

UNC Distribution Workgroup Minutes
Thursday 25 May 2023
via Microsoft Teams

Attendees		
Rebecca Hailes (Chair)	(RH)	Joint Office
Ben Mulcahy (Secretary)	(BM)	Joint Office
Aleksandra Cebo	(ACe)	EDF
Andy Clasper	(AC)	Cadent
Anne Jackson	(AJ)	Gemserv
Charlotte Gilbert	(CG)	BU-UK
David Addison	(DA)	CDSP
David Mitchell	(DMi)	SGN
Edd Green	(EG)	EON
Ellie Rogers	(ER)	CDSP
Guv Dosanjh	(GD)	Cadent
Harry Hailwood	(HH)	Brook Green Supply
Helen Bennett	(HB)	Joint Office
James Lomax	(JL)	Cornwall Insight
Louise Hellyer	(LH)	TotalEnergies Gas & Power
Mark Jones	(MJ)	SSE Energy Supply
Richard Pomroy	(RP)	Wales & West
Steve Mulinganie	(SM)	SEFE Energy Limited
Tracey Saunders	(TS)	Observer

Copies of all papers are available at: <https://www.gasgovernance.co.uk/Dist/250523>

Please note these minutes do not replicate/include detailed content provided within the presentation slides, therefore it is recommended that the published presentation material is reviewed in conjunction with these minutes. Copies of all papers are available at: <https://www.gasgovernance.co.uk/Dist/250523>

1. Introduction and Status Review

Rebecca Hailes (RH) welcomed everyone to the meeting and gave a brief overview of the scheduled items for discussion.

1.1. Approval of Minutes (27 April 2023)

RH shared a copy of the UNC Distribution Workgroup Minutes from 27 April 2023, which provided a view of tracked changes that David Morley (DMo) had requested. RH noted that DMO was not present at this meeting, which made the discussion of the requested alterations harder, but noted it was appropriate for this workgroup to view and approve them. The changes commenced from the Workgroup Discussion of the Pre-Modification discussion of Hydrogen Blending.

Richard Pomroy (RP) asked if the added commentary was intended to be taken as direct quotes, and Steve Mulinganie (SM) proposed that these changes be clearly attributed to DMO as an individual and thereby ensure they were not misconstrued as statements made by the whole Workgroup. This approach was agreed upon by other Workgroup Participants.

Workgroup Participants went on to review the commentary DMO had asked to be added to the minutes regarding the review of proposed changes to the AUGÉ framework document.

On reading these SM asked if Shrinkage and Leakage Model (SLM) estimation deficiency is indeed recognised as a UIG contributor as the requested alterations state. RP agreed that it assumes the AUGER rules at least a part of the unattributed gas that falls out of calculations as SLM and not to other causes. He noted that the AUGER has never appointed a Shrinkage expert to determine this with any accuracy, and whilst it is reasonable that they can have a view as to sources for UIG, stating such is caused by Shrinkage is a leap. SM stated that there is not a category within AUGER for unknown contributors, so this statement seemed factually inaccurate. He acknowledged that querying if a volume has been allocated in a category correctly is reasonable but questioned the factual accuracy of the statement. Ellie Rogers (ER) advised that the CDSP was reaching out to DMO to explore his understanding of the process. SM suggested a clarification be added that this statement was reflective of DMO's belief only. This approach was agreed upon by other Workgroup Participants.

As the group reviewed the alterations further, SM observed many of them to be added notes rather than minutes, and expressed concern about the risk of personalised comments, highlighting that the Workgroup should be mindful that the resultant documents are published in the public domain. Other Workgroup Participants agreed they were uncomfortable with many of the suggested alterations and wanted them to be fully attributed to DMO only, with SM asking that the minutes of this meeting (25 May 2023) hold a clear record of the concerns expressed in their regard.

Andy Clasper (AC) also asked that a post meeting note be added to the original 27 April minutes to refer to these minutes' record of the discussion (25 May 2023) and the concerns that had been raised. This was completed during the meeting.

Based on this approach decided by the Workgroup, the changes were agreed, and the minutes were approved.

Approval of Minutes (3 May 2023)

The minutes for the Distribution Workgroup of 3 May 2023 were agreed approved.

1.2 Approval of late papers

No late papers had been received.

1.3. Review Outstanding Actions

Action 0102: *NTS Exit Metering Issue* - John Baldwin (JB) to liaise with National Grid offline and come back to Distribution Workgroup with an update on what the impact is, whether it is material and what the potential solution is.

Issue Update:

RH gave an overview of the action and referenced the request made in the last meeting that National Gas contact John Baldwin and Steve Brown of Ofgem to take this action forward. Accordingly, the Workgroup agreed that the action had been escalated beyond this group and should be closed.

Action closed.

1.4. Industry Update from Ofgem

RH directed the Workgroup to the recent update provided by Ofgem at the Modification Panel held on 18 May and published by Ofgem at <https://www.ofgem.gov.uk/publications/code-modificationmodification-proposals-ofgem-decision-expected-publication-dates-timetable>

Ofgem update is as follows from the May 2023 UNC Modification Panel:

Modification	Estimated Decision Date
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0761 - Arrangements for Interconnectors with additional Storage capability	TBC
0813 - Revision of Virtual Last Resort User and Contingent Procurement of Supplier Demand Event Triggers	20 July 2023

Guv Dosanjh (GD) asked if Modification 0696V was still awaiting a decision, noting it had been with the Authority since 22 May 2020, which RH confirmed was the case. SM, as the proposer of Modification 0696V, noted that Modification 0701 had been approved in May 2021 and that the Modifications were commonly perceived as related, which Ofgem was known to be aware of. GD asked if the JO could approach Ofgem regarding the delay in consideration of 0696V. (<https://www.gasgovernance.co.uk/0696>)

Ellie Rogers (ER) noted that 0696V is linked to ‘Line in the Sand’ considerations, beyond which point changes cannot be made. SM referred to the Statute of Limitations on the basis that such considerations are known issues and bring with them a number of legal complexities.

New Action 0501: RH to discuss the expected decision date for Modification 0696V with Ofgem.

1.5. Pre-Modification discussions

No Pre-Modifications were introduced to the Workgroup.

2. CSS REC Consequential Changes Update

David Addison (DA) provided the Workgroup with an update, stating that since 31 March 2023, the CDSP has had a total of just 3 missing messages. He advised that 2 were still being investigated, with the other confirmed as not having a related pending message notification. DA advised that the CDSP had made allowances for the possible separation of these two elements and had thereby ensured there was no impact. As such, and aside from the 2 messages currently under investigation, DA was able to confirm that there had not been a separation between UKL and CSS reported dates, which he expressed as good news and potentially presaged that the mechanisms intended to be introduced under Modification 0836S may prove rarely required if it all.

3. Workgroups

3.1. 0812S – Review of Alternatives to “Must Read” Arrangements

(Report to Panel 21 September)

<https://www.gasgovernance.co.uk/0812>

3.2. 0819 – Establishing/Amending a Gas Vacant Site Process

(Report to Panel 20 July)

<https://www.gasgovernance.co.uk/0819>

3.3. 0825 - Removal of the remaining Retrospective Asset, Address and Supply Point (RAASP) elements of the Retrospective Adjustment arrangements put in place under Modification 0434

(Report to Panel 17 August)

<https://www.gasgovernance.co.uk/0825>

3.4. 0831 - Allocation of LDZ UIG to Shippers Based on a Straight Throughput Method
0831A – Allocation of LDZ UIG to Shippers (Class 3 and 4) Based on a Straight Throughput Method

(Report to Panel 21 September)
<https://www.gasgovernance.co.uk/0831>

3.5. 0836S - Resolution of Missing Messages following Central Switching Service implementation and integration with REC Change R0067

(Report to Panel 17 August 2023)
<https://www.gasgovernance.co.uk/0836>

4. Distribution Workgroup Change Horizon

ER discussed the content of the update kindly provided by the CDSP and published as the UNC Regulatory Change Roadmap May 2023 at <https://www.gasgovernance.co.uk/Dist/250523>. ER noted that a number of Modifications had been implemented of late, with a larger proportion of what is now being reported either recently Approved or Awaiting Ofgem Approval. She committed to providing further information on a firm date for Modification 0840. Indicative dates for Modifications 0701, 0770FT and 0811S were provided as November 2023.

ER also acknowledged the Industry Update from Ofgem that Modification 0696V is still awaiting a confirmed decision date and that the date for a decision on Modification 0813 had been delayed until July 2023.

5. Issues

None raised.

6. Any Other Business

Helen Bennett (HB) advised the Workgroup that the Joint Office will soon be opening the Nomination Window for Industry Representatives, including Modification Panel members, on Friday 30 June 2023. The presentation, entitled “6.0 UNC Elections 2023-24”, for this item can be found at <https://www.gasgovernance.co.uk/Dist/250523>.

Should the Joint Office receive more nominations than seats available, then voting for representation will commence on 01 August 2023. The Workgroup was also advised that PAC member seats were to have seat nominations staggered in tranches with the intention to maintain awareness of the Committee’s oversight of current performance issues from one Gas Year to the next, with the first tranche of seat nominations from 01 October 2023.

7. Diary Planning

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

Time / Date	Paper Publication Deadline	Venue	Programme
Thursday 10:00 22 June 2023	5 pm 14 June 2023	Microsoft Teams	Standard Agenda including any Modification Workgroups relating to Distribution Workgroup
Thursday 10:00 27 July 2023	5 pm 18 July 2023	Microsoft Teams	Standard Agenda including any Modification Workgroups relating to Distribution Workgroup
Thursday 10:00 24 August 2023	5 pm 15 August 2023	Microsoft Teams	Standard Agenda including any Modification Workgroups relating to Distribution Workgroup
Thursday 10:00	5 pm	Microsoft Teams	Standard Agenda including any Modification Workgroups relating to

28 September 2023	19 September 2023		Distribution Workgroup
Thursday 10:00 26 October 2023	5 pm 17 October 2023	Microsoft Teams	Standard Agenda including any Modification Workgroups relating to Distribution Workgroup
Thursday 10:00 23 November 2023	5 pm 14 November 2023	Microsoft Teams	Standard Agenda including any Modification Workgroups relating to Distribution Workgroup
Monday 10:00 11 December 2023	5 pm 30 November 2023	Microsoft Teams	Standard Agenda including any Modification Workgroups relating to Distribution Workgroup

Action Table (as of 25 May 2023)

Action Ref	Meeting Date	Minute Ref	Action	Reporting Month	Owner	Status Update
0102	26/01/23	7.1	<p><i>NTS Exit Metering Issue</i> - John Baldwin (JB) to liaise with National Grid offline and come back to Distribution Workgroup with an update:</p> <ul style="list-style-type: none"> - What is the impact? - What is the solution? - Is it material? 	<p>February-2023 March-2023 April-2023 May 2023</p>	John Baldwin (JB)	Closed
0501	25/05/23	1.4	RH to discuss the expected decision date for Modification 0696V with Ofgem.	June 2023	Joint Office (RH)	Pending

UNC Workgroup 0812R Minutes
Review of Alternatives to “Must Read” Arrangements
Thursday 25 May 2023
via Microsoft Teams

Attendees		
Rebecca Hailes (Chair)	(RH)	Joint Office
Ben Mulcahy (Secretary)	(BM)	Joint Office
Aleksandra Cebo	(ACe)	EDF
Andy Clasper	(AC)	Cadent
Anne Jackson	(AJ)	Gemserv (PAFA)
Charlotte Gilbert	(CG)	BU-UK
David Mitchell	(DM)	SGN
Gurvinder Dosanjh	(GD)	Cadent
Edd Green	(EG)	EON
Ellie Rogers	(ER)	Xoserve
Harry Hailwood	(HH)	Brook Green Trading
Helen Bennett	(HB)	Joint Office
James Lomax	(JL)	Cornwall Insight
Mark Jones	(MJ)	SSE Energy Supply
Richard Pomroy	(RP)	Wales & West Utilities
Steve Mulinganie	(SM)	SEFE
Tracey Saunders	(TS)	Observer

The Workgroup Report is due to be presented at the UNC Modification Panel by 21 September 2023.

Please note these minutes do not replicate/include detailed content provided within the material published, therefore it is recommended that the published material is reviewed in conjunction with these minutes.

Copies of all papers are available at: <https://www.gasgovernance.co.uk/0812/250523>

1.0 Introduction and Status Review

Richard Pomroy (RP) as Proposer was asked for his view as to the status of this Review Group and what he felt were the next best steps.

RP summarised that commentary from the Performance Assurance Committee (PAC) had been obtained on the Transporter provision of the “Must Read” arrangements and that this was positive, but otherwise felt that a consensus had not been reached about the best way forward, and as such he did not think the Review had much more to discover if continued. Accordingly, his thoughts were that the Workgroup Review be concluded, and the results filed. Those can then be used as a reference should any party wish to progress this matter further at a later date.

Rebecca Hailes (RH) agreed with this assessment and offered to finalise the Workgroup Report for review and publishing. No Workgroup Participants offered alternative views to this course of action, and it was accordingly agreed.

New Action 0501: Rebecca Hailes (RH) to complete Workgroup Report for review at the next, and final, Review Workgroup in June 2023.

1.1. Approval of Minutes (03 May 2023)

The minutes from the meeting held on 03 May 2023 were approved.

1.2. Approval of Late Papers

There were no late papers.

1.3. Review of Outstanding Actions

Action 0302: Joint Office (RH) to update the Workgroup Report where the PAC response was considered, and Workgroup briefly discussed that Option 3 is the only viable option to take forward. It was identified that views were required from Shippers to identify a preferred solution to take the Modification forward. This could then be provided to PAC for their views.

Update: Proposer confirmed no new shipper views had been received beyond those already discussed.

Action closed.

2.0 Update on Shipper feedback considerations

As Action 0302 above, the Proposer confirmed no new Shipper views had been received beyond those already discussed.

3.0 Development of Workgroup Report

The Workgroup Report will now be finalised for approval.

4.0 Next Steps

Review of Workgroup Report in the next, and final, Workgroup meeting on 22 June 2023.

5.0 Any Other Business

None

6.0 Diary Planning

Workgroup meetings will take place as follows:

Time / Date	Paper Publication Deadline	Venue	Programme
Thursday 10:00 22 June 2023	5 pm 14 June 2023	Microsoft Teams	<ul style="list-style-type: none"> Review and approve Workgroup Report

Action Table (as of 25 May 2023)

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
0302	23/03/23	1.3	<p>Joint Office (RH) to update the Workgroup Report where the PAC response was considered, and Workgroup briefly discussed that Option 3 is the only viable option to take forward.</p> <p>It was identified that views were required from Shippers to identify a preferred solution to take the Modification forward. This could then be provided to PAC for their views.</p>	Joint Office (RH)/ Shippers	Closed

0501	25/05/23	1	Rebecca Hailes (RH) to complete Workgroup Report for review at the next, and final, Review Workgroup in June.	Joint Office (RH)	Pending
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**UNC Workgroup 0819 Minutes
Establishing/Amending a Gas Vacant Site Process
09:30 Thursday 25 May 2023
via Microsoft Teams**

Attendees		
Rebecca Hailes (Chair)	(RH)	Joint Office
Ben Mulcahy (Secretary)	(BM)	Joint Office
Aleksandra Cebo	(ACe)	EDF
Andy Clasper	(AC)	Cadent
Charlotte Gilbert	(CG)	BU-UK
Clare Louise Roberts	(CLR)	Scottish Power
David Mitchell	(DMi)	SGN
Edd Green	(EG)	EON
Ellie Rogers	(ER)	CDSP
Guv Dosanjh	(GD)	Cadent
Harry Hailwood	(HH)	Brook Green Supply
Helen Bennett	(HB)	Joint Office
James Lomax	(JL)	Cornwall Insight
Louise Hellyer	(LH)	TotalEnergies Gas & Power
Mark Jones	(MJ)	SSE Energy Supply
Richard Pomeroy	(RP)	Wales & West
Steve Mulinganie	(SM)	SEFE Energy Limited

Copies of all papers are available at: <https://www.gasgovernance.co.uk/0819/250523>

The Workgroup Report is due to be presented at the UNC Modification Panel by July 2023.

Please note these minutes do not replicate/include detailed content provided within the presentation slides, therefore it is recommended that the published presentation material is reviewed in conjunction with these minutes. Copies of all papers are available at: <https://www.gasgovernance.co.uk/0819/250523>

1.0 Introduction and Status Review

1.1. Approval of Minutes (27 April 2023)

The minutes from the meeting held on 27 April 2023 were approved.

1.2. Approval of Late Papers

Legal text and the related Explanatory table were provided to Joint Office as Late Papers. Workgroup agreed to consider these late papers.

1.3. Review of Outstanding Actions

There are no outstanding actions.

2.0 Amended Modification

The Workgroup noted that new clean and change-marked versions of the Modification had been provided to the Joint Office on 11 May.

Rebecca Hailes (RH) observed that neither the Proposer nor any other Centrica attendees were present for the Workgroup. In their absence, Guv Dosanjh (GD) suggested that the Workgroup could be used to review the Legal Text which Cadent had provided. RH and Workgroup agreed.

Amended Legal Text

Andy Clasper (AC) provided a detailed walkthrough of the Legal Text changes which were shown in mark-up. The key changes were to Transportation Principal Document Section G Supply Points

AC talked through how the recent changes address eligible causes for both requesting Vacant status and for changes to the AQ. A detailed discussion then followed in which the Workgroup explored the interaction of the Legal Text clauses and their enactment of the Business Rules in the Modification, including when sites no longer met the Vacant site criteria. RH requested that Business Rule references be added to the Explanatory Tables to make these easier to trace.

New Action 0501: Cadent (AC) to add Business Rule references in the Explanatory Text.

Steve Mulinganie (SM) asked if the Workgroup was comfortable that the 'Amending a Gas Vacant Site Process Guidance Document, under differing governance to the UNC, sets Vacant site criteria and if this was the case if it could be recorded in the meeting minutes. He stated that his belief was that a lot of operational considerations can appropriately be in the subsidiary document, enabling operational changes as needed, but that this was different to having eligibility criteria within the Guidance Document.

Ellie Rogers (ER) agreed that as a subsidiary document, it could be changed via a majority vote for approval at the UNCC, in contrast to the Legal Text which would be governed under existing full UNC governance.

SM noted that the Guidance Document details the criteria for eligibility for a site to be designated as Vacant and that most are requirements (Points 3a to 3c) of a Product Class 4 site anyway. The requirement that the site has a standard (dumb) or Non-active AMR or SMETS meter with a Non-Active DCC Flag (Point 3d) was, in contrast, the test as to whether a Product Class 4 site can be designated a Vacant site, and as such was the true test. Accordingly, he suggested that this requirement should be included Code. AC agreed to review this.

New Action 0502: Cadent (AC) to consider detailing criteria for Vacant Site eligibility within Legal Text, and in particular those given in 3d. of the current Guidance Document.

ER noted if a site is vacant there is no value in PAC looking at read performance, as such standard read obligations would hold for vacant sites, similar to the current isolation process. She also requested clear rules be set for the CDSP to apply in consideration of the Vacant Site status to ensure there is no risk of subjectivity or discretion in processing such sites.

New Action 0503: Proposer (LG) and Cadent (AC) to produce a clear ruleset for CDSP actions in relation to Vacant site designation.

SM recognised that if a meter read were provided, and even should it prove to fail validation, it would trigger the site dropping out of the Vacant site status. Whilst this was reasonable, he asked what options would exist should the Shipper find that the read had erroneously been attributed to the wrong MPRN. If a Shipper identified such an error had been made, could it be resubmitted as Vacant, or would there be barriers to doing this?

AC advised that the site would indeed come out of Vacant status, but that there was nothing in the text preventing Shippers from reassigning the site to Vacant status. He did observe though that such an event would effectively 'reset the clock' for the 12-month minimum period required to change the Annual Quantity (AQ) to 1 to receive relief from charges.

ER clarified that the exit criteria, in terms of clause 10.4.1(e), were designed to be only applicable to new meter readings pertinent to a current period of Vacancy, and thus not applicable to reads provided as updates of earlier historical reads outside of the Vacant period which would not trigger the exit criteria.

SM suggested this be added to the legal text as Shipper Agreed Reads (SARs) etc. are appropriate and should not impact the Vacant process. He suggested the clear boundary of 'reads relevant to the period of vacancy' be used. Workgroup Participants subsequently agreed to request that BR5 be changed by the Proposer accordingly.

New Action 0504: Proposer (LG) to update BR5 part 5 to include the distinction 'reads relevant to the period of vacancy', when the LT provider will then consider an approach to including this in the Legal Text

ER and AC discussed the process for setting an AQ for a site exiting Vacant status and highlighted that 10.4.6 puts BR7 in text form. AC noted this clause was complicated and invited parties to review and feedback if there were any concerns.

AC advised that the Legal Text change to TPD Section V General adds the Amending a Gas Vacant Site Process Guidance Document as a UNC Related Document.

AC highlighted again how Modification 0816S has changed the section of code that this Modification is set to change, and as a result, the clause numbering no longer works. He stated the Workgroup needed to be aware of this, and that it probably required either a Fast-Track Modification or a Consent to Modify to address.

ER noted that parties needed to feedback to the CDSP on how they want sites that have the Vacant status to be made visible in the Gas Enquiry Service (GES) and any changes required to the Data Access Matrix (DAM, now part of REC).

The inclusion of IGTs was discussed, with the current CDSP Rough Order of Magnitude (ROM) inclusive of IGT sites, currently with no mechanism to exclude them. The Workgroup was advised that Centrica were thought to be raising an IGT Modification to explore this and ER confirmed herself to be attending the IGT Workstream on 8 June when this was to be discussed. Charlotte Gilbert (CG) stated that she too had record in her notes of Centrica raising an equivalent IGT UNC Modification. RH added a link to the IGT Cross Code Implications page <https://www.igt-unc.co.uk/modification-workstream-meetings/cross-code-modification-implications/>

3.0 Completion of the Workgroup Report

Recognising an extension request is pending, RH completed amendments within the meeting with the feedback provided by the Workgroup Participants in attendance.

4.0 Next Steps

- Workgroup understood the Proposer was on paternity leave, so it was agreed by the Workgroup that RH should request an extension to the Workgroup, asking to now report to Panel in August.
- The Legal Text provider and Proposer are to consider the actions assigned to them and provide amendments for the next Workgroup in June, if at all possible.
- Feedback on the inclusion of IGT supply points and subsequent consideration of the ROM.

5.0 Any Other Business

None.

6.0 Diary Planning

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

Workgroup meetings will take place as follows:

Time / Date	Paper Publication Deadline	Venue	Programme
Thursday 10:00 22 June 2023	5 pm 14 June 2023	Microsoft Teams	<ul style="list-style-type: none"> Review amended Modification and Legal Text iGT Considerations and effects to the ROM

Action Table (as of 25 May 2023)

Action Ref	Meeting Date	Minute Ref	Action	Owner	Reporting Month	Status Update
0501	25/05/23	2	Cadent (AC) to add Business Rule references in the Explanatory Text.	Cadent (AC)	June 2023	Pending
0502	25/05/23	2	Cadent (AC) to consider detailing criteria for Vacant Site eligibility within Legal Text, and in particular those given in 3d. of the current Guidance Document.	Cadent (AC)	June 2023	Pending
0503	25/05/23	2	Proposer (LG) and Cadent (AC) provider to produce clear rule set for CDSP actions in relation to Vacant site designation.	Proposer (LG) & Cadent (AC)	June 2023	Pending
0504	25/05/23	2	Proposer to update BR5 part 5 to include the distinction 'reads relevant to the period of vacancy', when the LT provider will then consider an approach to including this in the Legal Text	Proposer (LG) & Cadent (AC)	June 2023	Pending

UNC Workgroup 0825 Minutes

Removal of the remaining Retrospective Asset, Address and Supply Point (RAASP) elements of the Retrospective Adjustment arrangements put in place under Modification 0434

Thursday 25 May 2023

via Microsoft Teams

Attendees		
Rebecca Hailes (Chair)	(RH)	Joint Office
Ben Mulcahy (Secretary)	(BM)	Joint Office
Aleksandra Cebo	(ACe)	EDF
Andy Clasper	(AC)	Cadent
Charlotte Gilbert	(CG)	BU-UK
Clare Louise Roberts	(CLR)	Scottish Power
Dan Fittock	(DF)	Corona
David Mitchell	(DMi)	SGN
Gurvinder Dosanjh	(GD)	Cadent
Edd Green	(EG)	Eon
Ellie Rogers	(ER)	CDSP
Harry Hailwood	(HH)	Brook Green Trading
Helen Bennett	(HB)	Joint Office
James Lomax	(JL)	Cornwall Insight
Mark Jones	(MJ)	SSE
Oorlagh Chapman	(OC)	Centrica
Richard Pomroy	(RP)	Wales & West Utilities
Steve Mulinganie	(SM)	SEFE
Tracey Saunders	(TS)	Observer

Copies of all papers are available at: <https://www.gasgovernance.co.uk/0825>

The Workgroup Report is due to be presented at the UNC Modification Panel by 17 August 2023

Please note these minutes do not replicate/include detailed content provided within the presentation slides, therefore it is recommended that the published presentation material is reviewed in conjunction with these minutes. Copies of all papers are available at: <https://www.gasgovernance.co.uk/0825/250523>

1.0 Introduction and Status Review

Rebecca Hailes (RH) welcomed all to the Workgroup.

1.1 Approval of Minutes (03 May 2023)

The minutes were approved.

1.2 Approval of Late Papers

RH advised the Legal Text and explanatory table were provided late and asked Workgroup to consider reviewing them. Workgroup agreed to accept the late papers.

1.3 Review of Outstanding Actions

Action 0301: Proposer (ACe) to update the Modification to confirm impact or no impact to IGT UNC.

Update: The Proposer advised the Workgroup that she was attending an IGT Panel meeting on 08 June 2023 with Ellie Rogers (ER) to ensure that IGTs are comfortable with the proposed Modification and will bring results of the discussions to the June Workgroup

Action Carried Forward.

2.0 Amended Modification

Rebecca Hailes (RH) shared screen images of the draft amended Modification version 1.6, which the Workgroup Participants then collectively reviewed.

The Proposer (ACe) informed the Workgroup that the latest changes focused on adding clarity. This included adding a request to the Authority to confirm that approval of the Modification also results in the non-implementation of then superseded 0651. This is reiterated in an 'Avoidance of doubt' statement in the Solution section of the Modification.

The Proposer advised that aside from any feedback regarding IGT impact due to be discussed in the next Workgroup, the changes reviewed are the only anticipated changes to the Modification.

Legal Text Review

Andy Clasper (AC) stated that the Legal Text for this Modification is unusual in that it is deleting the Legal Text implemented by Modification 0434 - Project Nexus – Retrospective Adjustment, and its consequential cross-references only. In effect, all retrospective updates added as part of Modification 0434 are being removed. For this reason, he recommended Workgroup Participants review the Explanatory table but in doing so suggested this would be more gainfully done outside of the Workgroup meeting.

RH suggested it would similarly be good practice to review Transportation Principal Document (TPD) Section E in its current form to compare with what would be removed to ensure a contiguous fit. AC advised that whilst text is being removed, empty clauses and sections are being retained and marked as "not used" to minimise any numbering impact.

AC also noted that 6.8 Updated Meter Readings Offtake Reconciliation is not being altered or removed which was also confirmed by ER.

3.0 Development of Workgroup Report

The Workgroup Report will be reviewed in June following the IGT Impact feedback from the Proposer.

4.0 Next Steps

The Chair, RH, confirmed the next steps to be:

- Proposer to clarify the IGT Impacts at IGT Panel on 08 June and provide Joint Office with final amended Modification.
- RH would assess the Workgroup Report ahead of a final review at the June meeting.
- Consider sending the Workgroup Report to the July Panel.

5.0 Any Other Business

None

6.0 Diary Planning

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

Workgroup meetings will take place as follows:

Time / Date	Paper Publication Deadline	Venue	Programme
Thursday 22 June 23	5 pm 14 June 2023	Microsoft Teams	<ul style="list-style-type: none"> • Confirm IGT Impact • Review amended Modification. • Completion of Workgroup Report

Action Table as at Action Table as of 25 May 2023

Action Ref	Meeting Date	Min Ref	Action	Owner	Reporting Month	Status Update
0301	23/03/23	2.0	Proposer (ACe) to update the Modification to confirm impact or no impact to IGT UNC.	Proposer (ACe)	April 2023 May 2023 June 2023	Carried Forward

UNC Workgroup 0831/0831A Minutes

Allocation of LDZ UIG to Shippers Based on a Straight Throughput Method

Allocation of LDZ UIG to Shippers (Class 3 and 4) Based on a Straight Throughput Method

Thursday 25 May 2023

via Microsoft Teams

Attendees		
Rebecca Hailes (Chair)	(RH)	Joint Office
Ben Mulcahy (Secretary)	(BM)	Joint Office
Andy Clasper	(AC)	Cadent
Claire Louise Roberts	(CLR)	Scottish Power
Edd Green	(EG)	E.ON Next
Ellie Rogers	(ER)	CDSP
Dan Fittock	(DF)	Corona Energy
Dan Stenson	(DS)	Brook Green Trading
David Mitchell	(DMi)	SGN
Gurvinder Dosanjh	(GD)	Cadent
Harry Hailwood	(HH)	Brook Green Trading
Helen Bennett	(HB)	Joint Office
James Lomax	(JL)	Cornwall Insight
Kevin Clark	(KC)	Utilita
Linda Hannaby-Doyle	(LHD)	Scottish Power
Louise Hellyer	(LH)	TotalEnergies Gas & Power
Mark Field	(MF)	Sembcorp
Mark Jones	(MJ)	SSE
Phillipa Burton	(PB)	Scottish Power
Steve Mulinganie	(SM)	SEFE Energy Limited

Copies of all papers are available at: <https://www.gasgovernance.co.uk/0831>

The Workgroup Report is due to be presented at the UNC Modification Panel by 21 September 2023.

Please note these minutes do not replicate/include detailed content provided within the presentation slides, therefore it is recommended that the published presentation material is reviewed in conjunction with these minutes. Copies of all papers are available at: <https://www.gasgovernance.co.uk/0831/250523>

1. Introduction and Status Review

Rebecca Hailes (RH) welcomed everyone to the meeting.

It was noted that a draft Amended Modification 0831 (both Marked and Clean copies) had been provided to the Joint Office as well as a Rough Order of Magnitude (ROM) response from the CDSP.

1.1. Approval of Minutes (03 May 2023)

The Workgroup was asked to approve the minutes from the meeting held on 03 May 2023. Mark Field (MF) questioned if Modification 0831A had been assigned to the correct proposer, which the Joint Office committed to verifying and addressing as necessary.

No further comments were made, and the minutes were duly approved.

1.2. Approval of late papers

No late papers had been submitted.

1.3. Review Outstanding Actions

No actions are outstanding.

2. Amended Modification 0831A

A new draft of this Modification had not yet been provided and remains at v1.0 dated 06 March 2023, with the Workgroup later agreeing that it could replicate, in the main, the text of Modification 0831.

3. Amended Modification 0831

As the Proposer for Modification 0831, Mark Jones (MJ) talked through the amended text and highlighted the detrimental effect of detected theft bias for Pre-Payment Meters (PPM) as recently discussed in the Authority response to Modification 0840 (Urgent) - Equalisation of prepayment and non-prepayment AUG factors, as further justification for this Modification. The Workgroup subsequently discussed in some detail whether this was a pertinent, appropriate, or valid proposition. As aspects of this discussion were felt political it was agreed that the Chair, RH, would summarise these in the Workgroup Report to enable the Workgroup to progress to review the suggested amendments to the Modification.

MJ talked through the amended Business Rules noting that:

BR1 states that the requirement for the preparation of the AUG Statement and AUG Table will discontinue.

BR2 confirms the allocation of a factor of 1 to all LDZ System Exit Points.

BR3 as previously written has been removed.

Ellie Rogers (ER) noted that the obligation of the CDSP to appoint the AUG will cease to exist and advised that there are natural breakpoints in the contract, with the intention for the contract to be managed by the CDSP outside of this Modification.

Andy Clasper (AC) observed that BR5 looks to move the AUG table and asked why it could not remain in the Transportation Principal Section E, Annex E-1. MJ explained that was a blank template and needed to be deleted and replaced with a table with set values of 1. ER concurred, stating that the table is used by the AUG as the template for their annual values. AC suggested it would be simpler for the BR to state that the table is to be amended to show set values of 1, rather than deleted.

MJ was asked if a term used to refer to the table had been considered and he advised that he was awaiting feedback from the Lawyers in this regard.

AC expressed the view that there seems to be a lot of duplication within the Business Rules, with BR3 doing much of the same as BR5, with BR2 referring to a UIG table. His view was that the rules should be much simpler and asked if BR5 was required at all as it was just a clarification statement. MJ acknowledged this commentary and conceded that BR5 was probably too long.

Steve Mulinganie (SM) suggested including the wording; 'The AUGE contract would be discontinued' and questioned why the BRs needed to contemplate the contractual arrangements at all, especially as it introduces an obligation on the Legal Text to then address them.

It was postulated that conceptionally, this Modification could be very simple, replacing one set of table values with another, and RH suggested it may be easier to include the table within the Modification.

ER stated that clarification was needed to remove the AUGE requirement as otherwise the CDSP would still be obliged to appoint an AUGE. Acknowledging comments made thus far she suggested that potentially an 'avoidance of doubt' statement around the contractual arrangements would best serve. SM suggested wording in the meeting Chat as "For the avoidance of doubt the CDSP will deal with the consequential commercial arrangements arising from these changes".

RH summarised that BR1 is to be amended by Proposer (MJ), CDSP and Cadent (AC) to ensure that the requirements to appoint the AUGE are removed, with the CDSP then taking the required actions to manage the contractual requirements.

New Action 0501: BR1 is to be amended by Proposer (MJ), working with CDSP (ER) and Cadent (AC) to ensure that the requirements to appoint the AUGE are removed.

Workgroup Participants then discussed the transitional nature of the Modification and SM noted that there was no process made available for subsequent changes to the table, thus requiring another Modification to make any subsequently proposed changes.

AC was not sure BR4 could be drafted as legal text in its current form, with the AUGE Table being outside of UNC and thus resulting in two tables in existence.

Proposer (MJ) agreed to address the points raised in the Workgroup and redraft BRs, with some elements being "for the avoidance of doubt" statements only.

SM asked if the rules discussed in this Modification will similarly be updated in the Alternative Modification proposed by Brook Green Trading. Harry Hailwood (HH) confirmed that this was the case and RH suggested that 0831 should include the table so that 0831A could do the same, thereby clearly showing the value differences. HH also stated the intention to raise a subsequent Modification to address the issues for other Product Classes.

HH asked if they should wait for Modification 0831 revised Business Rules to be completed before revisiting the BRs for 0831A. This approach was agreed between the Proposers.

RH highlighted that the Workgroup Report was a combined one for both Modifications so both need to be finished to enable the Report to be submitted to the UNC Modification Panel. SM noted that the only difference for 0831A is to have different table values.

New Action 0502: Proposers of 0831(MJ) and 0831A (HH) to provide Joint Office with new draft Modifications before 14 June 2023.

4. Legal Text consideration

As amendments to Modification 0831 BRs that are to be replicated in 0831A are still being developed, Legal Text has not yet been requested.

5. Rough Order of Magnitude (ROM)

ER talked the Workgroup through the ROM, with the two Alternatives being so similar in effect that the CDSP have produced an amalgamated ROM, with text within the document solely relating to 0831 being in blue and text relating to 0831A in purple with all other black text being true for both. ER confirmed that impacts are all the same for Shippers, and shared that the CDSP Subject Matter Experts (SMEs) had advised her that as zeros have existed in previous

tables, they were more of a known quantity than values of 1, which were unprecedented and therefore required further testing.

RH noted that the ROM mentions the specified activity is completed once a year for each new Gas Year, which, given the nature of the Modifications may not be applicable anymore. ER responded that such text being retained was likely due to a desire to minimise overall changes from the Modification, and operationally the CDSP would simply load the same factors each year to fulfil this retained requirement.

SM noted that such considerations suggest a timebound requirement despite the Modification fixing the values which he remarked was strange, ER agreed to double-check this element.

New Action 0503: CDSP (ER) to review and clarify timebound requirements within ROM.

Claire Louise Roberts (CLR) questioned if the Modification was meant to include Product Classes 1 and 2, to which HH confirmed his Modification is being revised just for Class 1. This was due to current system limitations. ER explained that the volumes for each Class are set out in the UK LINK Manual with a maximum limit of 50,000 with Class 2 having less than 1,000 MPs currently. HH added that Brook Green Trading is looking with the CDSP at current capacities and advised that CDSP are aware and open to the current interest in the nature and capacity of Product Class 2.

RH advised that Modification development should not be directed by system capacities and Dan Fittock (DF) voiced his support of this comment. ER stated that the CDSP is supportive of enhancing Class 2 to make it more applicable, but it is not a change that they can immediately deliver, and as such the CDSP is just looking to manage expectations.

MF asked that if constraints within Product Class 2 have been identified, what constraints exist in the other Product Classes and what other multiplication factors can be made available for other Product Classes. ER explained that the UK Link manual currently limits volumes at 50k, but increases are possible. She noted that there are a lot fewer sites in Daily Metered (DM) than in Non-Daily Metered (NDM), and whilst she did not have the numbers to hand, she could obtain them if required. She elaborated that the values and capacity were set at Project Nexus, and with current discussions developing the CDSP is looking to get a feel for what parties need.

MF asked, if it was the case that the question was pertinent to the development of this Modification, for the numbers in each Product Class and the potential headroom that exists for each, and for an understanding of how long this piece of analysis would take.

SM observed that it is relevant if the Modification includes both Class 1 and Class 2, and the Proposer has the autonomy to include both but noted that this is currently not the case. He thought it a pragmatic approach to get this Modification implemented as soon as possible and then consider the wider picture. He elaborated that Project Nexus included awareness of the potential of changing Product Classes with the rollout of Automated Meter Reading (AMR) and Smart metering. DF confirmed that a quick implementation was an agreed objective of the Review group.

In response to further questions on the current volume headroom on Product Classes, ER verified that the CDSP has already started this analysis, complete with testing, to understand the best solution to enable them to later approach customers to discuss and agree on the next steps, but stated the analysis would not be ready for this Workgroup.

RH noted that the current draft of Modification 0831A still included both Product Classes 1 and 2 so the request is still pertinent but acknowledged the amount of work included.

SM felt that it would be appropriate to instead review the volumes and subsequent issues as a separate Distribution Workstream Action, to which the Workgroup Participants agreed.

New DWG Action: *Product Class Constraints* – Action from 0831/0831A WG Discussion to develop an understanding of system restrictions on Product Class capacities and the options available to address perceived future requirements. **CDSP (ER)**

ER progressed the ROM walkthrough, advising that whilst the CDSP will undertake testing to ensure solution resilience there are no costs for the implementation of either Modification as this work will be absorbed as part of the existing BAU process.

She also advised that removing the requirement for the AUGE contract results in a cost-saving in the range of £300k to £400k per annum, and whilst the CDSP cannot divulge commercially sensitive contract value, this range has been shared as it includes the cost of the CDSP internal processes and activities related to managing AUGE.

SM noted the commentary with the ROM regarding forward contractual costs being incurred, which ER confirmed that due to timing considerations of the potential implementation of these Modifications and the current AUGE process cycle, it is difficult to anticipate whether a contract breakpoint would be chronologically close or not. ER subsequently agreed to review the wording used in the ROM potentially using 'some contractual cost' whilst mindful of the contractual relationship sensitives.

New Action 0504: CDSP (ER) to review ROM wording regarding forward AUGE contractual costs.

ER also confirmed that the release would be an Ad-hoc one and would require some notice, which initiated a discussion amongst Workgroup participants regarding the implementation lead time and the commentary within the Modification, which was confirmed to currently be 3 months.

SM asked that given the discussion points today, should the implementation be as soon as reasonably practical following approval and asked for the views of the Proposer. MJ agreed that whilst there had originally been CDSP feedback that an October implementation date be best suited, this was not necessarily now the case. ER concurred that, as the AUGE work for this October and for the next Gas Year had mostly been done already this was not such a concern, and whilst her feedback to the proposer had originally been that October was the appropriate target date for implementation she had since received CDSP SME feedback that the only real caveat was that implementation should be on the first day of the month to avoid having two tables in place within the same calendar month.

SM observed that Ofgem had recently quickly approved a recent Urgent Modification (0840 Urgent - Equalisation of prepayment and non-prepayment AUG factors) due, in part, to citing that it benefited a category of consumers, and as this Modification is looking to do the same and no longer locked into a specific date, it could be approved and implemented quite quickly. Louise Hellyer (LH) added that she supported implementation as soon as reasonably practical, providing a reasonable period of notice was provided. SM suggested it would still be good to target implementation at the start of the Gas Year in October anyway, especially given the benefits to specific consumer groups.

New Action 0505: Proposer (MJ) and CDSP (ER) to discuss and agree revised implementation timeline.

6. Development of Workgroup Report

Development of the Workgroup Report was deferred pending the submission of amendments to both Modifications.

7. Next Steps

- Amendments to be made to Modification 0831, including consideration of the AUG Table, implementation date and Business Rules.
- Subsequent amendments to be considered for revision of 0831A.
- Review the new Rough Order of Magnitude.
- Consider Legal Text update.
- Develop the combined (0831/0831A) Workgroup Report.

8. Any Other Business

None.

9. Diary Planning

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

Workgroup meetings will take place as follows:

Time / Date	Paper Publication Deadline	Venue	Workgroup Programme
10:00 Thursday 22 June 2023	5 pm 14 June 2023	Microsoft Teams	<ul style="list-style-type: none"> • Consider Amended Modification 0831 • Consider Amended Modification 0831A • Consider an Update on the combined Rough Order of Magnitude • Consider Update on Legal Text • Develop the Workgroup Report 0831/A (combined report)

Action Table (as of 25 May 2023)

Action Ref	Meeting Date	Minutes Ref	Action	Owner	Reporting Month	Status Update
0501	25/05/23	3	BR1 is to be amended by Proposer (MJ), working with CDSP (ER) and Cadent (AC) to ensure that the requirements to appoint the AUGE are removed.	Proposer (MJ)	June 2023	Pending
0502	25/05/23	3	Proposers to provide Joint Office with New drafts of 0831/0831A Modifications with revised BRs to be provided to JO before 14 June	Proposers 0831(MJ) 0831A (HH)	June 2023	Pending
0503	25/05/23	5	CDSP (ER) to review and clarify timebound requirements within ROM.	CDSP (ER)	June 2023	Pending
0504	25/05/23	5	CDSP (ER) to review ROM wording regarding forward AUGE contractual costs	CDSP (ER)	June 2023	Pending
0505	25/05/23	5	Proposer (MJ) and CDSP (ER) to discuss and agree revised implementation timeline.	Proposer (MJ) and CDSP(ER)	June 2023	Pending

UNC 0836S Workgroup Minutes
Resolution of Missing Messages following Central Switching Service
implementation and integration with REC Change R0067
Thursday 25 May 2023
via Microsoft Teams

Attendees		
Rebecca Hailes (Chair)	(RH)	Joint Office
Ben Mulcahy (Secretary)	(BM)	Joint Office
Andy Clasper	(AC)	Cadent
Edd Green	(EG)	E.ON Next
Ellie Rogers	(ER)	CDSP
Dan Stenson	(DS)	Brook Green Trading
David Addison	(DA)	CDSP
David Mitchell	(DMi)	SGN
Gurvinder Dosanjh	(GD)	Cadent
Harry Hailwood	(HH)	Brook Green Trading
Helen Bennett	(HB)	Joint Office
James Lomax	(JL)	Cornwall Insight
Kevin Clark	(KC)	Utilita
Linda Hannaby-Doyle	(LHD)	Scottish Power
Louise Hellyer	(LH)	TotalEnergies Gas & Power
Mark Field	(MF)	Sembcorp
Mark Jones	(MJ)	SSE
Steve Mulinganie	(SM)	SEFE Energy Limited

Copies of all papers are available at: <https://www.gasgovernance.co.uk/0836>

The Workgroup Report is due to be presented at the UNC Modification Panel by 17 August 2023.

Please note these minutes do not replicate/include detailed content provided within the presentation slides, therefore it is recommended that the published presentation material is reviewed in conjunction with these minutes. Copies of all papers are available at: <https://www.gasgovernance.co.uk/0836/250523>

1.0 Introduction and Status Review

1.1. Approval of Minutes (27 April 2023)

The minutes from the meeting held on 27 April 2023 were approved.

1.2. Approval of Late Papers

There were no late papers to consider.

David Addison (DA) advised the Workgroup that if the presentation that had been sent as a paper for this Modification was well received, he had a second presentation for the Workgroup's review to elaborate on the next steps of the development of the Modification, this would be considered a Late Paper, which the Workgroup agreed to accept.

1.3. Review of Outstanding Actions

Action 0201: Issues and Questions from Panel: Workgroup to consider the Materiality Test and feedback on any comments direct to David Addison or via Joint Office.

Update: DA confirmed that feedback had been received which has been incorporated into the presentations for this Workgroup.

Action Closed

Action 0401: Shipper participants to provide their view on the Invoicing materiality test. Linked to Action 0201.

Update: This action was also closed on the basis of the feedback referred to in action 0201.

Action Closed

2.0 Amended Modification

Presentations

DA talked through the presentation “0836S Presentation for DWG (17 May 2023)” which can be found at <https://www.gasgovernance.co.uk/0836/250523>. He advised that the text coloured a light grey had previously been seen by the Workgroup, with the darker text being the new additions and commentary.

DA reminded the Workgroup that the Modification provides the CDSP with the ability to initiate UK LINK (UKL) registration where a UKL and CSS Effective From Date (EFD) discrepancy exists and will adjust UKL to the CSS RFD in such instances.

Slide 5 – DA explained that the blue shaded box in this diagram represents the period between *CSS Registration Effective From Date* and *UK Link Registration Effective From Date* and advised that from a Code perspective, this Modification is inserting the CSS Effective Date into UKL.

DA talked through the Materiality Test commentary in the presentation and stated that it can take up to 35 to 40 Working Days for a Shipper Agreed Read (SAR) to process and that he was proposing a one-off materiality test after parties have had a window for Alternate Reads. If the reads are accepted the 1,200 kWh threshold suggested in the presentation and based upon an equivalent context established in the Retail Energy Code (REC) (**See slide 9**), would provide a simple test any parties could perform using the value obtained between CSS Registration EFD and UKL Registration EFD readings.

Workgroup Participants did not raise any questions or challenges to the proposed process.

DA informed the Workgroup that since CSS implemented the recent change on 31 March 2023 the CDSP has seen a total of 3 missing messages, none of which would need an adjustment under this process. DA thus suggested that introducing this minimal system change would be a suitable solution, especially given that any meter reading based process would be by its nature, very involved.

With no objections from Workgroup Participants on the proposed process DA presented his second slide deck, “0836S Presentation 2 Timeline for DWG (31 May 2023)” which can also be found at <https://www.gasgovernance.co.uk/0836/250523>. This provided an Illustrative timeline for the process.

Slide 2 DA advised that this was intended as a one-off Adjustment and as such it would be beneficial to allow for Shippers to assess meter readings and undertake any required replacements. He also looked to remind the Workgroup that this is an exception process that is anticipated to be low volume.

Slide 3 The various steps involved in a replacement meter read were itemised and a timeline was provided for discussion that ultimately suggested that D+50 would be the point at which any Adjustment could be considered.

No Workgroup Participants expressed an opinion to the contrary of this proposed timeline.

Slide 4 DA approached developing the Business Rules for the Modification, and whilst acknowledging that Code should not be set based on the ease of CDSP processing, as this is an exception process, he felt it appropriate to make it simple to implement. As such the proposal is for a Monthly process for Adjustments in which, after allowing for Replacement Meter Readings 3 months after the UKL Registration date the CDSP would perform the Materiality test at the end of that month, with Adjust at M+2.

An example was given in which a start of February live date saw the Materiality Test in May with any resultant Adjustment appearing in the July invoices.

Amended Modification Document

DA talked the Workgroup through the changes made in the new draft amendment of the Modification. Reference to the proposed materiality test had been added, together with clarity about how CDSP invoice adjustments would be made.

DA also advised of an amended date for the expected implementation of associated REC Change R0067, as now likely to be no earlier than December 2023 rather than August 2023 as originally anticipated.

DA did confirm that Shippers could still change reads after the materiality test was made but noted the CDSP would not go back to reassessing the materiality test. Steve Mulinganie (SM) asked if this was specified in the Business Rules, to which DA agreed to add it as an 'Avoidance of Doubt' statement.

New Action 0501: Proposer (GD/DA) to review BRs and consider adding an 'Avoidance of Doubt' statement confirming that the CDSP would not reassess the materiality test should a Shipper change reads after the test was performed.

DA also noted that as part of the process, the CDSP will be approaching the CSS registered Shipper of the meter which means the CDSP will effectively be engaging with a party that was without relation to the meter on the UK Link at the time. He also advised of the intention to use the current registered Product Class at the time of the CSS Registration Effective Date to avoid considerable additional potential complexity.

Andy Clasper (AC) observed that there appeared to be conflicting statements within the Modification regarding triggers being more or less than the 1,200 kWh threshold. SM suggested that there needs to be a reference in the Modification to the REC threshold rather than a value, proposing wording it as 'the REC threshold (which is currently 1,200 kWh)'. Discussion around allowing timing for a replacement read to take place was also held.

New Action 0502: Proposer (GD/DA) to check for consistency in the application of the REC Threshold, that a reference to the REC is used, and to consider the timing to allow for replacement reads.

RH asked if the Modification was ready to consider requesting Legal Text. Gurvinder Dosanjh (GD) suggested an offline discussion with DA would inform a view of this and commented that it should prove possible to get a first draft of the Legal Text for the next Workgroup.

RH enquired when a Rough Order of Magnitude (ROM) would be made available, to which DA responded that costs have already been allocated for R0067, which could be used to inform the creation of a ROM.

New Action 0503: CDSP (ER/DA) to produce a ROM for the June 2023 Workgroup.

RH advised that the draft Modification could be forwarded to the Joint Office as version 2. She also advised that it seemed likely two further Workgroups would be required, on the basis that a first draft of the Legal Text would be seen in the June 2023 meeting.

3.0 Development of Workgroup Report

An update to the Workgroup Report will be considered at the next meeting to be held on 22 June 2023.

4.0 Next Steps

- Modification amendments from Workgroup discussion.
- Provision of ROM for next Workgroup.
- Provision of the initial draft of Legal Text for review at next Workgroup.

5.0 Any Other Business

None.

6.0 Diary Planning

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

Workgroup meetings will take place as follows:

Time / Date	Paper Publication Deadline	Venue	Programme
Thursday 10:00 22 June 2023	5 pm 14 June 2023	Microsoft Teams	TBC
Thursday 10:00 27 July 2023	5 pm 18 July 2023	Microsoft Teams	TBC

Action Table (as of 25 May 2023)

Action Ref	Meeting Date	Minute Ref	Action	Reporting Month	Owner	Status Update
0201	23/02/23	2.0	Issues and Questions from the Panel: Workgroup to consider the Materiality Test and feedback on any comments direct to David Addison or via Joint Office.	March 2023 April 2023 May 2023	Workgroup	Closed
0401	27/04/23	2.0	Shipper participants to provide their view on the Invoicing materiality test. Linked to Action 0201.	April 2023	Shipper participants	Closed
0501	25/05/23	2.0	Proposer to review BRs and consider adding an 'Avoidance of Doubt' statement confirming that the CDSP would not reassess the materiality test should a Shipper change reads after the test was performed.	June 2023	Proposer (GD/DA)	Pending
0502	25/05/23	2.0	Proposer to check for consistency in the application of the REC Threshold, that a reference to the REC is used, and to consider the timing to allow for replacement reads.	June 2023	Proposer (GD/DA)	Pending
0503	25/05/23	2.0	CDSP (ER/DA) to produce a ROM for the June 2023 Workgroup.	June 2023	CDSP (DA)	Pending