

UNC Distribution Workgroup Minutes
Thursday 25 March 2021
via Microsoft Teams

Attendees		
Alan Raper (Chair)	(AR)	Joint Office
Helen Bennett (Secretary)	(HB)	Joint Office
Andy Clasper	(AC)	Cadent
Andy Knowles	(AK)	Utilita <i>(0758 only)</i>
Carl Whitehouse	(CW)	Shell Energy
Dan Simons	(DS)	Gemserv on behalf of PAFA <i>(pre-modification discussion only)</i>
Darren Lond	(DL)	National Grid <i>(0758 only)</i>
David Addison	(DA)	Xoserve
David Morley	(DM)	Ovo Energy
Ellie Rogers	(ER)	Xoserve
Fiona Cottam	(FC)	Xoserve <i>(0758 only)</i>
Fraser Mathieson	(FM)	SPAA/Electralink
Gareth Evans	(GE)	Waters Wye Associates <i>(0758 only)</i>
Guv Dosanjh	(GD)	Cadent
Hilary Chapman	(HC)	SGN
Jason Salmon	(JS)	Utility Warehouse
Jayne McGlone	(JMc)	Xoserve <i>(0758 only)</i>
Kate Lancaster	(KL)	Xoserve
Kirsty Dudley	(KD)	E.ON
Lorna Lewin	(LL)	Orsted
Louise Hellyar	(LH)	Total Gas & Power Ltd <i>(0758 only)</i>
Mark Bellman	(MB)	ScottishPower
Mark Jones	(MJ)	SSE
Mark Tolladay	(MT)	Correla on behalf of Xoserve
Michael Walls	(MW)	Ofgem <i>(0758 only)</i>
Naomi Anderson	(NA)	Utility Warehouse <i>(0758 only)</i>
Oorlagh Chapman	(OC)	Centrica
Owen Mason	(OM)	Bulb Energy
Rhys Kealley	(RK)	Centrica <i>(0758 only)</i>
Richard Pomroy	(RP)	WWU (0664V and AOB only)
Robert Johnstone	(RJ)	Utilita <i>(0758 only)</i>
Steve Britton	(SB)	Cornwall Insights
Steve Mulinganie	(SM)	Gazprom Energy
Tracey Saunders	(TS)	Northern Gas Networks

Copies of all papers are available at: <https://www.gasgovernance.co.uk/dist/250321>

1. Introduction and Status Review

Alan Raper (AR) welcomed everyone to the meeting.

1.1. Approval of Minutes (25 February 2021)

The minutes from the previous meetings were agreed.

1.2. Approval of late papers

AR advised Workgroup that all material for Workgroup to consider were received within the timeline set.

1.3. Review Outstanding Actions

Action 0201: *Modifications with Ofgem* - ML to consider and update Workgroup with the more detail around the strategy for *Modification 0687 - Creation of new charge to recover Last Resort Supply Payments*.

Update: AR invited Tracey Saunders (TS) to provide workgroup with an update. TS advised she has had discussions with Ofgem and has been informed they are looking to introduce something which will bypass Transporters and Shippers which will mean charging out to Suppliers directly instead of asking Transporters to recover costs through their formula revenue.

SM advised that REC is still some way off and there are still market failures and that electricity have already made the changes. He said that Ofgem need to decide upon the modification, either implement it or reject and wait for the REC.

AR suggested raising the issue at UNC Panel in April to see if more information can be drawn out. **Carried Forward**

1.4. Modifications with Ofgem

TS advised she was expecting an update on Modification 0701 - Aligning Capacity booking under the UNC and arrangements set out in relevant NExAs, and Modification 0696 - Addressing inequities between Capacity booking under the UNC and arrangements set out in relevant NExAs, from Ofgem as suggested at UNC Panel on 18 March 2021. AR confirmed that there was no representation from Ofgem at the meeting.

AR clarified that Modification 0730V - COVID-19 Capacity Retention Process, was rejected by Ofgem and the Notice of Non-Implementation has been published here: <https://www.gasgovernance.co.uk/0730>.

1.5. Pre-Modification discussions

1.5.1. Adding the Retail Energy Code Performance Assurance Code Manager as a new User type to the Data Permissions Matrix

Hilary Chapman (HC) confirmed the modification was not accepted at UNC Panel on 18 March 2021 as the modification is not time critical.

Dave Addison (DA) was invited to provide a walkthrough of the modification where the following areas were discussed:

Purpose

The Retail Energy Code (REC) Performance Assurance Committee will monitor the performance of REC parties performing activities specified under the REC. The UK Link system will provide a logical and efficient source of data to support the relevant Code Manager reporting. This Modification seeks to amend the UNC Data Permissions

Matrix (DPM) to add the Retail Energy Code Performance Assurance Code Manager as a new User type.

DA explained that within REC there are three Code Manager appointments and Xoserve have been approached to help the Performance Assurance Code Manager to develop their reporting pack.

DA confirmed there is no requirement for UNC Code to be changed, therefore, this is an enabling modification.

When Steve Mulinganie (SM) asked if the intention is for the Performance Assurance Code Manager to have access to real data before REC is implemented, DA advised the Performance Assurance Code Manager wants to be able to develop the reports in advance of 01 September 2021, in order to do that they will need to be in receipt of real data.

ER clarified that; exactly what data the Performance Assurance Code Manager is allowed to access is controlled through the DSC Contract Management Committee.

TS clarified from a UNC Panel perspective, as the Performance Assurance Code Manager is not yet to be appointed, she is not sure there can be agreement to allow access to data to someone that is not formerly in place.

There then followed a discussion where the merits of simply introducing REC Co as the entity contracting for the data, and manage the data release through a DRR managed by DSC Contract Management Committee or being more specific and introducing the Performance Assurance Code Manager. It was noted that other Code Managers may be introduced via the Significant Code Review route in due course.

After the discussion, DA said that he is considering a more generic insert into the DPM and that may be the RECCO which is a physical entity and then control through the DRR would be a better solution.

AR noted this could be a relatively short-term problem.

SM noted that REC should not be able to see all the data as some of it is sensitive.

HC confirmed she supports the approach of giving authorisation to REC Co not individual REC Code Managers.

It was confirmed this modification has an IGT UNC cross code impact and there is a sponsor in place to raise that modification to IGT.

When asked, DA confirmed that he expected that giving permission to the RECCO for data requests will be covered within GT-D as part of the Ofgem Switching Programme SCR UNC text to for REC version 2.

Why Change

- The Retail Energy Code (REC) intends to monitor the performance of the REC parties. The UK Link system provides a logical source for reporting to support assessment of activities that are defined in the REC.
- The REC Performance Assurance Code Manager (REC PACM) has recently been appointed so is still developing the reporting framework but intends to have this

defined and established ready for Retail Code Consolidation (REC v2) in September 2021.

- In order to support the development of these reports REC PACM needs to be added to the DPM prior to September 2021.
- In line with UNC Legal Text implemented for Modification 0649S - Update to UNC to formalise the Data Permissions Matrix, a new Modification is needed to add a new User type to the DPM.

Options

- There is only one option which is to add the REC PACM to the Data Permissions Matrix as a new User type.
- The REC PACM will also be added to the Data Permissions Matrix Conditionality Document as a new User type.

Solution

- There is no change required to the actual UNC as a result of this Modification.
- This Modification will add the REC PACM to the Data Permission Matrix.
- The Data Permissions Matrix is the framework that permits the CDSP to release data to specific named parties. The actual data the User type can access will be set out and agreed by DSC Contract Management Committee.

Recommended Steps

The Proposer recommends that this modification should be:

- Subject to self-governance
- Workgroup assessment to develop the modification for 2 months.

1.5.2. Review of Gas Meter By-Pass Arrangements

Dan Simons (DS) (Gemserve on behalf of PAFA) introduced the Review of Gas Meter By-Pass Arrangements by advising the purpose of the request is to seek approval for a review of the current gas Meter By-Pass arrangements under the UNC.

Why Change

DS explained there is a risk on the Performance Assurance Committee (PAC) Risks and Issues register relating to gas meter by-passes and their potential impact on the accuracy of settlement. The risk relates to gas meter by-passes being left open, as this would allow consumption to by-pass the meter without ever being recorded.

At the direction of the PAC, Xoserve carried out some initial analysis and took a look at data between July 2020 and January 2021. This showed there is somewhere in the region of 13k meters with by-passes recorded in UK Link with a status of open, or closed, some going back as far as 2004. A further exercise was also carried out with

data sets issued to all Shippers in October 2020 for sites with a by-pass recorded in UK Link.

Shippers were then asked to investigate any with an open bypass and a sample of those with a closed bypass.

Some responses were received which resulted in status updates in UK Link, however, overall the response rate was fairly underwhelming.

However, this did highlight a general lack of clarity in relation to the processes around Meter Bypasses and what was supposed to happen and when.

Consequently the PAC are concerned that there may be a risk to settlement accuracy and unidentified gas (UIG).

Steve Mulinganie said that it might aid understanding if DS provided Workgroup with some context and background to meter by-passes.

Background and context

DS explained that a Meter By-pass is a fitting that allows the flow of gas to be diverted so that it does not pass through the gas meter . Typically a meter by-pass would be fitted in the event of some kind of meter issue or to allow work on the meter to take place without interruption to the gas supply.

The circumstances in which a by-pass would be fitted are limited so do not apply to all metering work and all premises, normally this would be specific sites where the flow of gas needs to be maintained. i.e. hospitals, nursing homes, schools, homes for the elderly or vulnerable, etc.

For a by-pass to be fitted, approval is sought and obtained from the Gas Transporter, where a by-pass is installed it is then the Shipper's responsibility to update UK Link.

While the by-pass is open, any gas used will not pass through the meter and be recorded, consequently when the by-pass is then closed, the Shipper should update UK Link and also provide a consumption adjustment for the period that gas was not being recorded through the meter.

Scope

In terms of the scope it is proposed the review should:

- Firstly look at the existing Meter By-Pass arrangements as defined in the UNC.
- Secondly, to consider the accuracy of Meter By-Pass data recorded within industry systems such as UK Link.
- Arrangements in other codes might need to be considered as well such as SPAA, RGMA, MAMCoP and REC.

Questions

DA asked why it is a UNC matter, DS advised that UNC describes that a meter by-pass can exist and when opening them and closing what you need to do, although it was noted that there may be no change required to UNC at all.

RP commented he was surprised about the number of supply points that had by-passes fitted and is wondering whether permission should be granted on a time limited period.

KD asked if this is expected to extend to IGT UNC, explaining whereas the volume of sites impacted is much lower, she said it feels right to include them.

AR suggested discussions could be held in one place and that the invitation to the Review Group will be extended to IGT.

DS confirmed it is his intention to present this to the April 2020 UNC Panel meeting for direction to get a Review Group set up. He will send in the Request and Joint Office will critically friend it.

2. Workgroups

2.1. 0734S – Reporting Valid Confirmed Theft of Gas into Central Systems

(Due to report to Panel 15 April 2021)

<https://www.gasgovernance.co.uk/0734>

2.2. 0746 - Clarificatory change to the AQ amendment process within TPD G2.3

(Due to report to Panel 15 April 2021)

<https://www.gasgovernance.co.uk/0746>

2.3. 0664V - Transfer of Sites with Low Valid Meter Reading Submission Performance from Classes 2 and 3 into Class 4

(Due to report to Panel 15 April 2021)

<https://www.gasgovernance.co.uk/0664>

2.4. 0758 - Temporary extension of AUG Statement creation process

(Due to report to Panel 15 April 2021)

<https://www.gasgovernance.co.uk/0758>

3. COVID-19 Issues

AR clarified that Modification 0730V - COVID-19 Capacity Retention Process, was rejected by Ofgem and the Notice of Non-Implementation has been published here: <https://www.gasgovernance.co.uk/0730>.

4. CSS Consequential Changes – Detailed Design Report

DA confirmed that following the detailed walkthrough of the changes to the Central Switching System Legal Text at Workgroup in February, the Legal Text has now been provided to Ofgem and the consultation will commence on 31 March 2021 and will close mid-July 2021.

5. Issues

None raised.

6. Any Other Business

6.1. Significant Measurement Error Notification EM009 - Alrewas EM MTD

AR advised he was asked to add this to the Distribution Workgroup for awareness and invited Guv Dosanjh (GD) to provide an overview.

GD advised the first Workgroup was held on 15 March 2021 where two decisions were made, the nomination of the Independent Technical Expert and the Terms of Reference were confirmed.

The error is in relation to the Alrewas EM Offtake which supplies gas to the East Midlands LDZ.

On 23 February 2021, the plate was removed for inspection and was found to have been installed in the incorrect orientation. The plate was subsequently changed with the new plate being inserted with the correct orientation.

A date for the next Workgroup has been provisionally held for 27 April 2021.

AR confirmed that discussions are being held under the Offtake Arrangements Committee and that a further updated will be provided at the next Distribution Workgroup as a standard agenda item, noting that sometimes there might not be anything to report.

New Action 0301: *Significant Measurement Error Notification EM009 - Alrewas EM MTD-* Joint Office to add this topic to the next agenda.

6.2. Assessment of draft 2021-22 AUGE Statement against the Framework for the Appointment of an Allocation of Unidentified Gas Expert

Item covered as part of Modification 0758 discussions.

6.3. November '21 Release Supporting Document Updates

James Barlow (JB) provided a reminder to Workgroup what is changes will require review over the next couple of months:

UNC Validation Rules

- XRN5072 - Application and derivation of TTZ indicator and calculation of volume and energy – all classes.
- XRN5180 - Inner Tolerance Validation for replacement reads and read insertions.

JB advised these changes are currently in detailed design and the Detail Design Change Packs are due to be issued in March for XRN5072 and April for XRN5180.

XRN5180 was previously presented to this group in July 2020.

The UNC Validation Rules will be updated to reflect the changes proposed and presented to this group in May 2021. Based on the support of this Workgroup, the updated document will be presented to UNCC in June 2021 for approval. Once approved, the updated version will have its effective date aligned to the implementation date of the release.

UK Link Manual

- XRN5007 - Correction in the reconciliation process when volume is zero.

JB advised this was presented to this Workgroup, and UNCC, in May 2020 for guidance on how to document the proposed methodology. The recommendation from UNCC was to add the methodology to the UK Link Manual. Therefore, it is proposed that a new guidance document is created as part of section 4 of the UK Link manual. This guidance document will be issued for review, via change pack, during the delivery phase of the November 2021 release.

6.4. MAP ID's

SM asked for an understanding of the consequential actions arising from MAP IDs and asked if there is a risk this might identify meter points on unregistered sites?

DA confirmed that it could be the case when it is indicated there is an asset which has been in situ.

New Action 0302: *MAP ID's* - Joint Office to add this topic to the next agenda.

On a related point, KD clarified PPMIP in SPAA was rejected.

6.5. Mod 425 reports

SM raised the concern there is a delay which is generating CMS notifications of site visits in 2019 being raised on CMS in Feb/March this year with no explanation as to why these are

relating to issues that go back 2 years. DA asked for SM to send him an example and this will be placed on the next agenda for Distribution Workgroup.

New Action 0303: *Site Visits (Mod 425 Reports)* - SM to forward examples of the CMS notifications in question.

New Action 0304: *Site Visits (Mod 425 Reports)* - Joint Office to add this topic to the next agenda.

6.6. Submission of more reads into Central Systems

SM advised there were limits of how many reads can be submitted set in UK Link from Project Nexus. SM is asking what the extent is to which those limits set are relevant as Gazprom Energy would like the ability to submit more reads than the limit set. He also asked if the limits set are still suitable?

SM added that assurances were made at Nexus implementation that read volume limits could be amended.

New Action 0305: *Submission of more reads into Central Systems* - Xoserve (DA) to review the limits that are currently set in order to assess if the limit is still relevant; suitable and can be changed.

New Action 0306: *Submission of more reads into Central Systems* - Joint Office to add this topic to the next agenda.

7. Diary Planning

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

Time / Date	Venue	Workgroup Programme
Thursday 10:00 22 April 2021	Teleconference	Distribution Workgroup standard Agenda
Thursday 10:00 27 May 2021	Teleconference	Distribution Workgroup standard Agenda
Thursday 10:00 24 June 2021	Teleconference	Distribution Workgroup standard Agenda
Thursday 10:00 22 July 2021	Teleconference	Distribution Workgroup standard Agenda
Thursday 10:00 26 August 2021	Teleconference	Distribution Workgroup standard Agenda
Thursday 10:00 23 September 2021	Teleconference	Distribution Workgroup standard Agenda
Thursday 10:00 28 October 2021	Teleconference	Distribution Workgroup standard Agenda
Thursday 10:00 25 November 2021	Teleconference	Distribution Workgroup standard Agenda
Thursday 10:00 13 December 2021	Teleconference	Distribution Workgroup standard Agenda

Action Table (as of 25 March 2021)						
Action Ref	Meeting Date	Minute Ref	Action	Reporting Month	Owner	Status Update
0201	25/02/21	1.4	Modifications with Ofgem: ML to consider and update Workgroup with the more detail around the strategy for <i>Modification 0687 - Creation of new charge to recover Last Resort Supply Payments.</i>	March April 2021	Ofgem (ML)	Carried Forward
0301	25/03/21	6.1	<i>Significant Measurement Error Notification EM009 - Alrewas EM MTD-</i> Joint Office to add this topic to the next agenda.	April 2021	Joint Office	Pending
0302	25/03/21	6.4	<i>MAP ID's</i> - Joint Office to add this topic to the next agenda.	April 2021	Joint Office	Pending
0303	25/03/21	6.5	<i>Site Visits (Mod 425 Reports)</i> - SM to forward examples of the CMS notifications in question.	April 2021	Gazprom Energy (SM)	Pending
0304	25/03/21	6.5	<i>Site Visits (Mod 425 Reports)</i> - Joint Office to add this topic to the next agenda.	April 2021	Joint Office	Pending
0305	25/03/21	6.6	<i>Submission of more reads into Central Systems</i> - Xoserve (DA) to review the limits that are currently set in order to assess if the limit is still relevant; suitable and can be changed.	April 2021	Xoserve (DA)	Pending
0306	25/03/21	6.6	<i>Submission of more reads into Central Systems</i> - Joint Office to add this topic to the next agenda.	April 2021	Joint Office	Pending

UNC Workgroup 0734S Minutes
Reporting Valid Confirmed Theft of Gas into Central Systems
Thursday 25 March 2021
via Microsoft Teams

Attendees		
Alan Raper (Chair)	(AR)	Joint Office
Helen Bennett (Secretary)	(HB)	Joint Office
Andy Clasper	(AC)	Cadent
Carl Whitehouse	(CW)	Shell Energy
David Addison	(DA)	Xoserve
David Morley	(DM)	Ovo Energy
Ellie Rogers	(ER)	Xoserve
Fraser Mathieson	(FM)	SPAA/Electralink
Guv Dosanjh	(GD)	Cadent
Hilary Chapman	(HC)	SGN
Jason Salmon	(JS)	Utility Warehouse
Kate Lancaster	(KL)	Xoserve
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Lorna Lewin	(LL)	Orsted
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Mark Jones	(MJ)	SSE
Mark Tolladay	(MT)	Correla on behalf of Xoserve
Oorlagh Chapman	(OC)	Centrica
Owen Mason	(OM)	Bulb Energy
Richard Pomroy	(RP)	Wales & West Utilities
Steve Britton	(SB)	Cornwall Insights
Steve Mulinganie	(SM)	Gazprom Energy
Tracey Saunders	(TS)	Northern Gas Networks

Copies of all papers are available at www.gasgovernance.co.uk/0734/250221

The Workgroup Report is due to be presented at the UNC Modification Panel by 15 April 2021.

1.0 Introduction

Alan Raper (AR) welcomed all to the meeting.

1.1. Approval of Minutes

The minutes from 25 February 2021 were approved.

1.2. Approval of Late Papers

AR advised that an amendment to the modification was submitted late and Workgroup agreed to accept it.

1.3. Review of Outstanding Actions

Action 0201: DA to liaise with SM/FM in order to provide wording for suggested Business Rule to cover how the consumption adjustment process needs to work in this scenario.

Update: FM confirmed this is in the latest version of the modification. **Closed**

Action 0202: DM to request that their lawyer have a provisional look at legal text to see how the new BR could apply to a consumption adjustment when no actual meter readings are available.

Update: Hilary Chapman advised this is in progress. **Carried Forward**

2.0 Consideration of amended Modification

Referring to the amended modification submitted for Workgroup to review, which will be v4.0, FM advised Workgroup that the modification has been updated to reflect Workgroup discussions held on 25 February 2021 and proceeded to walkthrough the changes, the following areas were discussed:

What?

The sentence relating to carrying out AQ corrections was removed as this had not ultimately been specified in the business rule, but may be an area parties wish to consider in relation to confirmed theft in future.

Solution

Business Rule 3, the group were advised the Shipper objection window was changed to from 20 to 15 Supply Point System Business Days, following agreement at the February Distribution Workgroup that 15 days which was felt to balance the need for Shippers to have an opportunity to object while working within the anticipated monthly output from TRAS/REC.

Business Rule 4 which relates to reporting outputs to the PAC, it was decided at the February Distribution Workgroup that the relevant PARR report would not be specified in the legal text so as to maintain some flexibility in terms of what goes into the PARR. FM noted the PAFA had provided a draft specification for a PARR report which was published with the meeting papers.

FM advised that some high-level wording would be required in Business Rule 4 to ensure an output can be provided to PAC, and suggested the following wording:

'Relevant data shall be retained by the CDSP and made available to the PAC according to the PARR report specification as agreed and as may be amended from time to time by the PAC'.

Workgroup agreed with this wording.

Business Rule 5

FM noted this Business Rule is the core of the modification as its intention is to ensure confirmed theft volumes are entered into Settlement. FM advised the Business Rule was updated to specify that theft energy volumes would be entered into Settlement via a Consumption Adjustment (CA), following a suggestion from Xoserve that this would be the most workable method, but noted that Xoserve had taken an action to investigate and confirm if this was the preferred method, and if not to propose alternative wording for the Business Rule.

DA highlighted several complexities that may arise with use of the CA process to enter theft volumes into Settlement, as this process currently relies on the provision of meter readings to enable the CA to be calculated. DA advised that options are currently being investigated including assessing whether the existing CA process can be enhanced in a way that is not overly costly to enable theft to be input this way, or whether a process specific to theft may be required that can attribute a theft volume in Settlement but remain separate to meter reading and validation processes.

Workgroup discussed at length the difficulties that may arise in trying to use the existing CA process in order to process confirmed theft volumes into Settlement, particularly given that systems require incremental meter readings and these are unlikely to be available from the Supplier.

SM suggested the solution to this may be similar to the solution for meter bypasses, as these also involve the processing of consumption where incremental meter readings are not available. DA proposed that Suppliers could be given information on the existing readings in Central Systems to enable them to choose start/end reads to enable the CA. FM and SM believed that requiring Suppliers to do this may not be optimal as it may create an unmanageable level of sending and receiving information between TRAS/Suppliers and Central Systems.

KD suggested that Suppliers are already using a similar principle to bill these sites, if Suppliers are invoicing for a particular period, they would need a start and end point. FM confirmed the Supplier would need to provide a start and end date and an estimated consumption.

SM went on to say that if Xoserve already have the readings to choose from, why could they not choose an appropriate reading to base the CA on, rather than passing this to the Supplier?

FM suggested two potential ways forward for the purpose of enabling the production of legal text:

1. Theft consumption could have a specific carve-out in code to stipulate that it will not be subject to normal validations or require incremental meter readings.
2. Code could remain silent on this subject with the relevant system requirements being agreed through the development of the DSC solution, or code could remain high level and not stipulate a precise method but simply state 'the volume will be addressed in Settlement through an appropriate process', or similar wording.

AR considered the Workgroup may be becoming lost in the detail of the DSC process, and whilst this is relevant to the production of legal text, the points being discussed are not new.

SM agreed and suggested the question at hand could be summarised as 'is CA the right method'. AR requested that Xoserve take an action to confirm this and the group noted the progression of Modification 0734S now largely relies on this question being answered.

New Action 0301: *Business Rule 5 - Xoserve (DA) to consider if consumption adjustment (CA) is the right method to apply for theft energy volumes to be entered into Settlement.*

Business Rule 7

KD highlighted that **Business Rule 7** seeks to create new obligations in regard to suspected theft reporting and questioned why the title of the modification refers only to confirmed theft reporting. SM agreed to update the title of the modification to include reference to suspected theft.

New Action 0302: *Business Rule 7 - SPAA (FM) to amend the modification accordingly and change the title so that it matches the intent of the modification.*

3.0 Issues and Questions from Panel

3.1. Workgroup to consider any potential cross-Code impacts and implementation timelines.

It was confirmed this is referenced in the amended Modification.

4.0 Review of Business Rules

Please refer to agenda item 2.0 where a review of the updated Business Rules was undertaken.

5.0 Consideration of Draft Legal Text

Legal text has not yet been provided. It was confirmed by the legal text provider, SGN, that once the modification is stable, the legal text would be provided.

6.0 Development of Workgroup Report

AR confirmed he will annotate what has been discussed so far in the Workgroup Report.

7.0 Next Steps

AR summarised as follows:

- A new version of the modification is expected.
- The Legal Text will be provided once the modification stabilises.
- The Workgroup Report will start to be developed once the modification stabilises.

8.0 Any Other Business

None.

9.0 Diary Planning

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

Workgroup meetings will take place as follows:

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Thursday 10:00 22 April 2021	Teleconference	Distribution Workgroup standard Agenda
Thursday 10:00 27 May 2021	Teleconference	Distribution Workgroup standard Agenda

Action Table (as of 25 March 2021)						
Action Ref	Meeting Date	Minute Ref	Action	Reporting Month	Owner	Status Update
0201	25/02/21	2.0 (BR5)	DA to liaise with SM/FM in order to provide wording for suggested Business Rule to cover how the consumption adjustment process needs to work in this scenario	March 2021	CDSP (DA)	Closed
0202	25/02/21	2.0 (BR5)	DM to request that their lawyer have a provisional look at legal text to see how the new BR could apply to a consumption adjustment when no actual meter readings are available..	March April 2021	SGN (DM)	Carried Forward
0301	25/03/21	2.0	<i>Business Rule 5 - Xoserve (DA)</i> to consider if consumption adjustment (CA) is the right method to apply for theft energy volumes to be entered into Settlement	April 2021	CDSP (DA)	Pending
0302	25/03/21	2.0	<i>Business Rule 7 - SPAA (FM)</i> to amend the modification accordingly and change the title so that it matches the intent of the modification	April 2021	SPAA (FM)	Pending

UNC Workgroup 0746 Minutes
Clarificatory change to the AQ amendment process within TPD G2.3
Thursday 25 March 2021
via Microsoft Teams

Attendees		
Alan Raper (Chair)	(AR)	Joint Office
Helen Bennett (Secretary)	(HB)	Joint Office
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Ellie Rogers	(ER)	Xoserve
Fraser Mathieson	(FM)	SPAA/Electralink
Guv Dosanjh	(GD)	Cadent
Hilary Chapman	(HC)	SGN
Jason Salmon	(JS)	Utility Warehouse
Kate Lancaster	(KL)	Xoserve
Kirsty Dudley	(KD)	E.ON
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Richard Pomroy	(RP)	Wales & West Utilities
Steve Britton	(SB)	Cornwall Insights
Steve Mulinganie	(SM)	Gazprom Energy
Tracey Saunders	(TS)	Northern Gas Networks

Copies of all papers are available at: <https://www.gasgovernance.co.uk/0746/250321>

The Workgroup Report is due to be presented at the UNC Modification Panel by 17 June 2021.

1. Introduction and Status Review

Alan Raper (AR) welcomed all to the Workgroup.

1.1. Approval of Minutes (25 February 2021)

The minutes from the previous meeting were accepted.

1.2. Approval of Late Papers

AR confirmed that the amended modification was received late, Workgroup agreed to accept it.

1.3. Review of Outstanding Actions

Action 0201: SM to redraft Business Rules 1, 2 & 3, then consider if that is sufficient or if the other ones need to be kept. (Revise and refine the Business Rules on the basis of Modification 0736S).

Update: This has been completed and is covered in agenda item 2. **Closed**

2. Amended Modification

Referring to the amended modification published 23 March 2021, v3.0, SM advised Workgroup that the modification has been updated to reflect Workgroup discussions held on 25 February 2021 and proceeded to walkthrough the changes, the following areas were discussed:

Business Rule 1

This Business Rule sets the scope of the modification and guidance has been provided which adds clarity and relevant Uniform Network Code reference points.

Business Rule 2

This states that the CDSP will require the relevant Shipper, within 20 days, to confirm that all AQ amendments using reason code 3, undertaken in accordance with BR1, were compliant with the amended requirements of TPD G 2.3.24, introduced by the implementation of Modification 0736 (Clarificatory Change to the AQ Amendment Process within TPD G2.3)

Business Rule 3

This deals with the consequence of Business Rule 2. Clarity has been added around the period of recovery.

Business Rule 4

This Business Rule allows the CDSP to amend the AQ where a relevant Supply Point AQ has not been revised subsequent to the AQ Correction determined as invalid by Business Rule 2.

SM clarified that the modification is proceeding well and the Business Rules are stabilising.

DA commented that the amendments are now making the Business Rules very clear, although asked for clarification that when referring to AQs, it is the Formula Year AQ.

When KD asked if Business Rule 2 refers to working or business days, Workgroup agreed this should refer to Supply Point Business days.

SM confirmed he will provide a further iteration of the modification.

Mark Jones (MJ) asked if Shippers have lost supply points would they use reason code 3. SM confirmed that they would and that is covered in Business Rule 3.

It is noted in the modification that a DSC Change Proposal has been raised to deliver the solution (XRN5286). DA advised there is an existing tool available that CDSP would be looking to utilise which may need some amendments and confirmed he will assess the cost range.

New Action 0301: SM to amend the modification according to Workgroup discussions, to add clarity in Business Rule 2 refers to Supply Point Business days.

Post Meeting Note:

Amended Modification v4.0 has been received and published on 26 March 2021. **Action 0301 Closed**

New Action 0302: CDSP (DA) to assess the cost range of the utilisation of existing tool to manage this process.

3. Review of Legal Text

This will be covered in due course.

4. Development of Workgroup Report

This will be reviewed at the next Workgroup meeting in April.

5. Next Steps

- Andy Clasper (AC) will now draft the legal text.
- AR will work on the Workgroup Report and provide a draft before next Workgroup.

6. Any Other Business

None raised.

7. Diary Planning

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

Workgroup meetings will take place as follows:

Time / Date	Venue	Programme
10:00 Thursday 22 April 2021	Microsoft Teams	Detail planned agenda items. <ul style="list-style-type: none"> • Consider draft Legal Text • Review Workgroup Report

Action Table (as of 25 March 2021)

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
0201	25/02/21	2.0	SM to redraft Business Rules 1, 2 & 3, then consider if that is sufficient or if the other ones need to be kept. (Revise and refine the Business Rules on the basis of Modification 0736S).	Proposer (SM)	Closed
0301	25/03/21	2.0	SM to amend the modification according to Workgroup discussions, to add clarity in Business Rule 2 refers to Supply Point Business days.		Closed
0302	25/03/21	2.0	CDSP (DA) to assess the cost range of the utilisation of existing tool to manage this process.		Pending

**UNC Workgroup 0664V Minutes
Transfer of Sites with Low Valid Meter Reading Submission
Performance from Classes 2 and 3 into Class 4**

Thursday 25 March 2021

via Teleconference

Attendees		
Alan Raper (Chair)	(AR)	Joint Office
Helen Bennett (Secretary)	(HB)	Joint Office
Andy Clasper	(AC)	Cadent
Carl Whitehouse	(CW)	Shell Energy
David Addison	(DA)	Xoserve
David Morley	(DM)	Ovo Energy
Ellie Rogers	(ER)	Xoserve
Fraser Mathieson	(FM)	SPAA/Electralink
Guv Dosanjh	(GD)	Cadent
Hilary Chapman	(HC)	SGN
Jason Salmon	(JS)	Utility Warehouse
Kate Lancaster	(KL)	Xoserve
Kirsty Dudley	(KD)	E.ON
Lorna Lewin	(LL)	Orsted
Mark Bellman	(MB)	ScottishPower
Mark Jones	(MJ)	SSE
Mark Tolladay	(MT)	Correla on behalf of Xoserve
Oorlagh Chapman	(OC)	Centrica
Owen Mason	(OM)	Bulb Energy
Richard Pomroy	(RP)	Wales & West Utilities
Steve Britton	(SB)	Cornwall Insights
Steve Mulinganie	(SM)	Gazprom Energy
Tracey Saunders	(TS)	Northern Gas Networks

Copies of all papers are available at: <https://www.gasgovernance.co.uk/0664/250321>

The Final Modification Report 0664VV(S) is due to be presented at the UNC Modification Panel by May 2021

1. Introduction and Status Review

Alan Raper (AR) welcomed all to the Workgroup and advised that the proposer is submitting a second variation request which includes justification that this modification should now follow a self-governance route. Should UNC Panel determine that it meets the self-governance criteria, the varied modification would be Modification 0664VVS.

1.1. Approval of Minutes (25 February 2021)

The minutes from the 25 February 2021 Workgroup meeting were approved.

1.2. Review of outstanding actions

Action 1201: Review draft Varied Modification 0664VV - SSE (MJ) to update the draft Modification 0664VV taking into consideration the various points raised by the Workgroup.

Update: Please refer to agenda item 2.0 where it is confirmed an amended modification is to be produced. **Carried Forward**

Action 1202: Review draft Varied Modification 0664VV - SSE (MJ), Xoserve (DA) and Cadent (AC) to discuss the legal text implications surrounding the proposed changes to the draft Modification 0664VV and consider the functionality of a staged implementation.

Update: This would have to be another modification now as Lock Out has been removed. Please refer to agenda item 2.0 where it is confirmed an amended modification is to be produced. **Carried Forward**

2. Review draft Varied Modification 0664VV

AR showed onscreen the draft version of Modification 0664VV v1.0 dated 18 March 2021.

Mark Jones (MJ) provided an overview of what the variation consists of:

- Justification for a proposed change to the governance route from Authority Direction to Self-Governance.
- The addition of Business Rule 11:
Where an overall Shipper portfolio meets the Minimum Performance Measure then no Supply Meters will need to be reclassified irrespective of the performance of any Shipper and Supplier combinations under that Shipper. The performance of each Shipper and Supplier combination are only considered when the overall Shipper portfolio does not meet the Minimum Performance Measure.
- The Shipper and Supplier combination has been added to Business Rule 2 and Business Rule 5.
- Lock-out period, which referred to the time period which Shippers will not be able to re-register Supply Points into Classes 2 or 3 has been removed.

KD asked how the word 'overall' is determined so that it is not ambiguous. MJ advised that a test would be completed at Shipper level and this will be clarified by the legal text.

A change has been made to the reporting with slight changes to the proposed PARR reporting.

DA expressed some concern that the proposed amendments to PARR reporting did not accurately reflected the change in requirement from shipper only to shipper and supplier combinations.

MJ confirmed that the legal text will need a change. Andy Clasper (AC) sought confirmation that the Business Rules would not be subject to further change. When this was confirmed he advised he will amend the legal text to incorporate the changes set out in the draft varied modification.

3. Consideration of Revised Legal Text for 0664VV

This will be considered at the April Workgroup.

4. Completion of Variation Request for February 2021 Panel Submission

This will be considered at the April Workgroup.

5. Next Steps

AR summarised the next steps to be:

- Submission of a Variation Request.
- Review the Legal text.
- Produce a Supplemental Report to summarise the changes.
- Submission to the May 2021 UNC Panel.

6. Any Other Business

None

7. Diary Planning

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

Time / Date	Venue	Workgroup Programme
Thursday 10:00 22 April 2021	Teleconference	Distribution Workgroup standard Agenda

Action Table (as of 25 March 2021)

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
1201	11/12/20	3.0	<i>Review draft Varied Modification 0664VV - SSE (MJ) to update the draft Modification 0664VV taking into consideration the various points raised by the Workgroup.</i>	SSE (MJ) & Xoserve (DA)	Carried Forward
1202	11/12/20	3.0	<i>Review draft Varied Modification 0664VV - SSE (MJ), Xoserve (DA) and Cadent (AC) to discuss the legal text implications surrounding the proposed changes to the draft Modification 0664VV and consider the functionality of a staged implementation.</i>	Cadent (AC), SSE (MJ) & Xoserve (DA)	Carried Forward

UNC Workgroup 0758 Minutes
Temporary extension of AUG Statement creation process
Thursday 25 March 2021
via Microsoft Teams

Attendees		
Alan Raper (Chair)	(AR)	Joint Office
Helen Bennett (Secretary)	(HB)	Joint Office
Andy Clasper	(AC)	Cadent
Andy Knowles	(AK)	Utilita
Carl Whitehouse	(CW)	Shell Energy
Darren Lond	(DL)	National Grid
David Addison	(DA)	Xoserve
David Morley	(DM)	Ovo Energy
Ellie Rogers	(ER)	Xoserve
Fiona Cottam	(FC)	Xoserve
Fraser Mathieson	(FM)	SPAA/Electralink
Gareth Evans	(GE)	Waters Wye Associates
Guv Dosanjh	(GD)	Cadent
Hilary Chapman	(HC)	SGN
Jason Salmon	(JS)	Utility Warehouse
Jayne McGlone	(JMc)	Xoserve
Kate Lancaster	(KL)	Xoserve
Kirsty Dudley	(KD)	E.ON
Lorna Lewin	(LL)	Orsted
Louise Hellyar	(LH)	Total Gas & Power Ltd
Mark Bellman	(MB)	ScottishPower
Mark Jones	(MJ)	SSE
Mark Tolladay	(MT)	Correla on behalf of Xoserve
Michael Walls	(MW)	Ofgem
Naomi Anderson	(NA)	Utility Warehouse
Oorlagh Chapman	(OC)	Centrica
Owen Mason	(OM)	Bulb Energy
Rhys Kealley	(RK)	Centrica
Richard Pomroy	(RP)	WWU
Robert Johnstone	(RJ)	Utilita
Steve Britton	(SB)	Cornwall Insights
Steve Mulinganie	(SM)	Gazprom Energy
Tracey Saunders	(TS)	Northern Gas Networks

Copies of all papers are available at: <https://www.gasgovernance.co.uk/0758/250321>

The Workgroup Report is due to be presented at the UNC Modification Panel by 20 May 2021.

1.0 Outline of Modification

Gareth Evans (GE) introduced the modification and explained the purpose:

To allow the new AUGE sufficient time to develop a robust AUG Statement in accordance with the Framework for the Appointment of an Allocation of Unidentified Gas Expert, (AUGE), and to rollover the existing AUG Table, repeating the process undertaken previously for the 2013/14 & 2016/17 AUG Years.

AR confirmed that the Legal text has been provided and Fiona Cottam (FC) has provided some information in order to address the question raised from UNC Panel on 18 March 2021.

GE addressed Workgroup and advised that he recognises Workgroup did not expect to get to the point where there is unanimous agreement with this modification but is happy to discuss and answer any questions that Workgroup may have, while noting any discussion would not result in the modification being amended.

Concerning current process for developing the AUG statement which would be going for approval to UNCC in April 2021, GE confirmed this modification would not interfere with this process and clarified the difference is that this proposal would authorise the use of a different output.

Reason

GE explained the reason this modification has been raised was because it was felt there is not enough time – the AUGE proposed using a bottom-up compilation of values rather than top down, which represent a significant change in approach. Historically when there has been a step change in the AUG process it has taken more than one year, citing that in 2012 there was an interim value built and then a further 2 years was spent developing the new approach. GE advised there have been at least two occasions where this has taken a multi-year approach.

GE also advised that he has identified a couple of areas where further development is warranted:

- Polluter pays;
- Smart metering.

In his other role, Chairman of Industrial & Commercial Shippers and Suppliers (ICoSS) GE advised he produced a letter which includes a detailed assessment on the current framework document.

Solution:

GE took the opportunity to thank to Joint Office and Cadent for their assistance and providing the legal text in such a short timescale.

The solution of the modification will require the current process to be turned off, this is explained in Business Rule 1.

The introduction of the replacement table is Business Rule 2 which is using the previous year allocation factors, which was developed over multiple processes.

Modification 0711 - Update of AUG Table to reflect new EUC bands, introduced the splitting of EUC Bands, so there will be a small amendment to the previous year's table in order to accommodate that.

Legal Text

It was explained that as this modification would effectively extend the 2020/21 AUG Table, (in the form specified in Modification 0711), for a further 12 months, noting that the legal text would be placed in Transitional Rules.

RP highlighted there could be confusion and some clarity should be documented on what happens with the AUG Table in production. He added it would require clear signposting and to

make it clear that the 2020/21 AUG Table is not the one that would go forward for development next year. He added the modification is not amending any statement that may or may not be approved by UNCC in April, because that is part of the AUG framework, this table would be part of the UNC. AR clarified that it would be the 2020/21 AUG Table that would be codified.

SM agreed that if the Statement and Table provided to UNCC were approved, clear signposting would need to be applied to point to the actual table being used for 2021/22 is located.

When SM asked with regards to the ICoSS letter that this modification is not being pursued on behalf of ICoSS, GE confirmed this is not an ICoSS sponsored modification.

Rhys Kealley (RK) raised his concern that if the application of the AUG Table is delayed, depending how long Ofgem take to make a decision, retrospection and recalculations is a serious issue to consider. GE acknowledge this is a valid point which was also discussed at UNC Panel. GE advised he did consider raising the modification as urgent, but with 6 months to go before the key implementation date, he decided against urgency and equally that contingency arrangements should not be required. GE also confirmed it should be captured in the Workgroup Report as to why this modification should be submitted to UNC Panel no later than May and why an Ofgem decision is required prior to October.

Michael Walls (MW), the Ofgem representative advised he had a number of questions, which are as follows:

- **Purpose (from modification proposal form):** *To allow the new AUGE sufficient time to develop a robust AUG Statement in accordance with the Framework for the Appointment of an Allocation of Unidentified Gas Expert, (AUGE), and to rollover the existing AUG Table, repeating the process undertaken previously for the 2013/14 & 2016/17 AUG Years.*
 - **Questions/Items for FMR:** *Has the AUGE requested more time? If not, what procedures are set out within the commercial contract to allow parties to 'determine' this on behalf of/for the AUGE, or determine that the statement isn't 'complete' or robust? An explanation of why the solution is being progressed as a modification, rather than through existing UNC or contract management processes.*
- **Why (from modification proposal form):** *There are two reasons for deferring implementation of the proposed AUG Statement, firstly the **proposed AUG Table for 2020/21 does not go far enough** in advancing the AUG methodology; and secondly, there is assurance needed to demonstrate that this methodology is an improvement on the previous methodology and not just a change. **The proposed AUG Table for 2020/21 does not have the level of development as previous AUG Table and so does not represent the most robust view of Unidentified Gas available.***
 - **Questions relating to process/commercial contract considerations:** *In general, how do parties contribute in determining 'how far' the methodology should go, or how an AUGE performs and delivers its duties and outputs?*
 - *How do parties determine/agree if a statement is robust? What if there is a disagreement?*
 - *What are the existing processes for agreement, validation? What are the **contract** management options, as this is a commercial contract, and why are these considered to be insufficient for this issue.*
 - *In effect, this modification could be seen as placing a validation role of the **statement** onto the Authority. Could you please explain, if this is the case, and if so, how this would interact with existing UNC text and the commercial contract for the AUGE.*
 - *As the AUGE statement gets discussed next month at the UNCC meeting **where** it will be approved/rejected, does this modification intend to introduce the concept*

and precedent of a validation/refusal for any party into the UNC which would override that decision/process?

- *How does this interact with the commercial contract? Does this **contradict** established contract management or UNC processes?*

GE confirmed that the AUGE has not asked for more time, there are lot of areas noted in the ICoSS letter and suggested it is worth looking at all of that and that there is a large proportion of the industry think more time is needed.

GE raised questions and concerns within the AUG process. The Committee has only had since 31 December 2020 to see the output from the new AUGE and, other than the process set out in the Framework, there few options available if there is a concern that the process has not worked. The only recourse would be a unanimous overturning of the proposal at UNCC or, as has been done here, raise a modification specifying a revised AUG Table. GE clarified there is simply no more time to amend the Statement, (and Table), in development.

SM advised there was a question regarding compliance with the framework at UNCC, where it appeared UNCC were unable to deal with the situation. It was noted that the framework does not stipulate what happens where compliance is questioned, and this has identified a governance gap in the process, especially as there is no way of escalating to the contract between the AUGE and Xoserve.

Naomi Anderson (NA) confirmed Utility Warehouse are very much in favour of this modification and see this as the only option.

David Morely (DM) highlighted his observation that this modification needs to be implemented as fast as possible so that forecasting of costs can be completed. GE advised he has lots of sympathy and clarified there is a summer process to review the whole regime.

RK asked, in terms of getting more time, has any consideration been given to provide the AUGE with more time. GE advised the process does not stop, it continues to roll forward and that the AUGE has already started work on next year's iteration.

Carl Whitehouse (CW) enquired why the modification was raised before the final results from the current AUGE were published. GE advised that in order to allow full debate in the industry the modification was raised, rather than adopt the urgent process. GE advised there has been lots of challenge and questions from various parties, however, it became evident throughout the process there is no opportunity to drill down, the process is not able to cope very well with the change in AUGE at such a fast pace.

Kirsty Dudley (KD) stated, for the purpose of clarity in the Final Modification Report, is it that the process does not cope or is it that the Committee that is not as agile as they could be, and is this setting a precedent for raising a modification just because a party does not like an output. She added that we have an expert, (the AUGE) but are using a modification to challenge the AUGE's expert status. In response GE clarified the 2021/22 AUG Table is not as accurate as it could be, and it is very clear the 2020/21 AUG Table would provide a better table. GE agreed, he does not like having to raise the modification, and in his view, highlights a fundamental flaw in the process. GE also clarified that, in his view, the 2021/22 AUG Statement should include greater reference to the COVID-19 pandemic.

MW noted it is clear there is disagreement with the way the process works and requested that all those points are fully explored in the Final Modification Report. GE confirmed he is not creating a process where this will happen each year. MW said that if this modification is referred to Ofgem, Ofgem will be asked to say that the process is not robust enough and needs to be replaced and noted that it is a new aspect of the governance for UNCC to ask Ofgem to provide a validation role for expert-determined conclusions. MW said he is concerned that if Ofgem do that once it allows it to be done again and it needs to be clear if that is the role that the industry want Ofgem to play. GE wanted to make it clear that it is not the intention for Ofgem to validate, it is purely the process that has forced the industry to this point. GE noted he understands Ofgem's nervousness but made it clear there is very little

other option and this is only a one-off event. It was also noted that this is unprecedented and the first time ever a modification of this type has been referred to Ofgem.

Andy Knowles (AK) advised that the polluter pays is a point is key, this is the AUGE key principle level of granularity they do not go to, and if a Shipper has a large smart metering portfolio, there is a high chance your customers are not stealing and this point is not reflected in the proposed AUG Statement.

AR will take the discussions from this Workgroup and set them out in the Workgroup Report for further comment.

Timeline:

AR clarified that in order to provide the Final Modification Report to the June 2021 UNC Panel, this may need a shorter consultation period.

GE thanked Ofgem for providing their comments and confirmed he will align the Business Rules to the legal text and address Ofgem's questions in the Why Change section of the modification.

Andy Clasper (AC) confirmed he will remove the square brackets in the legal text and that there will be no other changes.

2.0 Initial Discussion

2.1. Issues and Questions from Panel

Panel Question: In the Why Change Section of Modification - clarify the statements concerning temporary and permanent UIG at D+5.

Although this was not specifically discussed at Workgroup, Fiona Cottam (FC) has provided her response to the question raised at UNC Panel:

The question is a good one as they are not (currently) defined UNC terms. I do not think that this modification particularly requires them to be defined in the legal text anywhere.

The two terms were something used by the previous AUGE and which Xoserve also used in the UIG Task Force work, to differentiate between:

- *UIG created at Allocation (defined in H2.6.1 as "Unidentified Gas for a LDZ and a Day") and which may not change after the Exit Close-Out Date (i.e. D+5) – sometimes called temporary UIG.*
- *"Unidentified Gas for a LDZ and a Day", to which all subsequent User UGR [Unidentified Gas Reconciliation] Quantities for the LDZ (E7.1.3) have been applied up to the Code Cut-Off Date (the "Line-in-the-Sand") – sometimes called permanent UIG.*

There are no references to temporary or permanent UIG in either UNC or the AUG Framework, so there is no actual obligation on the AUGE to perform or publish that analysis.

2.2. Initial Representations

None received.

2.3. Terms of Reference

The standard UNC Workgroup Terms of Reference will apply and is available at www.gasgovernance.co.uk/mods

As matters have been referred from Panel a specific Terms of Reference will be published alongside the Modification at <https://www.gasgovernance.co.uk/0758>.

Next Steps

AR clarified that in order to provide the Final Modification Report to the June 2021 UNC Panel, this may need a shorter consultation period.

GE confirmed he will align the Business Rules to the Legal Text and address Ofgem's questions in the Why Change section of the modification.

3.0 Any Other Business

None.

4.0 Diary Planning

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

Workgroup meetings will take place as follows:

Time / Date	Paper Publication Deadline	Venue	Programme
Thursday 10:00 22 April 2021	5pm Tuesday 13 April 2021	Microsoft Teams	Detail planned agenda items. <ul style="list-style-type: none"> • Amended Modification • Consideration of Business Rules • Review of Impacts and Costs • Review of Relevant Objectives • Consideration of Wider Industry Impacts • Consideration of Legal Text • Completion of Workgroup Report

Action Table (as at 23 March 2021)

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
No outstanding actions					