

**UNC Workgroup 0864S Minutes
Update of UNC Code Communication Methods
Monday 13 May April 2024
Via Microsoft Teams**

Attendees		
Mark Cockayne (Chair)	(MC)	Joint Office
Harmandeep Kaur	(HK)	Joint Office
Charlotte Gilbert	(CG)	BU-UK
David Mitchell	(DM)	Scotia Gas Networks
Edward Allard	(EA)	Cadent
Ellie Rogers	(ER)	Xoserve
Gavin Williams	(GW)	National Gas Transmission
Helen Bennett	(HB)	Joint Office
Josie Lewis	(JL)	Xoserve
Mark Jones	(MJ)	SSE
Oorlagh Chapman	(OC)	Centrica
Steve Mulinganie	(SM)	SEFE
Susan Ann Helder	(SH)	Northern Gas Networks
Tracey Saunders	(TS)	Northern Gas Networks

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

The Workgroup Report is due to be presented at the UNC Modification Panel by 16 May 2024.

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/0864/130524>.

1.0 Introduction and Status Review

Mark Cockayne (MC) welcomed all parties to the meeting and confirmed that the meeting was quorate.

1.1 Approval of Minutes (14 March 2024)

The minutes from the previous meeting were approved.

1.2 Approval of late papers

MC noted that the Rough Order of Magnitude (ROM) was submitted late. Ellie Rogers (ER) explained that the delay was caused due to some clarifications that were finalised shortly after the deadline.

The late paper was approved.

1.3 Review of Outstanding Actions

0401: JO to make internal enquiries in relation to TPD Section B, Annex B-3 7.2 (f) to understand whether this clause has been moved under a new reference or removed entirely.

Update: MC advised that a Joint Office (JO) colleague has reviewed the Code Updates for the last 12 months to gather more information about clause 7.2(f) being amended. MC confirmed that the clause was not updated in the last 12 months, however, JO will continue the search for the previous updates. MC agreed to provide an update in the post-meeting notes. **Carried Forward.**

0301: GW to review clause 5.2.6 in the GTB General document with the Legal Team to determine whether the clause needs to remain in the text.

Update: GW advised that he has not discussed the action with the Legal Department, however, he and some other Workgroup parties believe that removing 5.2.6 from the GTB General document is outside the scope of this Modification as the solution with the Modification is to replace any reference to facsimile with email. GW proposed that any reference to facsimile in 5.2.6 is amended to email, leaving the clause in. The Workgroup Members did not raise any objections to GW's proposal. **Closed.**

2.0 Amended Modification

The amended Modification was reviewed in the previous meeting on 11 April 2024.

3.0 Review of Fax References

A line-by-line review of the fax references was completed in the 20 March 2024 Workgroup.

4.0 Legal Text Review

GW presented the Legal Text Explanatory Table which explains the changes made to the UNC documents as part of the solution. Please refer to the published table for full details.

GW reminded the Workgroup that Paragraphs 4 to 7 of the TDIIC Transitional Rules document have an expiry date, and as the clauses have now expired, it was agreed that no changes will be made to these paragraphs. GW explained that another Modification is looking to update the document by removing the expired clauses and any other irrelevant parts of the document.

GW explained that he had not provided Legal Text changes for paragraphs 5 to 6 in Annex 1 of the Transitional Rules document due to an error. GW confirmed that these paragraphs have now been reviewed and the Legal Text has been updated to replace facsimile with email in these clauses. GW presented the changes made to the document to TDIIC Transitional Rules Annex 1 to the Workgroup.

Steve Mulinganie (SM) queried whether 'shall be communicated by' in paragraph 5.1.12 is being left in. SM explained that the other changes do not have a preamble before 'email' and generally say 'by email'. GW agreed to refer the point to their legal team and ask whether the term should be removed.

SM enquired about the meaning of 'sent' in Annex G-2, 4.5(c)(ii). SM asked whether 'sent' is when the email has left the system or when the sender presses 'send'. SM raised a concern about proving that the communication had occurred. Tracey Saunders (TS) noted that her view is that 'sent' would mean that the communication has been transmitted from the sender, similar to post which is considered sent when it is put in the post box. SM pointed out that if the Legal Text is ambiguous, people will interpret it how they want to. SM explained that someone could argue that they have not received an email and therefore it is not deemed received.

TS reviewed some legislation and advised that, 'sent' is always deemed as a lowercase. In Case Law, the 'sent' status of a communication is determined with a digital stamp. This is the time when the communication leaves someone's outbox. TS explained that there is a lot of conversation around the issue of company servers blocking emails without sending a bounce back as the email is received by the company, however, it is blocked by the server and does not reach the recipient. TS expressed nervousness regarding the Self-Governance route of

the Modification after considering this information. TS noted that there could be a material impact on things such as credit and termination notices. TS added that the legislation has not taken into account that fax is being turned off and they were last updated several years ago so the legislation has not caught up. SM agreed that TS's comments addressed the point he had raised.

For full information, please see Section 46 of Gas Act 1986 (found at: <https://www.legislation.gov.uk/ukpga/1986/44/section/46/1992-07-01>) and Section 1147 of Companies Act 2006 (found at: <https://www.legislation.gov.uk/ukpga/2006/46/section/1147>)

GW advised that the precedent that underpins the 'deemed receipt' element came from Modification 0479 which introduced email and the justification for 'deemed receipt' text came from BSC Code P1.1.3 which was approved and implemented.

5.0 Review Rough Order of Magnitude

Josie Lewis (JL) provided an overview of the ROM (available at: <https://www.gasgovernance.co.uk/0864>)

SM queried whether Xoserve will support both fax and email during the transition period. JL explained that there will not be a transition period as a 'big bang' approach is being taken with this Modification. SM queried whether there would be a data cleanse in that case. JL explained that the 30,000 entries identified in their system will be end-dated and once the change goes in, the end date will take effect. ER added that the entries will be stored as general data and will not be transferred into any flows.

ER explained that the file format will remain the same, however, the fax will change to email. The Shippers will need to send the email in the old file format. SM asked whether the Shippers will need to send the missing information again via email. ER confirmed that they would.

ER advised that there will need to be a communication from Xoserve to the Shippers to inform them that a particular function will not be used as fax anymore so they will need to ensure that telephone and email are added. However, they will continue using the existing process as the route of S67 notification will not change.

MC enquired whether identifying the processes using fax and notifying Shippers and Transporters of the change has been analysed as part of the ROM. ER explained that they have not proposed a migration process. They have said that the implementation will need to be done via the BAU process. SM raised a concern regarding the BAU process not identifying that fax is a redundant form of communication and not asking to re-submit the missing information. ER noted that Xoserve would have to send a communication as part of the implementation design which will provide the fax numbers that will no longer be in use and ask to send the email information via the specified file format. SM highlighted that Xoserve will need to provide a portfolio of the processes that use fax. ER noted that the communication can be double-faceted. The first part will be to inform that fax is no longer in use and the second part will provide information regarding what is stored for each Shipper. ER agreed to make a note of this as part of the delivery implementation.

JW provided three solution options:

- Option 1a: Replace Fax with Email (File format changes). The file format change will be required to adjust the data field length of characters to 241 from 25.
- Option 1b: Option 1b: Replace Fax with Email (No File format changes). A file format change is not required; however, this would mean that when the email information received is more than 25 characters, these files will present the same up to 25 characters.
- Option 2: Reuse Fax with Email (No File format changes). The data fields will continue with a field length of 25 characters.

MC enquired whether Xoserve has considered any instances where an email address exceeds

25 characters. ER explained that the current data field is not designed for emails. It has been designed for telephone and fax numbers; therefore, they have not had the situation of data exceeding 25 characters. MC noted that a lot of emails would exceed 25 characters. GW asked whether 1a is the only feasible option. SM noted that options 1b and 2 cannot work. ER explained that they wanted to include 1b and 2 as possible options to show that those possibilities have been considered, however, there is a risk of emails exceeding 25 characters.

SM suggested that Options 1b and 2 are removed because these are not viable solutions if the email is invalid. ER explained that the options were added so that the Workgroup and DSC Change Management Committee (ChMC) could see that the options had been considered. SM noted that the change should not go to ChMC without any context when an option is not viable. ER agreed to make it clear that the other options are not viable and provide the relevant context as well. SM suggested adding this information as points that were considered while preparing the ROM and not as options. Oorlagh Chapman (OC) was of the view that presenting all the different options is good for transparency to show that these have been considered, however, a note needs to be made to highlight the risks of the options so that they are not taken forward by ChMC. ER agreed with OC and proposed including the context regarding this in the Workgroup Report as well.

Post Meeting Note

Xoserve have provided a revised version 2 of the ROM to address the points raised by the Workgroup. The ROM has been amended to highlight that Options 1b and 2 have been considered, however, these are not viable options as neither option would be able to deliver the required solution and therefore should not be considered. The options have been retained in the ROM for visibility.

The Workgroup Report has also been updated accordingly.

The updated documents can be found at: <https://www.gasgovernance.co.uk/0864>.

MC enquired about the difference in costs with a major and a minor release, and the difference in the timescale based on the type of release. JL advised that they cannot quantify the cost difference and they are not confirming that there would be cost efficiencies based on the type of release.

When discussing Implementation Costs, JL advised that the high-level cost range for this request is £150k to £230k, however, the cost will depend on the option that is taken forward. ER advised that Option 1a is the biggest impact option. SM advised that the ROM provides an invalid cost range as if it is known that Option 1a is the only viable option and its costs are highest in the cost range, this should be reflected in the ROM. OC agreed with SM and suggested demonstrating which options are not viable and what the cost for the valid option would be, even if it is on a higher scale. ER agreed to take the feedback on board. ER advised that the cost range of £150k and £230k would be the same even if Options 1b and 2 were discounted as this is a high-level cost range.

GW enquired about what factors introduce the cost range with 1a. ER explained that ROM provides a high-level cost range and does not include a detailed design, so the cost is based on the unknown. In the DSC process, the ChMC goes through a detailed design presented in a BER which provides a breakdown of the costs. GW asked whether the costs can be queried when it reaches the DSC process stage. ER explained that with an approved Modification, the delivery cannot be stopped, however, ChMC can challenge the costs.

SM referred back to the mention of 30,000 entries in the UK Link and enquired whether this is the number of Meter Points or instances of fax that need to be replaced. ER explained that this is the number of instances of fax that need to be end-dated. SM noted that SEFE will reach out to Xoserve separately to discuss the implementation in a bit more detail. MC enquired how quickly Xoserve would be able to prepare a report of the instances of fax for

each Shipper. ER explained that this would form part of the delivery process and as Xoserve has the information, it will be possible to pull it together.

ER highlighted that several Service Areas are being impacted by this Modification and a discussion regarding the funding split will be required. ER advised that the funding split will be discussed at ChMC, however, views from the Workgroup are welcomed as they help ChMC with their discussions. OC suggested that if all customers are impacted, then all customers should contribute. Ed Allard (EA) noted that OC's point regarding the funding split is valid.

EA enquired whether a 2025 Major Release aligns with the fax switch-off date. ER explained that the fax switch-off is in December 2025 and the release will need to be before that to allow sufficient time for parties to sort out their systems. ER advised that the June Major Release works with the Modification timeline and allows enough time for all parties.

It was noted that JL will update the ROM to correct the reference to TBD which should have been TPD and a Workgroup Point will be added to reflect the discussions around Options 1b and Options 2 being non-viable options. SM suggested adding the options as matters of consideration which will explain why only one option has been presented and what the cost range for the viable option is. ER agreed with SM's suggestion.

6.0 Development of Workgroup Report

MC presented the amendments made to the Workgroup Report since the last Workgroup. MC updated the Workgroup Report in collaboration with the Workgroup.

The Workgroup discussed the Self-Governance status of the Modification. It was suggested that the Panel consider whether the Modification still meets the Self-Governance criteria further to some issues highlighted by the Workgroup that could have a material impact.

The Workgroup considered the cross-code impact of the Modification. Charlotte Gilbert (CG) confirmed that an IGT Modification is being raised, however, as this is at its early stages, a reference is not yet available.

GW noted that further to a discussion in the Cross Codes Steering Group, it was advised that the Modifications across the Network need to have an aligned implementation. The Workgroup considered whether all Modifications across the Network should be aligned. It was noted if an aligned implementation is required, it needs to be considered whether the other Modifications are also Self-Governance and which Modification will be the leading Modification. CG confirmed that REC will be raising the IGT Modification, and the unification of the approach is to ensure that the different code managers are communicating about the change.

ER highlighted that the REC Modification will be released in November 2025 which does not leave a contingency period if something goes wrong. The Workgroup agreed that implementation alignment with the IGT Modification to be the logical approach. It was highlighted that Xoserve's release dates will need to be communicated to the Cross Code Steering Group in order to align the Modifications.

MC asked Helen Bennett (HB) to attend the next Cross Codes Steering Group meeting and raise awareness of the Modification. MC confirmed that the Workgroup Report will be updated and published on the Modification page.

Action 0501: JO (HB) to attend the next Cross Code Steering Group meeting to raise awareness of Modification 0864S and provide an update to the Workgroup on the outcome of the discussions.

7.0 Next steps

MC clarified that the Workgroup Report would be updated to reflect the discussions in the Workgroup and published with a view of being presented at the UNC Panel on 20 June 2024.

8.0 Any Other Business

None.

9.0 Diary Planning

0864S meetings are listed at: <https://www.gasgovernance.co.uk/0864>

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

Time/Date		Meeting Paper Deadline		Venue	Programme	
10:00 Monday 03 June 2024		5pm Monday 27 June 2024		Microsoft Teams	Standard Agenda	
864S Action Table						
Action Ref	Meeting Date	Min Ref	Action	Reporting Month	Owner	Status Update
0401	11/04/24	4.0	JO to make internal enquiries in relation to TPD Section B, Annex B-3 7.2 (f) to understand whether this clause has been moved under a new reference or removed entirely.	May 2024	JO (MC)	Carried Forward
0402	11/04/24	4.0	GW to review clause 5.2.6 in the GTB General document with the Legal Team to determine whether the clause needs to remain in the text.	May 2024	GW (NGT)	Closed
0501	13/05/24	6.0	HB (JO) to attend the next Cross Code Steering Group meeting to raise awareness of Modification 0864S.	June 2024	HB (JO)	Pending