

**UNC Distribution Workgroup Minutes**  
**Thursday 22 July 2021**  
**via Microsoft Teams**

<b>Attendees</b>		
Rebecca Hailes (Chair)	(RHa)	Joint Office
Helen Cuin (Secretary)	(HCu)	Joint Office
Alan Raper	(AR)	Joint Office ( <i>Observer</i> )
Andy Clasper	(AC)	Cadent
Claire Louise Roberts	(CLR)	Scottish Power ( <i>0763R only</i> )
Clare Manning	(CM)	E.ON Energy
Dan Simons	(DS)	PAFA/Gemserv ( <i>0763R only</i> )
Dave Mitchell	(DMi)	SGN
David Addison	(DA)	Xoserve
Ellie Rogers	(ER)	Xoserve
Fraser Mathieson	(FM)	SPAA/Electralink ( <i>0769S and 0734S only</i> )
Guv Dosanjh	(GD)	Cadent
Jaimee LeResche	(JL)	Xoserve ( <i>0769S only</i> )
James Barlow	(JB)	Xoserve ( <i>item 5.2 only</i> )
Jenny Rawlinson	(JW)	BU UK
Kate Lancaster	(KL)	Xoserve
Mark Jones	(MJ)	SSE
Oorlagh Chapman	(OC)	British Gas
Rhys Kealley	(RK)	British Gas ( <i>0767 only</i> )
Richard Pomroy	(RP)	WWU
Steven Britton	(SB)	Cornwall Insight
Steve Mulinganie	(SM)	Gazprom Energy
<b>Apologies</b>		
Tim Davis	(TD)	Barrow Shipping ( <i>0749R</i> )

Copies of all papers are available at: <https://www.gasgovernance.co.uk/dist/220721>

**1. Introduction and Status Review**

Rebecca Hailes (RHa) welcomed everyone to the meeting.

**1.1. Approval of Minutes (24 June 2021)**

The minutes from the previous Distribution Workgroup were approved.

**1.2. Approval of late papers**

No late papers to approve.

**1.3. Review Outstanding Actions**

**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:** RHa provided an update on the behalf of Max Lambert from Ofgem see item 1.4.  
**Closed.**

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

**Update:** Steve Mulinganie (SM) confirmed that Modification 0773 - Introduction of a Micro Business identifier in Central Systems, had been withdrawn on 12 July 2021. **Closed.**

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

**Update:** Modification 0773 withdrawn 12 July 2021. David Addison (DA) advised that issue around Micro Business Flags still required some work. It was agreed to close this action and raise a new action to understand the requirement better. **Closed.**

**New Action 0701:** RHa to engage with Ofgem's Cross Code Steering Group and Xoserve (DA) to understand the requirement for a Micro Business Identifier.

**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.

**Update:** David Mitchell (DM) confirmed that the Guidance Document had been updated for submission to the August UNCC. **Closed.**

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

**Update:** Ellie Rogers (ER) explained that this action had been raised to better understand the interactions with the Ratchet process. ER clarified that the Ratchet process will not change under Modification 0701. The solution design is being worked through the DSC Change process and a change pack will be issued to engage with Shippers. Alan Raper (AR) understood all three 0701 actions related to implementation considerations, which will be captured within the DSC Change Management process. It was agreed to close all three actions and record a new action to ensure the potential implementation issues form part of the DSC considerations. **Closed.**

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

**Update:** See Action 0604. **Closed.**

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

**Update:** See Action 0604. **Closed.**

**New Action 0702:** Modification 0701 – Workgroup to review any potential implementation issues arising from DSC considerations and consider if any further documentation is required for incorporation into the UNC.

#### 1.4. Modifications with Ofgem

Rebecca Hailes (RHa) referred to the Ofgem publication dates timetable, available at: <https://www.ofgem.gov.uk/publications/code-modificationmodification-proposals-ofgem-decision-expected-publication-dates-timetable> and provided the following update on behalf of Max Lambert (Ofgem):

- Modification 0687 – Ofgem have written to RECCo to ask them to consider if there is an alternative REC-based solution to this issue. RECCo have factored this into their forward work plan and Ofgem encourages industry parties to engage with the REC Code Manager at the appropriate time.
- Modification 0696 – This modification has been deprioritised. A decision will be made in line with the expected decision date (TBC).

RHa also advised that Modification 0758 - Temporary extension of AUG Statement creation process had been provided to Ofgem on 17 June 2021, for a decision. Panel did not recommend implementation.

## 1.5. Pre-Modification discussions

### 1.5.1. CSS Consequential Changes – Transitional Modification

David Addison (DA) explained that he had hoped to have a draft Modification for pre-Modification discussions today but due to the complexity of the changes and because a number of implementation dates needed to be considered, further time was required. DA advised that Xoserve are working on the processes that will be impacted but they have not got a view of the transitional requirements at the moment. He hoped to have a pre-Modification at the August Workgroup, ready for the Modification to be raised for consideration at the September Panel.

DA confirmed that the date range for CSS implementation was between 06 June 2022 and 31 August 2022, and that Ofgem have requested non-weekend implementation dates for the programme.

## 2. Workgroups

### 2.1. 0734S – Reporting Valid Confirmed Theft of Gas into Central Systems and Reporting Suspected Theft to Suppliers

(Due to report to Panel 18 November 2021)

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

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

*Meeting postponed.*

(Due to report to Panel 21 October 2021)

<https://www.gasgovernance.co.uk/0749>

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

(Due to report to Panel 21 October 2021)

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

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

(Due to report to Panel 18 November 2021)

<https://www.gasgovernance.co.uk/0767>

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

(Due to report to Panel 16 September 2021)

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

## 3. CSS Consequential Changes – Transitional Modification

See item 1.5. No further discussion.

## 4. Issues

None raised.

## 5. Any Other Business

### 5.1. User Representative Appointment Process

RH advised that the initial Nomination window had closed for Shipper User representatives for the UNC Modification Panel and the various UNC Sub-Committees and DSC Committees, reporting the number of positions currently filled and the need for further Nominations as below:

Name of Committee	Positions filled	Comments
Panel and UNCC (6 User Positions)	6	No Election Required No Vacancies

Demand Estimation Sub-Committee (DESC) (5 User Positions)	5	No Election Required No Vacancies
Energy Balancing Credit Committee (EBCC) (9 User Positions)	5	No Election Required 4 Vacancies <b>Further Nominations requested</b>
Performance Assurance Committee (PAC) (9 User Positions)	9	No Election Required No Vacancies

DSC Change Management Committee (6 User Positions)	2 x Shipper Class A 2 x Shipper Class B 0 x Shipper Class C	No Election Required 2 Shipper Class C Vacancies <b>Further Nominations requested</b>
DSC Contract Management Committee (6 User Positions)	2 x Shipper Class A 1 x Shipper Class B 0 x Shipper Class C	No Election Required 1 Shipper Class B Vacancy 2 Shipper Class C Vacancies <b>Further Nominations requested.</b>
DSC Credit Committee (6 User Positions)	4	4 Positions filled No Election Required 2 Vacancies <b>Further Nominations requested</b>

## 5.2. Uniform Network Code Validation Rules (UNCVR)

David Addison (DA) provided a change marked version of the UNCVR and a supporting presentation explaining the need for updates to the document.

DA referred to Change proposal: XRN5072 - Application and derivation of TTZ indicator and calculation of volume and energy (all classes); and XRN5180 - Inner Tolerance Validation for replacement reads and read insertions.

XRN5072 had been raised by Xoserve to complete a review of, and make improvements to, the volume calculations that involve Through the Zero (TTZ) counts.

XRN5180 had been raised to address an issue where there are two reads and a read is trying to be inserted or replacing another, when a subsequent Meter Reading is loaded and rejected.

DA provided an overview of the changes within the UNCVR.

Steve Mulinganie (SM) enquired about the predication of the changes ahead of the Central Switching System CSS and the insertion of changes ahead of the process becoming live. The timing of the changes and how best to manage these were considered and whether to postpone the CSS changes in line with the expected implementation between 06 June 2022 and 31 August 2022.

It was agreed that Version 6 would be submitted to the UNCC for approval in August 2021, without the CSS changes which had been highlighted in yellow and produce a subsequent version with the CSS changes.

The Workgroup reviewed the Version 6 required changes and supported submission to the August UNCC for approval.

## 5.3. Request 0749R

It was noted that the proposer of Request 0749R - Increased DM SOQ Flexibility had been unable to attend the Distribution Workgroup for two consecutive meetings and the report date for this Request was due in October 2021.

The Workgroup considered the progress with 0749R and whether or not the UNC Modification Panel would extend the reporting date.

**6. Diary Planning**

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

<b>Time / Date</b>	<b>Paper Publication Deadline</b>	<b>Venue</b>	<b>Programme</b>
Thursday 10:00 26 August 2021	5pm 18 August 2021	Microsoft Teams	Standard Agenda
Thursday 10:00 23 September 2021	5pm 15 September 2021	Microsoft Teams	Standard Agenda
Thursday 10:00 28 October 2021	5pm 20 October 2021	Microsoft Teams	Standard Agenda

<b>Action Table (as of 22 July 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>Closed</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>Closed</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>Closed</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>Closed</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>Closed</b>
<b>0605</b>	24/06/21	5.4	<i>Modification 0701</i> – Workgroup to consider the materiality delaying implementation.	TBC	All	<b>Closed</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>Closed</b>
<b>0701</b>	22/07/21	1.3	RHa to engage with Ofgem's Cross Code Steering Group and Xoserve (DA) to understand the requirement for a Micro Business Identifier.	September 2021	Joint Office (RHa)	<b>Pending</b>
<b>0702</b>	22/07/21	1.3	Modification 0701 – Workgroup to review any potential implementation issues arising from DSC considerations and consider if any further documentation is required for incorporation into the UNC.	September 2021	All	<b>Pending</b>

## UNC Workgroup 0734S Minutes Reporting Valid Confirmed Theft of Gas into Central Systems and Reporting Suspected Theft to Suppliers

**Thursday 22 July 2021**

**via Microsoft Teams**

Attendees		
Rebecca Hailes (Chair)	(RHa)	Joint Office
Helen Cuin (Secretary)	(HCu)	Joint Office
Alan Raper	(AR)	Joint Office ( <i>Observer</i> )
Andy Clasper	(AC)	Cadent
Clare Manning	(CM)	E.ON Energy
Dave Mitchell	(DMi)	SGN
David Addison	(DA)	Xoserve
Ellie Rogers	(ER)	Xoserve
Fraser Mathieson	(FM)	SPAA/Electralink ( <i>0769S and 0734S only</i> )
Guv Dosanjh	(GD)	Cadent
Jenny Rawlinson	(JW)	BU UK
Kate Lancaster	(KL)	Xoserve
Mark Jones	(MJ)	SSE
Oorlagh Chapman	(OC)	British Gas
Richard Pomroy	(RP)	WWU
Steven Britton	(SB)	Cornwall Insight
Steve Mulinganie	(SM)	Gazprom Energy

Copies of all papers are available at: <https://www.gasgovernance.co.uk/0734/220721>

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

### 1.0 Introduction and Status Review

Rebecca Hailes (RHa) welcomed everyone to the meeting.

#### 1.1. Approval of Minutes (24 June 2021)

The minutes from the previous Workgroup were approved.

#### 1.2. Approval of Late Papers

RHa advised of 4 late papers, which the Workgroup approved.

#### 1.3. Review of Outstanding Actions

**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:** Steve Mulinganie (SM) suggested closing the action as Business Rule 5 had been updated. **Closed.**

**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.

**Update:** Fraser Mathieson (FM) believed that this may now be covered by the newly amended business rules. **Closed.**

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

**Update:** DA confirmed he had examined the UNC and where the CDSP are required to generate estimates; and, that this estimate would deviate from the normal UNC TPD H2.2 profiling logic by creating a zero-incrementing Meter Reading from the previous Meter Reading. Typically, these requirements are referenced in the UNC. It was agreed that the Legal Text Provider would determine whether this needs to be outlined in the UNC. DA asked all other parties to consider the presentation provided offline in relation to zero-incrementing methodology. DA suggested further dialogue can be considered next month and whether some of the guidance notes need to be built in as a business rule.

#### **Carried Forward**

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

**Update:** DA believed this was covered in the updated Business Rules, in order to minimise flexing the relevant period, it had been considered whether there was a way of warranting the supplier providing meter reads as the CDSP can only use reads that are available. It was understood this was not possible, however the flexibility with the meter period provided a pragmatic approach.

DA further explained that he had wanted to warrant that the Suppliers had provided all relevant Meter Readings available for the Start / End of the Theft Period. He wished to point out that Theft Volume can only be assessed against existing Metered Volume and so Meter Readings should be available. DA explained whilst the need for this is materially lessened by the ability that the CDSP is afforded to flex the Theft Period to the Metered Period, it had been confirmed that such a warranty was not something to be included within the Modification. DA believed that FM had confirmed in a previous meeting that where a Theft had been identified that typically a Meter Exchange will be undertaken as the Meter may have been compromised. In which case, DA was relaxed about the warranty as the Connection and Disconnection Regulations and the UNC defines the requirements to provide data within specified periods.

DA explained as the CDSP will be given the ability to flex the Theft Period to the Metered Period, then the UNC will afford transparency to the Supplier as to the treatment of the Theft Claim by the CDSP. If the Supplier has concerns with this approach, they could provide readings (via their Shipper) prior to the Theft Claim. However, it was understood within the Modification that this could not nor should not be mandated.

DA wished to add that the CDSP had sought comfort that Readings would be provided, but FM had indicated that the Supplier would have assessed all readings prior to submission to the CDSP and where the veracity of these would be called into question, they would not be provided. In some rare scenarios the CDSP will not have access to any Meter Readings. The only scenario that has been identified is where No Meter has been installed. In such circumstances FM indicated that the Supplier would have provided any relevant records. As such, where none exist on UK Link it should be assumed that no such records exist. DA wished to note that this is relevant as the CDSP intend to employ a manual process to insert the adjustment value against the meter point but that this will not be checked should information be inserted into UK Link for the Theft Period, and the adjustment amounts would not be re-opened. **Closed.**

## **2.0 Amended Modification and Review of Business Rules**

The Workgroup considered the Amended Modification and the provided Business Rules.

The Workgroup considered the Theft Period and Theft Energy Value and the metered period. Referring to Business Rule 5, DA explained that the CDSP will seek to align the Theft Period to a suitable metering Period within CDSP systems, as close as reasonably practicable. For the avoidance of doubt the Theft Energy Value will not be subject to amendment, this rule is about providing some flexibility to best align the period.

Richard Pomroy (RP) wished to note his response to Modification 0674 and the need to achieve accurate settlement. He recognised this approach was aimed at achieving better settlement,



and that it was a step in the right direction, but that settlement may not necessarily be on the day.

The Workgroup considered the Guidance notes 11 and 12. David Mitchell (DMi) asked for some further clarity notes to be added to the Business Rules to assist the Lawyer understanding the concept.

The Workgroup acknowledged the Modification would need a further amendment.

The Workgroup considered the Relevant Objectives and agreed that the mechanism proposed would more accurately allocate energy related to theft between Shippers.

RP enquired about the D+5 allocation, Unidentified Gas (UIG) and accuracy in terms of reconciliation. FM explained the Modification would allow a more valid data set. He also explained that when the AUGER looks at the data it will be able to use data that has gone into Reconciliation, which will provide better visibility of consumption attributed to theft and can be subsequently built into future models. DA clarified that when theft is crystallised, it will attribute the gas to the Shipper and a credit to UIG, through the reconciliation processes.

FM explained how the Modification would also reduce administration processes.

### 3.0 Issues and Questions from Panel

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

SM believed this was related to REC going live in September. FM confirmed that the IGTs are considering the options and whether to signpost the IGTUNC to the UNC.

### 4.0 Consideration of Draft Legal Text

DMi confirmed once the Modification was amended this would be provided to the Lawyer with an aim to provide the Legal text in time for consideration at the August meeting.

### 5.0 Development of Workgroup Report

Deferred until August.

### 6.0 Next Steps

Provision of Legal Text and Workgroup Report production.

### 7.0 Any Other Business

None raised.

### 8.0 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 26 August 2021	5pm 18 August 2021	Microsoft Teams	Consideration of Amended Modification  Consideration of Legal Text  Completion of Workgroup Report

<b>Action Table (as of 22 July 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>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>Closed</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>Carried Forward</b>
<b>0603</b>	24/06/21	2.0	Xoserve (DA) to consider Relevant Periods within the existing Business Rules	July 2021	Xoserve (DA)	<b>Closed</b>

**UNC Workgroup 0763R Minutes  
Review of Gas Meter By-Pass Arrangements  
Thursday 22 July 2021  
via Microsoft Teams**

<b>Attendees</b>		
Rebecca Hailes (Chair)	(RHa)	Joint Office
Helen Cuin (Secretary)	(HCu)	Joint Office
Alan Raper	(AR)	Joint Office ( <i>Observer</i> )
Andy Clasper	(AC)	Cadent
Claire Louise Roberts	(CLR)	Scottish Power ( <i>0763R only</i> )
Clare Manning	(CM)	E.ON Energy
Dan Simons	(DS)	PAFA/Gemserv ( <i>0763R only</i> )
Dave Mitchell	(DMi)	SGN
David Addison	(DA)	Xoserve
Ellie Rogers	(ER)	Xoserve
Guv Dosanjh	(GD)	Cadent
Jenny Rawlinson	(JW)	BU UK
Kate Lancaster	(KL)	Xoserve
Mark Jones	(MJ)	SSE
Oorlagh Chapman	(OC)	British Gas
Richard Pomroy	(RP)	WWU
Steven Britton	(SB)	Cornwall Insight
Steve Mulinganie	(SM)	Gazprom Energy

Copies of all papers are available at: <https://www.gasgovernance.co.uk/0763/220721>

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

## 1.0 Introduction and Status Review

Rebecca Hailes (RHa) welcomed everyone to the meeting.

### 1.1. Approval of Minutes (24 June 2021)

The minutes from the previous Workgroup were approved.

### 1.2. Approval of Late Papers

RHa advised of 1 late paper, which the Workgroup approved.

### 1.3. Review of Outstanding Actions

**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.

**Update:** David Addison (DA) reported that typically this would be no more than 2 weeks. Richard Pomroy (RP) wished to note there are some exceptions for bespoke meters where the period can be much longer. DA explained and Workgroup agreed that when considering the point at which best to undertake a verification check, it would be sensible to have a 3-month data point.

**Closed.**

## 2.0 Consideration of Request

## 2.1. Meter By-Pass Analysis Update

Dan Simons (DS) provided a slide pack summarising the progress against each of the questions the proposer sought to answer as part of the review along with a view on the potential next steps to be taken. For the fully detailed update, please refer to the published slides on the meeting page at: <https://www.gasgovernance.co.uk/0763/220721>.

In response to review questions 1&2, Meter ByPasses being notified, DS provided an overview on page 5 of the ONJOB and ONUPD updates. From the analysis data DS concluded there didn't appear to be an issue with Shippers reporting an Open Bypass being fitted.

The Workgroup considered the potential for unknown sites which are not reported. SM wished to note there are many obligations and aspects within the UNC where Shippers are responsible for reporting data and where there could be unknowns from data not being reported. He challenged that the 'unknowns' could be zero and a view or perception that there could be a problem without sufficient evidence or data to justify there may be problem, is not a true measure of a risk and should not be used a basis for industry focus.

The Workgroup considered a secondary concern that there could be erroneous status flags and relevant flows have not gone into the system. The Workgroup considered the granularity of data. The Workgroup also considered the subsequent consumption adjustments not being notified within 15 days (review question 3) and that this was still an unknown as to whether adjustments were required and not provided or simply not required.

SM believed there was an administrative data cleansing requirement as there may be erroneous flags. He recognised there are some genuine sites with a Bypass. It was suggested that an exercise should be undertaken to audit all ByPasses.

SM asked the Workgroup to consider the costs of an audit against the energy cost related to this problem to evaluate the benefit of undertaking a full audit exercise as the realised value from doing this may not be warranted when taking into account the auditing costs. He suggested a more focussed approach.

RP noted that the benefit of accurately recording meter ByPasses along with appropriate consumption adjustments would improve settlement accuracy. The Workgroup agreed that understanding the potential AQ value / Energy value would be useful to the Workgroup to understand the significance of the issue.

The Workgroup discussed review question 4 and whether MAMs are seeking appropriate permission in all instances from Transporters before Bypass is installed. It was suggested that the DNs could report to the CDSP all meter ByPass requirements/requests for further interrogation. RP enquired what the Workgroup would be trying to establish with this exercise, whether this would be to check current procedures, or to verify installations.

SM suggested, this exercise would test the permissions and could highlight if there are any discrepancies in 3 scenarios: 1. where permission has not been granted but a ByPass has still been installed; 2. where approval has been granted, the ByPass has installed and notified to CDSP; and 3. where permission is granted but the ByPass has not been installed.

It was agreed that Workgroup wished to review this data for All Transporters for the period between May 2019 – May 2021.

<p><b>New Action 0701:</b> Xoserve to provide All Transporters with a list of Bypass installations in central systems between May 2019 and 2021 for Transporters to provide a view next month on whether requests are being submitted to the Transporters.</p>
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The Workgroup considered review question 5 and if Meter ByPasses are being installed as intended for premises detailed in GDN/PM/GT2 and MAMCoP and if this warranted further investigation.

RP suggested that the Workgroup would need to consider the potential for a site to change its use. It was agreed to wait for the analysis / results from New Action 0701 as to whether this required further consideration. SM had reservations on whether this needed further focus.

RP and SM debated as the Meter ByPass issue is to improve about settlement accuracy, if there should be something in MAMCoP to obligate the MAM for the maintenance of the ByPass.

SM also wanted to understand what would happen once a Meter ByPass is installed and the status of site or status of the ByPass changes. RP believed it was not clear what happens when there is a change of use for a site. RP noted as there is a cost associated with removing a ByPass there may be circumstances where the ByPass remains on site but is not used.

The Workgroup considered if the end-to-end processes are clear, fit for purpose and whether the existing UNC had the appropriate mandates and obligations. SM believed that based on the limited data sets it was difficult to conclude that Shippers are not aware of their obligations.

DS suggested the main focus for the Workgroup based on discussions would be on the durations of a ByPass and Consumption adjustments and whether a Modification would be required for these areas. The Workgroup also believed there would be value undertaking a data cleansing exercise before raising any Modifications.

The Workgroup considered review question 11 and the likely data cleanse activities, recognising there may be some housekeeping related issues.

It was suggested that data cleansing should focus on sites with:

- An open ByPass is recorded where the site is recording consumption
- An open ByPass is recorded for longer than 2 weeks
- A closed ByPass has been in situ for greater than 1 Year.

Ellie Rogers asked if a ByPass could stay in place and closed. It was clarified that a ByPass can stay on site and not used however where it is removed the ByPass flag should be updated, to indicate a ByPass is no longer on site.

It was agreed further consideration would be given on the requirement for data cleansing next month as this may circumvent the need for a Modification.

## **2.2. Data Cleansing**

See item 2.1. No further discussion.

## **2.3. Review of End-to-End Process**

The Workgroup briefly considered whether to review the end-to-end process, DS believed this wouldn't be necessary if the Workgroup considered the 11 questions presented.

## **3.0 Next Steps**

The Workgroup hoped to continue discussions in August if more data is available. It was agreed that if the information requested for New Action 0701 was not available in time the August discussions would be postponed until September.

## **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 26 August 2021  (TBC - Subject to data availability for Action 0701)	5pm 18 August 2021	Microsoft Teams	Review of further analysis  Review of data cleansing requirements  Review of potential UNC changes
10:00 Thursday 23 September 2021	5pm 15 September 2021	Microsoft Teams	TBC

Action Table (as of 22 July 2021)						
Action Ref	Meeting Date	Minute Ref	Action	Reporting Month	Owner	Status Update
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)	<b>Closed</b>
0701	22/07/21	2.1	Xoserve to provide All Transporters with a list of Bypass installations in central systems between May 2019 and 2021 for Transporters to provide a view next month on whether requests are being submitted to the Transporters.	August 2021	Xoserve / All Transporters	<b>Pending</b>

**UNC Workgroup 0767 Minutes**  
**Incorporation of AUGE Framework Document into the UNC main body**

**Thursday 22 July 2021**

**via Microsoft Teams**

<b>Attendees</b>		
Rebecca Hailes (Chair)	(RHa)	Joint Office
Helen Cuin (Secretary)	(HCu)	Joint Office
Alan Raper	(AR)	Joint Office ( <i>Observer</i> )
Andy Clasper	(AC)	Cadent
Clare Manning	(CM)	E.ON Energy
Dave Mitchell	(DMi)	SGN
David Addison	(DA)	Xoserve
Ellie Rogers	(ER)	Xoserve
Guv Dosanjh	(GD)	Cadent
Jenny Rawlinson	(JW)	BU UK
Kate Lancaster	(KL)	Xoserve
Mark Jones	(MJ)	SSE
Oorlagh Chapman	(OC)	British Gas
Rhys Kealley	(RK)	British Gas ( <i>0767 only</i> )
Richard Pomroy	(RP)	WWU
Steven Britton	(SB)	Cornwall Insight
Steve Mulinganie	(SM)	Gazprom Energy

Copies of all papers are available at: <https://www.gasgovernance.co.uk/0767/220721>

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

## 1.0 Introduction and Status Review

Rebecca Hailes (RHa) welcomed everyone to the meeting.

### 1.1. Approval of Minutes (24 June 2021)

The minutes from the previous Workgroup were approved.

### 1.2. Approval of Late Papers

None to approve.

### 1.3. Review of 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:** Modification to be replaced with New Modification. **Closed.**

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

**Update:** Modification to be replaced with New Modification. **Closed.**

## 2.0 Review Of Alternative Options – Independent Audit/Review

Steve Mulinganie (SM) confirmed that Modification 0767 had been put on hold, whilst discussions continue on an alternative approach which is to introduce an assurance process such as an independent audit with the capability to review and challenge compliance with the framework set out and without the need to use the UNC dispute process.

The preference would be for the assurance process / independent verification to run alongside the AUG process, to ensure compliance with the framework.

SM suggested that Modification 0767 could be withdrawn and asked for views from the Workgroup on the alternative approach and if a further Modification would be required.

Rhys Kealley (RK) questioned whether the assurance piece was necessary. He asked if the concept of the framework could be outlined to help parties understand the benefits and potential costs. RK summarised the scope he had envisaged the assurance process covering, which included compliance with the framework and cross-checking methodologies.

SM explained with the nature of the AUG process Shippers do not know what is in the contract or what the touch points are. The independent verification would be looking for assurances and to provide confidence that the process undertaken and duties discharged are in line with the rules.

Ellie Rogers (ER) believed a Modification would be required to introduce any assurance/audit framework into the UNC and to specify how non-compliance would be dealt with.

SM explained the intent to withdraw Modification 0767 rather than amending it, due to the alternative approach being substantially different. SM hoped to provide a draft Modification for a Pre-Modification discussion in August.

Alan Raper (AR) concurred that a new Modification would be required and suggested this may need to consider the consequences of non-compliance and the powers of halting the process, which may be a complex Modification rather than simply undertaking an assurance exercise.

AR asked about the potential reporting requirements, or a compliance function for the correction and monitoring of the AUG process.

The Workgroup briefly considered the potential interactions with the UNCC.

RHa asked what the difference would be between an independent audit and assertive contract management. RK explained that with the contract management approach Shippers do not have the visibility. SM believed the process needs to be subject to oversight especially when there are large values at risk.

The Workgroup briefly considered the Reconciliation by Difference (RbD) Audit Sub-Committee process (used in the past) and the procurement for appointing an auditor.

Mark Jones (MJ) asked if there would be an issue around accessing data and visibility to the terms within the contract between Xoserve and the CDSP.

The Workgroup agreed to consider the alternative approach in more detail next month as a pre-Modification discussion.

## **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 assurance/audit review as a pre-Modification discussion at the Distribution Workgroup in August.

### 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)

No further meetings were planned due to the proposer's intention to withdraw Modification 0767.

Action Table (as of 22 July 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	Closed
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	Closed

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

**Thursday 22 July 2021**

**via Microsoft Teams**

Attendees		
Rebecca Hailes (Chair)	(RHa)	Joint Office
Helen Cuin (Secretary)	(HCu)	Joint Office
Alan Raper	(AR)	Joint Office ( <i>Observer</i> )
Andy Clasper	(AC)	Cadent
Clare Manning	(CM)	E.ON Energy
Dave Mitchell	(DMi)	SGN
David Addison	(DA)	Xoserve
Ellie Rogers	(ER)	Xoserve
Fraser Mathieson	(FM)	SPAA/Electralink ( <i>0769S and 0734S only</i> )
Guv Dosanjh	(GD)	Cadent
Jaimie LeResche	(JL)	Xoserve ( <i>0769S only</i> )
Jenny Rawlinson	(JW)	BU UK
Kate Lancaster	(KL)	Xoserve
Mark Jones	(MJ)	SSE
Oorlagh Chapman	(OC)	British Gas
Richard Pomroy	(RP)	WWU
Steven Britton	(SB)	Cornwall Insight
Steve Mulinganie	(SM)	Gazprom Energy

Copies of all papers are available at: <https://www.gasgovernance.co.uk/0769/220721>

The Workgroup Report is due to be presented at the UNC Modification Panel by 16 September 2021.

### 1.0 Introduction and Status Review

Rebecca Hailes (RHa) welcomed everyone to the meeting.

#### 1.1. Approval of Minutes (24 June 2021)

The minutes from the previous Workgroup were approved.

#### 1.2. Approval of Late Papers

None to approve.

#### 1.3. Review of Outstanding Actions

**0601:** Xoserve (DA) to confirm what assurances / controls will be in place around the use of data.

**Update:** David Addison (DA) confirmed where a service is provided under a third-party contract between Xoserve and the customer, the contract will specify the permitted purpose of access to data as well as the method of delivery and the duration. The contract will include robust data protection clauses that align with Data Protection (DP) legislation, which shall include a warranty from the customer that it has a lawful basis for the processing of that data. **Closed.**

**0602:** Cadent (AC) / Xoserve (DA) to confirm and provide additional articulation of the purpose and rationale for releasing data to a Local Authority (LA).

**Update:** Andy Clasper (AC) explained that the LAs are asking for identification of customers, the type of customer they are and annual usage. Local Authorities are requesting this data now and he confirmed that this Modification is not aligned to the CSS programme. The Terms of data release will be covered by DSC Governance.

Clare Manning (CM) wished to highlight that the Xoserve data privacy notice does not cover provision of data with Local Authorities and that individual data statements may need to be updated. This was noted by Xoserve. **Closed.**

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

**Update:** DA reported that in the last Workgroup it was observed that the (REC) Data Access Schedule already appeared to be planning to grant access to Local Authorities, which was presumed to be on the strength of the electricity service affording parties this access. DA noted that the mark up against Version 3 of the REC reflects the Electricity Enquiry Service. DA clarified that the Electricity industry allows data access to LAs and he believed this was the direction of travel. DA clarified in terms of some changes within the CSS programme, some have been for Gas only and other instances Electricity only. **Closed.**

## **2.0 Review of Modifications Purpose and Rationale**

Andy Clasper (AC) explained the purpose of Modification was to provide data provision to allow Local Authorities to engage with certain parties to assist with meeting decarbonisation and Net Zero targets.

## **3.0 Initial Discussion Consideration of Assurances and Controls**

Further to last month's discussions and the action updates there was no further discussion,

## **4.0 Alignment with DPM Conditionally Document**

DA explained that that DPM and DPM Conditionality Documents will need to be updated.

## **5.0 Development of Workgroup Report**

The Workgroup considered the Workgroup Report

Clare Manning (CM) confirmed that the IGT had raised Modification IGT157. Jenny Rawlinson (JR) understood that the two Modifications were independent and do not rely on both being implemented at the same time. Ellie Rogers (ER) wished to note that if both Modifications are approved the implemented dates would be aligned.

Jenny Rawlinson (JR) wished to note the concerns expressed last month that Local Authorities could utilise the data provided to measure the performance of businesses and potentially penalising them if targets are not being met and if this was a consideration for this Modification or the next stage of the implementation process.

Steve Mulinganie (SM) believed there should be suitable indemnities in place for the protection of data, to allow unlimited liability if LAs misuse the information, and there is a route back if there is a breach, so they are liable for any misuse.

David Addison (DA) noted the concerns for these to be addressed within the Data Request Report (DRR).

The Workgroup finalised the Workgroup Report for submission to the UNC Modification Panel.

## **6.0 Next Steps**

RHa confirmed that the Workgroup Report would be submitted to the UNC Modification Panel in August.

**7.0 Any Other Business**

None.

**8.0 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)

No further meetings planned.

**Action Table (as at 22 July 2021)**

<b>Action Ref</b>	<b>Meeting Date</b>	<b>Minute Ref</b>	<b>Action</b>	<b>Owner</b>	<b>Status Update</b>
<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>Closed</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>Closed</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>Closed</b>