

**UNC Distribution Workgroup Minutes**  
**Thursday 24 June 2021**  
**via Microsoft Teams**

<b>Attendees</b>		
Alan Raper (Chair)	(AR)	Joint Office
Helen Cuin (Secretary)	(HCu)	Joint Office
Rebecca Hailes	(RH)	Joint Office ( <i>Observer</i> )
Andy Clasper	(AC)	Cadent
Claire Louise Roberts	(CLR)	Scottish Power ( <i>0763R Workgroup only</i> )
Claire Manning	(CM)	E.ON Energy
Dan Simons	(DS)	Gemserv
Dave Mitchell	(DMi)	SGN
David Addison	(DA)	Xoserve
David Morley	(DMo)	Ovo Energy
Ellie Rogers	(ER)	Xoserve
Fiona Cottam	(FC)	Xoserve ( <i>0763R Workgroup only</i> )
Fraser Mathieson	(FM)	SPAA/Electralink ( <i>0734S Workgroup only</i> )
Guv Dosanjh	(GD)	Cadent
Jaimee LeResche	(JL)	Xoserve ( <i>0769S Workgroup only</i> )
Jayne McGlone	(JMc)	Xoserve (item 3 only)
Jennifer Randall	(JR)	National Grid
Jenny Rawlinson	(JW)	BU UK
Kate Lancaster	(KL)	Xoserve
Mark Jones	(MJ)	SSE
Martin Attwood	(MA)	Xoserve ( <i>0763R Workgroup only</i> )
Oorlagh Chapman	(OC)	British Gas
Ryan Prince	(RP)	Xoserve ( <i>0763R Workgroup only</i> )
Steve Mulinganie	(SM)	Gazprom Energy
Tom Faulkner	(TF)	Cornwall Insight
Tracey Saunders	(TS)	Northern Gas Networks

Copies of all papers are available at: <https://www.gasgovernance.co.uk/dist/240621>

**1. Introduction and Status Review**

Alan Raper (AR) welcomed everyone to the meeting.

**1.1. Approval of Minutes (27 May 2021)**

David Morley (DMo) wished to note a required amendment to the Workgroup 0767 minutes within item 2.1.3 believing there was a missing action from the minutes which needed to be recorded. AR confirmed this would be considered during Workgroup 0767.

The minutes from the Distribution Workgroup were approved.

**1.2. Approval of late papers**

AR advised the Workgroup that one late paper had been received for item 5.2 Distribution Network Operator Designated Class 1 Guidance Document. The Workgroup accepted all the papers submitted.

### 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 advised that the progression of Modification 0687 is still under discussion and will be considered during agenda item 1.4 Modifications with Ofgem. **Carried Forward**

### 1.4. Modifications with Ofgem

Rebecca Hailes (RH) referred to the Ofgem publication dates timetable, available at: <https://www.ofgem.gov.uk/publications/code-modificationmodification-proposals-ofgem-decision-expected-publication-dates-timetable>.

RH also noted Modification 0687 confirming this is still under review and Modification 0696V noting the expected decision date is to be confirmed.

Modifications with Ofgem for Decision – Expected publication dates timetable					
Mod Ref	Title	Lead Team	Final Mod Report Received	Ofgem expect to conduct an IA or Consultation	Expected Publication Date
0687	Creation of new charge to recover Last Resort Supply Payments	Switching Programme	17/010/2019	No	29/10/2021
0696V	Addressing inequalities between Capacity booking under the UNC and arrangements set out in relevant NExAs	Gas Markets and Systems	22/05/2020	TBC	TBC 2021

### 1.5. Pre-Modification discussions

#### 1.5.1. Micro Business Identifier

Steve Mulinganie (SM) provided a draft Modification and explained that the intent of the Modification is to have a flag within Central Systems to identify a Micro Business which can be used by relevant Parties. The introduction of a Micro Business identifier within Central Systems will assist the appropriate management of the Micro Business Customer cooling off period during the switching process.

It was recommended that this Modification should follow Self-Governance procedures and will be submitted to the July UNC Modification Panel.

SM clarified as this change is being made to incorporate Ofgem's proposed changes for Micro Business for there to be a requirement for a cooling off period and that this change would not have a direct impact on the faster switching programme.

David Addison (DA) confirmed a Change Proposal (CP) will need to be raised to support this change.

SM wished to provide parties an opportunity to review the draft Modification Proposal and provide any comments by close of play on Wednesday 30 June 2021, to allow the draft Modification to be finalised and formally submitted.

Jenny Rawlinson (JW) enquired about the likely IGT UNC impacts. SM believed there may be an impact to the IGT UNC and confirmed if an IGT UNC Modification is required this would be raised.

RH suggested that the proposal may have a Significant Code Review (SCR) impact and enquired about the impacts to the Retail Energy Code (REC) and if the Cross Code Steering Group should be made aware of the Modification. It was agreed to draw attention to this Modification at the next Cross Code Steering Group meeting.

**New Action 0601:** Workgroup to provide comments to Steve Mulinganie, Gazprom on the draft Micro Business Identifier Modification (please see contact details provided in Modification).

**New Action 0602:** Joint Office (RH) to flag Micro Business Identifier Modification at the next Cross Code Steering Group

## 2. Workgroups

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

(Due to report to Panel 19 August 2021)

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

### 2.2. 0749R - Increased DM SOQ Flexibility

(Report to Panel 21 October 2021)

**Meeting postponed**

<https://www.gasgovernance.co.uk/0763>

### 2.3. 0763R - Review of Gas Meter By-Pass Arrangements

(Report to Panel 21 October 2021)

<https://www.gasgovernance.co.uk/0763>

### 2.4. 0767 - Incorporation of AUGÉ Framework Document into the UNC main body

(Report to Panel 18 November 2021)

<https://www.gasgovernance.co.uk/0763>

### 2.5. 0769S - Adding Local Authorities as a new User type to the Data Permissions Matrix

(Report to Panel 19 August 2021)

<https://www.gasgovernance.co.uk/0769>

## 3. CSS Consequential Changes – Transitional Modification

David Addison (DA) explained there was a need for a transitional modification, to proceed with an agreed change approved through the CSS programme referring to Change Request CR071 for removing the inflight switch transitions. DA hoped that the Transitional Modification would be drafted to allow a pre-modification discussion at the next meeting in July.

DA advised that Ofgem are actively looking at non-Monday implementations. DA explained there is a risk to some processes in relation to non-effective business days which could have a level of complexity, such as turning off AQ processes or bringing forward / delaying transfers due to a non-effective day.

SM understood there were a couple of proposals with regards to implementation dates and 'dead zones', one of which being to look at weekend implementations.

DA explained there may be some consequential impacts to the industry for example; holding back batch jobs, ensuring invoice generation is not impacted, and disapplying SLAs.

SM suggested that Xoserve provide information on the processes affected and key dates, to allow consideration with a view to limiting any commercial risk.

DA believed there were 33 dates in question which Xoserve will start working on and updates given.

DA also wished to provide the Workgroup with an update following a conversation at UNC panel in relation to Modification 0762S - Adding the Retail Energy Code Company as a new User type to the Data Permissions Matrix. DA explained the need to consider a concern raised about protection of information within the UNC and the need to consider how the Data Permission Matrix (DPM) references and interacts with REC's equivalent document, the Data Access Matrix, (DAM). DA confirmed that Xoserve are producing a paper to circulate to the industry to draw attention to the important elements to be considered.

DA suggested that parties may wish to consider these elements when responding to the Ofgem consultation in relation to the REC Data Access Schedule which ends on 30 July 2021: [https://www.ofgem.gov.uk/sites/default/files/docs/2021/04/rec\\_v.3.0\\_consultation\\_document\\_-\\_final\\_corrected\\_08-apr-2021\\_0.pdf](https://www.ofgem.gov.uk/sites/default/files/docs/2021/04/rec_v.3.0_consultation_document_-_final_corrected_08-apr-2021_0.pdf)

Jenny Rawlinson (JR) welcomed the support Xoserve were able to provide to help understand and identify what the likely concerns could be and if there are potential disadvantages.

SM asked if Xoserve (DA) could share their response to the consultation for parties to consider in support of Shippers understanding which elements Shippers may need to consider.

#### 4. Issues

None raised.

#### 5. Any Other Business

##### 5.1. User Representative Appointment Process

RH highlighted that the Nomination window is now open for Single Points of Contact, (SPoCs), to nominate Shipper User representatives for the UNC Modification Panel and the various UNC Sub-Committees and DSC Committees. The window for nominations closes on Monday 09 July 2021.

RH encouraged parties to submit their nominations.

##### 5.2. DNO Designated Class 1 Guidance Document

David Mitchell (DM) provided an overview of the changes, which were intended to follow on from a change to the title of the document approved through Fast-Track Modification 0757 - Amendment to Ratchet Process Guidance Document Name.

DM confirmed the title of the document was amended from "Class 1 Ratchet Charge Guidance Document" to "Distribution Network Operator Designated Class 1 Guidance Document".

The Workgroup did not raise any concerns with the provided changes, which would require UNCC approval. The Workgroup were asked to consider the changes and provide feedback in good time for the document to be submitted to the July UNCC meeting.

**New Action 0603:** Workgroup to review the proposed changes to the Distribution Network Operator Designated Class 1 Guidance Document and provide comments by Wednesday 30 June 2021, to allow submission to the July UNCC for approval.

##### 5.3. Implementation Update on Modification 0710

Tracey Saunders (TS) provided an update on the implementation of Modification 0710S - CDSP provision of Class 1 read service. TS explained the intention to postpone implementation to 01 April 2023 as resources required to novate the existing contracts to the CDSP to facilitate implementation on 01 September 2021 could be better deployed on the procurement event to acquire the CDSP's service provider. It was therefore proposed that this is delayed until the service provider has been procured.

##### 5.4. 5.4 Consideration for Guidance Documents to assist implementation of Modification 0701.

Steve Mulinganie (SM) explained due to complex issues with the arrangements and central system, there may be a need for guidance documents to help understand how this process works.

It was noted that implementation of Modification 0701 - Aligning Capacity booking under the UNC and arrangements set out in relevant NExAs, was being deferred until November 2022.

SM expressed the need to consider the November implementation and consequential impact rolling this out over the winter period.

TS explained this was post a CSS solution, expressing she would have liked to have seen an implemented earlier, however the additional cost could be justified. With the handful of sites impacted, TS suggested it may be worth looking at portfolios and for Shippers to advise if there would be an issue with delaying the implementation.

Ellie Rogers (ER) confirmed that the Modification had been approved and could be moved into solution development: at this stage it was understood that the ratchet process did not need to be being touched. ER explained that the high-level solution needs to be issued and assessed to see if a winter implementation was viable.

ER confirmed that if not November 2022 was not desirable, the next logical date for implementation would be June 2023 as this coincided with the subsequent major release.

TS believed the number of actual sites impacted would be minimal and these could be notified in advance to be prepared. TS confirmed that the Transporters would be happy to work with ICOSS to identify potentially affected sites and mitigate the impact.

**New Action 0604:** *Modification 0701* – Workgroup to understand the Modification’s Solution and interactions with winter processes.

**New Action 0605:** *Modification 0701* – Workgroup to consider the materiality delaying implementation.

**New Action 0606:** *Modification 0701* – Workgroup to consider the governance and status of a guidance document.

**5.5. Meeting to be arranged for consideration of AUG Modification.**

In relation Modification 0767 - Incorporation of AUGE Framework Document into the UNC main body, SM enquired when a meeting would be set up to consider the alternative approach to introduce an independent audit and the controls and assurances. SM explained this required a wider audience than that suggested by the UNCC action and hoped to have a meeting ahead of the July UNC Modification Panel. It was suggested that a meeting should be organised within the next 2 weeks.

**6. Diary Planning**

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

<b>Time / Date</b>	<b>Venue</b>	<b>Workgroup Programme</b>
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

<b>Action Table (as of 24 June 2021)</b>						
<b>Action Ref</b>	<b>Meeting Date</b>	<b>Minute Ref</b>	<b>Action</b>	<b>Reporting Month</b>	<b>Owner</b>	<b>Status Update</b>
<b>0201</b>	25/02/21	1.4	<b>Modifications with Ofgem:</b> 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>	July 2021	Ofgem (ML)	<b>Carried Forward</b>
<b>0601</b>	24/06/21	1.5.1	Workgroup to provide comments to Steve Mulinganie, Gazprom on the draft Micro Business Identifier Modification (please see contact details provided in Modification).	July 2021	All	<b>Pending</b>
<b>0602</b>	24/06/21	1.5.1	Joint Office (RH) to flag Micro Business Identifier Modification at the next Cross Code Steering Group	July 2021	Joint Office (RH)	<b>Pending</b>
<b>0603</b>	24/06/21	5.2	Workgroup to review the proposed changes to the Distribution Network Operator Designated Class 1 Guidance Document and provide comments by Wednesday 30 June 2021, to allow submission to the July UNCC for approval.	July 2021	All	<b>Pending</b>
<b>0604</b>	24/06/21	5.4	<i>Modification 0701</i> – Workgroup to understand the Modification's Solution and interactions with winter processes.	TBC	All	<b>Pending</b>
<b>0605</b>	24/06/21	5.4	<i>Modification 0701</i> – Workgroup to consider the materiality delaying implementation.	TBC	All	<b>Pending</b>
<b>0606</b>	24/06/21	5.4	<i>Modification 0701</i> – Workgroup to consider the governance and status of a guidance document.	TBC	All	<b>Pending</b>

**UNC Workgroup 0734S Minutes**  
**Reporting Valid Confirmed Theft of Gas into Central Systems**  
**Thursday 24 June 2021**  
**via Microsoft Teams**

Attendees		
Alan Raper (Chair)	(AR)	Joint Office
Helen Cuin (Secretary)	(HCu)	Joint Office
Rebecca Hailes	(RHa)	Joint Office ( <i>Observer</i> )
Andy Clasper	(AC)	Cadent
Claire Manning	(CM)	E.ON Energy
Dan Simons	(DS)	Gemserv
Dave Mitchell	(DMi)	SGN
David Addison	(DA)	Xoserve
David Morley	(DMo)	Ovo Energy
Ellie Rogers	(ER)	Xoserve
Fraser Mathieson	(FM)	SPAA/Electralink ( <i>0734S Workgroup only</i> )
Guv Dosanjh	(GD)	Cadent
Jennifer Randall	(JR)	National Grid
Jenny Rawlinson	(JW)	BU UK
Kate Lancaster	(KL)	Xoserve
Mark Jones	(MJ)	SSE
Oorlagh Chapman	(OC)	British Gas
Steve Mulinganie	(SM)	Gazprom Energy
Tom Faulkner	(TF)	Cornwall Insight
Tracey Saunders	(TS)	Northern Gas Networks

Copies of all papers are available at: <https://www.gasgovernance.co.uk/0734/240621>

The Workgroup Report is due to be presented at the UNC Modification Panel by 19 August 2021.

## 1.0 Introduction

Alan Raper (AR) welcomed all to the meeting.

### 1.1. Approval of Minutes

The minutes from 27 May 2021 were approved.

### 1.2. Approval of Late Papers

No late papers recorded.

### 1.3. Review of Outstanding Actions

**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:** Dave Mitchell (DMi) confirmed there is no update to provide as the modification is not yet finalised. **Carried Forward**

**Action 0501:** DA and FM and SM to agree a set of rules and solutions where meter readings can be provided and where zero incremental readings will be used.

**Update:** Fraser Mathieson (FM) confirmed an agreed way forward had been discussed which would require an amendment to the business rules, to ensure the right level of energy is entered into settlement. FM confirmed that Guidance notes had been added to the modification to provide clarity.

David Addison (DA) confirmed the salient points from the discussions in relation to a policy decision for meter exchanges where theft had taken place because of the potential tampering with the asset.

FM provided an overview of some theft scenarios, explaining that there are three main scenarios:

- 1 – Meter exchanged with consumption recorded with new meter,
- 2 – Theft of actual meter, and
- 3 – Theft via pre-payment fraud.

FM explained there are scenarios where meter reads are available and there is a clean slate with a new meter to record consumption. In support of this there is a need to keep business rule 5, in that the relevant energy should be processed into settlement via a consumption adjustment. In support of this, two new guidance notes had been added, with an instruction to enter the relevant energy into Settlement, and this would be treated as an instruction to enter the relevant energy.

Rebecca Hailes (RH) enquired about the Performance Assurance Reports, the potential need to update the Performance Assurance Report Register (PARR) and if there will be a mechanism for flagging Theft related consumption adjustments to the Performance Assurance Committee (PAC).

SM clarified, for the avoidance of doubt statement that the “Relevant Energy” is the value of energy contained in the claim, that is, the volume of energy that will be put into settlement and the metered energy should be disregarded. A zero value in the claim is allowable as it may be relevant for the Shipper to validate such a claim although the Performance Assurance Committee should be made aware of it.

SM enquired if there was a new separate report required as zero settlement would have relevance to settlement performance, and if zero energy claims needed to be reported. It was suggested that all claims should be reported to PAC, and the quantity of energy that has processed into settlement. PAC may also wish to have a report on Shipper behaviour in terms of objecting to energy claims.

It was confirmed that some work had been undertaken with John Welch, from the Performance Assurance Framework Administrator (PAFA) to consider potential reporting. The Modification however is not recommending particulars of report or if PAC should have a new report. It was clarified that the primary focus of the Modification is to ensure energy is entered into settlement.

Dave Mitchell (DMi) asked about the obligations and if the CDSP will update systems. The high-level process was outlined that: Theft will be notified to the CDSP; an opportunity will be provided for the Shipper to object, and then the CDSP will update central systems.

AR enquired if the Schedule of Central Services would need to be updated. DA confirmed that the DSC impacts would need to be considered.

RH asked if the PARR should be attached as an appendix to the Modification. SM confirmed the different elements would be collated together and appended.

The Workgroup considered the communication routes and involvement with the Theft Risk Assessment Service (TRAS) and if this needed to be defined in the UNC, to make it clear the route/source to which communications will take and how best to reference the Theft Reports provided in accordance with the Retail Energy Code (REC).

DMi enquired what would happen if REC sent reports to CDSP, and if the Shipper did not object and an erroneous value was entered. DMi enquired if there was any validation or appeal to allow an erroneous entry to be backed-out. The Workgroup considered the validation aspect and concluded that there was an opportunity to object and the responsibility for parties to check the numbers being proposed. It was noted that there is no obligation on a party to check proposed energy values, but there was a right to object. In terms of CDSP validation, SM was unsure how it could be undertaken for a site that has been stealing gas, as there will be no reference point for the consumption and there may be a lack of history and, even if there was any history, it may not be representative of true consumption.

Rebecca Hailes (RH) asked how Shippers will know about a notification. DA explained that the CDSP will notify parties of the transactions flowing. **Closed.**

## 2.0 Consideration of amended Modification

Following the discussion under Action 0501 the Workgroup considered the remaining Business Rules and the additional guidance notes.

Business Rules 6 was considered. This related to fiscal theft, financial fraud where the meter is registering gas, but a meter pre-payment card has been loaded with a greater financial value than paid for.

The Workgroup also considered where Theft has taken place and there has never been a meter in situ. DA explained further consideration was required on how to manage the scenario of a missing meter when it has never been fitted. When a meter has been in place it is possible to go back to last read, which may indicate the point at which theft may have commenced. DA challenged how to manage the scenario when a meter is missing and there is no record of a meter ever been in situ.

The Workgroup considered how dummy data could be used as a default and having a process to manage such a scenario. DA was keen to make it clear to Suppliers that this should be a rare occurrence, but that the circumstance has to be assessed on the meter volume, and a default consumption based on this, reaffirming this should only be used when a meter has never been in situ. It should not be a default process for use when a meter had been fitted.

It was recognised that there would be a need to ensure the TRAS process is robust, and it was important to make sure that the right claim is submitted. SM provided an overview of the TRAS process, the interactions with the Retail Energy Code (REC) and the feeds into the process. SM explained that if there is a discrepancy, there are a set of rules set by the REC which need to be followed, there will be an end-to-end process, with a need to ensure the process is followed and requests are followed.

DA asked about the risks associated with this process. SM explained that if parties are worried about the controls in place with REC or TRAS this needs to be dealt with separately.

The Workgroup further considered the two main scenarios of theft with an asset and theft without an asset.

When there is an asset, there would be some previous read history. When there has never been an asset associated with a supply point there will be no consumption history. DA reiterated his concerns expressed that Xoserve will not want to use a default process when an asset has been on site.

The process options were considered, these were:

Option 1 – energy submission received, assessment made against past meter assumption, with a judgement made based on site specifics (equipment) to estimate likely consumption.

Option 2 – no meter in situ, and never been in situ, accepting this was a minority of instances and should not be the adopted default scenario.

DA explained that the CDSP will be required to enter default data and suggested that while this may be only 1% of cases, nevertheless a process would need to be created and the circumstances around this clearly defined.

The Workgroup considered warranting the meter asset data and considered monitoring the significance of the concerns being raised and how this needs to be administered. If this could be warranted and it was suggested some form of cross-check could be adopted for extra assurance, and noted that this would need to be considered and addressed within REC.

**New Action 0601:** Xoserve (DA) to outline concerns with using default data and warranting meter asset data for this to be raised with the Retail Energy Code (REC) for further consideration.

DA asked for the Amended Modification to cover zero incrementing reads, explaining that it is important for nil incrementing reads to be covered within the UNC to manage this. SM asked if there was already something in UNC for zero incrementing reads which this Modification can refer to.

**New Action 0602:** Xoserve (DA) to provide narrative to develop the zero-incrementing read issue for considering whether this is covered within Guidance or UNC.

DA provided an overview on the potential solution scenarios. He explained that when a Supplier sends through theft energy which aligns to metering data this would be acceptable. However, there is a second scenario when meter reads may not align. The proposed solution would be to utilise the existing meter reads, but the CDSP may have some data overlapping the theft period, it was envisaged that the CDSP will look at the data and look to match a meter volume.

The Workgroup considered the possibly of overlapping/misaligned data and the theft timeframe being reported differing. DA was keen to make sure before the solution goes to DSC there are no unresolved issues, expressing the need to consider scenarios where data feeding into the process does not align. DA suggested that if there are reads in the system, these should be considered. It was suggested if the relevant energy is submitted for settlement, the process should recognise that there may not be a perfect fit as the relevant period may not be known. The Workgroup was looking for flexibility and not to have a process that was too rigid. SM explained that this Modification is about finding the right balance in the proposal and in the technical solution. DA expressed that if the period of theft needs to be considered as part of the process, the process needs to make sure that suitable reads are referred to and used.

**New Action 0603:** Xoserve (DA) to consider Relevant Periods within the existing Business Rules.

### 3.0 Issues and Questions from Panel

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

Not discussed.

### 4.0 Review of Business Rules

See item 1.3 and item 2.0 above. No further discussion.

## 5.0 Consideration of Draft Legal Text

See action 0202 update. Legal text will be provided once the Business Rules have been finalised.

## 6.0 Development of Workgroup Report

Deferred to July.

## 7.0 Next Steps

AR outlined the anticipated next steps these were:

- Amended Modification to be submitted.
- Provision of a ROM
- Provision of Legal Text (upon finalisation of Modification)
- Workgroup Report production

Based on the remaining work AR believed that concluding the Workgroup in July for submission to the August UNC Modification Panel was not achievable. AR therefore suggested that the Workgroup request a 3-month extension.

SM expressed concern about SPAA closing and was working to a hard deadline which could not go beyond August as there would be a resource issue from 01 September.

AR suggested that once the solution for meter readings and zero incremental readings is finalised, the Workgroup should be able to progress to the Workgroup Report stage and Legal Text can be requested.

## 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](http://www.gasgovernance.co.uk/events-calendar/month)

Workgroup meetings will take place as follows:

Time / Date	Venue	Workgroup Programme
Thursday 10:00 22 July 2021	Teleconference	See next steps above

<b>Action Table (as of 24 June 2021)</b>						
<b>Action Ref</b>	<b>Meeting Date</b>	<b>Minute Ref</b>	<b>Action</b>	<b>Reporting Month</b>	<b>Owner</b>	<b>Status Update</b>
<b>0202</b>	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.	July 2021	SGN (DM)	<b>Carried Forward</b>
<b>0501</b>	27/05/21	2.0	DA and FM and SM to agree a set of rules and solutions where meter readings can be provided and where zero incremental readings will be used.	<b>June 2021</b>	Proposer (SM) SPAA (FM) Xoserve (DA)	<b>Closed</b>
<b>0601</b>	24/06/21	2.0	Xoserve (DA) to outline concerns with using default data and warranting meter asset data for this to be raised with the Retail Energy Code (REC) for further consideration.	July 2021	Xoserve (DA)	<b>Pending</b>
<b>0602</b>	24/06/21	2.0	Xoserve (DA) to provide narrative to develop the zero-incrementing read issue for considering whether this is covered within Guidance or UNC.	July 2021	Xoserve (DA)	<b>Pending</b>
<b>0601</b>	24/06/21	2.0	Xoserve (DA) to consider Relevant Periods within the existing Business Rules	July 2021	Xoserve (DA)	<b>Pending</b>

**UNC Workgroup 0763R Minutes  
Review of Gas Meter By-Pass Arrangements  
Thursday 24 June 2021  
via Microsoft Teams**

<b>Attendees</b>		
Alan Raper (Chair)	(AR)	Joint Office
Helen Cuin (Secretary)	(HCu)	Joint Office
Rebecca Hailes	(RHa)	Joint Office ( <i>Observer</i> )
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Copies of all papers are available at: <https://www.gasgovernance.co.uk/0763/240621>

The Workgroup Report is due to be presented at the UNC Modification Panel by 21 October 2021.

## 1.0 Introduction and Status Review

### 1.1. Approval of Minutes (27 May 2021)

Minutes from the previous meeting approved.

### 1.2. Approval of Late Papers

None to approve.

### 1.3. Review of Outstanding Actions

**Action 0501:** *Q1 Review Question* - Xoserve (DA/ER) to provide information to satisfy if installation of Meter By-Pass is being notified to CDSP in a timely manner. (What RGMA transactions received within a period of time and how timely were they).

**Update:** Ellie Rogers (ER) provided a presentation to provide the Workgroup with an update.

ER provided an overview of the UNC obligation UNC TPD Section M 2.4.4(b) and confirmed that a Consumption Adjustment is only required when a meter By-Pass has been 'closed' and the energy consumed during the period the By-Pass was 'open' was greater than 10,000kWh.

ER further explained that, as there is no requirement for a Shipper to submit a Consumption Adjustment for energy under 10,000kWh, the CDSP are unable to ascertain if an adjustment submission has failed to be submitted or was simply not required.

ER confirmed since November 2020, the CDSP have been manually monitoring all instances of By-Passes being updated from 'open' to 'closed' status and liaising with Shippers to confirm if an adjustment is required or not. As of 22 June 2021, 59 sites had been identified with a closed status and no Consumption Adjustment. Of the 59 sites, 43 responses have been received from Shippers, 41 of which have confirmed an adjustment was not required with 2 confirmed as requiring an adjustment.

ER reported it was difficult to provide a conclusion on the timeliness of the updates.

Martin Attwood (MA) clarified of the 59 sites identified with a closed status and no Consumption Adjustment, most sites did not require an adjustment. He further clarified that of the 41 sites not requiring an adjustment, 29 had a by-pass flag still present in UK Link but physically the by-pass was not present on site and 12 had the flag removed. It was observed in some cases the By-Pass was not present on site and UK link had not been updated. Although there was no evidence of mis-declaring, it was recognised however some data cleansing was required.

MA wished to note that some Consumption Adjustments were quite old and Shippers may not have been submitting the adjustment within the stipulated 15 Supply Point Business Days, but this may be because Shippers were simply not aware of the requirement under UNC Section M 2.4.4(b).

Some analysis could suggest that some transactions are not being processed in a timely manner. It was explained that RGMA transactions should be sent to notify the CDSP of a change in the meter By-Pass status. ER clarified there have been approximately 350 Meter By-Pass status changes which became effective post Nexus and the CDSP are looking to pull information together on the timeliness of these transactions.

ER reported that in February 2021, there were 119 Sites with an open By-Pass, 107 of which have evidence of incrementing reads. This suggested these sites should have been updated to closed. For the same period and the same 119 sites, the earliest effective year was 1960 with the bulk of the effective years being early 1990s. This again suggested updates are not being sent to update the CDSP.

Rebecca Hailes (RH) suggested any data cleanse should focus on/prioritise the oldest cases first and should consider both open and closed.

The Workgroup discussed the scenario where a meter exchange has taken place and where the exchange may have removed the By-Pass. The Workgroup considered the required investigations and whether a meter exchange engineered out a By-Pass.

MA explained the update for a meter exchange should include an update to the meter By-Pass via the job file submitted.

ER made the following general observations. As of 21 June 2021, there were 12,758 meter By-Passes recorded within UK Link, 12,688 with a closed status and 70 with an open status. For the sites with an open status, in some cases the date refers back to 1960 however this could be a default date.

Steve Mulinganie (SM) enquired if more investigation needed to be done on the 1960 date. MA suggested based on the trends observed, some of the open status flags could be wrong. SM acknowledged that the analysis suggests there are some data issues and some data cleansing work needs to be undertaken.

ER went onto explain that for the sites both with an open or closed status, the premise types do not always line-up with the type of premises which should be considered for a by-pass, such as hospitals, sites with complex pipework, and multi occupied premises.

SM explained that the guidance is not an exclusive list, these are provided as examples. He clarified that there is an engineering decision for sites based on the consequences of not installing a By-Pass. **Closed.**

**Action 0502:** Q3 Review Question - DA to complete an assessment against the history of the by-pass and look to see if there has been a Consumption Adjustment.

**Update:** See Action update 0501. **Closed.**

**Action 0503:** Q4 Review Question – Andy Clasper (AC) agreed to investigate if Transporters are getting requests for permissions from the MAM.

**Update:** Andy Clasper (AC) reported that over the last 2 years, 61 requests have been submitted, 50 of which were approved. This equated to approximately 2 per month being approved. AC confirmed that the majority of these appear to be hospitals, although some sites had been rejected and these were in some cases for universities, crematoriums, and airports. The reason behind the rejection is not explained in the data he had access to but AC believed the rejection could be based on having a back-up supply. **Closed.**

## 2.0 Amended Request

The Workgroup considered if a data cleansing exercise would circumvent the need for a Modification. David Addison (DA) agreed that the data cleansing exercise should not need a Modification for Shippers to engage with this.

DA referred to the discussions held last month which considered a number of elements that possibly need Code level obligations. DA referred to examples of de-minimis consumption and the responsibilities of by-pass obligations/requirements.

DA explained where Consumption Adjustments are not required, this data could be wrong, and to give assurance that the process is being managed effectively, he suggested where a meter By-Pass is identified, the process should expect a Consumption Adjustment or confirmation an adjustment is not required. He challenged if adjustments are not required it brings into question why a By-Pass needed to be installed. He suggested that the 1960 date was a default data item and further challenged how long a By-Pass should remain open before it is triggered for a review.

SM suggested for the sites known to have or have had a By-Pass could it be established what the typical expected length of time a By-Pass can be in place for situations such as a meter failure. He asked whether there was a view on what the average length of time should be and what is too long?

DA explained a meter By-Pass can be installed to mitigate a meter failure and for short-term maintenance. DA suggested approaching the MAMs to establish what a sensible period would be for mitigation, suggesting MAMCoP chair could be approached. RH supported obtaining a view of the reasonable period a meter by-pass could be expected to be open.

SM clarified for meter maintenance, periods would be short term, meter failures would be longer term. DA recognised for meter maintenance, a meter By-Pass may be physically opened and closed on that site for just a day, for example to manage pressure loss on the outlet or cleaning filters. He suggested it is unlikely that this would translate to/necessitate changes in the Bypass flag on the systems. It was suggested a meter By-Pass flag may however, still exist on these sites for legitimate reasons (for example it being a hospital).

It was agreed to contact MAMCoP for a view.

**New Action 0601:** Xoserve (DA) to seek a view from MAMCoP on the typical periods for a Bypass meter to be opened to deal with a meter failure.

SM asked if the Workgroup should review the 10,000kWh adjustment ‘floor’ and if this is de-minimis. He suggested some justification in a monetary value maybe helpful. The Workgroup briefly considered the 10,000kWh would likely be in the region of £250-£300 and anything above 10,000 kWh was believed to be material enough.

Dan Simons (DS) questioned if part of the communication and responsibilities within the process was missing for Consumption Adjustments. DA enquired as to which party is specifically responsible, suggesting this was if this is predominantly the MAM and asked if this is right. It was explained that the MAM should submit a By-Pass request based on the requirements of the site, on an engineering assessment.

DA challenged in light of this, is it justified that the meter By-Pass remains in place for perpetuity, when the Shipper picks up the burden of the by-pass. It was questioned if there is anything around the status of the site, any other data that a shipper may have access to that challenged previous decision made. DA gave an example where a meter By-Pass may be set as open but central systems have incremental reads, suggesting a missed By-Pass status change. The Workgroup considered what reporting may be required, and what action may be required from the CDSP.

AR asked about the Workgroup considering the lifecycle of a meter by-pass. DA explained that there is an obligation to record when a meter By-Pass is opened and to take a reading when opening, he questioned if there is a subsequent reading submitted without a supporting notice that the By-Pass has been closed, should this trigger a report to the Shipper as the read submission suggests the status is wrong and merits investigation. The Workgroup considered if there was a need for an obligation on the CDSP or Shipper to act upon incremental reads and if this would require a UNC change.

DA also questioned if the criteria of sites should warrant further consideration. For example, if a take-away food premises is flagged with a by-pass should this be questioned. SM suggested that the assessment of the engineer should be taken into account, as this may need to consider if such a site may feed associated domestic consumption. Although the data may suggest something odd, this may not necessarily be the case and may need to be investigated further.

### 3.0 Review Questions

Not discussed.

### 4.0 Development of Workgroup Report

Deferred.

### 5.0 Next Steps

Further analysis and end-to-end process discussions to continue at the next meeting.

### 6.0 Any Other Business

None.

### 7.0 Diary Planning

Further details of planned meetings are available at: [www.gasgovernance.co.uk/events-calendar/month](http://www.gasgovernance.co.uk/events-calendar/month)

Workgroup meetings will take place as follows:

Time / Date	Paper Publication Deadline	Venue	Programme
10:00 Thursday	5pm 14 July 2021	Microsoft Teams	Review of further analysis

22 July 2021			Review of data cleansing requirements Review of potential UNC changes
10:00 Thursday 26 August 2021	TBC	Microsoft Teams	TBC
10:00 Thursday 23 September 2021	TBC	Microsoft Teams	TBC

Action Table (as of 24 June 2021)						
Action Ref	Meeting Date	Minute Ref	Action	Reporting Month	Owner	Status Update
0501	27/05/21	1.0	Q1 Review Question - Xoserve (DA/ER) to provide information to satisfy if installation of Meter By-Pass is being notified to CDSP in a timely manner. (What RGMA transactions received within a period of time and how timely were they).	June 2021	Xoserve (DA)	Closed
0502	27/05/21	1.0	Q3 Review Question - DA to complete an assessment against the history of the by-pass and look to see if there has been a Consumption Adjustment.	June 2021	Xoserve (DA)	Closed
0503	27/05/21	1.0	Q4 Review Question – Andy Clasper (AC) agreed to investigate if Transporters are getting requests for permissions from the MAM.	June 2021	Cadent (AC)	Closed
0601	24/06/21	2.0	Xoserve (DA) to seek a view from MAMCoP on the typical periods for a Bypass meter to be opened to deal with a meter failure.	July 2021	Xoserve (DA)	Pending

**UNC Workgroup 0767 Minutes**  
**Incorporation of AUGE Framework Document into the UNC main**  
**body**  
**Thursday 24 June 2021**  
**via Microsoft Teams**

<b>Attendees</b>		
Alan Raper (Chair)	(AR)	Joint Office
Helen Cuin (Secretary)	(HCu)	Joint Office
Rebecca Hailes	(RHa)	Joint Office ( <i>Observer</i> )
Andy Clasper	(AC)	Cadent
Claire Manning	(CM)	E.ON Energy
Dan Simons	(DS)	Gemserv
Dave Mitchell	(DMi)	SGN
David Addison	(DA)	Xoserve
David Morley	(DMo)	Ovo Energy
Ellie Rogers	(ER)	Xoserve
Guv Dosanjh	(GD)	Cadent
Jennifer Randall	(JR)	National Grid
Jenny Rawlinson	(JW)	BU UK
Kate Lancaster	(KL)	Xoserve
Mark Jones	(MJ)	SSE
Oorlagh Chapman	(OC)	British Gas
Steve Mulinganie	(SM)	Gazprom Energy
Tom Faulkner	(TF)	Cornwall Insight
Tracey Saunders	(TS)	Northern Gas Networks

Copies of all papers are available at: <https://www.gasgovernance.co.uk/0767/240621>

The Workgroup Report is due to be presented at the UNC Modification Panel by 18 November 2021.

## 1.0 Initial Discussion

### 1.1. Approval of Minutes (27 May 2021)

David Morley (DMo) wished to note a required amendment to the Workgroup 0767 minutes within item 2.1.3 believing there was a missing action from the minutes which needed to be recorded.

Please see item 2.0. Steve Mulinganie (SM) suggested discussions are put on hold as consideration is being given whether to proceed with this Modification. SM suggested as the modification maybe withdraw it may not warrant adding further actions.

It was agreed not to record any additional actions as this stage. The minutes were therefore approved with a view if the Modification proceeds appropriate actions will be recorded at the next meeting.

### 1.2. Review Outstanding Actions

**Action 0501:** GE to look at how General Terms - Section A - Dispute Resolution works, specifically Expert Determination paragraph 2.1.3 and compare with the Data Service Contract.

**Update:** Discussion Deferred. **Carried Forward.**

**Action 0502:** GE to develop a rationale for the inclusion of an independent review body that would sit outside of the current framework.

**Update:** Discussion Deferred. **Carried Forward.**

## 2.0 Initial Discussion

SM suggested that Modification 0767 is put on hold, whilst discussions continue on an alternative approach to introduce an independent audit with the capability to review and challenge compliance with the framework set out in the document: Framework for the Appointment of an Allocation of Unidentified Gas Expert.

SM explained that following the June UNCC meeting consideration is being given on whether to change the solution or update the framework. If it is deemed that the independent route would address the concerns the proposer would consider withdrawing the Modification depending on how discussions develop.

DmO believed it would be worthwhile capturing an action to record the need for a review on having an AUGE performance compared to the development of an independent audit body.

DmO suggested this should include an interrogation of the initial design to be incorporated, and development of the rationale for the inclusion of an independent review body instead of the current framework. DmO also asked the proposer to consider the timescale required for an independent audit.

SM suggested as the Modification maybe withdraw it may not warrant adding further actions for this Workgroup at this stage.

### 2.1. Issues and Questions from Panel

#### 2.1.1. Consider whether the existing UNC appeals process is appropriate for use with this Modification.

Not discussed.

#### 2.1.2. Consider whether this Modification is suitable for Self- Governance.

Not discussed.

#### 2.1.3. Consider the potential effect of this Modification on the contractual relationship between the CDSP and the AUGE.

Not discussed.

## 3.0 Next Steps

Further consideration to be given on the concept of an independent review before progressing development of Modification 0767.

## 4.0 Other Business

None.

## 5.0 Diary Planning

Further details of planned meetings are available at: [www.gasgovernance.co.uk/events-calendar/month](http://www.gasgovernance.co.uk/events-calendar/month)

Workgroup meetings will take place as follows:

Time / Date	Paper Publication Deadline	Venue	Programme
10:00 Thursday 22 July 2021	5pm 14 July 2021	Microsoft Teams	TBC

**Action Table (as of 24 June 2021)**

Action Ref	Meeting Date	Minute Ref	Action	Reporting Month	Owner	Status Update
0501	27/05/21	2.0	GE to look at how General Terms - Section A - Dispute Resolution works, specifically Expert Determination paragraph 2.1.3 and compare with the Data Service Contract.	June 2021	GE	<b>Carried Forward</b>
0502	27/05/21	2.0	GE to develop a rationale for the inclusion of an independent review body that would sit outside of the current framework.	June 2021	GE	<b>Carried Forward</b>

## UNC Workgroup 0769S Minutes Adding Local Authorities as a new User type to the Data Permissions Matrix

**Thursday 24 June 2021**

**via Microsoft Teams**

Attendees		
Alan Raper (Chair)	(AR)	Joint Office
Helen Cuin (Secretary)	(HCu)	Joint Office
Rebecca Hailes	(RHa)	Joint Office ( <i>Observer</i> )
Andy Clasper	(AC)	Cadent
Claire Manning	(CM)	E.ON Energy
Dan Simons	(DS)	Gemserv
Dave Mitchell	(DMi)	SGN
David Addison	(DA)	Xoserve
David Morley	(DMo)	Ovo Energy
Ellie Rogers	(ER)	Xoserve
Guv Dosanjh	(GD)	Cadent
Jaimee LeResche	(JL)	Xoserve (0769S Workgroup only)
Jennifer Randall	(JR)	National Grid
Jenny Rawlinson	(JW)	BU UK
Kate Lancaster	(KL)	Xoserve
Mark Jones	(MJ)	SSE
Oorlagh Chapman	(OC)	British Gas
Steve Mulinganie	(SM)	Gazprom Energy
Tom Faulkner	(TF)	Cornwall Insight
Tracey Saunders	(TS)	Northern Gas Networks

Copies of all papers are available at: [www.gasgovernance.co.uk/0769/240621](http://www.gasgovernance.co.uk/0769/240621)

The Workgroup Report is due to be presented at the UNC Modification Panel by 19 August 2021.

### 1.0 Outline of Modification

Andy Clasper (AC) introduced the Modification and explained that it seeks to amend the Data Permissions Matrix (DPM) to add Local Authorities (LAs) as a new User type. This enabling Modification proposes to add LAs to the DPM to allow Data Services Contract Management Committee to determine which data items can be provided.

AC explained that LAs have an ambition to lead the reduction of carbon emissions to meet net zero target dates that are accelerated ahead of the UK's legally binding target date of 2050. To help assess progress LAs would need to access data relating predominantly to consumer addresses and gas usage in order to target engagement with such consumers and monitor strategy outcomes. The Modification is needed to add LAs to DPM to allow the provision of information and to release protected information.

Steve Mulinganie (SM) understood that the release of information would be managed on a case-by-case basis, asking if there would be notification to the site owner that data has been requested.

David Addison (DA) clarified that by adding the LA to the DPM once they have been added if a LA asks for a report, this is approved through the Data Services Contract Management Committee. DA also clarified that once a report has been approved for release any subsequent request from another authority, asking for same data items, would not need approval by the DSC Committee.

SM challenged the potential use of data by the LA and extent to which data could be used against the site owner and that Shippers would not want to be drawn into any litigation, if the data, for example, was used to take action for non-compliance in reducing carbon emissions. SM enquired how the use of data would be protected and ensuring it is not used for other purposes not outlined in the request.

DA explained that the process to provide data can make sure that the purpose for access is outlined in the LA's request with assurances that it will not be used for any other purpose.

DA recognised the concern being raised that there could be subsequent actions pursued following the provision of data.

Rebecca Hailes (RH) asked if there would be a framework for the release and assurances.

The Workgroup considered the conditionality document, around the use case, ability for data to be used for other purposes and how this could be controlled with the limitation of data items provided.

Ellie Rogers (ER) confirmed consideration has been given on regular reporting for example which reports have been provided to detail the data release services being requested.

SM asked if there should be active consumer consent before providing information to the LA. He questioned this in the context of GDPR and asked if LAs would have to seek active consent to be provided with commercial information, expressing concern about the release of commercially sensitive data.

It was questioned why the provision of site data would be any different to that provided to comparison websites.

SM asked about the limitation of information and the avoidance of providing too much information. Concern was expressed with releasing certain data items such as the AQ. It was suggested data provision should be limited. SM wished to limit the information provided to make sure it only served the purpose of the request.

Alan Raper (AR) recognised the concerns being raised and the control of data once it has been released. It was understood there was a need to control the release of commercial data and for it be clear what data will be provided and to ensure the terms of the release were set out with sufficient rigour. SM suggested justification for requesting data should be included as part of the request.

AR suggested it would be worth having a broad outline of process and to understand the next stage of actual data provision.

The Workgroup wanted to understand more about the potential consent, data release process, and the DSC aspects around providing reassurance to ensure the end-to-end process is considered.

<b>New Action 0601:</b> Xoserve (DA) to confirm what assurances / controls will be in place around the use of data.
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<b>New Action 0602:</b> Cadent (AC) / Xoserve (DA) to confirm and provide additional articulation of the purpose and rationale for releasing data to a LA.
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RH enquired about the Access Schedule for the Retail Energy Code (REC). The release of information was briefly considered within REC and if this was defined between Gas and Electric. It was understood under REC the Access Schedule did not differentiate Gas and Electric.

It was explained whilst there are re-assurances with REC released data there was not an equivalent process in a document similar to the DPM Conditionality Document. It was agreed that the Workgroup would need to consider this for the Data Access Schedule.

**New Action 0603:** Xoserve (DA) / Cadent (AC): Data Access Schedule, and alignment with the DPM Conditionality Document, to be reviewed.

## 2.0 Initial Discussion

### 2.1. Issues and Questions from Panel

None raised.

### 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](http://www.gasgovernance.co.uk/mods)

## 3.0 Next Steps

AR confirmed that the Modification needed further consideration next month.

## 4.0 Any Other Business

None.

## 5.0 Diary Planning

Further details of planned meetings are available at: [www.gasgovernance.co.uk/events-calendar/month](http://www.gasgovernance.co.uk/events-calendar/month)

Workgroup meetings will take place as follows:

Time / Date	Paper Publication Deadline	Venue	Programme
10:00 Thursday 22 July 2021	5pm 14 July 2021	Microsoft Teams	Consideration of Wider Industry Impacts

**Action Table (as at 24 June 2021)**

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
<b>0601</b>	24/06/21	1.0	Xoserve (DA) to confirm what assurances / controls will be in place around the use of data.	Xoserve (DA)	<b>Pending</b>
<b>0602</b>	24/06/21	1.0	Cadent (AC) / Xoserve (DA) to confirm and provide additional articulation of the purpose and rationale for releasing data to a LA.	Cadent (AC) / Xoserve (DA)	<b>Pending</b>
<b>0603</b>	24/06/21	1.0	Xoserve (DA) / Cadent (AC): Data Access Schedule and alignment with the DPM Conditionality Document to be reviewed.	Cadent (AC) / Xoserve (DA)	<b>Pending</b>

