

**UNC Distribution Workgroup Minutes**  
**Thursday 28 January 2021**  
**via Microsoft Teams**

<b>Attendees</b>		
Alan Raper (Chair)	(AR)	Joint Office
Helen Bennett (Secretary)	(HB)	Joint Office
Andy Clasper	(AC)	Cadent
Chris Hooper	(CH)	E.ON Energy
David Addison	(DA)	Xoserve
David Mitchell	(DM)	SGN
Ellie Rogers	(ER)	Xoserve
Fiona Cottam	(FC)	Xoserve
Fraser Mathieson	(FM)	SPAA/Electralink
Guv Dosanjh	(GD)	Cadent
James Barlow	(JB)	Xoserve
John Welch	(JW)	PAFA
Josh Myers	(JM)	CNG
Kate Lancaster	(KL)	Xoserve
Kirsty Dudley	(KD)	E.ON
Laurie Hayworth	(LH)	Cornwall-Insight
Lorna Lewin	(LL)	Orsted
Mark Jones	(MJ)	SSE
Mark Perry	(MP)	Xoserve (Agenda item 1.5.1 only)
Oorlagh Chapman	(OC)	Centrica (pm only)
Richard Pomroy	(RP)	WWU (0664V and AOB only)
Steve Mulinganie	(SM)	Gazprom Energy
Tracey Saunders	(TS)	Northern Gas Networks

Copies of all papers are available at: [www.gasgovernance.co.uk/dist/280121](http://www.gasgovernance.co.uk/dist/280121)

## 1. Introduction and Status Review

Alan Raper (AR) welcomed everyone to the meeting.

### 1.1. Approval of Minutes (14 December 2020)

The minutes from the previous meetings were agreed.

### 1.2. Approval of late papers

AR advised Workgroup of the late papers received and asked Workgroup if they would accept them:

- Agenda item 1.3 Action 0103 & 0104 update
- Agenda item 5.0 Faster Switching SCR-REC
- AOB: Discussion on XRN4850 (FM)

Workgroup agreed to accept the late papers and the AOB item.

### 1.3. Review Outstanding Actions

**Action 0103/0104:** *Change of Tenancy Flag / CSS issues Original Action:* DA to liaise with SM regarding the possibility of having to raise a Change Request to Ofgem, or Shippers will not be provided the information.

**Update:** In providing an update with regards to this outstanding action, Dave Addison (DA) explained this has been quite a complex piece of work to deliver, mainly due to getting access to the system back tables as the data needed is not stored in the same file format as it is generated.

DA went on to remind Workgroup of how this action originated and advised that the Change of Tenancy flag does not suppress the objection window for the outgoing Shipper information whether or not they intend to object to the transfer. The Change of Tenancy flag is not a data item that will be provided post the Central Switching Service (CSS) program and, so far, there has been little support from the program to make the changes necessary.

DA explained, following Nexus implementation, Shippers were able to ask for consumption data which would be provided via the Q51 record. The data would be provided in kWh and would cover a maximum period of 12 months. Where there are not at least 2 readings within that period, the information would not be provided. Within the enquiry response, additional AQ information is provided which differs from the raw consumption data, which not subject to adjustment for seasonal weather.

DA clarified that the Q51 record is not a record that Xoserve stores, hence the difficulty in obtaining historic performance information.

In providing the information to Workgroup, DA asked Workgroup to consider if they have any objection to leave the Change of Tenancy Flag as it is and not pursue the change through the CSS program and therefore close the action.

Steve Mulinganie (SM) said that the analysis speaks for itself.

AR commented that there appears to be little evidence that such a change is required and on that basis from the information provided, there is little appetite to take the matter further with the CSS project.

SM commented that CSS set a very high bar and there is little point in proceeding forward based on the information provided. **Closed**

**Action 1201:** Joint Office (AR) to contact Gemserv to identify if there are any concerns and if an IGT modification is required to complement Modification 0730V.

**Update:** It was confirmed that the IGT UNC Code Administrator, (CA), view is that an IGT modification may be required to complement Modification 0730V depending on the legal text, but they are not taking this further at the moment.

**Post meeting note:** following a further discussion with the IGT UNC CA, as the legal text for Modification 0730 is contained within the Transition Document, an IGT UNC modification would be required to accommodate Modification 0730V in the IGT UNC. **Closed**

**Action 1202: CSS Consequential Changes – Detailed Design Report** - DA to provide a view of the issues that he is thinking through in relation to CSS Consequential Changes ahead of next meeting for review in Workgroup.

**Update:** This will be covered under agenda item 5.0. **Closed**

#### 1.4. Modifications with Ofgem

AR advised that no further update has been provided and reminded Workgroup of the update provided by Ofgem that the modifications listed below have been de-prioritised:

##### **0701 - Aligning Capacity booking under the UNC and arrangements set out in relevant NExAs**

A DSC change has been implemented which flags sites with a NExA so some benefit to sites already, so modification has been deprioritised.

##### **0696V - Addressing inequities between Capacity booking under the UNC and arrangements set out in relevant NExAs**

DSC change has been implemented which flags sites with a NExA so some benefit to sites already, so modification has been deprioritised.

##### **0687 - Creation of new charge to recover Last Resort Supply Payments**

This has been deprioritised whilst an alternative system for recovery of levy payments is developed under the REC.

##### **0730V - COVID-19 Capacity Retention Process**

This was discussed at the January 2021 UNC Panel where it was not recommended for implementation and has now been passed to Ofgem for an Authority Decision.

#### 1.5. Pre-Modification discussions

##### **1.5.1. Draft Request: Advanced Analytics NDM Demand Modelling**

Mark Perry (MP) addressed Workgroup to advise the Xoserve Unidentified Gas (UIG) Task Force reported that the Non-Daily Metered (NDM) modelling error is a significant factor in UIG volatility and that the use of advanced analytics, such as Machine Learning, may contribute to reducing this error.

MP advised that the results of the Xoserve led industry consultation on the future of the NDM Algorithm concluded there was strong support for investigating advanced analytic options within certain boundaries, (e.g. retain Annual Load Profile (ALPs) and Daily Adjustment Factor (DAFs)). MP added that using more advanced analytical tools could contribute to reducing the error and that it was worth having consultation in order to get a better understanding of where the advanced analytics could be used.

MP clarified that improved NDM Allocation would result in a reduction in UIG volatility and subsequent Meter Point reconciliation/UIG volumes.

MP advised that the Proposal suggests a UNC Review Group to investigate different options using advanced analytic techniques.

The Request Scope and objectives would be:

- Investigate different options of advanced analytic techniques to produce the underlying EUC Demand Models that are required to create the key parameters of ALP, DAF and Peak Load Factor (PLF).
- Simulate NDM Allocation / UIG over recent historic periods in order to prove the benefits of any proposed options when compared to current approach.
- Provide recommendations/results to DESC to consider as part of its obligations to manage the Demand Estimation process.

The UNC Review Group would allow work to proceed at a reasonable pace and would increase visibility of progress across the industry and allow the work to be done outside of the Demand Estimation Sub-Committee (DESC).

A collaborative industry approach is likely to generate more ideas/options which would benefit everyone.

In conclusion of the presentation, MP advised that a sponsor would be required to take the Request forward.

SM advised he had two questions:

- As part of considerations, the Review Group should assess how this might be funded.
- What would be the term of the Review Group. MP advised this is quite a big piece of work and clarified he thought it would progress towards the end of 2021 with a view to any solutions being implemented in 2022/2023.

Tracey Saunders (TS) commented that there needs to be time set aside to develop any modifications that will come out of the Review Group.

MP clarified that a modification might not be required, depending on the change required, it could just be a change to a UNC related document.

Kirsty Dudley (KD) commented that it sounds like the Review Group would be “hands-on” and that active participation would be required. She asked what the impact would be if people do not get involved. MP clarified that the more involvement means the more options that can be explored. If User participation is limited, this in turn would limit the amount of progress and may reduce the options that could be defined and investigated. KD explained her reason for questioning is that a lot of time has been spent on *Review Group 0693R - Treatment of kWh error arising from statutory volume-energy conversion*, which concluded without anything being determined. Fiona Cottam (FC) clarified that members of the Review Group do not have to be analysts and do not have to be participating. KD questioned if the Review Group will make the progress that is required. FC further clarified that MP has a team to support the Review Group whereas Review Group 0693R did not had less support as the industry had prioritised COVID-19 related issues.

AR advised he has reviewed the Terms of Reference for the Request, which are embedded into the Request, and commented there is a long list of items for discussion. MP advised that since the taskforce recommendations there has been a change to the modelling process which has brought improvement and clarified that regardless of the Review Group, progress is being made.

AR advised, in terms of next steps and with normal constraints of time and availability, it is the intention to present the Request to the February 2021 UNC Panel.

SM offered to sponsor the Request for the purpose of undertaking the Review and commented that he thought, in instances like this, Xoserve should be able to raise their own modifications.

When SM asked, MP confirmed he would present the Request to UNC Panel in February 2021.

**New Action 0101:** MP to forward a Word version of the Request to SM in order for him to review it.

AR confirmed that Joint Office will critically friend the Request when it is submitted.

## 2. Workgroups

### 2.1. 0693R – Treatment of kWh error arising from statutory volume-energy conversion (Report to Panel 17 December 2020)

<https://www.gasgovernance.co.uk/0693>

### 2.2. 0734S – Reporting Valid Confirmed Theft of Gas into Central Systems (Due to report to Panel 18 February 2021)

<https://www.gasgovernance.co.uk/0734>

**2.3. 0746 - Clarificatory change to the AQ amendment process within TPD G2.3**  
(Report to Panel early on 15 April 2021)

**3. UIG Update**

**3.1. UIG Update**

Ellie Rogers (ER) provided an update:

The LDZ National UIG continues to be published on the Xoserve secure section of their website: <https://xoserve.sharepoint.com/sites/XEUKLINKDev/>

**4. COVID-19 Issues**

AR confirmed that *Modification 0750FT - Amendment to regulations relating to COVID Modifications* had been implemented. This Modification, which was originally consulted upon as part of Modification 0730, updates the Statutory Instruments quoted in the Uniform Network Code (UNC) Transitional Arrangements Document Part VI for the devolved governments with the new regulations that replace them, as well providing clarity to obligations and future proofing against further to the regulations, should that occur.

TS clarified the intention of Modification 0750FT is to better future proof and make it clearer for everybody.

AR confirmed that *Modification 0730V – COVID-19 Capacity Retention Process* was presented at the December 2020 UNC Panel and is now with Ofgem awaiting decision. UNC Panel had recommended not implement this modification.

**5. CSS Consequential Changes – Detailed Design Report**

DA provided a general update to the Faster Switching Significant Code Review based on the Retail Energy Code REC v3 CSS Go Live.

**Background**

DA explained there are two facets to the Faster Switching Significant Code Review, (SCR), the Retail Codes Consolidation, (REC v2.0), which is currently out for consultation and is planned to go live in September 2021 and CSS Go Live, (REC v3.0), is planned to go live in Summer 2022.

DA advised that work was still ongoing to cater instances where sites had their master registration through the UNC, (as opposed to being mastered on CSS).

Overall, Uniform Network Code itself (UNC) Section G will have very few updates, although it is expected that the Modification Rules would be changed to allow the REC Code Manager and the UNC Code Administrator to raise UNC Modifications, where there is a cross-code impact with the REC.

**Faster Switching SCR - REC v3 CSS Go Live**

In advising of the CSS SCR Text, which will be pertinent to REC v3.0, DA advised this will include Transition; GT-D and Transition between CSS and UNC Registration.

SM asked, in terms of the REC Code Manager, if there would be three service providers for facilitating the REC, these are REC Code manager performance assistance; Professional services and Non-technical services, and at what level would CDSP be providing information.

DA clarified there will be a Transition workstream within the program and any changes as part of the Transition workstream will be progressed in a separate modification. There is a current working assumption that in-flight switches will be allowed.

## Switch Stream

SM commented that this would be a basic service available to all Users and, as an Xoserve product should be contemplated in UNC. DA clarified that this the presentation did not reference Switch Stream and, given then that further discussion on how Switch Stream would be taken forward were yet to take place, but at the moment, he did not see the service being included in the UNC.

DA advised that his initial view is that it is not anticipated the Switch Stream as file transactions would not be relevant UK Link communications. DA and SM will have an offline discussion about this topic.

## CSS SCR Text (REC v3.0) - Functional

DA went on to explain the text that will be considered as part of the CSS SCR REC v3.0:

- Transition is expected that this will be covered in a separate Modification.
- GT-D
  - Changes to CDSP Services definitions by adding REC related activities.
  - Incorporation of DPM into GT-D
  - And possibly some others
- Transition between CSS / UNC Registration

## Reminder of functionality

- Registration will be mastered under CSS.
- Settlement would be processed under the UNC using both a:
  - Base Registration Nomination, (the Settlement elements of an existing Confirmation).
  - Detailed Registration Nomination, (the existing Nomination File), – where applicable.
- UK Link will 'Associate', (this is a new UKL term), the two and make the BRN 'Operative' in relation to a Relevant CSS Request.
- Default Settlement Values will be used where an Operative BRN is not available, i.e.
  - has not been received, or
  - has been rejected, or
  - cannot be Associated, (this might be because of dates in the Switch Request, or changes at the site)

Therefore, in certain circumstances, Supply Point Class would default to Class 1, even if Class 1 specification is met, which may not be appropriate.

DA clarified that the Class Change functionality would have a 2-month validation and thinks this is something to contemplate within the UNC in terms of default rules. This interaction between codes and the rules on Class change are being looked at in more detail. In the absence of any objections, DA advised the program is looking to add some extra flexibility into the Code.

## Provision of Information

DA explained that Annex G-1 provides the specification for providing information, this is being checked in detail and have identified two required amendments:

- DN Interruption Details – the details are being indicated as being provided in the DRN Response (Nomination) – which currently are not available until Confirmation.

- It is proposed that this is provided at BRN response (Settlement Detail Response)
- Seasonal Large Supply Points – the details are provided in the Nomination Response today, whereas these are not shown in the text until the BRN response.
  - It is proposed that this is provided at DRN response – consistent with the UKL Design.

This concluded the update on the CSS aspects of Faster Switching Significant Code Review

**Action 1202: CSS Consequential Changes – Detailed Design Report** - DA to provide a view of the issues that he is thinking through in relation to CSS Consequential Changes ahead of next meeting for review in Workgroup.

DA provided a presentation to update to this outstanding action and advised of the further detail into a UNC opportunity that was highlighted at the Regulatory Design User Group (RDUG).

### **Faster Switching SCR: Retail Code Consolidation - REC v2**

#### **Background:**

DA advised that, within SPAA there are specific schedules that detail processes for determining Meter Readings between the Suppliers (Schedule 11), and submission to the CDSP (Schedule 21). It was highlighted at RDUG that some aspects of the above Schedules were not being taken into the REC, although it was concluded that the additional detail would probably not need to be defined within the UNC, but views were requested.

#### **Schedule 21:**

DA provided Workgroup with further detail and references that are in UNC regarding the requirement in UNC for the New Shipper to submit the Meter Reading and clarification of the source of the Meter Reading.

#### **Provision of Meter Readings:**

DA clarified that Meter Readings are provide to CDSP via a number of files depending on the Meter Point's characteristics.

#### **Conclusion:**

DA confirmed that the recommendation is to leave Code as it stands for Section M.

- **Read Source: No change needed.**
  - Schedule 21 currently specifies the means for provision of Meter Readings to the CDSP
  - Relevant Read Sources (POS and Shipper Estimate) are valid sources within UK Link Communications – **no specific change to UNC recommended.**
- **Submission: Arrangements already aligned.**
  - SPAA states that only the New Supplier can submit the Meter Reading (via their Shipper) for a Change of Supplier Meter Reading
  - UNC states that the New Shipper is responsible for providing the transfer Meter Reading.

In summary, DA confirmed that the recommendation is to leave UNC as it stands for Section M.

#### **Close Action**

## **6. Issues**

None raised.

## 7. Any Other Business

### 7.1. Large Loads Letters

TS advised Shipper participants that NGN have issued letters referring to 2021 forecast demand for large -load sites.

### 7.2. SPAA Change Proposal 443 and XRN4850 (Provision of customer contact data to Transporters)

AR showed onscreen Change Proposal XRN4850 – Notification of Customer Contact Details to Transporters, which aims to improve communications with end consumers during planned and unplanned gas supply disruptions.

It was explained that the SPAA Executive Committee have discussed the SPAA Change Proposal 443 – Provision of customer contact data to Transporters, relating to the backfill of customer contact data.

In essence, the SPAA Executive Committee have approved work to help improve the level of data being provided by Suppliers, which is of benefit to Transporters in contacting consumers during emergencies and other, strictly prescribed use cases.

The reason this is being discussed at Distribution Workgroup is to raise and to encourage Suppliers to provide the required customer contact data.

SM highlighted that the obligation exists and to date only 8 million records have been submitted across the whole portfolio.

An update was provided in that the SPAA Expert Group have recently discussed that rather than reporting on everyone, it might be better to individually report on those that have not backfilled their customer contact data.

## 8. Diary Planning

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

Time / Date	Venue	Workgroup Programme
Thursday 10:00 25 February 2021	Teleconference	Distribution Workgroup standard Agenda
Thursday 10:00 25 March 2021	Teleconference	Distribution Workgroup standard Agenda
Thursday 10:00 22 April 2021	Teleconference	Distribution Workgroup standard Agenda
Thursday 10:00 27 May 2021	Teleconference	Distribution Workgroup standard Agenda
Thursday 10:00 24 June 2021	Teleconference	Distribution Workgroup standard Agenda
Thursday 10:00 22 July 2021	Teleconference	Distribution Workgroup standard Agenda
Thursday 10:00 26 August 2021	Teleconference	Distribution Workgroup standard Agenda
Thursday 10:00 23 September 2021	Teleconference	Distribution Workgroup standard Agenda



Thursday 10:00 28 October 2021	Teleconference	Distribution Workgroup standard Agenda
Thursday 10:00 25 November 2021	Teleconference	Distribution Workgroup standard Agenda
Thursday 10:00 13 December 2021	Teleconference	Distribution Workgroup standard Agenda

<b>Action Table (as of 28 January 2021)</b>						
<b>Action Ref</b>	<b>Meeting Date</b>	<b>Minute Ref</b>	<b>Action</b>	<b>Reporting Month</b>	<b>Owner</b>	<b>Status Update</b>
<b>0103 &amp; 0104</b>	23/01/20	3.0	<b>Change of Tenancy Flag / CSS issues:</b> (Original Action: DA to liaise with SM regarding the possibility of having to raise a Change Request to Ofgem, or Shippers will not be provided the information.)	<b>January 2021</b>	CDSP (ER)	<b>Closed</b>
<b>1201</b>	14/12/20	1.3	Joint Office (AR) to contact Gemserv to identify if there are any concerns and if an IGT modification is required.	<b>As soon as possible</b>	Joint Office (AR)	<b>Closed</b>
<b>1202</b>	14/12/20	5.0	<b>CSS Consequential Changes – Detailed Design Report:</b> CDSP (DA) to provide a view of the issues that he is thinking through in relation to CSS Consequential Changes ahead of next meeting for review in Workgroup.	<b>January 2021</b>	CDSP (DA)	<b>Closed</b>
<b>0101</b>	28/01/21	1.5.1	<b>Draft Request: Advanced Analytics NDM Demand Modelling:</b> MP to forward a Word version of the Request to SM in order for him to review it.	<b>February 2021</b>	CDSP (MP)	<b>Pending</b>

**UNC Workgroup 0734S Minutes**  
**Reporting Valid Confirmed Theft of Gas into Central Systems**  
**Thursday 28 January 2021**  
**via Microsoft Teams**

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Mark Jones	(MJ)	SSE
Steve Mulinganie	(SM)	Gazprom Energy
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The Workgroup Report is due to be presented at the UNC Modification Panel by 15 April 2021.

## 1.0 Introduction

The Proposer, Steve Mulinganie (SM), provided an update and advised that implementation will now be assumed to be in line with the REC start date. Dave Addison (DA) sought clarification that implementation would be no sooner than the REC start date to which SM confirmed. DA added a concern that one of the challenging elements of the implementation will be the Contact Management System (CMS) rebuild.

### 1.1. Approval of Minutes

The minutes from 14 December 2020 were approved.

### 1.2. Approval of Late Papers

There were no late papers for approval.

### 1.3. Review of Outstanding Actions

**Action 1101:** SPAA/Electralink (FM) and the Proposer (SM) to update the Modification to address feedback received.

**Update:** Alan Raper (AR) confirmed an amended modification has been published. **Closed**

**Action 1201:** FM to check the data on reversals and resubmissions.

**Update:** Fraser Mathieson (FM) provided an updated and advised he has checked with the TRAS teams and confirmed this does happen, usually where there is a manifest error, although volumes are very low. The Business Rules have been updated in the amended modification accordingly to reflect this. When asked, FM advised that the reportable instances of this could give the wrong impression as there have been a few instances where the bulk of reports have not been meeting the threshold for the incentive scheme, but they would still be confirmed thefts. FM added that is key to note that if using TRAS, there would be facility to reject a report of theft if incorrect, which is reflected in the business rules. DA suggested the numbers that would be subjected to the reversal/correction process to be very low. There needs to be some function to facilitate a correction as easy as possible. SM advised he would expect the number of reports that are manifestly erroneous to be very low. **Closed**

**Action 1202:** Kirsty Dudley (KD) to check the approach if an IGT modification needs to be raised.

**Update:** KD advised this was raised at IGT UNC where it was decided that, until the legal text is provided, it is unsure if an IGT modification is required. **Closed**

**Action 1203:** FM and SM to provide an amended modification.

**Update:** AR suggested this action is a replication of Action 1101. **Closed**

## 2.0 Consideration of amended Modification

Referring to the amended modification published on the Joint Office website on 22 January 2021 (v2.0) AR advised Workgroup that the modification has significantly been redrafted and suggested a full walkthrough of the changes.

FM was invited to provide an overview of the changes made, the discussion of which is captured below:

### **Purpose of Modification:**

Minor clarification wording has been added.

### **Timetable:**

The timetable has been updated to reflect the Workgroup Report is due to be presented to the April 2021 UNC Panel.

### **What:**

Clarification has been added to make clear the modification seeks to place a requirement for Shippers to notify Suppliers of suspected thefts.

## **Section 5: Solution**

### **Business Rule 1**

**BR1** - Notifications of claim(s), or correction(s) relating to previous claim(s), of Theft(s), associated with relevant Meter Point Reference Numbers (MPRN's) received by the Central Data Service Provider (CDSP) from the Retail Energy Code (REC) will be passed to the relevant Shipper for consideration.

**Guidance** - this allows for Supplier initiated corrections to occur although one may expect these will only occur in exceptional circumstances. For the avoidance of doubt, on implementation of the solution described by this Modification Shippers will no longer be required to manually enter Supplier confirmed Thefts directly into central systems as

*this process will now be replaced by an automated process initiated by claims submitted by the Supplier via the REC.*

Claims or corrections will be passed to CDSP or Suppliers and guidance provided. SM advised this is where the concept of corrections is introduced which is the additional item.

KD commented that the Supplier makes any changes and the Shipper needs to replicate that.

SM clarified there are three areas being addressed:

1. Claim being submitted which may or may not be rejected.
2. Correction to a claim which may or may not be rejected.
3. Rejection of a claim due to manifest error.

DA referred to some examples within the modification to seek clarification about whether or not the correction process is a withdrawal of the initial claim or a net effect in terms of the value. SM referred DA to Business Rule 2.

## **Business Rule 2**

**BR2** - *For the avoidance of doubt if the correction is not objected to this will result in the previous claim being invalidated and the CDSP will act accordingly.*

**Guidance** – *a correction must always relate to a previously accepted claim and by its very nature would only occur in exceptional circumstances. See examples below*  
*Example 1: Supplier A reports a valid theft into the REC in relation to Supplier Investigation ID 1234 for 500 units. This is submitted to the CDSP by REC on behalf of the Supplier to the Shipper who does not object. Accordingly, the 500 units will be put into settlement, Subsequently Supplier A finds that the theft was erroneously reported. They submit a correction to REC which, in the absence of an objection by the Shipper, would mean Supplier Investigation ID 1234 was withdrawn and the 500 units which was put into settlement would be reversed out.*  
*Example 2: Supplier A reports a valid theft into the REC in relation to Supplier Investigation ID 1234 for 500 units. This is submitted to the CDSP by REC on behalf of the Supplier to the Shipper who does not object. Accordingly, the 500 units will be put into settlement, Subsequently Supplier A finds that the theft was erroneously reported and should be 400. They submit a correction to REC which, in the absence of an objection by the Shipper, would mean Supplier Investigation ID 1234 was withdrawn and subject to the correction not being objected to would then submit a new Supplier Investigation ID 5678 for 400.*

DA clarified that, in effect the User is not submitting a correction, the User is submitting a withdrawal and subsequently submission of a new claim.

SM confirmed this will be creating a correction which results in the invalidation of a claim that has been accepted.

DA said that the effect of the correction will be to withdraw the previous claim and substitute that with the correction provided. Any values that are included within that correction value are treated as a new claim.

KD referred to this process and suggested it is similar to a replacement meter read where the current read is withdrawn and replaced by the correct read.

SM advised this Business Rule resets what the correction does, it resets the position, there may be a subsequent claim received, which may or may not be rejected.

When asked, SM confirmed the expectation will be for the UNC to include text to say there is a correction process, BR2 reflects that.

SM suggested the removal of the word invalidated and replace with withdrawn should clarify the matter and that FR will amend the rule.

**BR2** - For the avoidance of doubt if the correction is not objected to this will result in the previous claim being **invalidated** withdrawn and the CDSP will act accordingly.

AR noted that a correction does not necessarily have to correct the volume of units down, it could go up as well, SM clarified this, and said the subsequent claim could be higher, the consequence of the correction could be higher.

AR asked if there is any time limit on a correction. SM advised he has not contemplated a time limit. KD said that if the correction is to be counted in the incentive scheme, the driver is to submit a correction within two monthly cycles. She noted that in some cases, it might be a valid challenge which might not end with a resubmitted claim. KD added that if a claim is resubmitted a new unique identifier would have to be provided.

Dave Mitchell advised that some of the BR's refer to reconciliation rather than settlement. He said that reconciliation could be a misplaced term. Workgroup agreed there should be a standard approach and to align the BR's to settlement.

DA sought clarification on the timeline for when a correction would be needed. It was confirmed that when the correction is raised it is driven by the timeline in Business Rule 3. Anything not objected to within 20 Business Days CDSP would be processed.

### **Business Rule 3**

**BR3** - The Shipper can object at MPRN level to the claim(s) or corrections within 20 Business Days of receipt of the claim from the CDSP. The grounds for objection are limited to instances of manifest error. For the avoidance of doubt in the event of an objection other than as set out in BR4 no further action is required by the CDSP.

**Guidance** – It was felt that four weeks would provide enough time for Shippers and Supplier to enter dialogue in terms of any concerns. Of course, the frequency of reporting into CDSP needs to be considered to avoid overlaps.

FM explained a Shipper can object to the claim within a timeframe. If an objection is raised then no further action is required by CDSP and it would not be processed into settlement.

Workgroup discussed and agreed to change from business days to **system** business days in order to mitigate the risk of CDSP system not being available, (which in effect is only relevant to 02 January since it is a Scottish Bank Holiday).

No further comments for this BR.

### **Business Rule 4**

**BR4** - Any objection submitted will be notified to the Performance Assurance Committee (PAC) and the Retail Energy Code who submitted the relevant Notification to the CDSP on behalf of the Supplier.

**Guidance** – This provides a very limited scope for objection and should mean that scenarios where the Supplier and Shipper disagree are exceptional. The monitoring of the number of objections would fall within the scope of the Performance Assurance function.

### **Objections:**

This Business Rule sets out the mechanism so that Suppliers get notified of an objection.

ER commented that it is assumed that Retail Energy Code, (REC), are responsible for relaying back to the individual Supplier.

KD asked if this will be in the PARR; FM advised that PAC should decide if anything is required regarding these notifications. SM advised this Business Rule has been kept at a high level, he advised there may be a requirement to provide further detail in the Business Rule.

JW advised that if it is decided that PAC would monitor the objections then the PARR is the best approach.

When asked what the key data items that would be expected to be provided to enable PAC to monitor the situation, KD suggested three things for PAC to monitor: the volume of adjustments designated as manifest errors; the nature of the challenge; how much the volumes were adjusted by and suggested a simple table could easily be produced.

It was mentioned that if the suggestion is for a PARR report, it could become part of the modification; if it is not in the modification, an assessment would be made by PAC as to whether or not the report is required.

If the report is formalised it will be added into the Business Rule; if the report is not formalised it will be added to the guidance note.

JW will discuss with PAC and return to Workgroup.

**New Action 0101:** *Business Rule 4 Reporting - PAFA JW to discuss with PAC and return to Workgroup.*

**New Action 0102:** *Regarding the 3 items for PAC to monitor - KD to provide suggested table.*

### Business Rule 5

**BR5** - *In the absence of an objection the relevant energy will be addressed in settlement by the CDSP.*

**Guidance** – *This recognises that the outcome may be both positive or negative. It is proposed that this would normally be done via a Consumption Adjustment.*

FM explained that the data provided by the Supplier goes into settlement unless it is objected to. He added the Guidance mentions Consumption Adjustment, which could be the wrong terminology and floated a question as to whether it should refer to reconciliation rather than Consumption Adjustment.

ER advised that UNC TPD E 3.5 (Gas Illegally Taken) mentions Consumption Adjustment.

The question was addressed to Xoserve as to what the terminology should be, Reconciliation; Consumption Adjustment; Settlement or 'by CDSP'.

DA commented that there needs to be caution applied into how the Legal Text is constructed and suggested the phrase 'addressed in accordance with UNC TPD Section M 1.9 (Consumption Adjustment)' is used.

AR further added that a Meter Bypass Adjustment (UNC TPD Section M 2.4 (Meter by-pass)) also refers to Consumption Adjustments and an analogy may be appropriate as this process also addresses a quantity of gas that has not gone through the meter.

It was suggested, to take this forward for now, to place square brackets around the word Settlement whilst assessing the terminology.

DA clarified that UNC TPD Section M 1.9.1 reflects the process that CDSP would follow in this instance:

*1.9.1 In the circumstances provided in the Code, an adjustment ("Consumption Adjustment") to metered consumption shall be made in determining the amount of gas offtaken from the Total System at a Supply Meter Point.*

In addition to the Business Rules above it is also proposed to make the following associated change:

### New Business Rule 6:

**BR6** - *Shippers shall use reasonable endeavours to ensure Suppliers who they provide Shipping services for are made aware of any suspected thefts which they themselves have been made aware of and which relate to that Supplier who they provide Shipping*

services for. The Shipper shall retain evidence of such notification and acknowledge they may be asked to provide such evidence upon request from a relevant party.

**Guidance** – This codifies the requirement for Shippers to report suspected theft of gas to the relevant Supplier for investigation. We do not see a role arising for the CDSP at this time as a result of this business rule, so no specific solution is required. If some form of oversight was needed, we would expect it would evolve via the PAC.

**[Note 1:** For the avoidance of doubt, any Annual Quantity (AQ) amendments required as a result of any material change to the existing AQ remains an existing obligation of the relevant Shipper and this Modification does not propose any intervention on such matters by the CDSP.

**Note 2:** For the avoidance of doubt, the Proposer would expect the Performance Assurance Committee to have access to appropriate tools to enable them to monitor the performance of these arrangements.

FM clarified this Business Rule should be considered separately to the other Business Rules as it relates to processing suspected theft by shippers rather than confirmed theft.

KD advised that, for some parties, they feed in the suspected theft from the beginning of the process and update the status through various stages and any reporting should cover all theft activity, regardless of source.

SM confirmed this Business Rule is high-level and left for Shippers to decide how the suspected thefts get through to the Supplier.

It was mentioned that the Transporter has no direct relationship with the Supplier, everything is input to CMS which notifies Shipper who subsequently notifies the Supplier.

KD aired her concern that this may be overcomplicating the process with the suspected theft and suggested the majority of which will become no theft rather than confirmed theft.

SM questioned if BR6 needs to be relevant to the settlement aspect of theft being addressed by the modification.

FM advised he would be uncomfortable if BR6 was removed, this was something that was identified as important as part of the Joint Theft Reporting Review Group (JTTR). KD requested the efficiency of the modification should be considered and added her concern that potentially this could cause additional complexity, when the whole reason for this modification was simplification and efficiency.

**New Action 0103:** Business Rule 6: FM to look at what the trans and supp obligations are and how they can work better together.

SM set the challenge that BR6 can be removed unless Workgroup say they want it kept in.

## **Section 6: Impacts & Other Considerations**

In this section, FM advised the Cross Code impacts updated in order to highlight that this solution will apply to both UNC and IGT UNC.

ER sought clarification of assuming this modification would supersede the current processes that records suspected theft.

AR asked if this would require a DSC change, ER confirmed that the Change Proposal is raised at the moment and the DSC element would be picked up once the modification is stabilised.

SM suggested the following wording for an additional Business Rule to accommodate theft where the period of the covered two shippers. It was suggested that the rule should reflect activity at a MPRN level and should a “one-fail: all-fail” principle:

**DRAFT BR [X]** - In the event that a claim or correction, relating to a previous claim, that covers a period during which multiple Shippers were Registered then any objection in accordance with BR3 will apply to the claim or correction in its entirety.

## 2.1. Issues and Questions from Panel

There were no new questions raised from the Panel.

### 2.1.1. Workgroup to consider any potential cross-Code impacts and implementation timelines.

The Cross-Code impact of the proposal was discussed as part of action update 1202 where Workgroup were advised that until the legal text is provided, it is unsure if an IGT modification is required.

## 3.0 Review of Business Rules

Please refer to agenda item 2.0 where a full review of the Business Rules was undertaken.

## 4.0 Consideration of Draft Legal Text

Legal Text has not yet been provided. It was confirmed by the Legal Text provider, SGN, that once the modification is stable, the Legal Text would be provided.

## 5.0 Development of Workgroup Report

AR confirmed he will annotate what has been discussed so far in the Workgroup Report.

## 6.0 Next Steps

AR summarised as follows:

- A new version of the modification is expected.
- The Legal Text would be provided once the modification stabilises.
- The Workgroup Report would start to be developed once the modification stabilises.

## 7.0 Any Other Business

None.

## 8.0 Diary Planning

Further details of planned meetings are available at: [www.gasgovernance.co.uk/events-calendar/month](http://www.gasgovernance.co.uk/events-calendar/month)

Workgroup meetings will take place as follows:

Time / Date	Venue	Workgroup Programme
Thursday 10:00 25 February 2021	Teleconference	Distribution Workgroup standard Agenda
Thursday 10:00 25 March 2021	Teleconference	Distribution Workgroup standard Agenda



Action Table (as of 28 January 2021)						
Action Ref	Meeting Date	Minute Ref	Action	Reporting Month	Owner	Status Update
1101	28/11/20		SPAA/Electralink (FM) and the Proposer (SM) to update the Modification to address feedback received.	January 2021	SPAA/Electralink (FM) and the Proposer (SM)	Closed
1201	14/12/20		FM to check the data on reversals and resubmissions	As soon as possible	SPAA/Electralink (FM)	Closed
1202	14/12/20		KD to check the approach if an IGT modification needs to be raised.	January 2021	E.ON (KD)	Closed
1203	14/12/20		FM and SM to provide an amended modification.	January 2021	CDSP (MP)	Closed
0101	28/01/21	2.0	<i>Business Rule 4 Reporting</i> - PAFA JW to discuss with PAC and return to Workgroup	February 2021	PAFA (JW)	Pending
0102	28/01/21	2.0	<i>Business Rule 4 Regarding the 3 items for PAC to monitor</i> - KD to provide suggested table	February 2021	E.ON (KD)	Pending
0103	28/01/21	2.0	<i>Business Rule 6:</i> FM to look at what the Transporter and Supplier obligations are and how they can work better together	February 2021	SPAA/Electralink (FM)	Pending

**UNC Workgroup 0746 Minutes**  
**Clarificatory change to the AQ amendment process within TPD G2.3**  
**Thursday 28 January 2021**  
**via Microsoft Teams**

<b>Attendees</b>		
Alan Raper (Chair)	(AR)	Joint Office
Helen Bennett (Secretary)	(HB)	Joint Office
Andy Clasper	(AC)	Cadent
Chris Hooper	(CH)	E.ON Energy
David Addison	(DA)	Xoserve
David Mitchell	(DM)	SGN
Ellie Rogers	(ER)	Xoserve
Fiona Cottam	(FC)	Xoserve
Guv Dosanjh	(GD)	Cadent
James Barlow	(JB)	Xoserve
John Welch	(JW)	PAFA
Josh Myers	(JM)	CNG
Kate Lancaster	(KL)	Xoserve
Kirsty Dudley	(KD)	E.ON
Laurie Hayworth	(LH)	Cornwall-Insight
Lorna Lewin	(LL)	Orsted
Mark Jones	(MJ)	SSE
Oorlagh Chapman	(OC)	Centrica (PM only)
Steve Mulinganie	(SM)	Gazprom Energy
Tracey Saunders	(TS)	Northern Gas Networks

Copies of all papers are available at: [www.gasgovernance.co.uk/0746/280121](http://www.gasgovernance.co.uk/0746/280121)

The Workgroup Report is due to be presented at the UNC Modification Panel by 15 April 2021.

## 1. Introduction and Status Review

Alan Raper (AR) welcomed all to the Workgroup.

AR reminded Workgroup that at the UNC Modification Panel meeting held on 19 November 2020, it was determined that Modification 0736A should be issued to a new Workgroup for assessment and be re-numbered as Modification 0746.

### 1.1. Approval of Minutes (14 December 2020)

The minutes from the previous meeting were accepted.

### 1.2. Approval of Late Papers

AR confirmed that no late papers have been submitted.

### 1.3. Review of Outstanding Actions

**Action 1201:** Workgroup to review the Transitional Business Rules, (BRs 4 - 7), ahead of Workgroup meeting in January 2021.

**Update:** This has been completed **Closed**

**Action 1202:** Subject to the decision to be made at UNC Panel on Thursday 17 December regarding Modification 0736S, the Proposer, SM, to redraft Modification 0746 for consideration ahead of Workgroup meeting in January 2021.

**Update:** Amended modification has been submitted. **Closed**

## 2. Amended Modification

Steve Mulinganie (SM) confirmed that two versions of the amended modification have been created. The amended modification that is currently published (v2.0 22 January 2021) is in-line with Workgroup discussions and agreements from the Workgroup meeting held on 14 December 2021.

The other version of the amended modification, (which would be v3.0) is in a more developed and is consistent with the intent of the modification going forward.

AR showed onscreen both amended modifications in order to highlight the differences:

Tracey Saunders (TS) suggested, regarding the published v2.0 modification, because the Business Rules have changed, this current condensed version might be better.

SM explained that the new amended modification which is currently in development will be the better option in terms of structure, but it may have to bring some Business Rules from v2.0 in order to have a complete set of Business Rules.

SM suggested the new amendments are issued to Workgroup participants for consideration and comments to be brought back to the next Workgroup meeting, (25 February) to give everyone a fair chance to review it.

**New Action 0101:** Workgroup participants to review the draft v3.0 of the modification and provide comments by close of play Friday 05 February 2021.

## 3. Review of Legal Text

This will be covered in due course.

## 4. Development of Workgroup Report

This will be covered in due course.

## 5. Next Steps

AR requested that Workgroup consider the amended draft modification and provide comments to enable the proposer to make the necessary changes ready for Workgroup discussions in February 2021.

## 6. Any Other Business

None raised.

## 7. Diary Planning

Further details of planned meetings are available at: [www.gasgovernance.co.uk/events-calendar/month](http://www.gasgovernance.co.uk/events-calendar/month)

Workgroup meetings will take place as follows:

Time / Date	Venue	Programme
10:00 Thursday 25 February 2021	Microsoft Teams	Detail planned agenda items. <ul style="list-style-type: none"> <li>Consider revised Modification 0746</li> </ul>

**Action Table (as of 28 January 2021)**

<b>Action Ref</b>	<b>Meeting Date</b>	<b>Minute Ref</b>	<b>Action</b>	<b>Owner</b>	<b>Status Update</b>
<b>1201</b>	14/12/20	2.0	Workgroup to review the Transitional Business Rules, (BRs 4 - 7), ahead of Workgroup meeting in January 2021	All Workgroup	<b>Closed</b>
<b>1202</b>	14/12/20	2.0	Subject to the decision to be made at UNC Panel on Thursday 17 December regarding Modification 0736S, the Proposer, SM, to redraft Modification 0746 for consideration ahead of Workgroup meeting in January 2021	Proposer (SM)	<b>Closed</b>
<b>0101</b>	28/01/21	2.0	Workgroup participants to review the draft v3.0 of the modification and provide comments by close of play Friday 05 February 2021.	Proposer (SM)	<b>Pending</b>

**UNC Workgroup 0664V Minutes  
Transfer of Sites with Low Valid Meter Reading Submission  
Performance from Classes 2 and 3 into Class 4**

**Thursday 28 January 2021**

**via Teleconference**

<b>Attendees</b>		
Alan Raper (Chair)	(AR)	Joint Office
Helen Bennett (Secretary)	(HB)	Joint Office
Andy Clasper	(AC)	Cadent
Chris Hooper	(CH)	E.ON Energy
David Addison	(DA)	Xoserve
David Mitchell	(DM)	SGN
Ellie Rogers	(ER)	Xoserve
Fiona Cottam	(FC)	Xoserve
Guv Dosanjh	(GD)	Cadent
James Barlow	(JB)	Xoserve
John Welch	(JW)	PAFA
Josh Myers	(JM)	CNG
Kate Lancaster	(KL)	Xoserve
Kirsty Dudley	(KD)	E.ON
Laurie Hayworth	(LH)	Cornwall-Insight
Lorna Lewin	(LL)	Orsted
Mark Jones	(MJ)	SSE
Oorlagh Chapman	(OC)	Centrica (PM only)
Richard Pomroy	(RP)	WWU (0664V and AOB only)
Steve Mulinganie	(SM)	Gazprom Energy
Tracey Saunders	(TS)	Northern Gas Networks

Copies of all papers are available at: [www.gasgovernance.co.uk/0664/280121](http://www.gasgovernance.co.uk/0664/280121)

The Final Modification Report 0664VV is due to be presented at the UNC Modification Panel by April 2021

## 1. Introduction and Status Review

Alan Raper (AR) advised Workgroup that when this was last presented to UNC Panel, a further point was raised which resulted in a further variation proposal being required, which would be 0664VV.

### 1.1. Approval of Minutes (11 December 2020)

The minutes from the previous 0664V Workgroup meeting were approved by attendees of that meeting present at this Workgroup.

### 1.2. Review of outstanding actions

**Action 1201:** Review draft Varied Modification 0664VV - SSE (MJ) to update the draft Modification 0664VV taking into consideration the various points raised by the Workgroup.

**Update:** Not discussed. **Carried Forward**

**Action 1202:** Review draft Varied Modification 0664VV - SSE (MJ), Xoserve (DA) and Cadent (AC) to discuss the legal text implications surrounding the proposed changes to the draft Modification 0664VV and consider the functionality of a staged implementation.

**Update:** Not discussed. **Carried Forward**

## 2. Review draft Varied Modification 0664VV

AR showed onscreen the draft version of 0664VV.

Mark Jones (MJ) advised that a 4-month proposed lock-out does not appear to be something that can be systematised anytime soon. Consequently, in the short to medium term, the Modification is probably going to be limited to one that reports to PAC.

DA advised, with regards to the Supplier entity and market participant ID check, when CSS changes are discussed later in the Distribution Workgroup agenda, it will be highlighted that a Shipper electing to change class is a complex process. While the validation specified in this variation is different, it is similarly complex.

DA raised his concern that the 2-month validation and the lock-out may create a number of different scenarios and will add a lot of complexity, which ultimately would need to be coded, and this needs to be considered in the context of the code freeze associated with the implementation of the CSS.

### Next Steps:

MJ's view is that an automated process would not be deliverable in the near future, and, as such, proposes to keep the foundations of the modification intact but provide compliance assurance by creating reports that go to the PAC.

Workgroup discussed if this would be better approached now as a fresh modification, noting that both the legal text and the Solution would need to change, however, the fundamentals of the modification would remain.

Richard Pomroy (RP) advised that a modification could be withdrawn up until it is submitted to Panel, noting that this modification already being varied once, and was of the view it could still be withdrawn.

DA advised he is not overly-concerned about reclassifying a site, the complexity arises as a result of the lock-out period: one option could be that the Shipper could simply be prohibited from reclassify within the 3-month lock-out period, but without the systematised block. If the modification goes through largely as a reporting solution, a Shipper would still be forced out of class 3 and into class 4, which is the essence of the proposal.

Workgroup agreed that the way forward for this modification could be to have a part A in 0664V and an optional part B which could address the problem with transgressions and reclassifying sites.

It was suggested that this is a matter for the DSC Change Management Committee, as the CDSP could be put in a position where an action is prohibited in the UNC, but there is no validation to prevent the action in the system.

ER clarified that, as things stood, the systematised element of Modification 0664V would be subject to the code-freeze associated with the implementation of the CSS.

AR suggested to take the modification forward as a reporting modification and introduce the lock-out element at a later date. In effect to split the modification into a part A and B.

Steve Mulinganie (SM) confirmed he would be satisfied with that approach as long as it addresses the point made in Gazprom Energy's consultation response in terms of measuring shippers fairly across their entire portfolio.

**New Action 0101:** MJ, DA & AR to consider today's and previous discussion and consider options for making all or parts the modification deliverable.

It was agreed that MJ will provide an update on progress at the next Workgroup in February 2021.

**3. Consideration of Revised Legal Text for 0664VV**

This will be considered at a future Workgroup once the direction of this modification is better understood.

**4. Completion of Variation Request for February 2021 Panel Submission**

This will be considered at a future Workgroup once the direction of this modification is better understood.

**5. Next Steps**

AR confirmed the next steps to be:

- MJ, DA & AR to consider today's and previous discussion and consider options for making all or parts the modification deliverable.

**6. Any Other Business**

None

**7. Diary Planning**

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

<b>Time / Date</b>	<b>Paper Publication Deadline</b>	<b>Venue</b>	<b>Workgroup Programme</b>
10:00 – 16:00 Thursday 25 February 2021	5pm Tuesday 16 February 2021	Teleconference	Standard Items

**Action Table (as of 28 January 2021)**

<b>Action Ref</b>	<b>Meeting Date</b>	<b>Minute Ref</b>	<b>Action</b>	<b>Owner</b>	<b>Status Update</b>
1201	11/12/20	3.0	<i>Review draft Varied Modification 0664VV - SSE (MJ) to update the draft Modification 0664VV taking into consideration the various points raised by the Workgroup.</i>	SSE (MJ) & Xoserve (DA)	<b>Carried Forward</b>
1202	11/12/20	3.0	<i>Review draft Varied Modification 0664VV - SSE (MJ), Xoserve (DA) and Cadent (AC) to discuss the legal text implications surrounding the proposed changes to the draft Modification 0664VV and consider the functionality of a staged implementation.</i>	Cadent (AC), SSE (MJ) & Xoserve (DA)	<b>Carried Forward</b>
0101	28/01/21	2.0	MJ, DA & AR to consider today's and previous discussion and consider options for making all or parts the modification deliverable.	SSE (MJ), Xoserve (DA) & Joint Office (AR)	<b>Pending</b>