

Record of Determinations: Panel Meeting 264 15 Oct2020

In favour	Not in Favour	Not Present	No Vote Cast
✓	X	NP	NV

Note definition of Defined Term "Panel Majority" in the Mod Rules 2.1.
FMR implementation votes should record either in favour or not present (or be blank) Mod Rules 9.4(b)

In favour	Not Present
✓	NP

Modification	Vote Outcome	Shipper Voting Members						Transporter Voting Members					IGT Voting Member	Consumer Voting Member	Non-Domestic Consumer Voting Member	Determination Sought
		AG	AG for DF	MB	MJ	RF	SM	DL	GD	HC	JF for RP	JF for TS	RC	LS	DM for NB	
Modification 0738 - Incremental NTS Entry Capacity Surrender	Not related to the Significant Code Review - unanimous vote against (13 out of 13)	X	NP	X	X	X	X	X	X	X	X	X	X	X	X	Does Modification 0738 impact a Significant Code Review?
	Is NOT a Self-Governance Modification - unanimous vote against (13 out of 13)	X	NP	X	X	X	X	X	X	X	X	X	X	X	X	Does 0738 meet the Self-Governance Criteria?
	Modification 0738 issued to Workgroup 0738 with a report by the 17 December 2020 Panel - unanimous vote in favour (13 out of 13)	✓	NP	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	Should Modification 0738 be issued to Workgroup 0738 with a report to be presented to the December Panel?
Modification 0739 - Aggregate overrun regime for Original Capacity held at the Bacton ASEPs	Not related to the Significant Code Review - unanimous vote against (12 out of 12)	X	NP	NP	X	X	X	X	X	X	X	X	X	X	X	Does Modification 0739 impact a Significant Code Review?
	Is NOT a Self-Governance Modification - unanimous vote against (12 out of 12)	X	NP	NP	X	X	X	X	X	X	X	X	X	X	X	Does 0739 meet the Self-Governance Criteria?
	Modification 0739 issued to Workgroup 0739 with a report by the 21 January 2021 Panel - unanimous vote in favour (12 out of 12)	✓	NP	NP	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	Should Modification 0739 be issued to Workgroup 0739 with a report to be presented to the 21 January 2021 Panel?
Request 0705R - NTS Capacity Access Review	Request 0705R to be extended by one year to October 2021 with an interim report in April 2021 - unanimous vote in favour (13 out of 13)	✓	✓	NP	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	Should Request 0705R be sent back to Workgroup for further consideration with an interim report April 2021 and final report October 2021?
Modification 0730 - COVID-19 Capacity Retention Process	Modification 0730 issued to consultation - unanimous vote for (13 out of 13)	✓	✓	NP	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	Should Modification 0730 be issued to Consultation, closing on 05 November 2020?
Modification 0731S - Introduction of an Annual Modification Panel Report	Legal Text requested for Modification 0731S - unanimous vote for (13 out of 13)	✓	✓	NP	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	Should Legal Text be requested for Modification 0731S?
Modification 0736 - Clarificatory change to the AQ amendment process within TPD G2.3	Legal Text requested for Modification 0736 - unanimous vote for (13 out of 13)	✓	✓	NP	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	Should Legal Text be requested for Modification 0736?
Modification 0664V - Transfer of Sites with Low Read Submission	New issues were raised during consultation - unanimous vote for (14 out of 14)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	Were any new issues identified during the consultation?

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In favour	Not Present
✓	NP

Modification	Vote Outcome	Shipper Voting Members						Transporter Voting Members					IGT Voting Member	Consumer Voting Member	Non-Domestic Consumer Voting Member	Determination Sought
		AG	AG for DF	MB	MJ	RF	SM	DL	GD	HC	JF for RP	JF for TS	RC	LS	DM for NB	
Performance from Class 2 and 3 into Class 4	Modification 0664V returned to Workgroup with a report to the December Panel - unanimous vote for (14 out of 14)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	Should 0664V be returned to Workgroup for further assessment with a report back to 17 December Panel?
Modification 0691S – CDSP to convert Class 2, 3 or 4 Supply Meter Points to Class 1 when G1.6.15 criteria are met	No new issues identified in Supplemental Report - unanimous vote against (14 out of 14)	X	X	X	X	X	X	X	X	X	X	X	X	X	X	Were any new issues identified during the Supplemental Report discussion?
	Modification 0691S to be implemented - majority vote for (11 out of 14)	✓	✓	✓	✓	✓	✓	✓				✓	✓	✓	✓	Should Modification 0691S be implemented? (Yes, votes only)
Modification 0710S - CDSP provision of Class 1 read service	No new issues were identified during consultation - unanimous vote against (14 out of 14)	X	X	X	X	X	X	X	X	X	X	X	X	X	X	Were any new issues identified during the consultation?
	Modification 0710S to be implemented - majority vote for (13 out of 14)	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	Should Modification 0710S be implemented? (Yes, votes only)

In favour	Not in Favour	Not Present	No Vote Cast
✓	X	NP	NV

Note definition of Defined Term "Panel Majority" in the Mod Rules 2.1.

FMR implementation votes should record either in favour or not present (or be blank) Mod Rules 9.4(b)

In favour	Not Present
✓	NP

UNC Modification Panel
Minutes of Meeting 264 held on
Thursday 15 October 2020
via teleconference

Attendees

Voting Panel Members:

Shipper Representatives	Transporter Representatives	Consumer Representatives
A Green (AG), Total Gas & Power M Bellman (MB), ScottishPower M Jones (MJ), SSE R Fairholme (RF), Uniper S Mulinganie (SM), Gazprom	D Lond (DL), National Grid NTS H Chapman (HC), SGN G Dosanjh (GD), Cadent J Ferguson (JF), Northern Gas Networks R Cailles (RC), BUUK	L Snoxell (LS), Citizens Advice D Mitchell (NB), Chemical Industries Association

Non-Voting Panel Members:

Chairperson	Ofgem Representative	Independent Supplier Representative
W Goldwag (WG), Chair	L King (LK)	(None)

Also, in Attendance:

B Fletcher (BF), Joint Office
D Addison (DA), Xoserve - CDSP Representative
H Ward (HW), Energy Assets
J Randall (JR), National Grid (agenda item 264.11)
K Jones (KJ), Joint Office
L O'Shaughnessy, Joint Office
N Wye, (NW), Waters Wye Associates Ltd (agenda item 264.8a)
R Clarke, Gemserv – IGT UNC Representative
R Hailes (RH), Panel Secretary
R Kealley (RK), British Gas (agenda item 264.14b)

S Britton (SB), Cornwall Insight

T Davis (TD), Barrow Shipping (agenda item 264.8b)

Record of Discussions

264.1. Introduction

The UNC Modification Panel Chair (WG) welcomed all attendees.

Post-meeting update

It was noted that Rebecca Cailles (RC) has formally replaced Alex Travell as the IGT Transporter Representative and Heather Ward (HW) and Brandon Rodrigues will be acting as alternates for Rebecca.

264.2. Note of any alternates attending meeting

Andrew Green for Dan Fittock

David Mitchell for Nigel Bradbury

Joanna Ferguson for Tracey Saunders and Richard Pomroy

Steve Mulinganie for Andrew Green (only for 0738 vote)

264.3. Record of apologies for absence

A Jackson , Gemserv – IGT UNC Representative

D Fittock, Corona Energy – Shipper Representative

E Rogers, Xoserve – CDSP Representative

L Heyworth (LH) Cornwall Insight

K Elleman, Joint Office

N Bradbury (NB), EIUG – Non-Domestic Consumer Representative

P Garner, Joint Office

R Pomroy, Wales & West Utilities – Transporter Representative

T Saunders, Northern Gas Transporter Representative

264.4. Minutes of the last meetings (17 September 2020)

Panel Members approved the minutes from 17 September 2020 subject to the minor amendments provided by Darren Lond in relation to agenda item 263.8 d) and the meeting day for Workgroup 0737.

264.5. Review of Outstanding Action(s)

Action PAN 04/11: Agenda Item 250.11 Code Administrator (JO) to draft a straw person template/dashboard showing Management Information for Modifications in flight for Panel to consider in January 2020. WG suggested that this was a good idea and would also allow the linkages with the Modification 0731S - *Introduction of an Annual Modification Panel Report* to be explored.

Update: R Hailes (RH) suggested that the update on this agenda item is deferred to the November meeting so that PG can provide an update.

Carried Forward to November

264.6. Issues log

RH confirmed that there are no current issues.

Meeting Date	Minutes Ref.	Issue	Issue Raised By	Status	Owner
		No current issues			

264.7. Urgent Modifications (Implementation Reporting)

a) Modification 0726 (Urgent) - COVID-19 Liquidity Relief Scheme

RH sought an update from Darren Lond (DL) as some of the take-up data from National Grid was not available at the September Panel meeting.

DL explained that it had been a timing issue in relation to the data availability in September and that the information had since been published.

Steve Mulinganie (SM) asked if the information relating to the industry parties that have sought relief from the scheme was confidential. He indicated that he had written to the Energy Balancing Credit Committee (EBCC) to understand if the information can be made available as Shippers will be required to underwrite the costs of any failed payments.

Joanna Ferguson (JF) reported that one organisation has defaulted on the first payment and that payments will be offset against invoice interest in the first instance to offset the debt and to minimise any 'pass through' occurring.

SM asked what the appropriate forum was to discuss this and whether it was EBCC, reiterating the importance of visibility of defaulting or failing companies and also of timely notification.

JF felt that EBCC was not appropriate as Transporter charges are not within the remit of the Committee. She agreed to consider this further in discussion with the other Transporters and Ofgem.

In response, to a question from the Panel Chair (WG) about whether generic anonymised data could be made available, JF indicated that discussions with Ofgem on reporting requirements was taking place and she would confirm what could be shared in due course.

Mark Bellman (MB) agreed with the points made by SM and suggested that information on how Shippers are managing solvency would be helpful.

JF indicated that this was considered as part of the Modification development suggesting that Ofgem would be best placed to respond as they are monitoring the scheme closely in both the gas and electricity sectors.

Liam King (LK) indicated that Ofgem would be undertaking a review of the effectiveness of this scheme in addressing liquidity issues and would feedback that Shippers would be interested in the outputs of this.

New Action PAN 10/01: Agenda Item 264.7: Northern Gas Networks (NGN) to provide an update on the reporting requirements of the COVID-19 Liquidity Relief Scheme discussed with Ofgem.

264.8. New, Non-Urgent Modifications

a) Modification 0738 - Incremental NTS Entry Capacity Surrender

Tim Davis (TD) introduced the Modification which aims to allow Users to surrender incremental NTS entry capacity allocated as a result of bids in entry capacity auctions in the period from April 2017 to September 2020.

TD explained that incremental capacity allocations based on the prices at the time had created user commitment but the implementation of Modification 0678A has retrospectively changed the prices and increase the materiality of user commitments.

He added that the solution in the Modification was vague to keep it simple with a one-off application opportunity and NTS having the discretion to accept/reject applications.

TD concluded his introduction by stating that there had been a pre-Modification discussion at Transmission Workgroup and Self-governance is being proposed because the value of incremental capacity available is not considered to be material.

DL was uncomfortable with the proposed governance and concerned that this Modification might set a precedence as every effort is made to make industry parties aware of the capacity charging regime. He, therefore, suggested that the Modification should follow Authority Direction.

TD disagreed with this view suggesting that small Shippers/Suppliers are not necessarily well informed.

SM agreed with DL and also expressed concern that this Modification could introduce a new principle allowing capacity hand back and suggested that Workgroup should seek to clarify this point and the appropriate governance arrangements.

LK advised that Ofgem were of the view that this modification should be Authority Direction.

Panel Members also suggested that one-month Workgroup development is not sufficient and that normally a minimum of three months is recommended but there was consensus that two months would be sufficient with a report presented earlier if it was practicable to do so.

Workgroup Questions:

1. Workgroup to consider whether the Modification satisfies the Self-Governance criteria.

For Modification 0738 Members determined (13 Panel votes were available for the determinations):

- It is not related to the Significant Code Review, by unanimous vote (13 out of 13).
- The criteria for Self-Governance were NOT met as the value of incremental capacity that could fall within the remit of this modification

proposal is likely to be material, by unanimous vote (13 out of 13). Modification 0738 will therefore follow Authority Direction procedures.

- That Modification 0738 be issued to Workgroup 0738 with a report by the 17 December 2020 Panel, unanimous vote (13 out of 13).

b) Modification 0739 - Aggregate overrun regime for Original Capacity held at the Bacton ASEPs

Nick Wye (NW) presented the Modification on behalf of ENI Trading & Shipping. He provided an outline of the Modification, its aims, the reasons for the change and the options that have been considered.

He highlighted that the background to this proposal lies with Modification 0501CV - Treatment of Existing Entry Capacity Rights at the Bacton ASEP to comply with EU Capacity Regs. NW explained that Ofgem's decision letter suggested that the aggregate overrun regime (referred to as the flexibility mechanism) proposed in Modification 0501CV better facilitated the relevant objective of security and effective competition between Shippers than Modification 0501V.

In addition, with the implementation of UNC 0678A, zero cost entry capacity has been removed, resulting in the need for this proposal.

Ofgem in its UNC 501CV decision letter encouraged industry to raise a further modification if there is a risk that future UNC changes would not allow for the existing market mechanisms to be used to flow flexibly at the current cost.

NW stated that the Proposer is recommending that this Modification does not meet the Self Governance criteria because it bestows unique rights for certain types of Entry Capacity which will result in benefiting Users not being required to acquire additional capacity at an ASEP where they hold sufficient qualifying Original Capacity at another.

Three months Workgroup assessment is being proposed.

Lauren Snoxell (LS) asked if the Workgroup could consider the benefits to consumers and if this leads to any cost displacement who would pick up the costs.

Workgroup Questions:

1. Workgroup to consider the benefits to Consumers and also to quantify the potential Consumer impacts.

For Modification 0739 Members determined (12 Panel votes were available for the determinations):

- It is not related to the Significant Code Review, by unanimous vote (12 out of 12).
- The criteria for Self-Governance were NOT met, as this Modification is likely to have a material effect on the commercial activities associated with gas transportation arrangements for Shippers, by unanimous vote (12 out of 12). Modification 0739 will therefore follow Authority Direction procedures.
- That Modification 0739 be issued to Workgroup 0739 with a report by the 21

January 2021 Panel, by unanimous vote (12 out of 12).

264.9. Existing Modifications for Reconsideration

a) Modification 0714 - Amendment to Network Entry Provision at Perenco Bacton terminal

DL provided an update on the Modification stating that National Grid continues to work with upstream parties and expects to report to the HSE by the end of November. It is likely that the HSE's determination could take a month and following this it would be with Ofgem for a decision. DL agreed to provide a further update in January 2021.

264.1. Workgroup Issues

None

264.2. Reports for Consideration

a) Request 0705R - NTS Capacity Access Review

Panel Members noted the Request Workgroup Report recommendations and the request for an extension to the Panel reporting date.

Panel Members discussed the request for an extension with some Members acknowledging the complexity of the review but expressing concern that an extension could potentially delay implementation of some areas of the review that could be implemented earlier and provide early benefits to industry parties.

Jennifer Randall (JR) assured Panel Members that the intention of the review was always to address issues as they were presented, discussed and developed by the Review Group. She confirmed that Modifications had been raised in relation to Overruns and reducing Entry User Commitment. Work was also progressing well on Exit User Commitment and Substitution for example. She stressed that as the products are developed the recommended changes will be progressed through Modifications.

Panel Members were reassured by this and reiterated the importance of Workgroup continuing the Review with this approach.

LK asked a general question about whether consumer impacts and benefits are also being considered as part of the review.

Panel Members asked that JR remind the Request Review Group to consider both the consumer benefits and impacts.

For Request 0705R, Members determined (13 Panel votes were available for the determinations):

- Request 0705R should be returned to Workgroup 0705R with an interim report in April 2021 and a final report by the October 2021 Panel, by unanimous vote (13 out of 13).

b) Modification 0730 - COVID-19 Capacity Retention Process

Panel Members noted the Workgroup Report recommendations

Rachel Clarke (RC) stated that following discussions between Anne Jackson and the Proposer, she was able to confirm that the Legal Text as drafted would not have a material impact on the IGT UNC. No equivalent IGT UNC Modification was, therefore, needed.

RH stated that Anne Jackson had raised a further comment in relation to the isolation flags suggesting that there would be no impact on IGT systems provided there was no additional flag for the purpose of this Modification.

DA stated that there is no specific flag for the purposes of this Modification.

For Modification 0730, Members determined (13 Panel votes were available for the determinations):

- Modification 0730 should be issued to consultation with a close out date of 05 November 2020, by unanimous vote (13 out of 13).

264.3. Consideration of Workgroup Reporting Dates and Legal Text Requests

Panel Members determined unanimously to extend the following Workgroup reporting date(s), recorded here with some additional data:

Modification number and title	Original Panel reporting date	Current Panel reporting date	Requested Panel reporting date	Reason for request to change Panel reporting date/Comments
0731S - Introduction of an Annual Modification Panel Report		Dec 2020	Nov 2020	No further Workgroup development required other than consideration of the Legal Text which will be completed to enable reporting to the November Panel.

DL commented on Modification 0737 and whether it should be located within Transmission Workgroup or NTS Charging Methodology Forum (NTSCMF). Fundamentally it is a capacity Modification with charging implications so it should sit with Transmission Workgroup. He acknowledged the reasons for why it was situated within NTSCMF and confirmed he was content for it to continue within NTSCMF.

There was also a brief discussion about whether 0705R should be a stand-alone Workgroup. Loraine O’Shaughnessy (LOS) stated that Transmission Workgroup had discussed this previously and agreed that it should stay within the Transmission Workgroup and that this will be reviewed periodically as required.

Panel Members discussed Legal Text requests and determined unanimously to make a deemed legal text request for the following Modification(s):

Legal Text Requests for Modifications
0731S - Introduction of an Annual Modification Panel Report
0736 - Clarificatory change to the AQ amendment process within TPD G2.3

In relation to Modification 0731S, Cadent confirmed that whilst they have had sight of the amended Modification the date for the last Workgroup meeting to discuss the Legal Text had not been set but they would use reasonable endeavours to provide the Legal Text in time.

In relation to Modification 0736 and 0736A, RH confirmed that deemed Legal Text is only being requested for 0736 as 0736A requires more development. Cadent confirmed that they were happy to progress Legal Text for 0736.

264.4. Consideration of Variation Requests

None

264.5. Final Modification Reports

a) Modification 0664V – Transfer of Sites with Low Read Submission Performance from Class 2 and 3 into Class 4

LOS briefly explained that this Modification had been discussed at the August Panel meeting and further information was sought before being issued to consultation at the September Panel.

LOS invited Mark Jones (MJ) as the proposer of the Modification to comment on the consultation responses. MJ confirmed that of the 3 representations received, 2 supported implementation, and 1 provided comments. MJ added that whilst Gazprom had provided support for the Modification in principle, this was subject to some further concerns being addressed. MJ apologised that the issue raised by Gazprom had been missed during the Workgroup discussions.

SM clarified that Gazprom had not supported Modification 0664 due to it discriminating between a situation where there is a single Shipper & Supplier relationship and a Shipper & multiple Supplier(s) or multi party model. SM welcomed the amendment to the Modification which recognises that the new Supplier should not be exposed to the failure of the previous Supplier. However, the amendment does not cover the multi-party model Specifically, where a Shipper provides services for multiple Suppliers the application of the Performance Measure at the Shipper level e.g. 90% of 25% may mean that a particular third party Supplier(s) performance may have an adverse impact on the other Supplier(s) using that Shipper i.e. other Supplier may be subject to sanction where in a Single Shipper & Supplier model they would not.

To mitigate this risk Gazprom noted that the performance test should be applied, in these circumstances, at the relevant Supplier level where the Shipper and Supplier are separate entities. This would ensure that a Supplier's treatment

would be consistent and non-discriminatory whether they are under a single Shipper/Supplier arrangement or where they fall under multi-party arrangements.

SM suggested that a further Workgroup meeting is needed to discuss this leading to a possible variation of Modification 0664V to ensure equity.

LOS confirmed that the Proposer SGN, has held discussions with the CDSP.

Dave Addison (DA) confirmed that this issue can be addressed through the planned systems changes without the need to update the ROM and incur any further delays.

MJ advised that this is likely to result in a further Variation to the Modification. Guv Dosanjh (GD) confirmed that Cadent will need to update the Legal Text once the Modification has been amended and suggested that 2/3 Workgroup meetings might be needed.

Panel Members reviewed the consultations and then determined (14 Panel votes were available for the determinations):

- That one new issue arose from consultation requiring a view from Workgroup, by unanimous vote (14 out of 14).
- Modification 0664V should be returned to Workgroup with a report to the December Panel, by unanimous vote (14 out of 14).

b) Modification 0691S - CDSP to convert Class 2, 3 or 4 Supply Meter Points to Class 1 when G1.6.15 criteria are met (Including Supplemental Report)

Panel discussion: see the Final Modification Report published at:

<https://www.gasgovernance.co.uk/0691>

LOS provided an update explaining that Modification 0691S was sent back to Workgroup by Panel in August to address questions raised during the consultation, these have been discussed at length during workgroup discussions and a Supplemental Report has been included in this report to provide additional information to provide Panel to make an informed decision.

Rhys Kealley (RK) pointed Panel Members to the three key questions raised and the additional information that had been included in the Supplemental Report. A lengthy discussion took place around the following areas and this was captured in the Final Modification Report:

- Dependency with Modification 0710
- Data quality risks and impacts on UIG
- Costs and benefits given that only 2 sites were in immediate scope.

LOS advised that no changes have been made to Solution or Legal Text by this review and Workgroup requested that Panel Members review the Supplemental Report and consider implementation of this Modification.

Panel Members then determined (14 Panel votes were available for the determinations):

- That there were no new issues identified in the Supplemental Report, by unanimous vote, (14 out of 14).
- To implement Modification 0691S, by majority vote (11 out of 14).

c) Modification 0710S - CDSP provision of Class 1 read service

Panel discussion: see the Final Modification Report published at:

<https://www.gasgovernance.co.uk/0710>

RH asked if an IGT UNC Modification was required and whether it can be developed in time.

RC confirmed that ESP would be raising the equivalent IGT UNC Modification and it is hoped to be discussed at the October IGT UNC Panel with 2 Workgroup meetings proposed for development. She asked what the driver was for the implementation date and whether the DSC Change Proposal document had been raised.

Dave Addison (DA) confirmed that DSC Change Proposal XRN5218 was under development.

There were no queries in relation to the Legal Text.

Panel Members then determined (14 Panel votes were available for the determinations):

- That there were no new issues requiring a view from Workgroup, by unanimous vote (14 out of 14).
- To implement Modification 0710S, by majority vote (13 out of 14).

264.6. AOB

a) Consideration of Alternative Modifications and Preference Voting

RH requested and Panel Members agreed to defer this topic until November.

b) Legal Text Guidance Document – Annual Review

RH stated that one response had been received from Anne Jackson. Hilary Chapman (HC) indicated that she had also sent comments.

Panel Members agreed to defer this agenda item to November to allow consideration of all the comments.

c) UNC User Representative Process – Update and Panel Feedback

RH stated that this item has been included on the Panel agenda in error and that it will be discussed as part of the UNCC meeting.

264.7. Date of Next Meeting

10:00, Thursday 19 November 2020, by teleconference.

Action Table (15 October 2020)						
Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update	Date of Expected update
PAN 11/04	21/11/19	250.11	Code Administrator (JO) to draft a straw man template/dashboard showing Management Information for Modifications in flight for Panel to consider in January 2020.	Joint Office (PG)	Carried Forward	November
PAN 10/01	15/10/20	264.7	Northern Gas Networks (NGN) to provide an update on the reporting requirements of the COVID-19 Liquidity Relief Scheme agreed with Ofgem.	NGN	Pending	November