

UNC Distribution Workgroup Minutes
10:00 Thursday 27 July 2023
via Microsoft Teams

Attendees		
Bob Fletcher (Chair)	(BF)	Joint Office
Ben Mulcahy (Secretary)	(BM)	Joint Office
Andy Clasper	(AC)	Cadent
Anne Jackson	(AJ)	PAFA (Gemserv)
Andy Eisenberg	(AE)	Eon Next
Charlotte Gilbert	(CG)	BU-UK
Daniel Wilkinson	(DW)	EDF
David Addison	(DA)	CDSP (Xoserve)
David Mitchell	(DMi)	SGN
Edd Green	(EG)	Eon Next
Fiona Cottam	(FC)	CDSP (Xoserve)
Gurv Dosanjh	(GD)	Cadent
Harry Hailwood	(HH)	Brook Green Supply
James Lomax	(JL)	Cornwall Insight
Jenny Rawlinson	(JR)	BU-UK
Kathryn Adeseye	(KA)	CDSP (Xoserve)
Kevin Clark	(KC)	Utilita
Louise Hellyer	(LH)	TotalEnergies Gas & Power
Lee Greenwood	(LG)	British Gas
Mark Jones	(MJ)	SSE Energy Supply
Oorlagh Chapman	(OL)	Centrica
Richard Pomroy	(RP)	Wales & West Utilities
Slama Akhtar	(SA)	Northern Gas Networks
Steve Mulinganie	(SM)	SEFE Energy Limited
Tom Stuart	(TSt)	Wales & West Utilities
Tracey Saunders	(TS)	Northern Gas Networks

Copies of all papers are available at: <https://www.gasgovernance.co.uk/Dist/270723>

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/270723>

1. Introduction and Status Review

Bob Fletcher (BF) welcomed everyone to the meeting and gave a brief overview of the scheduled items for discussion.

1.1. Approval of Minutes (22 June 2023)

Tracey Saunders requested amendments to the minutes under item 1.5 concerning the Pre-Modification discussion of issues pertaining to UNC 0701 - *Aligning Capacity booking under the UNC and arrangements set out in relevant NExAs*. The amendments emphasised that Modification 0701 had not yet been implemented and made other minor clarifying changes. The Workgroup reviewed the amendments in a tracked changes copy and the minutes for UNC Distribution Workgroup from 22 June 2023 were subsequently approved with these amendments.

1.2 Approval of late papers

BF advised that papers for item 5 Product Class Capacity were a late paper which was accepted to review by the Workgroup.

1.3. Review Outstanding Actions

Action 0601: Joint Office to add new Item 5 'Product Class Capacity' to the Distribution Workgroup agenda from July 2023 forward.

Issue Update: BF noted that this had been added to the agenda.

Action closed.

Action 0602: Joint Office to add Legal Text update and CDSP Permissions for 0701 to July Distribution Workgroup Agenda as a Pre-Modification.

Issue Update: BF confirmed that this had been done and the Pre-Modification discussion was to be held in this meeting.

Action closed.

Action 0603: Joint Office to adjust Workgroup order in each subsequent Distribution Workgroup to facilitate consistent industry engagement for proposed Modifications.

Issue Update: BF confirmed that the Joint Office was undertaking this action and that Parties may have noted the subtly reordered Agenda. He noted there were no further comments from the Workgroup and closed the action.

Action closed.

1.4. Modifications with Ofgem

BF shared that there were no significant updates to provide to the Workgroup, advising that the latest update on all UNC Modifications with The Authority can be reviewed at <https://www.ofgem.gov.uk/publications/code-modificationmodification-proposals-ofgem-decision-expected-publication-dates-timetable>

1.5. Pre-Modification discussions

1.5.1 CDSP permissions to facilitate implementation of UNC0701 (Aligning Capacity booking under the UNC and arrangements set out in relevant NExAs)

Tracey Saunders (TS) presented this Pre-Modification, noting that whilst it had been discussed in the June Distribution Workgroup, a Modification had not been raised at the time. She shared that due to crucial timing considerations, the Modification needed to complete consultation and be implemented by 04 November 2023. To aid in this endeavour she was keen to have a Workgroup review it as assurance to the Modification Panel that further Workgroup review was not necessary. She added that initially, the intention was to get the Modification processed in the July meeting of the Modification Panel, but that she had wanted to avoid rushing it and risking errors, and that it needed to be discussed with the CDSP. With this in mind, she asked to review the draft Modification in this Distribution Workgroup and obtain a consensus to approach the Modification Panel for approval to go out to Consultation without the need for further Workgroup assessment.

TS explained that the Modification has three elements, in that it adds clarity should a Shipper not reduce capacities that are outside of the agreed Network Exit Agreement (NExA) values, which would put them in breach of Code, that the CDSP will reduce the capacity for the site to the agreed NExA values. Secondly, the Modification will address the clause numbering in Modification 0701

Aligning Capacity booking under the UNC and arrangements set out in relevant NExAs which was based on Code at the time of submission and since then Code had changed, noting, in particular, the renumbering undertaken in preparation for the introduction of CSS (UNC 0708S - *Re-ordering of the UNC in advance of Faster Switching*), that had resulted in the Modification 0701 Legal Text no longer being in alignment with current Code.

Finally, TS added that when drafting the Legal Text there had been the consideration of the use of 'Network Exit Agreements' and 'NExA' which resulted in Business Rule 3 that any instances of 'Network Exit Agreement' within the Modification 0701 Legal Text be amended to 'NExA' for conformity.

TS advised that within the Modification 0701 Workgroup discussions four years ago, there had been a lot of dialogue that led to the Impact Statement establishing that the maximum daily capacity and NExAs were aligned, adding that the CDSP reduction permitted by this Modification should add clarity to this relationship and reduce the Shipper burden in regards to interaction with concerned customers by enabling them to cite industry Code as the driver for such changes.

TS highlighted that the Solution had a table that detailed the paragraph renumbering pre-and post-implementation of Modification 0708S which were delineated in blue within the Legal Text. The additional CDSP permissions were detailed in the new UNC TPD Section B paragraph 5.5. Further amendments are made to UNC TPD Section G, which becomes Annex B-3 where Capacity definitions for Transporter Determination of Feasibility are clarified as being linked to the NExA rather than Network Exit Agreement for conformity.

TS shared that the draft Modification had been submitted to the Joint Office and had undergone the Critical Friend process, as such the clarity and wording of the main part of the draft Modification had been reviewed, though not the Legal Text itself, adding that she wanted to get Workgroup views in case any amendments were required.

Jenny Rawlinson (JR) asked if a higher capacity had been requested through the usual means would that adjustment be in place so that the CDSP reduction would not occur.

TS responded that should a capacity be requested that proved higher than the NExA it would be rejected, otherwise the capacity would be increased and no Subsequent CDSP action permitted in this Modification would be required.

JR asked if this meant the Modification was just to address where that process had not been followed.

TS confirmed that it was just to address some sites where the Provisional Maximum Supply Point Capacity (PMSOQ) rules allowed ratcheting above the capacities permitted under NExAs, as these items were not originally tied together, or where there were errors when sites were first set up.

JR asked that requests from an IGT were still applicable.

TS confirmed that they would still be considered though shared that she was not entirely sure how the IGT UNC worked on this issue and would need to understand it better to confirm. She stated that she had sent the draft Modification to the IGT UNC Code Administrator and was awaiting their response and was expecting their feedback before the Modification Panel were asked to consider it.

SM asked after the scenario in which a Shipper has not performed an action because they were unable to and if this Modification empowered the CDSP to act where Shippers cannot.

TS explained that the CDSP can only act in the Capacity Reduction Window as was the case for Shippers, adding that if there was a system issue that meant a Shipper request bounced back to them, the CDSP should still be able to act and ensure capacity/NExA conformity. She added that

the CDSP Permissions were intended as enduring Code text rather than as a transitory to enable the CDSP to address any future NExA errors in the same way.

TS asked that, having discussed the Modification at two pre modification discussions to date, was it reasonable to request the Modification Panel to issue the Modification straight to consultation.

There were no objections from the Workgroup to this proposed approach and TS confirmed that the Modification would now go to the August Modification Panel with a request to issue the Modification to consultation.

2. CSS REC Consequential Changes Update

David Addison (DA) delivered a presentation to the Workgroup to provide insight into a proposed Modification to address the Settlement Adjustments for Supply Meter Points impacted by the Central Switching System P1 Incident. A copy of the presentation can be reviewed at <https://www.gasgovernance.co.uk/Dist/270723>

DA asked Parties to be cognisant that the P1 Incident was an evolving situation and that the information provided was to the best of CDSP's knowledge at the time. He shared that he had put Mod XXX in the tile in recognition that the industry seemed to be expecting a settlement action as part of the follow up to the P1 incident.

DA summarised that there had been 360 incidents of missing messages up to the end of June 2022 which Modification 0836S was formalising the CDSP's 'right to register' which, to date, was enacted as a derogation approved by the UNCC, with no retrospective element.

DA noted that as a result of the P1 incident at least 81,000 Supply Meter Points had been impacted, and that differing parties were responding to the situation based on best-fit solutions for their particular systems, customers and related considerations.

He added that the settlement situation needed to be addressed and to do so, the relevant impacted Supply Meter Points needed to be identified. These need to be specific and finite, with impact measured from 07 July onwards.

DA talked through a summary of the incident with the aid of the fishbone diagram shown on **Slide 3** of his presentation. He stated that he did not know when DCC first experienced the problem but advised that the CDSP had been monitoring events through gate closures and their subsequent projections had proven good, but that the industry needed to await the confirmed DCC data.

DA shared that when he spoke to the Modification Panel on 20 July about the incident circa a quarter of the volume was reported as 'at risk' as Registration Effective dates rapidly approached. Since then, Suppliers and Shippers have been proactively managing their affected portfolios and the CDSP had seen about 1,000 switches cancelled and reconfirmed, reducing the impact for which DA was thankful. He recommended that Shippers still reconcile against DCC data to check for any inconsistencies.

The DCC were unable to identify future dated registrations that will fail, so management of future dated registrations that will be impacted relies on data sourced from other systems, rather than the 'master' CSS system. In doing so some parties had reported instances of missing messages prior to 06 July, which the CDSP have not seen. These parties were currently in discussion with the DCC on this issue and whilst the CDSP data is reconciled with the DCC data they were continuing to double-check data.

DA noted that Option 1, the Cancellation and Future Dated Registration of all affected registrations, which he highlighted the electricity industry systems are unable to support, had not yet been formally declared as ruled out, but, unlike Option 2 (being the Retrospective enactment of Registrations for the originally requested dates) was not going into testing, and as such, expectations were that the Option 2 will be the solution used.

Option 2 will generate Secured Active Messages (SAMs) at D+27, assuming the earliest implementation of 02 August for the gate closure messages that should have been issued on 06 July.

DA drew the Workgroup's attention to the red text on **Slide 5**, which summarised the issues for UNC parties. Gas Settlement systems will not accept Retrospective Registrations, which will lead to the potential of Settlement issues. He confirmed that the CDSP will need to manually initiate UKL Registrations, which was not considered in the UNC, and expressed his appreciation of how pragmatic the UNCC had been in agreeing to the CDSP taking this action. DA stated that if the CDSP get messages before 15:00 on 02 August they will be on the UKL on 03 August.

TS asked which date would show on the Gas Enquiry Service (GES), the original date CSS date that Option 2 will retrospectively enact or the UK Link date.

DA confirmed it would be the UK Link date. He then moved onto **Slide 6** which walked through the DCC solution options and what the processes enabled by Modification 0836S - *Resolution of Missing Messages following Central Switching Service implementation and integration with REC Change R0067* would do.

The next slide (**Slide 7**) provided a timeline example Modification 0836S scenario for the DCC Option 2, with a SAM that should have been issued at 17:00 on D-1, which, under Option 2 the original Registration date will be reissued at D+27 and recorded on CSS. The CDSP will then record receipt on that date, producing an Adjustment Period between the original date and the UK Link date.

Regarding the Self-Service Option for Prospective Registrations (**Slide 8**), DA advised that confirmation had been received from DCC the incoming supplier can submit a withdrawal which would cancel the registration, and then issue a new registration for the same date, providing it is possible under REC timings, and commented that the CDSP had seen about a thousand of these. This meant there were no Settlement discrepancies for these Supply Meter Points.

However, DA acknowledged that this was not an option where Suppliers had submitted withdrawals where the intended Registration Date has passed, making for a discrepancy between when the supplier wanted the supply live, and what will be recorded in CSS. He stated that the new P1-related Modification needed to take account of this, adding that the CDSP did not need to intervene in the registration, and it should successfully go through gate closure but will lead to settlement issues as the original supply effect date will be affected. As such there would be a Settlement Adjustment period, though a reduced one.

DA talked the Workgroup through **Slide 11**, which provided a definition of Impacted sites, being sites where the originally intended CSS registration effective date was not reflected in UKL. He shared that if parties have cancelled a registration and were then not able to achieve their original intended date, this will not be reflected in CSS, but the CDSP were looking to capture these.

Slide 12 provided a Comparison to Modification 0836S processes, and DA highlighted that the CDSP was proposing to still use the Materiality Test as defined in Modification 0836S in response to questions from some parties who were asking if the parameters to the Test were going to be altered to take account of other factors, such as the number of Supply Meter Points in a portfolio that were affected. He added that the CDSP remained open to discussion on this.

DA added that the Invoice Adjustment period in Modification 0836S proposed a 3-month window, being the period of time available for the meter reads to be adjusted. He stated that the new Modification would propose reducing the window to six weeks from the CDSP issue of the CSS Registration Effective Date Meter Reading to allow the progress to work efficiently through the adjustments to a prompt resolution.

DA also shared that the Modification will suggest an option for parties to opt out of Settlement Adjustments. He explained that of the 84k supply points affected, circa 60k to 65k could be classed as internal portfolio transfers. He added that the CDSP did not know the nature of these, but they are from one company number to another within an organisation/group and might be appropriate that adjustments be made, conversely, an opt-out option is perhaps worthwhile. He added that it might also prove that some parties that have cancelled their earlier registration had flexed options within their customer contracts and that if a date is aligned in CSS and UKL the opinion may be that a settlement investigation is not required, or alternatively the gaining and losing supplier come to their own agreement.

DA stated that, given that any Modification of this nature and when the decision to implement is reached, even if identified as an Urgent Modification, the registration activity on 04 August and the following four days will be over and the CDSP will have used the UNCC permission to undertake the necessary actions, and as such there was no need to add anything in this regard to Modification 0836S.

Anne Jackson (AJ) was curious about the identification of the affected MPRNs, as it was not possible to identify impacted future-dated supplies from the DCC and questioned how Parties recognised which Registrations were affected.

DA stated that the CDSP had provided this information.

SM confirmed this, verifying that the DCC cannot see impacted registrations until they fall into the past so Shippers had been doing their own analysis using the Registration dates and Xoserve information to identify the impacted switches.

AJ shared that the DCC had told her that they could see the impacted MPRNs.

DA agreed that once requested registrations are in the past, they do get added to the DCC dataset, noting that the CDSP have 01 and 02 August registrations that the DCC are unable to confirm progress.

AJ concluded that Modification 0836S meets some of the needs of this incident, but the incident was not the same as what happened last year.

DA agreed, commenting that Modification 0836S does tick some of the boxes needed, adding that there are differences, as this **Slide 12** of his presentation demonstrated.

AJ noted that assuming IGT sites are in the total 86k sites impacted, the settlement issues under the UNC will be sorted out, but for the IGTs, as the CDSP do not invoice for them, the IGTs will get the wrong dates as will the Shippers they invoice, meaning down the line there will be a consequential impact on IGTs.

DA agreed.

AJ noted that Modification 0836S will correct the UNC charging for these sites and billing to the IGTs.

SM highlighted that retrospective issues for the P1 incident would not be addressed by Modification 0836S but will be by the Modification that will follow.

AJ noted that the billing for IGTs is within the UNC but IGTs undertake their own billing, and so charging for capacity etc being delivered through an IGT would be corrected under Modification 0836S.

DA confirmed that all UNC charging up to the CSEP Charging point will be included.

SM asked the Workgroup for views if the proposed Modification would warrant classifying as Urgent, noting that as it fixes issues after the event it was probably going to prove an Authority Directed Modification that did not need to be Urgent, noting that Modifications of that nature comes with additional challenges. He added that SEFE was proposing sponsoring the Modification.

Louise Hellyer (LH) stated that whilst it was undesirable to have the Modification dragged out she acknowledged the point that it was not Urgent in that it did not impact an ongoing situation but noted that Shippers will need to get the estimated reads to generate customer billing promptly, without which customers will be impacted.

SM asked if the Modification would benefit from going through a Workgroup, noting that there was a question around materiality and the lead times before and adding that the concern in not doing so was questions being raised in the consultation phase where there is no Workgroup debate in the report to steer Ofgem.

LH asked if the industry could get any agreement from Ofgem about decision turnaround, expressing concerns about how long this had proved to take for previous Modifications.

BF noted that the Modification Panel can set the number of Workgroup meetings to discuss a Modification or expedite the overall process to ensure the Modification is progressed in a timely manner.

LH responded that she was less worried about the industry being prompt in processing Modifications and more about the lack of assurance from Ofgem.

SM commented that even if the Modification was classified as Urgent, it would still be in the same Ofgem in-tray.

Mark Jones (MJ) commented that he agreed to support the Modification, saying it was similar to DSR, and that if the Modification was classified as Urgent it risked going around the loop.

BF asked if there needed to be any coordination with the electricity industry.

DA did not think so, given that the electricity industry had said they can only go with Option 2 and had been told effectively to sit and wait. Their commentary into the DCC was that they were not told registrations were cancelled so the electricity supplies have gone live. As such the Gas and Electricity conversations had to be separate.

SM commented that it was a good point and suggested making a statement at the beginning of the proposed Modification to clarify that there is no dependence on electricity.

DA confirmed he wanted to get the Modification to the August Modification Panel.

DA added that any influence parties could apply to the RECCo or DCC would be appreciated in considering how the DCC will take the handling of this incident as a precedent for similar situations in the future. Parties in DCC Groups would need to think about how that affects Changes.

SM commented that this was a good point as the REC had said there will be a full review.

DA requested an Action be taken regarding the de minimis volume of 1200 in the Materiality Test, asking that if any Party has any concerns regarding that figure (e.g., requesting zero or another figure) or have a really good alternative they need to come back as soon as possible, as he wanted to ensure the best way forward was taken. He repeated that the number of impacted sites might be an issue some want to explore.

SM counted that the approach needed to be based at the meter point level, adding that it would otherwise be too complicated. He commented that the 1200kWh figure was not being ignored and was perhaps something for the Performance Assurance Committee (PAC) to consider.

MJ commented that the price of 1,200 kWh was considerably more this year than it was last year.

New Action 0701: Industry Parties to provide CDSP (DA) with any concerns regarding the de minimis figure of 1200 kWh as a priority.

DA confirmed the intention to submit a Modification of a SEFE-sponsored Modification.

3. Workgroups

3.1. **0836S - Resolution of Missing Messages following Central Switching Service implementation and integration with REC Change R0067**

(Report to Panel 21 September 2023)

<https://www.gasgovernance.co.uk/0836>

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

(Report to Panel 19 October 2023)

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

3.3. **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 2023)

<https://www.gasgovernance.co.uk/0831>

3.4. **0812R – Review of Alternates to “Must Read” Arrangements**

(Report to Panel 21 September 2023)

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

4. Distribution Workgroup Change Horizon

Kathryn Adeseye (KA) presented the July UNC Regulatory Change Horizon Roadmap, a copy of which is available for review at <https://www.gasgovernance.co.uk/Dist/270723>

KA stated that there had not been many significant changes from the presentation in June, with the main call outs being that Modification 0799 - *UNC arrangements for the H100 Fife project (100% hydrogen)* has been added, as, despite XRN5298 being implemented in February 2023, a new XRN5635 has been created to address further activities required. Also, that, as Ofgem had rejected Modification 0813 *Revision of Virtual Last Resort User and Contingent Procurement of Supplier Demand Event Triggers*, XRN5606 would be removed from the report.

KA finished by confirming that Modification 0829 *Updates to the Supplemental Agreement Amendments Process* has been implemented and would also be removed from the report going forward.

5. Product Class Capacity

KA advised the Workgroup that the CDSP representation for this item was unable to attend the meeting and it was agreed to revisit the item in the August meeting.

6. Issues

No issues were presented.

7. Any Other Business

7.1. XRN5651 Tolerance Proposals

Fiona Cottam (FC) presented this set of proposals for the UNC Read Validation Tolerances Product Class 3 & 4. A copy of the presentation can be reviewed at <http://www.gasgovernance.co.uk/Dist/270723>

FC explained that consideration of this issue started as a question in April 2023 in a discussion at the DSC Contract Management Committee regarding the volume of meter reads failing due to failing inner tolerance validation checks. She explained that the tolerances were based on AQ per day calculation. The CDSP undertook an analysis of meter readings rejected for breaching the validation and the findings were presented to the May meeting of the DSC Contract Management Committee.

The challenge found with the current Tolerances for Class 3 and especially Class 4 Supply Meter Points was that as more sites become monthly read the validation will be applied to a single month's consumption and not to 12 months. With domestic and small industrial/commercial sites typically being very weather sensitive even under seasonal norms a winter month's consumption can be ten times that of a summer month. FC noted that a tolerance of 150% of AQ per day will cause 'normal' winter usage to fail inner tolerance every time, with failed reads needing to be resubmitted with an Override flag accepted.

Tolerance Ranges used in Meter Read validation process was raised and presented to the June meeting of the DSC Change Management Committee. The proposal asked the CDSP to provide analytical data that would support Shippers in determining the revised tolerance values which should be defined within the UNC Validation Rules and utilised by Shippers and within CDSP systems.

FC drew the Workgroup’s attention to **Slide 5** which detailed current Class 4 Read Validation Tolerances and highlighted figures thought too low for normal winters in red and for more extreme cold spells in yellow.

In **Slide 6** FC talked through the suggestion that Tolerances be set to their current highest levels plus with an additional 50% extra allowance. The outer tolerances were not to be changed as they were used to protect individual Shippers and the industry from the risk of excessive figures.

FC also recommended that high Winter Annual Ratio (WAR) bands be considered so as not to disincentivize sites being WAR banded.

RP asked to clarify that the Tolerances used the equivalent percentage of AQ consumed per day. FC confirmed that they did not use the annual AQ, but the AQ divided by 365.

Reviewing **Slide 8**, FC talked through the suggested updates to the Tolerances, noting that the larger sites needed to be more finely altered to take account of how small swings in percentage can relate to a lot of volume.

FC stated she could not say how many reads would be accepted as a result of these changes that would not have been before, as the CDSP did not know how many meter reads failed tolerances, nor was it possible to know what weather variables will occur that will, in turn, have a considerable impact on the figures.

FC advised that the intended next steps (**Slide 10**) were to receive views at the July Distribution Workgroup before seeking August UNCC approval of the agreed Tolerance Range changes to put the values in place under XRN5651. The intention was to deliver this as a Minor release with a target implementation date in September/October 2023. She added that the CDSP could not fully assess the impact until they were sure what was agreed.

BF said he was not aware that the CDSP can seek Changes themselves, so presumed a Shipper/Transporter sponsor would be required.

FC agreed and would request whoever sponsored XRN5651 (Centrica)

SM commented that the work was welcome and that his only question was regarding the Tolerance Override flag, noting that if a Shipper did submit a meter read with the Override flag enabled, and, due to these changes, it was not required, the meter read would be rejected, which would be counter to the intention of ensuring good reads are successfully collated.

FC agreed that this was a consideration and that she believed this was an education piece for the CDSP to deliver to ensure Parties are not caught out.

8. 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 24 August 2023	5 pm 15 August 2023	Microsoft Teams	Standard Agenda including any Modification Workgroups relating to Distribution Workgroup
Thursday 10:00 28 September 2023	5 pm 19 September 2023	Microsoft Teams	Standard Agenda including any Modification Workgroups relating to 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
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Distribution Workgroup Action Table						
Action Ref	Meeting Date	Minute Ref	Action	Reporting Month	Owner	Status Update
0601	22/06/23	1.3	Joint Office to add new Item 5 'Product Class Capacity' to Distribution Workgroup agenda from July 2023 forward.	July 2023	Joint Office (BM)	Closed
0602	22/06/23	1.5	Joint Office to add NGN (TS) Pre-Modification to July Distribution Workgroup Agenda	July 2023	Joint Office (BM)	Closed
0603	22/06/23	5	Joint Office to adjust Workgroup order in each subsequent Distribution Workgroup to facilitate consistent industry engagement for proposed Modifications.	July 2023	Joint Office (BM)	Closed
0701	27/07/23	2	Industry Parties to provide CDSP (DA) with any concerns regarding the de minimis figure of 1200 kWh as a priority.	August 2023	Industry	Pending

UNC 0836S Workgroup Minutes

Resolution of Missing Messages following Central Switching Service implementation and integration with REC Change R0067

10:00 Thursday 27 July 2023

via Microsoft Teams

Attendees		
Bob Fletcher (Chair)	(BF)	Joint Office
Ben Mulcahy (Secretary)	(BM)	Joint Office
Andy Clasper	(AC)	Cadent
Andy Eisenberg	(AE)	EON Next
Charlotte Gilbert	(CG)	BU-UK
Daniel Wilkinson	(DW)	EDF
David Addison	(DA)	CDSP (Xoserve)
David Mitchell	(DM)	SGN
Edd Green	(EG)	EON Next
Gurv Dosanjh	(GD)	Cadent
Harry Hailwood	(HH)	Brook Green Trading
James Lomax	(JL)	Cornwall Insight
Jenny Rawlinson	(JR)	BU-UK
Kathryn Adeseye	(KA)	CDSP (Xoserve)
Kevin Clark	(KC)	Utilita
Lee Greenwood	(LG)	British Gas
Louise Hellyer	(LH)	Total Energies Gas & Power
Mark Jones	(MJ)	SSE Energy Supply
Slama Akhtar	(SA)	Northern Gas Networks
Steve Mulinganie	(SM)	SEFE
Tom Stuart	(TSt)	Wales & West Utilities
Tracey Saunders	(TS)	Northern Gas Networks

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 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/0836/270723>

1.0 Introduction and Status Review

Bob Fletcher (BF) welcomed everyone to the meeting and gave a brief overview of the scheduled items for discussion.

1.1. Approval of Minutes (22 June 2023)

The minutes from the meeting held on 22 June 2023 were approved.

1.2. Approval of Late Papers

It was noted that the Legal Text Explanatory table had been provided late, although all other documentation for review by the Workgroup had been received by the Joint Office before the papers due date.

1.3 Review of Outstanding Actions

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

Update: David Addison (DA) confirmed that a ROM had been provided to the Joint Office and was available for review by the Workgroup.

Action Closed

Action 0601: Proposer to add REC Portal access guidance and the related R0067 REC Change Request as an Appendix to Modification. Proposer also to remove any square brackets in the document.

Update: DA confirmed the action had been completed and that the REC-related documentation now formed an appendix to the Modification.

Action Closed

Action 0602: Proposer to discuss potential IGT Impact with Anne Jackson

Update: DA advised the Workgroup that this discussion was being progressed, but had not been completed, stating that he had recently provided a paper to Anne Jackson (AJ) but not had an opportunity to discuss it with her.

AJ confirmed receipt of the paper but stated she had not had the time to read it in full yet. She noted that as DA had clarified the intent of the Modification, she was able to verify that if any alterations were to be made at a supply point level it was very likely that an IGT UNC Modification would be required to ensure the references that point to the UNC were kept correct.

DA explained that there were two core elements within the Modification, with the UNC Section G components enabling the CDSP to act in the case of a missing registration and the insertion of the CSS meter readings. He commented that, in reviewing the references across from the IGT UNC to the UNC he thought there were enough references between them for the purposes of the Modification but would defer to AJ's view.

AJ stated that in terms of registration and how supply points are managed the difference was extremely minor, in that IGT sites are treated in the same way as those on DNO networks, but that there was more of a challenge around specific clauses where they point to specific areas, making it very likely an IGT UNC Modification was required.

DA observed that if there was a need for an IGT UNC Modification a Proposer would be required.

AJ ruminated on the recent P1 incident and observed that it was not known how IGTs would respond to the matter as they would be billing on the dates they have been provided. She stated she had no knowledge of the details but advised that Shippers needed to be aware that an IGT issue may arise out of the matter yet.

Steve Mulinganie (SM) suggested that Shippers would need to understand what that pending issue was likely to be, suggesting putting an Action on the IGTs to explain the issue and associated actions.

AJ advised that such an explanation was likely to come up through the IGT UNC forums to the industry, rather than a UNC Workgroup. She expanded that the IGTs obtain their supply dates from the UK Link (UKL) and subsequently produce their own invoicing. Because of the P1 incident some of that information was incorrect and, under the UNC, the situation is being corrected under this Modification. Currently, the industry is unaware of the consequences of this situation for the IGTs, but it is a potential risk which she had no current knowledge as to how it will manifest.

BF summarised his understanding was that a potential IGT UNC Modification was required and that the workgroup will need to understand any alignment requirements. He asked if a joint UNC / IGT UNC workgroup was needed.

AJ did not think a joint workgroup was necessary as the UNC Modification delivers the necessary functionality up to and inclusive of the Connected System Exit Point (CSEP) so all billing to that point had been addressed in Modification 0836S, observing that the issue was specific to the IGT UNC billing from that point forward.

DA commented that this was a helpful conclusion and that he had just completed reviewing the current population of the previous issue that the Modification had first been raised to address (i.e. before the current P1 event) and looked for any affected IGT sites. He advised that there were 17 to date and that every one of them had been cancelled so would not require any consideration of settlement consequences. He added that there would probably be IGT sites where settlement consequences are an issue because of the P1 incident.

AJ commented that this suggested that, in the case of IGTs, UNC Modification 0836S is really for future proofing as there was not an immediate need yet, in that there are no IGT sites currently in the pot for settlement adjustment.

DA agreed, advising that the registrations from CSS that were missing were either because a cancellation was forgotten to be sent as one supplier had cancelled or due to a known issue with first registrations where a gap exists in the process within the CSS systems, which results in a switch being cancelled because the losing supplier has withdrawn before the switch becomes active. The CSS response was to cancel that original registration, meaning no subsequent settlement issue. He added that a REC Change was needed to close this gap.

Action Closed

Action 0603: Panel question response

Update: DA confirmed that response to the Panel Questions were provided in the Modification.

Action Closed

Action 0604: Joint Office (RH) to request Legal Text for 0836S at July Panel.

Update: BF noted that an extension had not been requested which prompted DA to advise the Workgroup that Legal Text had now been provided and an extension requested as a retrospective element was under consideration, though a separate Modification, sponsored by SM was now the route decided upon to address this issue.

Action Closed

2.0 Amended Modification

Note the documentation discussed below is available to review at www.gasgovernance.co.uk/0836S/270723

BF shared a screen view of the draft amended Modification, which DA talked the Workgroup through, stating that there had been no major changes and the amendments had been more of a tidying/housekeeping exercise, addressing issues such as square bracketing.

DA shared that some text had been added to the discussion of the Materiality Test description to address the Modification Panel question on that subject. The text now advised how the Workgroup had developed the Materiality Test to determine if an adjustment was required and now included the table discussed in Workgroup.

Under Code Specific Matters a link had been added to the REC Change 0067, noting that REC Portal access was required to view this and that the REC Change document itself had been added as an Appendix to the Modification.

DA also highlighted that Relevant Objectives had also been updated in light that the Workgroup had agreed that the Materiality Test added a further efficiency proponent to support objective f) *Promotion of efficiency in the implementation and administration of the Code.*

Review of Legal Text

DA talked the Workgroup through the legal text as it was shared onscreen. He noted that Definitive Registration Notifications (DRNs) was the UNC term for Secured Active Messages and the text defined the circumstances under which a DRN was considered a 'Missing DRN', being either where the CSS Provider fails to send it or it is either not received by the CDSP or is received but proves unable to progress. The latter was the case in the instances where server time mismatches suggested receipt of future-dated files, which DA confirmed was an issue that the CDSP has subsequently addressed.

DA then explained that clause 5.92. detailed the actions CDSP would then subsequently take, and was dependent upon REC Change R0067 being implemented under the REC.

ROM Highlights presentation

DA introduced this presentation as something he had produced to address the more unusual components of the ROM and advised that several XRN's have already been approved by the DSC Change Management Committee that considered the work required by this Modification.

XRN5535A 'Processing of CSS Switch Requests Received in 'Time Period 5' was created to enable the CDSP to register the missing messages on UKL and advised that teams had been setup to monitor the process, with two set up from February 2023, the long-term prospects of which he would need to be assessed in the future.

XRN5567 Implementation of Resend Functionality for Messages from CSS to GRDA has had a BER approved for delivery though a Detailed design had yet to be conducted, but DA shared that it was expected to automatically generate a resend message within day to avoid settlement issues but may need an adjustment, though with no more than two days impact they were unlikely to trigger a concern from the Materiality Test but did acknowledge that any UK site could be impacted including the large ones.

XRN5535B will be the delivery mechanism delivery of the activities developed in the ROM for UNC Modification 0836S.

The costs detailed gave a range for implementation between £28k to £34k, with the intention of scheduling a separate small implementation rather than being part of a Major Release. Ongoing operational costs were listed as between £5k and £8k per annum.

SM asked if these things were happening in parallel and if the ROM for the P1 Solution Modification was going to be similar solution for P1 or was this dealing with very small volumes and the work addressing the P1 going to be a different scenario dealt with very quickly.

DA explained that UNC 0836 and its ROM initiate the process in order to get the meter readings onto the system and into Change management, requiring about four weeks for implementation. Where the distinctions for the P1 related Modification come into play are more related to the ongoing Operational costs. He noted that the P1 was certainly an incident that needed to be sorted, and that £5k to £8k would not cover the P1 considerations as this issue was materially larger in scale. He shared that it was not yet know if the intention is to pay third party costs and that this consideration will potentially need to be returned to. The priority has shifted its focus to the P1, and that he did not know if customers will see an invoice for this work but would probably see a potential costs for use in future DCC and REC discussions.

DA added that wherever possible the CDSP will look to use the functionality already proposed, such as, presuming the Materiality Test remains at 12,000 kWh, taking a two-tier approach and performing a fully assessed detailed process for anything that appears to be at risk of hitting that threshold, as opposed to a simpler baseline test to identify those that require that more detailed approach.

DA drew the Workgroup's attention to the fact that the Modification retained the proposal of processing 15 messages a month, noting that, outside of incidents, that at the current rates the CDSP were aware of 14 such messages in four months, with the majority being ones the CDSP cancelled anyway. Accordingly, the logic was to size the team to this figure and excluded incidents, which he suggested the industry would not want the CDSP to resource a team for.

ROM

DA explained how the ROM provides a lot of detail about the solution and the proposed approach. He also walked through the Overview of impacts, noting in particular that: -

A3 confirms that the solution would not seek a retrospective registration date, with an exception for Greenfield sites where the CDSP will make separate assessment.

A4 verifies that UNC and IGT UNC sites will be dealt with in the same manner.

DA commented that they were seeking to clarify responsibility for the Supply Point if ever CSS and UK Link systems are misaligned. He highlighted that this is about generating invoicing which is reliant on switching and hence on the operator service desk, stating that he was hoping for more scrutiny on the provision of this, stating that, in fairness, the CDSP were now not waiting six or seven months for developments and recently had feedback within a few days confirming that registrations can be cancelled.

Part 2 XRN5545 Part B is detailed as including an updated manual process and the description is important as to what should be done.

The section on the Insertion of a meter reading for the CSS Registration Effective Date is detailed in recognition that it is important as to keep the costs down, and DA shared how most meter read related system Changes cost £300k+ due to the many considerations and ramifications. He explained that the process in the ROM was created as cost effectively as they could using existing reads that have the characteristics needed, in that they will generate reconciliation and can be used for AQ calculations. Shipper B will get the resultant meter read value via by email rather than another file format, so through a manual process but DA stated that this felt to be correct of this right process, acknowledging it would not be great for parties that may get large volumes of them, but stressed opening up the meter reading process would have huge cost considerations.

DA warned that once an adjustment had been performed the CDSP would not open it again, even if, for example, it was a duplicate, as there are separate processes that already exist to address these scenarios.

SM asked if the solution for UNC0836S excluded incidents on the basis that the P1 Modification he was to sponsor would deal with them, or if UNC 0836 does deal with incidents but costs and related measures are to be in the second Modification.

DA replied that he thought the CDSP will need to go to the DSC Change Management Managers Committee to ask if the CDSP can spend the agreed funds now to develop this solution. On this basis he advised parties not to expect any more development costs relating to the P1. However, he highlighted that operational costs for incidents were excluded for UNC 0836S, adding that Parties had hopefully noticed the CDSP acting on incidents through BAU processes using resources sourced through reallocation of work. He added that if incidents started happening regularly then clearly this approach could not be sustained long term, but currently, there was no expectation for a cost for this incident.

SM asked that if there were P1 related operational costs that could not be considered within the scope of UNC 0836S as it is expressly dealing with small volumes, is it possible those costs may surface in the P1 related Modification.

DA said that this was possible, although he did not see that scenario occurring, with the only real variable to consider likely being any third-party cost that the CDSP needed to pick up, in which case they would have to come back to industry with that cost.

3.0 Development of Workgroup Report

BF shared a view of the Workgroup Report (WGR) and discussed looking to use this version of the Modification, currently in draft, to submit the WGR report, and asked if any participants had any objections as the Workgroup had talked through the changes with objections raised.

BF noted that the timetables will be amended to August and that the Workgroup were supportive of the Modification being considered for Self-Governance. There were no views as to adding consumer impacts and the appendixes would be updated to include the REC Change documents.

AJ confirmed that IGT impact did exist and advised that consideration would need to be given in the IGT UNC regarding meter reads and the supply point components in section G, because they had been broken down to separate clauses. She added that UNC and IGT UNC Implementation may not need to be simultaneous as DA has confirmed that, at this stage, no IGT sites have been affected by the issue UNC 0836S is set to address but suggested that this be reviewed at the Implementation date.

SM asked if the later P1 related Modification relies upon UNC 0836S would it change the IGT element.

DA felt this should not be an issue as the Materiality Test was a core mechanism perceived to be used in both.

AJ advised that she had added this on the risk register for PAC in her PAFA role as the P1 incident affects significant volumes.

Implementation was agreed to require the standard 16-day notification period and did not require alignment with REC R0067.

BF confirmed that the WGR would be concluded and would be published with the Amended Modification, Legal Text, and ROM.

3.0 Next Steps

The WGR will be presented at the August Modification Panel

4.0 Any Other Business

None raised.

5.0 Diary Planning

No further Workgroups are planned.

0836S Workgroup Action Table						
Action Ref	Meeting Date	Minute Ref	Action	Reporting Month	Owner	Status Update
0503	25/05/23	2.0	CDSP (ER/DA) to produce a ROM for the June 2023 Workgroup.	June 2023 July 2023	CDSP (DA)	Closed
0601	22/06/23	2.0	Proposer to add REC Portal access guidance and REC Change Request as an Appendix to Modification. Proposer also to remove any square brackets in the document.	July 2023	Proposer (GD/DA)	Closed
0602	22/06/23	3.0	Proposer to discuss potential IGT Impact with Anne Jackson	July 2023	Proposer (GD/DA)	Closed
0604	22/06/23	3.0	Joint Office (RH) to request Legal Text for 0836S at July Panel.	July 2023	Joint Office (RH)	Closed

**UNC Workgroup 0819 Minutes
Establishing/Amending a Gas Vacant Site Process
10:00 Thursday 27 July 2023
via Microsoft Teams**

Attendees		
Bob Fletcher (Chair)	(BF)	Joint Office
Ben Mulcahy (Secretary)	(BM)	Joint Office
Andy Eisenberg	(AE)	Eon Next
Andy Clasper	(AC)	Cadent
Anne Jackson	(AJ)	Gemserv (PAFA)
Charlotte Gilbert	(CG)	BU-UK
Daniel Wilkinson	(DW)	Edf
David Addison	(DA)	CDSP (Xoserve)
David Mitchell	(DM)	SGN
Edd Green	(EG)	Eon Next
Fiona Cottam	(FC)	CDSP (Xoserve)
Gurvinder Dosanjh	(GD)	Cadent
Harry Hailwood	(HH)	Brook Green Trading
James Lomax	(JL)	Cornwall Insight
Jenny Rawlinson	(JR)	BU-UK
Kathryn Adeseye	(KA)	CDSP (Xoserve)
Kevin Clark	(KC)	Utilita
Louise Hellyer	(LH)	TotalEnergies Gas & Power
Lee Greenwood	(LG)	British Gas
Mark Jones	(MJ)	SSE Energy Supply
Oorlagh Chapman	(OL)	Centrica
Slama Akhtar	(SA)	Northern Gas Networks
Steve Mulinganie	(SM)	SEFE
Tom Stuart	(TSt)	Wales & West Utilities
Tracey Saunders	(TS)	Northern Gas Networks

The Workgroup Report is due to be presented at the UNC Modification Panel by 19 October 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/0819/270723>

1.0 Introduction and Status Review

Bob Fletcher (BF) welcomed everyone to the meeting and gave a brief overview of the scheduled items for discussion.

1.1. Approval of Minutes (22 June 2023)

Kathryn Adeseye (KA) had submitted an amendment request to the Joint Office for the Workgroup 0819 minutes from 22 June 2022 regarding the checks the CDSP would perform between the 'first qualifying No Access visit date' provided by the Shipper and the 'date the vacant site request was received, clarifying that any retrospective period would only be checked for meter readings between the two dates.

BF asked the Proposer if the requested change was acceptable to him, which Lee Greenwood (LG) confirmed. With no other comments or objections from the Workgroup the minutes, so amended, were approved.

1.2. Approval of Late Papers

BF confirmed that there were no late papers to report.

1.3. Review of Outstanding Actions

Action 0601: Proposer (LG) to provide amended Modification Proposal and Guidance Document defining which criteria the CDSP are to use to accept Vacant status requests and when to apply them.

Update: Lee Greenwood (LG) confirmed an amended Modification has been provided for the meeting.

Action closed.

Action 0602: CDSP (ER) to provide awareness of Modification 0819 in REC space regarding GES and DAM

Update:

KA confirmed this action had been completed. SM suggested that the action be kept open to ensure the Workgroup obtains updates on the REC aspect in subsequent meetings.

Action retained for a progress update.

2.0 Amended Modification

Lee Greenwood (LG) advised that **Business Rule 1** had been amended to address the concerns discussed in the last Workgroup where the meter criteria was only specified in the Guidance Document, which as being outside of the UNC, would have differing governance. He also highlighted the 'avoidance of doubt' statement added stating that IGT sites are included in the Modification's scope but that there were no changes to IGT-specific charges.

Business Rule 5 had an exit trigger (No 5) clarified and now reads 'Read relevant to period of vacancy' to be clear that meter reads (such as replacement reads) submitted that are for dates outside the period would not trigger an exit.

LG talked through the 'Rejection of Vacant Status' (Page 2 of the Vacant Site Guidance Document) stating that once a Shipper notifies the CDSP of the intent to make a site Vacant the CDSP will validate against the criteria listed between 1 and 5.

KA questioned if this was true of point 5d (*Standard Meter (DUMB) or Non-active AMR Meter or SMETS Meter with a Non-Active DCC Flag*) as she did not believe such details were held on the CDSP systems, and they were thereby unable to validate these criteria.

LG agreed, confirming that the CDSP would validate criteria 1 through to 5c only.

Steve Mulinganie (SM) suggested the sentence stating that "...the CDSP will retrospectively check" perhaps should read "...criteria 1 to 4 and 5a to 5c inclusive."

Tracey Saunders (TS) asked if a ROM already existed for this Modification, as it seemed to require a lot of change.

KA confirmed that a ROM had been produced but a revised version was to be produced for presentation at the August Workgroup meeting.

LG resumed the review of the Rejection of Vacant Status, noting that for proposed criteria 7 the CDSP will retrospectively check from the first qualifying no-access visit date up to and including the date the vacant site request is received.

KA questioned if that validation was linked with criteria 7, which was regarding the Shipper having no access to the Site, which the CDSP could not confirm.

LG agreed that the link between reads being present on the CDSP system and Shipper access to the site was only loosely linked.

SM noted that the title was “Rejection of Vacant Status” and details specifics that a party performs but there was no detail as to what the outcome would be, presumably rejection, but this was not confirmed. He suggested it would be helpful to clarify this for parties using this Guidance Document at a later date,.

LG agreed and committed to change this accordingly.

New Action 0701: Proposer (LG) to confirm the outcome of failing to meet the criteria specified under “Rejection of Vacant Status” in the Guidance Document.

TS noted the requirements detailed in “Maintain Vacant Status” which the Shipper must be able to demonstrate, asking if something is submitted for some form of checking or if records are kept to produce when challenged. She also asked for clarification as to whom would be checking this and if it was to be approached on an exception process.

LG confirmed that it was down to the Shipper to record that all these checks were being made, so that, should, for example, PAC monitoring raises some questions, the Shipper can duly demonstrate their evidence.

KA stated that Elly Rogers had shared a copy of related PAC reporting being developed in an earlier Workgroup.

TS asked if it was worth mentioning that PAC will monitor this.

SM responded that the Shipper will be warranting this. It was PAC’s decision on how they monitor things.

Lousie Hellyer (LH) suggested it may be better to say that this will be visible to PAC.

SM commented that it could state that it is an area that falls into PAC visibility, and Shippers may be called upon to justify their position.

LG asked if this should be stated at the beginning of the document, which SM confirmed would make it clear and TS agreed would be useful in the subsequent Consultation stage in that respondents would be able to clearly see the issue had been considered.

New Action 0702: Proposer (LG) to add a statement at the beginning of the Guidance Document that sites designated as Vacant are an area that falls into PAC visibility, and Shippers may be called upon to justify their position.

LG referenced decisions discussed at the previous Workgroup and related dialogue around the Legal Text which originally led to the belief that an IGT-specific Modification would not be required. He advised that subsequent discussions had confirmed that an IGT-specific Modification was indeed required, so he did need to complete this too.

Jenny Rawlinson (JR) asked if there are any other instances where the DNOs alter their charging on their part of the network because of their arrangements with Shippers which would impact an IGT network. If there is an existing precedent, then an IGT Modification might not be needed.

David Addison (DA) asked if the question was if there is there any precedent of DNOs charging up to the CSEP charging point in the Code. He stated that Modification 0836S does exactly that in terms of the settlement matters as that effectively generates an adjustment to charges to

DNOs on energy but won't touch the IGT charges, with that being the part the IGTs levy, adding that he thought it to be a precedent that had occurred many times before.

JR agreed that it felt like that was the case, but as this was going to happen to an IGT site, and since with DNO sites the Shipper has to be proactive, they should do the same for any IGT sites, though she recognised the water was muddied with the CDSP acting on Shipper's part, she asked if the IGTs would expect a request.

LG advised that when he previously spoke to Anne Jackson on the matter it was recognised that the Legal Text would be at a part of the UNC that the IGT UNC does point to, but there are other parts that do not without an IGT Modification to correct the referencing, which was required to ensure all the correct parts point to the right place.

JR agreed, adding that it would need to ensure that it does not impact IGT charging.

KA commented that Dentons had indicated in earlier conversations that an IGT Modification might be required.

3.0 Review of draft Legal Text

Andy Clasper (AC) lead a review of the Legal Text, advising that there were two areas highlighted in yellow that mirrored the two changes to the Business Rules in response to the discomfort about pointing to the Guidance Document. He advised that UNC TPD Section G 10.1.1 now included specifying what a 'relevant' meter was for the purposes of Vacant site designation.

SM noted that the text "...is not an operational Smart Meter or Advanced Meter" could be read as an operational Smart Meter or an Advanced Meter.

AC agreed, stating that if it were an Advanced Meter, operational or not, it will be picked up, conversely if it was an operational Smart Meter, it would not be picked up.

SM questioned this, stating his understanding was that if either were operational, Smart or Advanced, meter reads could be obtained remotely, and the Vacant designation would not be applied or necessary. As such, the Legal Text should state that the criteria be that both are not operational.

AC suggested the Legal Text says 'neither' an operational Smart Meter or Advanced Meter.

SM agreed with this suggestion.

New Action 0703: Legal Text Provider (AC) to amend 10.1.1 to state "... is neither an operational Smart Meter or Advanced Meter."

AC finalised his review of Legal Text changes in noting the additional text in 10.4.1e where a meter read submitted by the Registered user has a read date on which the Supply Meter Point was registered as Vacant would cease the Vacant status.

SM asked if the intention was to state these sites are 'registered' as Vacant, noting it was described as 'classified' as Vacant in the Modification. He noted the use of the word 'registered' in the Legal Text was a little case 'r' anyway but was also of the impression that the Guidance Document referred to 'criteria'.

AC acknowledged that he had to go back to the Lawyer on the other point raised so will ask the question on this also.

New Action 0704: Legal Text Provider (AC) to confirm legal view as to refer to sites being 'registered' or 'classified' as Vacant.

AC added that all the changes made to the Legal Text had been updated in the Explanatory Table as well.

LG asked the Workgroup if the IGT UNC Modification had to be submitted first and if this Modification needed to wait until this was done.

BF advised that there were two factors to consider, is a combined Workgroup required or does this Modification's progression not impact the way they interact.

TS noted that as this Modification was to be Authority Directed it could be noted that there was an IGT UNC mirror Modification in the awareness that both Modifications would likely be completed and deferred for a decision whilst awaiting the Authority to progress them.

BF asked if the IGT Modification would also be Authority Directed.

JR responded that generally, IGT mirrors the UNC in governance, but if the Proposer can raise the IGT Modification fairly quickly there is no reason why these two cannot be implemented together, noting the fact that a presence of IGT Representatives here who would also be present at any related IGT meetings meant the IGT Modification could go to the IGT Modification Panel, likely have just the one Workgroup before returning to the IGT Modification Panel and on to Industry Consultation.

SM asked if the Proposer was comfortable with raising the IGT Modification and where it needs to be and what bits need to be targeted.

Anne Jackson (AJ) advised that she was talking on behalf of the IGT UNC and confirmed that she had spoken with the Proposer and the CDSP (ER) and had reviewed the legal text. She noted that the drafting required would be partially implemented with this Modification, meaning that an IGT Modification would be required to ensure all the drafting required is in the IGT UNC. She added that she would work with the Proposer to ensure the Solution implemented is the same as in this Modification and as such the IGT UNC Modification should not be up for debate, adding the question was more if it should be applicable to the IGTs.

LG confirmed this fitted with his understanding.

4.0 Development of the Workgroup Report

The Workgroup Report will be completed at the next meeting.

5.0 Next Steps

Proposer to make small amendments discussed to the Guidelines document and resubmit to Joint Office.

Amended ROM to be presented at next meeting.

Small changes required to the Legal Text

Workgroup Report anticipated to be reporting to Sept / Nov Modification Panel

6.0 Any Other Business

No other business was discussed.

7.0 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	5 pm	Microsoft Teams	<ul style="list-style-type: none">Review amended Modification Proposal and Guidance

24 August 2023	16 August 2023		<p>Document.</p> <ul style="list-style-type: none"> • Review amended ROM and LT • IGT Update • Conclusion of Workgroup Report.
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Distribution Workgroup Action Table						
Action Ref	Meeting Date	Minute Ref	Action	Owner	Reporting Month	Status Update
0601	22/06/23	1.3	Proposer (LG) to provide amended Modification Proposal and Guidance Document defining which criteria the CDSP are to use to accept Vacant status requests and when to apply them.	Proposer (LG)	July 2023	Closed
0602	22/06/23	2	CDSP (ER) to provide awareness of Modification 0819 in REC space regarding GES and DAM	CDSP (ER)	August 2023	Action retained for REC update.
0701	27/07/23	1.3	Proposer (LG) to confirm the outcome of failing to meet the criteria specified under "Rejection of Vacant Status" in the Guidance Document.	Proposer (LG)	August 2023	Pending
0702	27/07/23	1.3	Proposer (LG) to add a statement at the beginning of the Guidance Document that sites designated as Vacant are an area that falls into PAC visibility, and Shippers may be called upon to justify their position.	Proposer (LG)	August 2023	Pending
0703	27/07/23	3	Legal Text Provider (AC) to amend 10.1.1 to state "... is neither an operational Smart Meter or Advanced Meter."	Legal Text Provider (AC)	August 2023	Pending
0704	27/07/23	3	Legal Text Provider (AC) to confirm legal view as to refer to sites being 'registered' or 'classified' as Vacant.	Legal Text Provider (AC)	August 2023	Pending

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

10:00 Thursday 27 July 2023

via Microsoft Teams

Attendees		
Bob Fletcher (Chair)	(BF)	Joint Office
Ben Mulcahy (Secretary)	(BM)	Joint Office
Andy Clasper	(AC)	Cadent
Andy Eisenberg	(AE)	EON Next
Charlotte Gilbert	(CG)	BU-UK
Daniel Wilkinson	(DW)	EDF
David Addison	(DA)	CDSP (Xoserve)
David Mitchell	(DM)	SGN
Edd Green	(EG)	EON Next
Fiona Cottam	(FC)	CDSP (Xoserve)
Gurv Dosanjh	(GD)	Cadent
Harry Hailwood	(HH)	Brook Green Trading
James Lomax	(JL)	Cornwall Insight
Kathryn Adeseye	(KA)	CDSP (Xoserve)
Kevin Clark	(KC)	Utilita
Lee Greenwood	(LG)	British Gas
Louise Hellyer	(LH)	TotalEnergies Gas & Power
Mark Jones	(MJ)	SSE Energy Supply
Oorlagh Chapman	(OC)	Centrica
Slama Akhtar	(SA)	Northern Gas Networks
Steve Mulinganie	(SM)	SEFE
Tom Stuart	(TSt)	Wales & West Utilities
Tracey Saunders	(TS)	Northern Gas Networks

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/0831/270723>

1. Introduction and Status Review

Bob Fletcher (BF) welcomed everyone to the meeting.

1.1. Approval of Minutes (22 June 2023)

The minutes from the previous meeting held on 22 June were approved.

1.2. Approval of late papers

No late papers were recorded.

1.3. Review Outstanding Actions

Action 0502: Proposers to provide Joint Office with New drafts of 0831/0831A Modifications with revised BRs.

Update: BF confirmed that revised drafts of both Modifications had been provided by the Proposers and published by the Joint Office.

Action Closed.

2. Amended Modification 0831

Mark Jones (MJ) talked the Workgroup through the amendments made to the Modification. He stated there were a few minor tweaks and highlighted the change made under Section 8 Implementation where it was now stated that at least six weeks lead time (with implementation on the 1st day of the month) were required after a decision to implement or allowed for when a date was determined by the Authority.

3. Amended Modification 0831A

Harry Hailwood (HH) talked through the changes to Modification 0831A, noting the only difference between the Modifications was the approach to Product Class 1 sites, and as such the changes aligned with those made in Modification 0831.

Steve Mulinganie (SM) asked if Modification 0831A set out in the Relevant Objectives as to why it was thought to be a better solution other than that already given for Modification 0831.

Harry Hailwood (HH) confirmed that the case was laid out at the start of the Modification and asked if this should also be detailed in the Relevant Objectives section.

SM responded that he thought that as Modification 0831A was an Alternate Modification it was important to clearly demonstrate to the Authority why the Proposer felt it provided a better solution to that given in Modification 0831.

BF confirmed that it should be a feature of the Relevant Objectives. He also noted that Legal Text and a revised ROM had been received.

4. Legal Text consideration

As the Legal Text provider, Andy Clasper (AC) talked the Workgroup through the Legal Text, sharing that the Explanatory table had not yet been provided.

Kathryn Adeseye (KA) asked after the rationale behind removing the word 'prevailing' from TPD C 1.5.3 and E 1.1.6, as, within the CDSP's process requirements, UIG reconciliation would still need to refer to the previous AUG table introduced prior to 0831/0831A, which they felt the inclusion of the word 'prevailing' enabled.

Fiona Cottam (FC) confirmed that the tables were applicable for allocation and then, in turn, for reconciliation and this needed to remain possible.

AC asked if the word 'prevailing' was left in place would it meet these CDSP requirements, adding that this presumably included four years' time with the 'Line in the sand' application.

FC agreed, suggesting it also allowed for any scenario where, if Modification 0831 was implemented now and something similar to Modification 0831A was later implemented, retaining the wording 'prevailing' would enable the required transition. She added that she understood

that the word 'prevailing' had been consciously added as part of Modification 0610S - *Project Nexus - Miscellaneous Requirements*.

SM suggested that 'relevant' was more pertinent, stating that 'prevailing' had a particular aspect to it, and referring to the 'relevant' table would be more fitting.

FC acknowledged that the key aspect was that a suitable qualifier of some description was required, as the CDSP processes that use the UIG Allocation table do not all switch to the latest table from day one.

AC committed to obtaining the lawyer's view and providing amended legal text if required.

BF asked if this was a feature of the Business Rules within the Modifications.

AC confirmed that it was not, stating the Business Rules were about changing the UIG Allocation tables.

SM noted that both UNC 0831 and UNC 0831A were prospective Modifications, adding that if they had been retrospective, they would have needed to assess such considerations in the Business Rules and suggested that this was perhaps why it was thought correct to take the word 'prevailing' out, as it crystallised the table. He reconfirmed his view that 'relevant' was a better word to add as it recognised that processes had differing purposes for which different tables were relevant.

FC shared her belief that the discussion had clarified the issue for the Legal Text provider to discuss with the drafting lawyers.

AC resumed reviewing the proposed Legal Text, noting that the deletion of TPD E paragraphs 1.1.14 & 9 removed the direction for the CDSP to appoint the AUGÉ. He ended by highlighting the directions that deleted the current Annex E-1 and replaced the table with those specified in either UNC 0831 or 0831A.

FC asked that as there will no longer be any variation between the LDZ entries in the table should it be simplified with entries just for EUC 1 and EUC 2 etc, thereby making it easier to read, with the distinctions between the current fifteen entries being somewhat obscure to most parties.

KA suggested that doing so may complicate matters should there be any future Modifications to the process, adding her understanding was that the intent was to minimise making changes wherever possible.

AC shared that there had been a further question raised by Ellie Rogers (CDSP) about whether the Legal Text needed to include updating references to the table in the Defined Terms document. He added that his understanding was that this was not required of the Legal Text, and this was a consideration that the Joint Office managed, noting that if the Legal Text under discussion was added to the UNC the Defined terms would be pointing to the wrong place.

BF confirmed that the Defined Terms found in front of Code provided a link to the location in Code each Term was used but he would check if this was normally outside of the Legal Text provision and was indeed maintained by the Joint Office outside of instruction by the Legal Text provider.

AC confirmed that currently, the Defined Terms pointed to paragraph 9 which was to be deleted as a result of implementation of either of these Modifications. He added that the Legal Text for Modification 0831A was exactly the same, with the only difference being the zeros listed in the table for Class 1 sites.

BF summarised that, regarding the Legal Text, the Workgroup was to await legal advice on the inclusion of the word 'prevailing' or other suitable qualifier.

5. Rough Order of Magnitude (ROM)

KA presented the ROM for both Modifications, adding that an amended version had been provided to identify a couple of clarifications in response to questions raised in the previous Workgroup meeting. She explained that now, under the Timescales section, it was clarified that a 5 to 6-week lead time (with a go-live day of 1st day of the month) was required for any implementation other than the first day of the gas year.

The DSC Change process was also clarified, with Change XRN5658 already formally entered into the Change process for the Modifications. She explained that the additional lead time detailed in the ROM for Change were dependencies governed by the Change Management Committee, and that the intention was to have UNC0831/0831A ready to commence implementation once the Authority decision was confirmed.

Finally, KA highlighted that a reference to Modification 0831A previously missing in the section on Cost Saving had been added.

6. Development of Workgroup Report (WGR)

BF opened the WGR for the Workgroup to review, noting that the additional text provided by the proposer supporting Relevant Objective d) for Modification 0831A could be added.

The Workgroup reviewed the proposed Authority Direction governance for the Modifications and no opposing views were expressed.

The receipt of an Initial Representation was noted, and SM surmised that the commentary related to Modification 0831 and a response could be that Modification 0831A recognised the concern raised and addresses it.

AC expressed his view that as a statement the Representation was factually correct.

MJ shared that he was not convinced that it was the case.

The Workgroup noted the commentary made regarding the Modifications' subsequent impact on information available to drive the reduction of UIG, as detailed in the 23 February 2023 Distribution Workgroup minutes, as the Proposer response to Panel Questions on the issue was detailed.

SM expressed concern with the use of the word 'stable' in describing UIG allocation within the section providing the Proposer's view of Relevant Objectives, suggesting that UIG will still be variable, adding that, in comparison, he felt the use of the word 'consistent' was appropriate as the Table would be fixed.

LH reflected that it was not possible to make UIG stable by its very nature, but fixing the table was a realistic step, and made a case for a more stable UIG than before.

SM responded that it was consistency that was achieved by the static values, not stability.

LH suggested that Parties were aware of the nature of UIG anyway and that the Modifications were lowering risk with fewer unknowns to deal with.

SM noted that there was a degree of risk driven by a number of factors versus the variable volume throughput.

KA shared that discussions within the CDSP had been held concerning if either Modification were approved such that 01 January may be considered as a possible implementation date, adding that the CDSP view was this scenario should be avoided, with 01 January being a Bank Holiday and a Non-system Supply-point Day, proposing that implementation would be better deferred to 01 February in such a scenario.

SM asked if Implementation for January would instead be the first Working Day.

LH shared her understanding that implementation within a calendar month was tricky on an allocation basis as that process was only done monthly.

FC confirmed that the CDSP did not have the facility to split reconciliation within the calendar month, adding that 01 January would also be within a period of Code Freeze.

SM questioned if six weeks' notice was already allowed for within the implementation rules within the Modifications, and that the only action required was converting table values to one surely an extra day would be sufficient.

FC countered that a period of hypercare would need to be included in the implementation actions taken.

SM noted that the cost of gas within January was always high, making timely implementation of the Modifications all the more impactful, suggesting alternatively a seven-week implementation lead time instead.

BF advised that if an Authority Decision was provided such that implementation may be on 01 January the consideration expressed could be taken to the UNCC, noting that implementation was a Transporter decision subject to DSC Change Management Committee decisions on system implementation and priority.

SM shared that he did not think reviewing the issue to be very helpful at this stage.

BF stated that unless a Workgroup participant wanted to add something specific into the report there was a question within the consultation process on implementation that parties could use to make their views known at the time, and as such asked if the Workgroup felt that the Workgroup Report was suitably developed to report back to the Modification Panel.

AC highlighted that the feedback from the lawyer to the question about the use of the word 'prevailing' in the Legal Text was an unknown and as such was the Workgroup happy to not review the Legal Text again.

SM responded that there was no argument as to what the Modifications were looking to achieve or that they were contentious.

AC agreed that was almost certainly right but noted that if the lawyers added a sentence to the Legal Text the Workgroup should be able to review it.

BF summarised the two options available to the Workgroup, being either to agree to return the WGR and take the risk of a complicated Legal Text response which he thought would be problematic as the Modification Panel would then likely seek to discuss that eventuality, or to convene a further Workgroup.

Oorlagh Chapman (OC) shared that she was conscious of the recent Legal Text discussions at Modification Panel, and how a potentially unresolved Legal Text issue would be unlikely to be accepted.

SM stated that the Workgroup's hope was that the query would result in amended Legal Text that simply had the word 'prevailing' added, asking that any participants present had any issues with that view needed to share them within Workgroup immediately. He acknowledged that if the Lawyer's response was to make changes to ten paragraphs or something similar it would be a very different matter to address.

BF shared that from a process point of view, the Workgroup Report did not need to be published until Friday 04 August, so if the question regarding the Legal Text raised a concern by then the reporting process could be stopped and a Workgroup view sought through a reconvened meeting.

SM expressed the view that the issue was not immaterial, so arranging a short Workgroup meeting to discuss the Legal Text feedback would provide a means to assurance on the matter.

Accordingly, BF suggested the Workgroup reconvene on Friday 04 August at 10am to review ahead of a decision as to whether to progress reporting back to the Modification Panel.

The Workgroup agreed to the proposal, noting that it was sufficient lead time for the Legal Text provider to obtain feedback from the lawyer and would also provide confidence to the Modification Panel that the feedback had been considered by the Workgroup.

Next Steps

Legal Text Provider to obtain feedback from lawyers on inclusion of ‘prevailing/relevant’ wording in TPD C 1.5.3 and E 1.1.6

The Joint Office is to schedule an Extraordinary Workgroup 0831 meeting for Friday 04 August at 10am to review the legal feedback and consider if the Workgroup Report is sufficiently developed to report back to the Modification Panel in August.

7. Any Other Business

No other business was raised.

8. 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
Friday 10:00 04 August 2023	N/A	Microsoft Teams	<ul style="list-style-type: none"> Consider Legal feedback Develop the Workgroup Report 0831/A (combined report) Consider reporting back to the Modification Panel in August

0831/0831A Workgroup Action Table

Action Ref	Meeting Date	Minutes Ref	Action	Owner	Reporting Month	Status Update
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 July 2023	Closed

UNC Workgroup 0812R Minutes
Review of Alternatives to “Must Read” Arrangements
Thursday 27 July 2023
via Microsoft Teams

Attendees		
Bob Fletcher (Chair)	(BF)	Joint Office
Ben Mulcahy (Secretary)	(BM)	Joint Office
Andy Clasper	(AC)	Cadent
Anne Jackson	(AJ)	PAFA (Gemserve)
Charlotte Gilbert	(CG)	BU-UK
David Mitchell	(DM)	SGN
Edd Green	(EG)	Eon Next
Fiona Cottam	(FC)	CDSP (Xoserve)
James Lomax	(JL)	Cornwall Insight
Jenny Rawlinson	(JR)	BU-UK
Kathryn Adeseye	(KA)	CDSP (Xoserve)
Kevin Clark	(KC)	Utilita
Louise Hellyer	(LH)	TotalEnergies Gas & Power
Mark Jones	(MJ)	SSE Energy Supply
Richard Pomroy	(RP)	Wales & West Utilities
Slama Akhtar	(SA)	Northern Gas Networks
Steve Mulinganie	(SM)	SEFE

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/0812/270723>

1.0 Introduction and Status Review

Bob Fletcher (BF) welcomed everyone to the meeting and gave a brief overview of the scheduled items for discussion.

1.1. Approval of Minutes (22 June 2023)

The minutes from the meeting held on 22 June 2023 were approved.

1.2. Approval of Late Papers

There were no late papers.

1.3. Review of Outstanding Actions

Action 0601: Joint Office (RH) to communicate Workgroup concern about the disparity between PAC Chair Statement and PAC minutes to PAC for consideration and response.

Update: BF advised the Workgroup that the PAC Chair had followed up on the initial response and outlined PAC’s current position in that PAC did not believe they have the vires to answer the question.

Richard Pomroy (RP) asked if the PAC had changed their view and was their position recorded in the first meeting invalid.

Steve Mulinganie (SM) shared that he thought it was the case that the initial position had been invalid as the PAC did not have the jurisdiction to take it and, in effect, was not authorised to comment.

RP suggested that the moral of the story was that any future Modification Workgroup on the matter should not ask PAC for their opinion as they cannot comment.

SM countered that whilst PAC was not prepared to 'die in a ditch' over the subject, they might be able to at least 'sit in the ditch' to talk an issue through to understand if there is a risk to settlement.

Anne Jackson (AJ) said that speaking as PAFA, it was simply the case that PAC is interested in Settlement accuracy, and 'Must reads' impacts one aspect of Settlement risk. PAC interest is only in the mitigation of Settlement risk, as to the existence of the 'Must read' Service or who provides it is only of interest to a PAC if it potentially affects the risk.

Jenny Rawlinson (JR) noted that she had challenged the PAC statement that Transporters should not be responsible for 'Must reads', and as a PAC member had stated that she did not think she could make that decision. It was then agreed to go back to PAC for clarification and at the last PAC meeting it was agreed that the response would be about the approach to Settlement and not make any comment about who the right party to perform the work should be.

AJ concurred, asserting that PAC was agnostic as to who would perform the work and did not make any call about the 'Must reads' service, other than to recognise it mitigated a risk to settlement.

RP commented that PAC had not quantified how much the risk was mitigated.

SM suggested that it was not if Transporters or the CDSP or whoever else performs the service, it was just a question for PAC as to whether it is done to the suitable standard.

RP asked what commentary should be used in terms of finalising the Workgroup Report (WGR).

SM suggested adding the comment that who is best placed to carry out the role is not a matter for PAC to comment upon.

AJ countered that it does impact settlement risk which PAC is interested in. It was who performs it PAC were agnostic to who, adding that the standard was determined and dictated through code.

JR asked if it was worth revisiting the reason why the question went to PAC originally to help get the Workgroup back on track.

AJ agreed that she thought it would help, noting there was concern that PAC had been asked to clarify on, which they had done.

SM commented that as this was a review group anyway, PAC's opinion was not essential.

RP stated that he was asked to get PACs view and was also asked to attend PAC which he resisted thinking the Review Group was where it was best discussed. He added that now an answer had been received the report could be finalised and closed.

SM agreed, summarising that text to the effect that it was not PACs place to comment on this could be used to complete the report.

RP suggested that it was not necessary to ask for a PAC view if a Modification was raised on the subject.

AJ responded that she thought that if the Modification was to propose a different provider, PAC would be agnostic, but if the Modification was to remove the service completely then PAC would be interested to understand potential impacts and risks to settlement. She added that other routes and alternatives were of course possible considerations for any such Modifications.

Action closed.

2.0 Finalise Workgroup Report

BF confirmed that the Workgroup Report was now closed and ready to submit to the Modification Panel.

3.0 Next Steps

The Review Group agreed to have concluded its work with no further steps required.

4.0 Any Other Business

No additional business was raised.

5.0 Diary Planning

No further meetings of this Review Group are planned.

0812R Workgroup Action Table					
Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
0601	22/06/23	2	Joint Office (RH) to communicate Workgroup concern about the disparity between PAC Chair Statement and PAC minutes to PAC for consideration and response.	Joint Office (RH)	Closed