

UNC Distribution Workgroup Minutes
Thursday 25 April 2024
via Microsoft Teams

Attendees		
Dan Simons (Chair)	(DS)	Joint Office
Harmandeep Kaur (Secretary)	(HK)	Joint Office
Andy Clasper	(AC)	Cadent Gas
Catriona Ballard	(CB)	Brookgreen Supply
Charlotte Gilbert	(CG)	BU-UK
David Mitchell	(DM)	SGN
Edward Allard	(EA)	Cadent Gas
Elisa Panciu	(EP)	Corona Energy
Ellie Rogers	(ER)	CDSP
James Lomax	(JLo)	Cornwall Insight
Josie Lewis	(JL)	CDSP
Kathryn Adeseye	(KA)	CDSP
Kevin Clark	(KC)	Utilita Energy
Oorlagh Chapman	(OC)	Centrica
Paul O’Toole	(PO)	NGN
Phil Hobbins	(PH)	National Gas Transmission
Rebecca Hailes	(RHa)	Joint Office
Steve Mulinganie	(SM)	SEFE Energy Limited
Susan Helders	(SH)	Northern Gas Networks
Tom Stuart	(TSu)	Wales & West Utilities
<p><i>This Workgroup meeting will be considered quorate provided at least two Transporter and two Shipper User representatives are present.</i></p> <p><i>Please note these minutes do not replicate 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 papers are available at: https://www.gasgovernance.co.uk/Dist/250424.</i></p>		

1. Introduction and Status Review

Dan Simons (DS) welcomed everyone to the meeting. The meeting was confirmed as quorate.

1.1 Approval of Minutes (28 March 2024)

The minutes from the previous meeting were approved.

1.2 Approval of Late Papers

No late papers to approve.

1.3 Review of Outstanding Actions

There were no outstanding actions for review.

1.4 Modifications with Ofgem

The Chair advised that a report was available on the Ofgem website at <https://www.ofgem.gov.uk/publications/code-modificationmodification-proposals-ofgem-decision-expected-publication-dates-timetable> dated 2 April 2024 and shows the expected decision dates for all Modifications currently awaiting an Ofgem decision.

The Chair noted that some of the Modification dates had since moved on and had been discussed at the April Panel meeting.

The Chair provided the following summary:

Modification	Estimated Decision Date
0857 - Revision to the Determination of Non-Transmission Services Gas Year Target Revenue	Approved on 19 April 2024
0854 - Revision of Virtual Last Resort User and Contingent Procurement of Supplier Demand Event Triggers	10 May 2024
0841 - Introduction of cost efficiency and transparency requirements for the CDSP Budget	17 May 2024
0842 - Gas Entry onto the Total system via an Independent Gas Transporter	TBC
0852 - Shipper notification in relation to option exercise for Customer Demand Side Response	09 May 2024

Post Meeting Note:

Modification 0852 - *Shipper notification in relation to option exercise for Customer Demand Side Response* was rejected by the Authority on 29 April 2024 and is now closed.

Modification 0857 - *Revision to the Determination of Non-Transmission Services Gas Year Target Revenue* will be implemented at 05:00 on 01 October 2024.

1.5 Pre-Modification discussions

1.5.1. Further updates to the AQ amendments process

Josie Lewis (JL) provided an overview of the draft Modification that proposes to make further updates to the AQ amendments process within TPD G 2.3. Specifically, adding clarity around the use of “eligible cause” G2.3.21 (b) (change in Consumer Plant), as well as ensuring a process for managing instances of [misuse] across all “eligible causes” where identified.

JL noted that at present, the Uniform Network Code (UNC) allows for the amendment of a Supply Point Annual Quantity (AQ) to be changed where the most recently calculated AQ does not reflect the expected consumption of gas. Currently there are “eligible causes” set out within UNC TPD G, known as ‘reason codes’ which can be used to amend the Supply Point AQ.

JL explained that there has been a notable increase in the usage of the “eligible cause” known as ‘reason code 2’: *‘the installation, replacement or removal of Consumer’s Plant which results in a material change in the basis on which gas is consumed’*, used to amend a Supply Point AQ. In some of these instances, it has become clear that ‘reason code 2’ has been used beyond the present criteria/intention specified in the UNC for this “eligible cause”. As a result, this Modification has been raised to provide additional clarity on the criteria for the use of

'reason code 2', making it explicit when this "eligible cause" can be utilised and what criteria must be met in order to utilise it.

JL confirmed that the Modification is being proposed as Self-Governance and that the intention is for the Modification to be presented to the UNC Panel on 16 May 2024 for consideration of the proposer's recommendation and to determine the appropriate route. A 3 to 6-month timeline has been proposed for discussions at Workgroup.

For further information, please see the published [drafted pre-modification](#).

Andy Clasper (AC) queried whether any thought had been given to extending the Modification 0736 affiliate rule because under Business Rule 4 if a Shipper amends an AQ and immediately switches to another Shipper, it would not be captured. Ellie Rogers (ER) agreed to look into the point raised by AC and to include this as a discussion point for the Workgroup. AC also pointed out that the reference in Business Rule 5 was incorrect. ER noted the incorrect reference and agreed to correct it.

1.5.2. Draft Review of current Supply Meter Point Classes (Class 1, 2, 3 and 4)

Josie Lewis (JL) provided an overview of the draft Modification which proposes a review of the current Supply Meter Point Classes; Class 1, 2, 3, and 4 which are set out within the Uniform Network Code (UNC). This review should assess whether the current arrangements for these Supply Meter Point Classes are fit for purpose and identify and consider possible amendments that are required to UNC.

JL explained that the Supply Meter Point (SMP) Classes were introduced as part of the implementation of Project Nexus in June 2017 and it seems timely to undertake a review of the wider class requirements to ensure that they are still fit for purpose and identify and consider possible changes to UNC.

The review would be best suited to:

- Understanding the existing Meter Point Class Requirements, the valid eligible causes, and whether these meet the objectives of the UNC Assessment or alternative means to achieve the objective.
- Assessment of options to achieve the objectives of the UNC in terms of the Meter point Class requirements.
- Development of high-level solution options (including business rules if appropriate)
- Consideration of potential performance assurance impacts
- Assess if the rules for each Class are fit for purpose.
- Assess capacity for Classes and consider if this is still fit for purpose based on current and anticipated usage of Classes.
- Assess the existing logic/rules for each class.

JL confirmed that the intention is for the Modification to be presented to the UNC Panel on 16 May 2024 for consideration of the proposer's recommendation and to determine the appropriate route.

JL asked the Workgroup whether they wished to focus on this now or whether they would prefer to put it on hold for now and visit it later. ER added that if the Group wishes to proceed with the Modification right now, a sponsor is needed for the Modification. Oorlagh Chapman (OC) expressed support for the development of the Modification noting that there is a lot of work to be done, however, this is an important topic that requires attention. OC noted that Centrica would be happy to sponsor the Modification. Steve Mulinganie (SM) also supported the Modification and agreed to provide sponsorship if required.

The Workgroup discussed the time required to develop the Modification and agreed that it would require a minimum of around 9 to 12 months.

For further information, please see the published [drafted pre-modification](#).

2. CSS REC Consequential Changes Update

Ellie Rogers (ER) provided the following updates:

Consideration of a Proposed Modification to Allow CDSP / Transporter Initiated Deactivation

ER explained that within the REC, Supply Meter Points that are at a Terminated Status cannot be Switched.

The CDSP has seen instances where Supply Meter Points have been stranded in REC Party portfolios as the REC Party is unable to undertake the necessary deactivation (i.e. Withdrawal is the equivalent UNC Term) for such sites due to market exit, or User qualification lapsing. CDSP has had this instance to date for circa 200 Supply Meter Points.

It is understood that Shippers may wish to retain Supply Points for such Meter Points to preserve access to Capacity at that site, and as such, may leave the Registration Live.

Electricity parties have highlighted concerns in the REC, that previously Deenergised MPANs were Deactivated as part of the same process. Electricity parties are considering applying this rule to the REC. The CDSP proposes to ensure that this is not applied in gas for the above reason.

As a short-term resolution to the above issue, the CDSP amended the SMP Status (and in turn the RMP Status) to allow the SoLR to transfer them into their portfolio, and then, if appropriate deactivate the Registration (i.e. withdraw from the Supply Point in UNC terms). At the REC PAB when the derogation was raised, objections were raised regarding this derogation being taken longer term as it was considered that it was inappropriate to amend the Supply Meter Point Status given the risk of this being at this erroneous state for a prolonged period of time whilst Supplier activity was orchestrated. As such, the CDSP was asked to consider a Registration Solution to ensure that this derogation is no longer required.

Options proposed by CDSP:

1. Allow the CDSP to initiate Deregistration. The CDSP would need to assure themselves that the SMP was indeed Dead and therefore there was risk of unidentified gas being caused. This would need to be done via a site visit.
2. The CSS Rules are changed to allow portfolio transfers of Terminated sites.

The CDSP had favoured option 1 but given the proposed electricity change, the CDSP will work with the REC Code Manager to determine if there are any synergies or common elements in the change that affects this approach.

SM noted that Option 1 provides flexibility around capacity rights whereas Option 2 does not provide a similar solution. ER agreed to confirm with David Addison and noted that a Modification may be proposed further to discussions with REC.

Mod 0836 Implementation:

ER noted that as per the previous discussions related to 0855, the CDSP has agreed to re-issue the Opening Reads for any Supply Meter Points impacted by the CSS P1 Incident following the implementation of XRN5675. The CDSP has recently agreed at the Change Management Committee (ChMC) that it will take the same approach for any instances of missing messages

following the 0836 implementation date but prior to the XRN5675 implementation. The Replacement Window will start following the issue of the Readings.

3. Workgroups:

Steve Mulinganie (SM) requested that Modification 0863S be deferred until May 2024. Discussions for Modification 0851R were also deferred to May 2024.

The following Workgroup meetings took place:

3.1. 0851R – Extending the Annually Read PC4 Supply Meter Point(SMP) read submission window

(Report to Panel 18 July 2024)

www.gasgovernance.co.uk/0851

Deferred until 23 May 2024.

3.2. 0862 – Amendments to the current Unidentified Gas Reconciliation Period arrangements

(Report to Panel 18 July 2024)

www.gasgovernance.co.uk/0862

3.3. 0863 – Erroneous Transfers Exception Process

(Report to Panel 15 August 2024)

<https://www.gasgovernance.co.uk/0863>

Deferred until 23 May 2024.

3.4. 0873 – Add specific roll-over functionality for the AUG Table 2025/26

(Report to Panel 18 July 2024)

www.gasgovernance.co.uk/0873

3.5. 0875 – Minor amendment to the Vacant Site exit process & 0819 Legal Text re-numbering

(Report to Panel 18 July 2024)

www.gasgovernance.co.uk/0875

4. Distribution Workgroup Change Horizon

Please note that the specifics of this report can be reviewed at <https://www.gasgovernance.co.uk/Disti/250424>; as such, they are not replicated here.

Josie Lewis (JL) provided a brief overview of the presentation slides to the Workgroup noting the following updates:

- Modification 0808, *Reverse Compression*, has been confirmed for implementation on 22 April 2024.
- Modification 0841, *Introduction of cost efficiency and transparency requirements for the CDSP Budget*, was recommended by the Panel on 21 March 2024 and is now subject to Ofgem Approval.

JL noted that further to last month's discussion, the CDSP has now added two additional columns - 'Confirmed Central System Implementation Date' and 'Code Implementation Date Confirmed'. JL agreed to have conversations with the Joint Office (JO) to add a link on their website which will lead to the UNC Regulatory Change Horizon Roadmap which parties will be able to check for regular updates. Rebecca Hailes (RH) confirmed that JO is looking into where the link could be added and potential alignment to the Transmission Workgroup table.

5. Product Class review

This point was addressed in the pre-modification discussions under item 1.5.2.

6. Issues

6.1. New Issues

No new issues were raised.

7. Any Other Business

7.1. Priority Customers Update

Phil Hobbins (PH) provided an update on Priority Customers, confirming that since the re-categorisation by the Secretary of State in 2022, all Category C Customers previously on the priority list have had their priority status maintained. If such sites wish to continue to maintain priority status, they need to provide a demonstration to the relevant Gas Transporter to show that they meet the new Category C criteria. If this is not provided by 1 November 2024, the Gas Transporter will give instructions to remove the site from the priority list.

PH provided detailed guidance on what Shippers need to provide and by which date:

- An independent assessment, which demonstrates that the site meets Fixed Tangible Asset Values.
- An independent assessment or manufacturer quote for repair or replacement of equipment onsite that would be required if the site were to lose their gas supply.

The total value of the quote would need to exceed 10% of the Fixed Tangible Asset Value. PH confirmed that Shippers would need to provide this no later than 1 November 2024.

'Minimise Flows' Decision'

PH explained that if some Category C sites received instruction to cease taking gas in Stage 2 of a Network Gas Supply Emergency it could be detrimental to their business. If the instruction was to minimise gas demand, it could still deliver a material reduction in demand but avoid a need to direct them to cease taking gas.

It has been agreed to issue an amendment to the E1 NGSE Procedure, which would require Gas Transporters to issue a direction to minimise their gas demand before they are instructed to cease taking gas completely.

Please refer to the [published slides](#) for full details.

SM noted that the presentation mentions communication with Shippers and Customers and asked PH to confirm when the communication will take place. PH confirmed that communication will be going out from the relevant Networks to category C Sites connected to their network. PH confirmed that NGT will also be sending out a letter in the week commencing on 29 April 2024. PH asked parties to contact him if a letter is not received.

SM queried whether the letters to the sites will be sent directly from the relevant transporter or whether they will be centrally coordinated. PH confirmed that the letters will be sent directly from the Transporters. RHa noted that the receiver of the information will need to guard it well if it contains sensitive information. SM explained that the data provided by the Shippers to maintain Category C status will be sensitive and should be treated as such. PH agreed with SM's remarks.

SM noted that their understanding is that the data provided will be taken as read and will not be validated or challenged by the Transporters. PH confirmed that the Gas Transporters do not intend to perform any such validation and they will not have the knowledge or capability to do so. However, as it is a new process and submissions will likely be in slightly different forms, a transporter may potentially need to raise a query with the shipper or seek clarification.

8. Diary Planning

Distribution meetings are listed at: <https://www.gasgovernance.co.uk/Dist>

All other Joint Office events are available via: www.gasgovernance.co.uk/events-calendar/month

Time / Date	Paper Publication Deadline	Venue	Workgroup Programme
10:00 Thursday 23 May 2024	5pm Wednesday 15 May 2024	Microsoft Teams	<ul style="list-style-type: none"> Standard Agenda
10:00 Thursday 27 June 2024	5pm Wednesday 19 June 2024	Microsoft Teams	<ul style="list-style-type: none"> Standard Agenda
10:00 Thursday 25 July 2024	5pm Wednesday 17 July 2024	Microsoft Teams	<ul style="list-style-type: none"> Standard Agenda
10:00 Thursday 22 August 2024	5pm Wednesday 14 August 2024	Microsoft Teams	<ul style="list-style-type: none"> Standard Agenda
10:00 Thursday 26 September 2024	5pm Wednesday 18 September 2024	Microsoft Teams	<ul style="list-style-type: none"> Standard Agenda
10:00 Thursday 24 October 2024	5pm Wednesday 16 October 2024	Microsoft Teams	<ul style="list-style-type: none"> Standard Agenda
10:00 Thursday 28 November 2024	5pm Wednesday 13 November 2024	Microsoft Teams	<ul style="list-style-type: none"> Standard Agenda
10:00 Thursday TBC December 2024	TBC	Microsoft Teams	<ul style="list-style-type: none"> Standard Agenda

UNC Workgroup 0862 Minutes
Amendments to the current Unidentified Gas Reconciliation Period
arrangements
Thursday 25 April 2024
via Microsoft Teams

Attendees		
Dan Simons (Chair)	(DS)	Joint Office
Harmandeep Kaur (Secretary)	(HK)	Joint Office
Steve Mulinganie (Proposer)	(SM)	SEFE Energy Limited
Andy Clasper	(AC)	Cadent Gas
Catriona Ballard	(CB)	Brookgreen Supply
Charlotte Gilbert	(CG)	BU-UK
David Mitchell	(DM)	SGN
Edward Allard	(EA)	Cadent Gas
Elisa Panciu	(EP)	Corona Energy
Ellie Rogers	(ER)	CDSP
Fiona Cottam	(FC)	CDSP
James Lomax	(JLo)	Cornwall Insight
Josie Lewis	(JL)	CDSP
Kathryn Adeseye	(KA)	CDSP
Kevin Clark	(KC)	Utilita Energy
Lee Greenwood	(LG)	Centrica
Oorlagh Chapman	(OC)	Centrica
Paul O'Toole	(PO)	NGN
Rebecca Hailes	(RHa)	Joint Office
Susan Helders	(SH)	Northern Gas Networks
Tom Stuart	(TSu)	Wales & West Utilities
<p><i>This Workgroup meeting will be considered quorate provided at least two Transporter and two Shipper User representatives are present.</i></p> <p><i>Please note these minutes do not replicate/include detailed content provided, 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/0862/250424.</i></p> <p><i>The Workgroup Report is due to be presented at the UNC Modification Panel by 18 July 2024.</i></p>		

1. Introduction and Status Review

Dan Simons (DS) welcomed all parties to the meeting.

1.1 Approval of Minutes (28 March 2024)

The previous minutes were approved.

1.2 Approval of Late Papers

No late papers to approve.

1.3 Review of Outstanding Actions

0301: IGTs (CG) to consider the potential impact on IGT Code, following review of Legal Text.

Update: The Chair confirmed that the action would be carried over until the draft Legal Text had been produced. Deferred to the next Workgroup Meeting. **Carried Forward.**

0302: CDSP (ER) to resubmit ROM following removal of provisional statement and references to further ROMs being produced.

Update: The Chair confirmed that the ROM has been updated to remove any references to it being a provisional statement or that further ROMs are pending. Please refer to the [published ROM](#) for full details. **Closed.**

2. Amended Modification

DS provided an overview of the amendments made to the Modification. Please refer to the [published papers](#) for the Amended Modification.

The Workgroup did not raise any concerns or queries in relation to the amendments.

Steve Mulinganie (SM) noted that the timeline has been set to review the Workgroup Report in July 2024 and asked whether Cadent would be able to provide Legal Text by this date. Andy Clasper (AC) explained that they are working with CDSP to draft Legal Text, however, the Legal Text is not straightforward. AC noted that they are targeting to have the Text ready for review by the May Workgroup meeting, however, they cannot provide confirmation at this stage. SM appreciated that the Legal Text is the most complex part of the process.

3. Review of Processes

Kathryn Adeseye (KA) confirmed that minor amendments have been made to the ROM to remove any references to a second ROM as the Workgroup discussions have highlighted that the output of the original ROM still stands. KA highlighted that the preliminary ROM is no longer preliminary, and will be treated as the actual ROM.

DS noted that the ROM does not specify whether the Change will be a major or an ADHOC release and queried which option is most likely. KA clarified that it will likely be a major release, however, this will be decided by the DSC Change Management Committee (ChMC) and the CDSP has not received any indication as to when this release will happen. ER explained that the Change Proposal which will kick off the release management process for this Modification will be presented to the ChMC on 8 May 2024 further to which, they can start adding an indicative release date. ER noted that the release will not happen before November 2024.

ER proposed talking about service line impact in the Workgroup explaining that the Change comes into Service Area 10 for invoices. It is NGT and DNO funded for invoicing, however, the proposer of the Change and the ChMC can determine what the funding split should be. ER noted that this is a Shipper-driven Change and will be discussed in the Change Proposal. SM noted that they have previously said that the Change should be 100% Shipper-funded but would be happy to hear other thoughts.

4. Business Rules Development

The Business Rules have been discussed in previous meetings. No further discussions were held.

5. Legal Text Review

Deferred to the next Workgroup Meeting.

6. Development of Workgroup Report

The Chair presented the Workgroup Report.

The Workgroup reviewed the Workgroup Report. No objections or concerns were raised in

relation to the Report. The Chair noted that the development of the Report will continue in the background.

7. Next Steps

The Workgroup is to review and agree on the legal text and consider any IGT UNC impact. The Final Workgroup Report will be reviewed.

8. Any Other Business

None.

9. Diary Planning

0862 Meetings are listed at: <https://www.gasgovernance.co.uk/0862>

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

Time / Date	Paper Publication Deadline	Venue	Workgroup Programme
10:00 Thursday 23 May 2024	5pm Wednesday 15 May 2024	Microsoft Teams	<ul style="list-style-type: none"> • Completion of Workgroup Report • Review and finalisation of Legal Text • Consider IGT UNC impact

Workgroup 0862 Action Table						
Action Ref	Meeting Date	Minute Ref	Action	Reporting Month	Owner	Status Update
0301	28/03/24	6.0	IGTs (CG) to consider the potential impact on the IGT Code, following a review of Legal Text.	May 2024	IGTs (CG)	Carried Forward
0302	28/03/24	6.0	CDSP (ER) to resubmit ROM following removal of provisional statement and references to further ROMs being produced.	May 2024	CDSP (ER)	Closed

UNC Distribution Workgroup 0873 Minutes
Add specific roll-over functionality for the AUG Table 2025/26
Thursday 25 April Month 2024
via Microsoft Teams

Attendees		
Dan Simons (Chair)	(DS)	Joint Office
Harmandeep Kaur (Secretary)	(HK)	Joint Office
Steve Mulinganie (Proposer)	(SM)	SEFE Energy Limited
Andy Clasper	(AC)	Cadent Gas
Catriona Ballard	(CB)	Brookgreen Supply
Charlotte Gilbert	(CG)	BU-UK
David Mitchell	(DM)	SGN
Ellie Rogers	(ER)	CDSP
Elisa Panciu	(EP)	Corona Energy
Fiona Cottam	(FC)	CDSP
James Lomax	(JLo)	Cornwall Insight
Josie Lewis	(JL)	CDSP
Kathryn Adeseye	(KA)	CDSP
Kevin Clark	(KC)	Utilita Energy
Marina Papatoma	(MP)	Wales & West Utilities
Oorlagh Chapman	(OC)	Centrica
Paul O'Toole	(PO)	NGN
Rebecca Hailes	(RHa)	Joint Office
Susan Helder	(SH)	Northern Gas Networks
Tom Stuart	(TSu)	Wales & West Utilities
<p><i>This Workgroup meeting will be considered quorate provided at least two Transporter and two Shipper User representatives are present.</i></p> <p><i>Please note these minutes do not replicate/include detailed content provided, 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/0873/250424.</i></p> <p><i>The Workgroup Report is due to be presented at the UNC Modification Panel by 18 July 2024.</i></p>		

1.0 Outline of Modification / Request

Ellie Rogers (ER) introduced the Modification on Steve Mulinganie's (SM) behalf explaining that the Modification seeks to allow an approved AUG Table to apply for more than one AUG Year specifically for the AUG Table which will go live for AUG Year 25/26.

The clause that allowed the AUG Table rollover previously, fell away under the Project Nexus changes as the whole AUG Section was removed. The current AUG appointed by the CDSP, under the existing contract will produce their last AUG Statement and AUG Table to go live for AUG Year 2025/26. The CDSP would be required to start a procurement exercise to appoint an AUG under a new contract around May 2024 for the contract to be in place for May 2025. However, Modification 0868 seeks to extend the current annual process for the production of the AUG Statement to a 3 yearly process, this means there could be a material change in the requirements for an AUG compared to the 'as is' scope.

ER explained that in order to factor in the potential change to the AUGE scope and process, and in light of the current contract expiring in April 2025, this Modification is proposing to 'roll over' the AUG Table to be produced for AUG Year 2025/26 for a limited period of 2 years (26/27 and 27/28). As a result, the AUG Table for 2025/26 will be effective for AUG Years 2026/27 and 2027/28 as well.

Please refer to the [published papers](#) for the full details.

SM noted that there was some pushback at the UNC Panel and the Panel questioned whether the Modification needs to cover a two-year roll-over period or whether it can cover one year as procurement could happen quite rapidly once Modification 0868 has been finalised. SM explained that they are happy to consider this option if it makes other parties more comfortable. SM welcomed the Workgroup's thoughts on the point.

ER highlighted SM's point to David Mitchell (DM) for the preparation of the Legal Text. DM agreed to bear this point in mind when looking at Legal Text.

ER agreed to map out the two options of a 2-year roll-over and a 1-year roll-over which will explain why 2-years was initially proposed and will help the Workgroup to determine whether a 1-year 'roll-over' would be the better option.

Action 0401: ER to 'map out' the AUG Table timeline to demonstrate the rationale for a 2-year 'roll-over' as opposed to a 1-year 'roll-over'.

Rebecca Hailes (RHa) suggested adding a 'sunset clause' to the Transitional Rules to say that it has an end date. ER agreed and noted that adding an expiry date would be straightforward with this Modification. ER queried whether this would need to be added to the Business Rules. RHa explained that the 'sunset clause' needs to be in the Legal Text so that the UNC can be updated accordingly. RHa noted that the idea is that the Transition Rules can be cleared out easily.

SM noted that it sounds like a guidance note rather than a Business Rule. RHa added that guidance notes explaining that this Modification will operate for the minimum time possible would help to aid understanding.

ER noted that one of the Panel Members raised an issue with the use of the word 'functionality' in the Modification as it implied that the rollover of the AUG Table was in some way optional, which is not the case. ER agreed to remove the word to avoid any confusion and update the guidance note to include the sunset clause in the same update. SM noted that it is clear that the word 'functionality' does not add any specific new requirement and that removing it will avoid confusion and will not affect the Modification.

ER highlighted the tight timeline that needs to be followed for this Modification noting that the CDSP is holding off procuring a new AUGE contract while it awaits the Modification. ER confirmed that she has written to Ofgem requesting a decision before the end of August 2024. The Ofgem representative has agreed to communicate the message and the need for urgency to the relevant team.

ER explained that only two more Workgroups remain to develop and finalise the Modification, and the Legal Text will be needed by the last Workgroup in order to go to the Panel in July 2024 with a shorter consultation. Rebecca Hailes (RHa) advised that as a rule, the Panel has asked not to shorten consultation periods, but noted that in exceptional circumstances such a proposal would still be considered. DM agreed to start looking at the Legal Text once the proposer is happy with the Modification.

2.0 Initial Discussion

2.1. Issues and Questions from Panel

2.1.1 Consider asking Proposer removing the word functionality from title

ER agreed to remove the word 'functionality' from the Modification to avoid confusion.

Please refer to item 1.0 for full details.

2.1.2 Consider impact on Modification 0843

ER explained that Modification 0843 has been raised by OVO Energy to introduce an independent Shrinkage Expert who will look at the Shrinkage Model Error. Panel had asked that the Workgroup consider any potential impact of 0873 on Modification 0843.

SM noted that during the discussions in the UNC Panel, it was agreed that this Modification is unlikely to have a direct impact on 0843, however, the question was left in so that we can show in the Workgroup Report that the point has been discussed.

ER confirmed that having reviewed the timeline of 0843, the Modification is unlikely to go to the UNC Panel before September 2024 at the absolute earliest. Therefore, after addressing the question of a 1-year or 2-year rollover, this Modification might not have any impact on 0843 at all. ER noted that she is not nervous about the impact but would like to address it in detail so that the panel can see that it has been discussed. SM agreed with ER's assessment.

2.1.3 Consider any potential role for UNCC in authorising a roll-over

The Workgroup considered the UNCC's role in the AUG process noting the question raised in the Panel meeting about whether the UNCC should have a role in authorising the roll-over or determining how long it might be for. SM noted that while the UNCC does not have much input in terms of the AUG process, it is responsible for approving the AUG Table via a unanimous vote. ER proposed presenting the AUG Table agreed upon by UNCC in 2025, again in 2026. ER noted that this might resolve the element of lack of UNCC control as it allows the ability of review and unanimous approval. ER highlighted that the concern with this solution would be what happens if, for some reason, the UNCC does not approve the table.

Fiona Cottam (FC) agreed with ER's suggestion and noted that the step of re-working the table may need to be taken out. In relation to the earlier point of a 2-year rollover, FC noted that when the timeline was worked out, the CDSP decided upon a 2-year rollover because they were addressing the 3-year cycle and wanted to avoid the situation of two AUGEs working at the same time. FC noted that the new table with 0868 might not be available until April 2028. The 2-year rollover allowed a clean cut-off. ER agreed and noted that this will be covered in the visual timeline map Action.

SM queried whether the role of UNCC needs to be covered by a Business Rule. FC advised that there is a good text to steal from E9.4.3 which covered current UNCC processes for AUG table approval. ER agreed to review the text and to update the Modification accordingly.

Action 0402: ER to update the Modification further to the Workgroup discussions.

2.1.4 Consider whether the roll-over could be for fewer years

Please refer to item 1.0 for the update.

2.2. Initial Representations

None received.

2.3. Terms of Reference

Individual Workgroup Terms of Reference will apply and are available at www.gasgovernance.co.uk/0873.

3.0 Next Steps

The following next steps were confirmed:

- Draft the Workgroup Report.

- Provide the updated Modification,
- Begin Legal Text drafting.

4.0 Any Other Business

None.

5.0 Diary Planning

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Time / Date	Paper Publication Deadline	Venue	Workgroup Programme
10:00 Thursday 23 May 2024	5pm Thursday 16 May 2024	Microsoft Teams	Standard Workgroup Agenda

0875 Workgroup Action Table						
Action Ref	Meeting Date	Minute Ref	Action	Reporting Month	Owner	Status Update
0401	25/04/24	1.0	ER to 'map out' the AUG Table timeline to demonstrate the 2-year 'rollover'.	May 2024	CDSP (ER)	Pending
0402	25/04/24	2.1.3	ER to update the Modification further to the Workgroup discussions.	May2024	CDSP (ER)	Pending

Workgroup 0875 Minutes

Minor amendment to the Vacant Site exit process & 0819 Legal Text re-numbering

Thursday 25 April 2024
via Microsoft Teams

Attendees		
Dan Simons (Chair)	(DS)	Joint Office
Harmandeep Kaur (Secretary)	(HK)	Joint Office
Steve Mulinganie (Proposer)	(SM)	SEFE Energy Limited
Andy Clasper	(AC)	Cadent Gas
Catriona Ballard	(CB)	Brookgreen Supply
Charlotte Gilbert	(CG)	BU-UK
David Mitchell	(DM)	SGN
Ellie Rogers	(ER)	CDSP
Fiona Cottam	(FC)	CDSP
James Lomax	(JLo)	Cornwall Insight
Josie Lewis	(JL)	CDSP
Kathryn Adeseye	(KA)	CDSP
Marina Papatoma	(MP)	Wales & West Utilities
Oorlagh Chapman	(OC)	Centrica
Paul O'Toole	(PO)	NGN
Rebecca Hailes	(RHa)	Joint Office
Susan Helders	(SH)	Northern Gas Networks
Tom Stuart	(TSu)	Wales & West Utilities

This Workgroup meeting will be considered quorate provided at least two Transporter and two Shipper User representatives are present.

Please note these minutes do not replicate/include detailed content provided, 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/0875/250424>.

The Workgroup Report is due to be presented at the UNC Modification Panel by 18 July 2024.

1.0 Outline of Modification / Request

Kathryn Adeseye (KA) provided an overview of the Modification explaining that it seeks to make a minor amendment to the Vacant Site exit process when the exit criteria trigger is 'Class Change is submitted' or 'Request for Isolation' and revise the 0819 Legal Text numbering post Modification 0816 implementation.

KA explained that following Ofgem's approval of Modification 0819, the design work to implement the Vacant Site process under the DSC has been progressing. As a result of the detailed design work, a couple of scenarios have been identified within the current legal text for Modification 0819 which need to be amended slightly to ensure the intention of Modification 0819 is met.

The Modification has been proposed as Self-Governance with 3-month Workgroup discussions. KA confirmed that the XRN5615 associated with 0819 is scheduled for a November Release

and noted that CDSP would like to get 0875 approved before the date as well. If approved in time, 0875 will be included in the same Release.

KA shared a presentation explaining what the original intent of 0819 was and included diagrams explaining the End-to-End Process Flow. For full details, please refer to the [published presentation slides](#) and the [Modification](#).

Steve Mulinganie (SM) noted that the diagram in the presentation shared in the meeting is very useful in explaining that the Modification is looking to remove an unintended loophole from the process. SM asked that the presentation be included with the Modification to aid understanding and to address the Panel's concerns about whether this is a housekeeping Modification.

While discussing Business Rule 1, SM queried whether 'Request for Isolation' is a defined term as it is capitalised. KA agreed to check and confirm whether 'Request for Isolation' is a defined term and whether an updated version of the Modification is required as a consequence.

Action 0401: KA to check whether the term 'Request for Isolation' in Business Rule 1 is a Defined Term and whether an updated Modification is required.

Rebecca Hailes (RHa) queried whether the Modification is saying that the Legal Text of 0819 is incorrect. KA confirmed that they are not saying the Legal Text is incorrect per se, more that the identified loophole is an unintended consequence. The Legal Text was drafted as per the Business Rules. RHa explained that when the UNC is updated, the text from 0819 will go in and the text from 0875 needs to be added on top of it and at the same time. RHa asked whether November 2024 is a drop-dead date. ER confirmed that November 2024 is an indicative date as it needs to be released with 0819. SM noted that based on the information presented in this Workgroup, the full 3 Workgroups might not be required.

KA asked Cadent about a timeline for the Legal Text. Andy Clasper (AC) confirmed that Cadent intends to provide a draft of the Legal Text back in the next Workgroup. AC noted that an implementation date for 0819 cannot be fixed until this Modification has progressed as both Modifications need to be given the same implementation date. SM noted that 0819 and 0875 are not being linked. SM explained that 0819 contains a scenario that is being fixed with an amendment with this Modification, however, this should not stop 0819 from being implemented. AC advised that they would have not been able to implement Modification 0819 without raising another Modification, so the two Modifications (0819 and 0875) are linked in that sense.

Action 0402: AC to provide draft Legal Text for consideration at the May Workgroup meeting.

2.0 Initial Discussion

2.1. Issues and Questions from Panel

None raised.

2.2. Initial Representations

None received.

2.3. Terms of Reference

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

3.0 Next Steps

The following next steps were confirmed:

- KA to consider a revised Modification.
- AC to provide a draft of the Legal Text.
- DS to draft the Workgroup Report once any revised Modification has been submitted.

4.0 Any Other Business

None.

5.0 Diary Planning

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0875 Workgroup Action Table						
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0401	29/04/24	21.0	KA to check whether the term 'Request for Isolation' in Business Rule 1 is a Defined Term and whether an updated Modification is required.	May 2024	CDSP (KA)	Pending
0402	29/04/24	21.0	AC to provide draft Legal Text for consideration at the May Workgroup meeting.	May 2024	Cadent (AC)	Pending