

UNC Workgroup 0630R Minutes
Review of the consequential changes required in UNC as a result of
the Ofgem Switching Programme

Tuesday 16 April 2019

at Dentons, One Fleet Place, London, EC4M 7WS

Attendees

Bob Fletcher (Chair)	(BF)	Joint Office
Helen Cuin (Secretary)	(HCu)	Joint Office
Alexander Mann	(AM)	Gazprom
Alison Nield	(AN)	Gazprom
Charles Wood	(CWo)	Dentons
Chris Barker	(CB)	BUUK
Chris Warner	(CWa)	Cadent
Claire Roberts	(CR)	Scottish Power
Daniel Lodge*	(DL)	npower
Dave Addison	(DA)	Xoserve
David Morley*	(DM)	Ovo Energy
David Tennant	(DT)	Dentons
Gareth Evans	(GE)	Waters Wye Ltd
Guv Dosanjh	(GD)	Cadent
Karen Stockdale*	(KS)	PX Limited
Kate Mulvany	(KM)	British Gas
Kirsty Dudley*	(KD)	E.ON
Lorna Lewin	(LL)	Orsted
Mark Bellman	(MB)	Scottish Power
Mark Jones	(MJ)	SSE
Mike Berrisford	(MiB)	Joint Office
Miri Nae	(MN)	Dentons
Rachel Ramsay	(RR)	Ofgem
Richard Pomroy	(RP)	Wales & West Utilities
Sally Hardman	(SH)	Scotia Gas Networks
Shanheeni Vekaria	(SV)	Utility Warehouse
Steve Ladle	(SL)	Gemserv
Tracey Saunders	(TS)	Northern Gas Networks

**via teleconference*

Copies of all papers are available at: <http://www.gasgovernance.co.uk/0630/160419>

The Workgroup Report is due to be presented at the UNC Modification Panel by 16 May 2019.

1. Introduction and Status Review

BF welcomed everyone to the meeting, explaining the purpose of the meeting is to review the suggested Legal Text changes that will be required to the UNC as a result of the Ofgem Switching Programme. IGT representatives were also present to note the related impacts affecting the IGT UNC.

1.1. Approval of Minutes (06 March 2019)

The minutes from the previous meeting were deemed approved.

2. Consideration of Legal Text

CWa reported that work on the UNC Legal Text had been conducted due to the requirements of the Faster Switching Significant Code Review (SCR), it had not been produced under normal UNC Modification development. He went on to explain that all impacted Codes either have or are in the process of producing Legal Text to support the SCR process. It was noted that Cadent supported by Xoserve and Dentons have been working on the system and Legal Text requirements to be included in the consultation required for the SCR.

CWa confirmed that this Request Workgroup had been established for information sharing purposes only and to gain views from interested parties. This was the first-time parties will have sight of the UNC Legal Text which reflects the consequential requirements from the introduction of the new Retail Energy Code (REC) for the Central Switching Service (CSS). This was an opportunity for industry parties to gain an understanding of the new arrangements which are far reaching and have a significant effect on Transporters and Shippers.

CWa highlighted that following consideration of the Legal Text the industry will need to consider what the next steps are in the period leading up to 2021 implementation and how the Legal text is to be managed.

SL noted on behalf of the IGT Code administrator RG005 (IGT UNC Review of Consequential Changes resulting from Faster Switching arrangements), that the IGTs will continue to reference to the UNC, albeit the structure will be slightly different, with some areas splitting out more specific IGT requirements if needed. He confirmed a large number of changes are required to ensure references are maintained.

DT introduced the approach taken, explaining that some elements were out of scope, that there will be a need for transitional rules for the future, and there is an expectation for transition modifications. The approach taken has been to draft Legal Text with the principle objectives to ensure there are UNC interfaces with the REC process for CSS Supply Points, and not reinventing the process where possible. Common rules for CSS and non-CSS supply points have been kept, being clear where the rules are different. There has also been a re-ordering exercise to move around some of the existing rules to make it easier to understand and to allow the Code to flow. It was noted that marked up Legal Text in Green highlights were sections that have been moved, not deleted. Rules have been grouped for supply registration, supply data, and generic rules for all supply points and CSS supply point registration.

CWo provided an overview of UNC TPD Section G to highlight the changes, confirming that brief summaries of the REC processes have been incorporated. He also explained the use of Annexes and highlighted there will be no concept of a re-confirmation for CCS Supply Points.

CWa clarified that Shippers will no longer drive registration as this will be driven by Suppliers, this was a fundamental change to the way Code operates now. There was some uncertainty expressed that all Shippers understood that they would not have control on registering and de-registering supply points. MJ also noted the impacts/risks on Shippers for settlement charges where they are not able to manage registration.

CWo confirmed that the Supplier of Last Resort (SoLR) element had not been tackled at the this time as further clarity is required on how this will work in practice. It was advised that Ofgem are aware of the gaps, and there is a separate piece of work to look at SoLR and other issues such as Shared Supply Meter Points. KM recognised there is an appetite for change in Shipper/Supplier of last resort review of activities, but noted that this is being managed separately.

Whilst reviewing sections of the Legal Text RP noted that there is one NTS sub-deduct Network, a Distribution Network (DN) sub-deduct arrangement, and that the Legal Text will need to be revisited to take account of this.

KM challenged TPD Section G paragraph 3.2.6 in relation to data protection and accessing relevant information. She wished to note that to enable the correction of data, Shippers need to understand what is recorded, however under the API processes Shippers can't look at the data as they are not a controller, nevertheless they are expected to correct it. DA explained that emergency contact details will be retained from the previous Registered User. The availability of data to subsequent Registered Users has been examined considering GDPR responsibilities. The information is retained to enable this to be passed onto the Transporter, to meet Transporter obligations, it does not mean the information is passed on to other Shippers. He recognised that CSS will record this information but the CDSP will not be providing onward data to the Shipper. KM challenged the role of the CDSP as it appeared in this situation the CDSP had become a data controller and suggested that this may need further exploration. KM challenged if a Shipper can't access/see the data they cannot control its accuracy. The rolling over of contact details was briefly considered further and it was agreed to make a note of this point and reconsider.

CWo highlighted to the Workgroup the new flows of data, and new defined terms. CWa emphasised that within TPD Section G paragraph 3.4.6 there are new data flows for Shippers and that there will be new key defined terms.

CWa noted that the process will be fundamentally changing the way in which Shippers interact with Xoserve. Confirmations will no longer exist as they do now. Confirmations will reduce as these will only exist for NTS CSS Supply Points. GE wanted it to be clear that Nominations will still exist, CWa explained that the two new file transactions will not be setting up a basis for a Confirmation as it exists now. Deregistration will apply to CSS Supply Points, Withdrawals will be removed as a current term.

RP wished to observe that under TPD Section G paragraph 4.5.4 there were default rules and pointed out that the CDSP appeared to have an element of discretion. He thought this was contrary to the rules established under FGO where CDSP discretion had been removed. It was agreed to consider the area on non-discretion further.

The Workgroup discussed the Deregistration process and how Xoserve will manage Deregistrations. DA clarified that the Supply Meter Point status and Isolation status will be provided back to REC. GE asked if Xoserve will be aggregating up all the definitions, CWo advised that they would review the current definitions listings and update them. DA explained how Xoserve will set the Isolation and Termination flags (dead or extinct). GE expressed concern of having to look at several databases and losing detail and losing a level of granularity. DA believed details would not be lost and that the UK Link system will store the required information to support the use of flags.

SL enquired if Xoserve have looked at the need to have a Withdrawal Closing meter read. DA confirmed that this had been considered, it was believed this would be covered within TPD Section N in terms of Closing Reads, however he suggested that this should be noted and re-checked. It was noted that there could be issues with opening and closing reads for multiple short notice switches on a single supply meter point.

RP enquired about the Shipper-Supplier Association Data (SSAD) and noted that Shippers can have a relationship with more than one Supplier (and visa-versa) and if this needed to be reflected in the rules. He wished to understand how the processes will work. DA explained that the Shippers will approve Suppliers undertaking data flows (pre-approved work).

CWo noted the changes in TPD Section G 6 essentially stripped out old rules in relation to offers and confirmations.

MB enquired whilst considering Section G 7 Isolations, about the Deregistration process and asked for clarity that this can only take place if the supply point is isolated. It was noted that the Isolation and Withdrawal concept will not exist, the Deregistration process will replace this.

GE enquired about TPD Section G 7.5.2 and the flow of data. DA explained that the flow should be from the UNC to REC, and not in reverse. Supply Meter Removals was discussed. GE suggested that this needs to be considered further. It was agreed that the points raised by GE about reverse data flowing from REC to UNC should be noted and the Legal Text re-examined.

The Workgroup considered TPD Section 8 Re-establishment and the different scenarios.

Whilst reviewing TPD Section 9 Shared Supply Meter Points, CWo made particular reference to paragraph 9.4, and that assumptions had not been made about what REC will and will not do. It was anticipated that there would be only one CSS switch request at a point in time but if there was more than one switch request it was assumed REC would allow this. For Shared Supply Point Notifications with sharing Registered Users as long as there was matching switching requests, this would be met. The default of not having a matching switching request was highlighted and that in this instance the first request would be acted upon. DA noted that Shared Supply Points would be looked at again. He noted a change request had been put on hold for this to be revisited.

CWo summarised the contents of TPD Annex G-1, the 4 tables and the rules around the tables. The Workgroup considered the grouping of the data items and the level of detail being added to the Annex. The level of detail being inserted was considered and whether it was appropriate, noting this can only be amended through a Modification.

The Workgroup considered TPD Section B, with DT noting the significant changes.

GE enquired about the LDZ Capacity Registration (LDZ Supply Points) and the Legal Text being added to TPD Section B 4.4.1. He suggested that the inserted text "(and a User shall not be required to apply for LDZ Capacity)" should state and a User **will** (rather than shall) not be required to apply for LDZ Capacity.

Whilst considering TPD Section B Annex B-3 DM Supply Point Capacity and Offtake Rate, TS asked for clarity on TPD Section G and the clean and marked up versions provided (Documents 5 and 7), to ensure they correspond.

SL enquired whilst reviewing TPD Section B Annex B-3 6.6 if IGTs will be able to provide a similar instruction. DA agreed this needed to be confirmed.

The Workgroup considered TPD Section M Supply Point Metering. DT summarised the changes, noting the consequential changes up paragraph 2.6. It was anticipated in terms of accepting Meter Information Notifications from parties (Section 4.2.1 page 19) there would be very little change in functionality in terms of system changes.

The Workgroup considered TPD Section M 5.13 Opening Meter Readings. SL enquired about the Registered User of a Supply Meter Point and the reference to Relevant User in Section 5.13.4 (a), and 5.13.4 (b), and what constitutes a Relevant User for meter information. It was understood that currently to send through a reading the provider needs to be the Registered User. The points were noted, and it was agreed to review the reference to a Relevant User. GE also wanted to understand the rationale behind the CDSP utilising the last Meter Read submitted prior to the Supply Point Registration date in respect of Opening Meter Reads.

The Workgroup reviewed the remaining Legal Text changes to TPD Sections A,B,C,E,H,J,Q, S including General Terms and the new definitions within Document 10.

It was questioned when the related CDSP DSC document changes would be reviewed. It was confirmed that the DSC documentation will need to be addressed, however this will depend on the interfaces between the DSC and CSS. KM when this would be mobilised.

CWa explained what he believed would be the next steps. He noted following today's meeting there was a need to undertake some further work on the Legal Text. The Legal Text will then need to be provided formally to Ofgem. CWa understood that Ofgem will be consulting on the consequential changes, which will include the Legal Text drafting in May.

CWa noted that as an industry there will need to be consideration given during the SCR of any in flight Modifications and any future Modifications which may impact the Legal Text provided to support the SCR and then any corresponding SCR Modification to implement the Legal text. He explained careful consideration will need to be given on the impact to the baseline Legal Text, Transition Text and future Legal Text. The development of the CSS interfaces may also have an impact. He explained that transitional work at moment would be premature. He emphasised the need for Transporters to work with the Joint Office, to think about the impacts and if a set of guidelines are needed to properly assess Modifications that may impact the SCR Legal Text. He suggested the UNC Panel should be able to consider Modifications, the justification for a Modification and not simply send them to Ofgem based on a perception they will impact the Legal Text being changed as part of the SCR. He explained that there should be a thorough review and challenge. CWa suggested that the UNC Panel should work with the Joint Office and devise some rules for the assessment.

SL asked for clarification if it was considered that the SCR process had commenced or was about to. Ofgem were asked if they could provide confirmation to the industry if the SCR process was considered to be now formally in place.

BF explained the potential approach comparing how similar large-scale changes such as Project Nexus was managed. He highlighted that there are three simple considerations for changes. These were in summary, will the proposed change:

1. Amend process up until the SCR change
2. Amend process up until the SCR and continue after SCR changes
3. Amend process only after the SCR

BF noting the Ofgem SCR consultation in May, highlighted that there will need to be a UNC Modification to change the CDSP documentation, and Modification to amend the UNC and DSC Contracts as this is likely to be a material impact.

SL reported that the initial approach for the IGT UNC will be to maintain two versions of the iGT UNC, a current version and an indicative version. DT suggested that as the baseline is subject to change that the future Legal Text will need to be revisited and compared against the baseline to keep the process as efficient as possible and avoid multiple reiterations.

The Workgroup considered following review of the Legal Text if there was no need for a further Workgroup meeting to conclude the Workgroup Report. It was suggested due to the nature of the Request the Workgroup Report could be drafted and circulated for comments with a view to closing the Request Workgroup without the need for a further meeting. It was agreed that the Joint Office would finalise the Request Workgroup Report and publish this for Workgroup participants to provide any further comments with a view to closing the Workgroup at the May UNC Panel meeting.

The Workgroup briefly considered the publication of the BRD and Legal Text. CWa confirmed that the SCR legal Text will be provided to Ofgem to support the Ofgem consultation.

3. Review of Outstanding Actions

Action 0301: Xoserve/Joint Office to notify Workgroup participants when version 0.7 of the Business Requirements Document has been published.

Update: DA/BF confirmed this had been actioned. **Closed.**

4. Next Steps

See item 2.0.

5. Any Other Business

None.

6. Diary Planning

No further meetings were planned.

Action Table (as at 16 April 2019)

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
0301	06/03/19	2.0	Xoserve/Joint Office to notify Workgroup participants when version 0.7 of the Business Requirements Document has been published.	Xoserve (DA)/Joint Office (BF)	Closed