
| Guv Dosanjh | (GD) | Cadent |
| India Koller | (IK) | SGN |
| Jon Dixon | (JD) | Ofgem |
| Kirsty Dudley | (KD) | E.ON |
| Lorna Lewin | (LL) | Orsted |
| Max Lambert | (ML) | Ofgem |
| Paul Youngman | (PY) | Drax |
| Phil Lucas | (PL) | National Grid |
| Rebecca Cailles | (RC) | BU-UK |
| Richard Pomroy | (RP) | Wales & West Utilities |
| Sally Hardman | (SH) | SGN |
| Steve Britton | (SBr) | Cornwall Insights |
| Steve Mulinganie | (SM) | Gazprom Energy |
| Tracey Saunders | (TS) | Northern Gas Networks |

Copies of all papers are available at: www.gasgovernance.co.uk/dist/250620

1. Introduction and Status Review

Alan Raper (AR) welcomed everyone to the meeting and introduced Kate Elleman (KE) from Joint Office who will be taking over this Workgroup going forward from July 2020.

AR explained some changes and additions to the agenda in terms of:

- Steve Mulinganie (SM) would like an AOB item to discuss an issue that arose at DNCMF.
- Andy Clasper (AC) would like an AOB for the GSR cut off process
- Under agenda item 4 (COVID-19 Issues), SM would like to discuss a potential new modification relating a Capacity Retention Process.

1.1. Approval of Minutes (28 May 2020)

The minutes from the previous meetings were accepted.

1.2. Review Outstanding Actions

KE addressed Workgroup and advised she would like to start adding the month in which actions are due to be reported in the actions table.

Action 1102: *NGIS Reports* - DNs to investigate internally and report back to Workgroup.

Update: Tracey Saunders (TS) confirmed this has now moved as an action for SM and ICoSS to discuss. **Closed**

Action 1202: Xoserve (DA) to assess the material effort to correct the formula for Class 3 and 4 New Supply Meter Points – reference AQ setting.

Update: ER advised priorities within Xoserve have been concentrating on COVID-19 related issues and agreed to report back to Workgroup in **August 2020**. **Carried Forward**

Action 0101: *NGIS Reports: (Action 1102):* SM will gather support and comments from ICOSS members and send email to all DNs directly.

Update: Similar to the update provided for Action 1102, this action is now closed. **Closed**

Action 0103: *Where requested the CDSP is required to pass a period of consumption data to an Incoming Shipper User when there is a Change of Tenancy (CoT):* DA to liaise with SM regarding the potential to raise a Change Request with Ofgem in relation to the specific data item.

Update: ER advised priorities within Xoserve have been concentrating on COVID-19 related issues and agreed to report back to Workgroup in **August 2020**. This action will be merged with action 0104. **Carried Forward**

Action 0104: *CDSP is required to pass a period of consumption data to an Incoming Shipper User when there is a Change of Tenancy (CoT):* All Shippers to provide an informal view to Xoserve for them to consider options.

Update: ER advised she is not aware of any feedback received from Shippers as yet and advised priorities within Xoserve have been concentrating on COVID-19 related issues and agreed to report back to Workgroup in **August 2020**. This action will be merged with action 0103. **Carried Forward**

Action 0601: *Review of Modification 0722 - Allow Users to submit Estimated Meter Reading during COVID-19:* CDSP (DA) to provide more detail in terms of how 'this' could work.

Update: ER advised CDSP have been looking at what the exit strategy might be for this Modification, the Interim Report, Reporting and how to show findings to the Industry.

ER explained that, during a Change of Supplier (CoS), if a supplier takes a Site on where reads have been submitted as estimated readings, she is looking at the provision of an Advice Note to advise the new Supplier estimated reads have been issued as actual readings.

Kate Elleman (KE) suggested the outline of what the intention is, is shared at the **July 2020** Distribution Workgroup.

This action will be merged with action 0602. **Carried Forward**

Action 0602: *Review of Modification 0722 - Allow Users to submit Estimated Meter Reading during COVID-19:* CDSP (DA) to start developing options

Update: The same approach will be used for this action as Action 0601. CDSP will provide an update to the **July 2020** Distribution Workgroup meeting.

1.3. Modifications with Ofgem

Max Lambert (ML) drew attention to the current status of the Modifications awaiting Ofgem direction:

0696V - Addressing inequities between Capacity booking under the UNC and arrangements set out in relevant NExAs

www.gasgovernance.co.uk/0696

and

0701 - Aligning Capacity booking under the UNC and arrangements set out in relevant NExAs

www.gasgovernance.co.uk/0701

Max Lambert (ML) advised that he was unable to provide an update for Modification 0696V and Modification 0701.

Jonathan Dixon (JD) added that Ofgem are looking at the issues that prompted Modification 0696 to be raised in the first instance. He added he is liaising with SM to discuss the timelines and appreciates this has already been outstanding for several months.

JD is confident Ofgem will be able to provide a clear position in time for the next panel UNC Panel in July 2020.

0687 - Creation of new charge to recover Last Resort Supply Payments

www.gasgovernance.co.uk/0687/

ML confirmed that as part of the June 2020 UNC Panel, Joint Office stated they would write to Ofgem asking for a date as to when they are likely to make a decision.

1.4. Pre-Modification discussions

No pre-modification discussions to be had.

2. Workgroups

2.1. 0697S – Alignment of the UNC TPD Section V5 and the Data Permissions Matrix

(Report to Panel 16 July 2020)

www.gasgovernance.co.uk/0697

2.2. 0710 CDSP provision of Class 1 read service

(Report to Panel 17 September 2020)

www.gasgovernance.co.uk/0710

3. UIG Update

FC provided an overview of the UIG update and explained the COVID-19 lockdown is going to be a major contributor to UIG for some time due to some sites consuming little or no gas and some sites consuming more gas than expected.

0723 – Use of Isolation Flag:

Talking through the graph shown on slide 4 of the UIG presentation, FC explained this shows around the middle of March 2020 physical isolations dropped sharply.

FC reminded Workgroup that there is no way of determining a COVID-19 based Isolation from a normal isolation.

The information on Slide 5 of the UIG presentation is provided to give an indication for how much AQ has been lost per LDZ.

SM asked how these figures compare with the drop in the market isolations shown on the previous slide. FC clarified that, potentially, there are a lot of Sites doing a fraction of their business and many businesses working on skeleton staff but still using worked on more than 2.5% threshold permitted by the modification (and hence would be eligible for Modification 0723 measures).

0722 - Submit Estimated Meter Reads as Actuals

Again, FC clarified there is no flag to identify an estimated-actual from an actual-actual meter reading.

In terms of settlement impact, once the reads start processing into reconciliation and Rolling AQ, if the reads are erroneous there is scope to give rise to UIG, either negative or positive depending on the degree of error.

FC explained that if a meter reading is lower than the next good actual meter read, following COVID-19, the system will reconcile and correct the energy position.

FC advised the graph on slide 7 shows the number of Class 4 meter reads per day, peaking at 800,000 on individual days, although 7 day rolling average values are much lower.

Under the terms of the modification, CDSP would expect to see an upward trend, as opposed to a downward trend, as shown on the graph. The graph is an indication of showing that this service is not being utilised very much.

The graph on slide 8 shows how UIG is trending, where you can see from the middle of March 2020 the widespread homeworking (18 March) is indicated.

FC went on to show the likely impact of the Urgent Modification and summarised:

- Modification 0722 triggers quicker reconciliation and has a minor impact on AQs.
- Modification 0723 addresses on the day and after the day UIG.
- Modification 0724 has no settlement impacts.

FC highlighted that Workgroup could expect UIG to continue to be volatile during and after lockdown and as NDM Allocation will not react as quickly as the usage changes, and noted that Shippers would need to correct/reverse actions taken under 0722 and 0723 rules.

FC concluded by advising the latest version for these slides are being updated and published on xoserve.com.

KD requested an update on the UIG Workgroup being disbanded and if the items still outstanding will be transferred to Distribution Workgroup.

AR advised that the approach is to try to close the development phase of long-running modifications and issue them to consultation before UIG Workgroup transfers to Distribution Workgroup.

New Action 0603: Joint Office (AR) to produce a handover plan for when UIG is disbanded and any items move from UIG to DWG.

4. COVID-19 Issues

AR reported that the initial Interim Report was provided to the June 2020 UNC Panel. AR sought comments from Panel Members in relation the report format, content, and any feedback on any other areas. An action was recorded at UNC Panel for Panel Members to provide any comments on the interim report to the Distribution Workgroup and Performance Assurance Committee by 25 June 2020.

It was noted that UNC Panel requested Workgroup to consider the exit strategy for each of the outstanding urgent modifications.

AR said that he is hoping to generate a bit more discussion to see if participants would like anything further added to this Interim Report.

Some participants offered their thoughts as to what could be included in the report of which are noted here:

- What is the effect on AQ and could a Formula Year AQ (FYAQ) calculation revision to the be a solution.
- What is the pathway to exiting from the modifications and how do we effect a return to normal running.
- How will the impact of not being able to track true individual sites consumption affect AQs.
- How will the FYAQ and Rolling AQ be impacted by using estimated reads rather than actuals.

AR agreed to redraft the Interim Report and republish it for Workgroup comments.

New Action 0604: Joint Office (AR) to re-draft the Interim Report, republish and request Workgroup comments.

New Action 0605: RP to return to Workgroup on 22 July with thoughts on the potential for a new modification regarding FYAQ.

4.1. Review of Modification 0722 - Allow Users to submit Estimated Meter Reading during COVID-19

AR continued to provide Workgroup with a recap of the outstanding urgent Modifications and advised that with regards to Modification 0722 (Urgent) – Allow Users to submit Estimated Meter Reading during COVID-19 and 0723 (Urgent) - Use of the Isolation Flag to identify sites with abnormal load reduction during COVID-19 period, upon looking at the data provided by Xoserve, although it appears that that both modifications are not experiencing excessive use.

AR advised it is difficult to identify if this is underlying bona-fide use or incremental use permitted under the modification. However, high-level analysis should at least reveal trends to allow some metrics to be reported back to UNC Panel in the next Interim Report.

4.2. Review of Modification 0723 – Use of the Isolation Flag to identify sites with abnormal load reduction during COVID-19 period

AR advised that information provided by Xoserve earlier in the agenda suggests this facility is not being widely utilised up and that current volumes would indicate there is not much requirement to put in place additional measures.

TS commented that now lockdown is starting to ease, isolation flags for those premises no longer covered by the restrictions imposed by the regulations should have their isolation flag removed.

AR advised he will update the Interim Report and publish it for further comment.

KE clarified that when the reporting is in a good state the metrics should be provided to PAC.

4.3. Review of Modification 0724 – Amendment to Ratchet charges during COVID-19 period

This item was discussed as part of the overall COVID-19 agenda item.

TS advised there was a challenge at UNC Panel on 18 June 2020 with reference to the intent of the modification should the site have a NExA in place. In view of this challenge, the following response was issued:

With reference to Modification 0724U Amendment to Ratchet charges during COVID-19 period, as proposer I can confirm that the intent of the modification, and the position from all Distribution Networks, is that the existence of a NExA would not be the sole cause for an application made under this modification to be rejected.

Ratchets charges are based on the Supply Point Capacity (SOQ), and should a site incur a Ratchet charge as a direct result of the conditions stated in the legal text for modification 0724U, then the Distribution Network would refund these charges in line with this same legal text.

It should be noted that NExAs can also contain specifications as to Supply Offtake Rate (SHQ) and the permitted rate of increase or decrease (ramp rates); although the modification gives relief from breaches of SOQ and hence any a corresponding SOQ breach in the NExA, breaches of SHQ or ramp rates would continue to be discussed with the site as required to ensure the integrity and safety of the Distribution Network's pipelines.

4.4. New Urgent Modification COVID-19 Capacity Retention Process

SM provided a brief overview of the intention of the Modification which is to allow supply points isolated in accordance with Modification 0723 (Urgent) - *Use of the Isolation Flag to identify sites with abnormal load reduction during COVID-19 period*, to be subject to a rebate of 50% of their LDZ Capacity Costs. In order to give the appropriate level of relief, SM suggested that wherever possible, the relief would be applied retrospectively from 01 June 2020.

There are some outstanding refinements required before the Modification can continue to be processed.

RP asked, in terms of reporting for Modification 0726 (Urgent) he is suggesting reporting to UNC Panel is the best place to do that.

AR confirmed Modification 0726 (Urgent) has been implemented and should report to UNC Panel at the first suitable opportunity.

5. CSS Consequential Changes – Detailed Design Report

This item was not covered.

6. Issues

Nothing raised at this meeting.

7. Any Other Business

7.1. Seasonal Normal Review Process (MP)

MP provided a reminder that the new Seasonal Normal basis will take effect from 01 October 2020. As a result of this the Composite Weather Variable (CWV) formula will change (to include Solar Radiation); the Seasonal Normal Composite Weather Variable (SNCWV) values will change; Class 3 and 4 NDM Nominations and Allocations will be using CWVs based on the new formula and the revised SNCWV values; all Rolling AQs / SOQs for Class 3 and 4 Supply Meter Points will reflect the new view of Seasonal Normal weather, either by calculating an AQ using reads submitted during September 2020 which will refer to revised Weather Adjusted Annual Load Profiles (WAALPs) or applying a Seasonal Normal Ratio to existing AQ where an AQ was not calculated during September 2020.

7.2. Mod 186 Reporting at DNCFM

SM referred the Workgroup to some information that was published at the recent DNCFM held on Tuesday 23 June 2020.

SM quoted from a slide presented by Cadent on the Key Update Collectable Revenue Trace.

At the meeting, SM advised that Cadent drew attention to a line item in the report for £3.9m that was referred to as a shipper portfolio change.

SM advised Workgroup that he would like an explanation as to how this has happened and specifically asked:

1. Is this effect replicated across other networks,
2. Which section of UNC has been applied to permit the action, and
3. Should the rules, as they are, have allowed the shipper to revise their AQ

ER advised that the reduction was as a result of the ability to amend an AQ within 3 months of taking on a new customer by applying UNC TPD Section G1.6.21(c), in conjunction with provision G1.6.24.

SM responded and said that under rules G1.6.21, an AQ can only be amended under very particular circumstances and he does not understand how a change of this magnitude would be allowed.

FC added it appeared that the incoming shipper took on a site where the previous shipper had not updated the AQ data, which resulted in an opportunity to amend the AQ.

JD advised that Ofgem could not offer any clarity but did confirm that Ofgem looked at this clause as part of Modification 0721 (Urgent). In terms of next steps, JD agreed Workgroup should request a response from transporters.

Workgroup asked if the rules have been used extensively by shippers to revise AQs.

AR asked if this is an active issue or has the peak passed / is it a closed event and if there is evidence that the rules are being applied and utilised as drafted.

When asked, FC clarified the changes were done as a one-off, Xoserve are not seeing similar volumes of AQ changes from the same Shipper or other shippers.

New Action 0606: Mod 186 Reporting at DNCMF: Xoserve and Gas Transporters to investigate the matter and provide a statement to the JO for publication to the Workgroup by 10 July 2020.

SM suggested that the matter should be investigated in a timely manner and agreed with a timeline that required a transporter statement by week ending 10 July,

7.3. GSR cut off process (AC)

Andy Clasper (AC) advised that as part of the GSR process, Cadent are sending a letter to Contract Managers to provide address details. He confirmed this does not have any impact on the SPAA GSR process.

AC added that DNs provide this service on behalf of Suppliers.

8. Diary Planning

Further details of planned meetings are available at: <https://www.gasgovernance.co.uk/events-calendar/month>

| Time / Date | Venue | Workgroup Programme |
|---------------------------------|----------------|--|
| 10:00, Thursday 23 July 2020 | Teleconference | Distribution Workgroup standard Agenda |

| Action Table (as of 25 June 2020) | | | | | | |
|-----------------------------------|--------------|------------|---|-----------------|---------------------|---------------------------------------|
| Action Ref | Meeting Date | Minute Ref | Action | Reporting Month | Owner | Status Update |
| 1102 | 28/11/19 | 6.3 | NGIS Reports - DNs to investigate internally and report back to Workgroup | | DNs | Closed |
| 1202 | 19/12/19 | 5.1 | Xoserve (DA) to assess the material effort to correct the formula for Class 3 and 4 New Supply Meter Points | August 2020 | Xoserve (DA) | Closed – see future agenda item table |
| 0101 | 23/01/20 | 1.2 | NGIS Reports: (Action 1102): SM will gather support and comments from ICOSS members and send email to | | Gazprom Energy (SM) | Closed |

| Action Table (as of 25 June 2020) | | | | | | |
|-----------------------------------|--------------|------------|---|-----------------|-----------------|--|
| Action Ref | Meeting Date | Minute Ref | Action | Reporting Month | Owner | Status Update |
| | | | all DNs directly. | | | |
| 0103 | 23/01/20 | 3.0 | <p><i>Impact of the lack of CoT Flag:</i></p> <p>DA to liaise with SM regarding the possibility of having to raise a Change Request to Ofgem, or, Shippers will not be provided the information.</p> <p><i>CDSP is required to pass a period of consumption data to an Incoming Shipper User when there is a Change of Tenancy (CoT):</i></p> <p>All Shippers to provide an informal view for Xoserve to be able to decide the best way forward</p> | August 2020 | Xoserve (DA/ER) | Closed – see future agenda item table |
| 0104 | 23/01/20 | 3.0 | <p><i>CDSP is required to pass a period of consumption data to an Incoming Shipper User when there is a Change of Tenancy (CoT):</i></p> <p>All Shippers to provide an informal view for Xoserve to be able to decide the best way forward</p> | August 2020 | | Now merged with 0103 |
| 0601 | 28/05/20 | 4.1 | <p><i>Solution options regarding notification to incoming Users and performance reporting (Modification 0722).'</i></p> <p>CDSP (DA) to provide more detail in terms of how 'this' could work.</p> <p>CDSP (DA) to start developing options</p> | July 2020 | CDSP (DA) | Closed – see future agenda item table |

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|-------------|----------|-----|--|-----------|------------------------------|-----------------------------|
| 0602 | 28/05/20 | 4.1 | <i>Review of Modification 0722 - Allow Users to submit Estimated Meter Reading during COVID-19:</i> CDSP (DA) to start developing options | July 2020 | CDSP (DA) | Now merged with 0601 |
| 0603 | 25/06/20 | | Joint Office (AR) to produce a handover plan for when UIG is disbanded and any items move from UIG to DWG | | Joint Office (AR) | Pending |
| 0604 | 25/06/20 | | Joint Office (AR) to re-draft the Interim Report, republish and request Workgroup comments | | Joint Office (AR) | Pending |
| 0605 | 25/06/20 | | RP to return to Workgroup on 22 July with thoughts on the potential for a new modification regarding FYAQ | | WWU (RP) | Pending |
| 0606 | 25/06/20 | | <i>Mod 186 Reporting at DNCMF</i> Xoserve and Gas Transporters to investigate the matter and provide a statement to the JO for publication to the Workgroup by 10 July 2020. | | Xoserve and Gas Transporters | Pending |

Future Agenda Items (Previous Actions)

| Action Ref | Agenda Item | Owner | Reporting Month |
|-------------------|---|--------------|------------------------|
| 1202 | Deriving Formula Year AQ for New Class 3 and 4 Supply Meter Points | ER | Aug 2020 |
| 0103 & 0104 | Change of Tenancy Flag / CSS issues | ER | Aug 2020 |
| 0601 & 0602 | Consider options for dealing with consequences of estimated-actual Meter Reads (Mod 0722) | ER | Jul 2020 |