## UNC Distribution Workgroup Minutes 10:00 Thursday 22 June 2023 via Microsoft Teams

Attendees		
Rebecca Hailes (Chair)	(RH)	Joint Office
Ben Mulcahy (Secretary)	(BM)	Joint Office
Andy Clasper	(AC)	Cadent
Anne Jackson	(AJ)	PAFA (Gemserv)
Charlotte Gilbert	(CG)	BU-UK
David Addison	(DA)	CDSP (Xoserve)
David Mitchell	(DMi)	SGN
David Morley	(DMo)	OVO
Ellie Rogers	(ER)	CDSP (Xoserve)
Harry Hailwood	(HH)	Brook Green Supply
Helen Bennett	(HB)	Joint Office
James Lomax	(JL)	Cornwall Insight
Jenny Rawlinson	(JR)	BU-UK
Kathryn Adeseye	(KA)	CDSP (Xoserve)
Louise Hellyer	(LH)	TotalEnergies Gas & Power
Lee Greenwood	(LG)	British Gas
Mark Jones	(MJ)	SSE Energy Supply
Oorlagh Chapman	(OL)	Centrica
Richard Pomroy	(RP)	Wales & West
Steve Mulinganie	(SM)	SEFE Energy Limited
Tracey Saunders	(TS)	NGN

Copies of all papers are available at: https://www.gasgovernance.co.uk/Dist/220623

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. <a href="https://www.gasgovernance.co.uk/Dist/220623">https://www.gasgovernance.co.uk/Dist/220623</a>

#### 1. Introduction and Status Review

Rebecca Hailes (RH) welcomed everyone to the meeting and gave a brief overview of the scheduled items for discussion.

#### 1.1. Approval of Minutes (25 May 2023)

The Minutes for UNC Distribution Workgroup from 25 May 2023 were approved.

#### 1.2 Approval of late papers

RH advised that the Regulatory Change Roadmap provided by Xoserve for item 4 had been provided late but was accepted to review by the Workgroup.

#### 1.3. Review Outstanding Actions

**Action 0501:** *Modification 0696V* – Rebecca Hailes (RH) to discuss the expected decision date for Modification 0696V with Ofgem.

**Issue Update:** RH advised the Workgroup that following recent discussions she had held with the Authority she had been able to share with the Proposer that a decision is anticipated in September 2023.

#### Action closed.

**Action 0502:** Meter Point Class Constraints – Action from 0831/0831A WG Discussion to develop an understanding of system restrictions on Product Class capacities and the options available to address perceived future requirements.

#### **Issue Update:**

Ellie Rogers (ER) advised the Workgroup that, given the fundamental nature of this Action, the CDSP will provide a response in due course. Their relevant internal teams will develop a plan to investigate the current capacities of each of the different Classes at present. She asked for feedback on the suggestion that this Action be managed by the DSC Change Management Committee, and retaining it as an Agenda Item within the Distribution Workgroup to ensure feedback was provided in both forums.

RH commented that this seemed a sensible suggestion, proposed a new Item number five (5) on the agenda entitled 'Product Class Capacity'.

ER agreed on the basis that the Workgroup is happy with the proposal and asked that the industry be forthcoming in providing engagement on the issue and provide the CDSP with the input they will require.

RH expressed an awareness that there was currently considerable activity underway, giving the examples of the current work on the AUGE factors and wider changes to the AUGE which will impact various Classes.

Steve Mulinganie (SM) recommended that this work should be focused on where the capacities of the system may impede anticipated industry activities. He commented that whilst it is not possible to predict how current and future Modifications will impact matters, but considerations such as the growing population of Smart are known, giving the example of Class 2 suddenly becoming attractive to the industry, which would potentially result in a step change with all parties looking to move into Class 2. He felt the CDSP should be considering their ability to scale Classes based on such anticipated scenarios.

ER suggested the action was more generic, with the industry aware of current capacities for some Classes standing at 50k. She stated that the investigative work the CDSP teams are embarking on is to test capacities beyond this figure and how best to extend it.

SM asked what scenarios were included in this work, asking if Class 3 volumes moving to Class 2 were included. ER acknowledged the possibility of a large movement from Class 3 supplies with Smart moving into Class 2, confirming that far more than the current limit of 50k could move to Class 2. SM confirmed that this was the kind of scenarios that needed to be explored, asking if movement from Class 4 to Class 2 was also under consideration, and requested an understanding of the scope of scenarios under consideration.

ER shared that the teams were using heatmapping in their approach, postulating that if the current heatmap goes red at a population of 50k how what would be required to get green at 22 million. How would this be achieved and what are the lead times required. This was all to be part of the work that the CDSP was intending to ask the DSC Change Committee to approve.

RH asked why the CDSP were intending to ask the DSC Change Committee if this work was required when Distribution Workgroup have already stated it was required. She suggested that the approach taken should be that there are already Modifications in existence that likely necessitate it.

SM added that it was not just the consideration of Modifications, noting that Shippers could decide to move all their sites to Class 2 tomorrow.

ER highlighted the challenge of the UK Link manual stated limited capacity.

SM confirmed that this was the problem, in that contractually Shippers can scale Classes however they choose, with no restrictions with the CDSP scaling as required. He appreciated that there was a balance between regret spend and system capacity but if Shippers decide that commercially and for consumer benefit, they wish to move volumes between Classes it should be available.

ER advised that she was unaware of the history behind setting the 50k capacity for Class 2 but acknowledged the requirement that CDSP review how to deliver it, including the testing required as to how this could work, as well as the timescales and costs.

RH observed that the requirement needed to be advised to the DSC Change Committee as in relation to a current risk.

ER acknowledged that parties can move between Classes at any time but observed that the Class 2 population has been at 1k for a long time and there has not been a request to change that before, in comparison to when Modification 0700 - *Enabling large scale utilisation of Class 3* came in. She confirmed that the CDSP are now looking at the issue with the team to explore the costs and resources required and confirmed that Shipper and Transporter input was required to ensure that what is needed is delivered.

Richard Pomroy noted that the Hydrogen blending decision from DESNZ is due this year which could provide an imperative for parties to move Class. He recognised this was speculative but suggested it could add to the commercial considerations already mentioned, further noting that whilst the Request 0849R - *Commercial Framework Review to Enable Hydrogen Blending* was looking at blending at quite low levels, there are potential developments out there that may change things quite substantially, suggesting that ER talk to Vicki Mustard (CDSP) in this regard.

#### Action closed.

**New Action 0601:** JO to add new Item 5 'Product Class Capacity' to Distribution Workgroup agenda from July 2023 forward.

#### 1.4. Modifications with Ofgem

RH advised that there had been no update since that given at Modification Panel on 15 June, the details of which can be found at <a href="https://www.gasgovernance.co.uk/Panel/150623">www.gasgovernance.co.uk/Panel/150623</a>.

#### 1.5. Pre-Modification discussions

### Consequential Modification required by the implementation of 0701 'Aligning Capacity booking under the UNC and arrangements set out in relevant NExAs'

Tracey Saunders (TS) advised the Workgroup that NGN were intending to produce a Modification to address issues that had arisen from the implementation of Modification 0701 - *Aligning Capacity booking under the UNC and arrangements set out in relevant NExAs.* She noted that that Modification had been sent for Authority decision in 2020, and, despite approval in May 2021 had been subsequently further deferred to allow system changes relating to CSS and was now due to be implemented on 04 November 2023. Because of this long hiatus before implementation, the Legal Text numbering within the Modification 0701 is now out of synchronisation with the current Code.

As there is now the requirement for a Modification to be raised, TS is also now intending to add specific Legal Text to the Modification to specify the already agreed CDSP transitionary activity

intended to ensure that no Shipper is inadvertently put in breach when 0701 is implemented. This included the requirement for the CDSP to align any capacities above agreed NExA thresholds back to those in the NExA. TS noted that this would likely be of benefit to Shippers needing site agreement to reduce any capacities still above the NExA limits, with the Legal Text making a clear evidential case for the requirement.

TS advised she was hoping to get the Modification Proposal to the July Modification Panel but advised that it was probable that she would be presenting it at the August Modification Panel with the aspiration that it would go straight to consultation on the premise that a Legal Text renumbering Modification would normally be Fast Track and that the CDSP permissions mentioned were already implied with the Modification simply making them implicit. She suggested that it could prove that the CDSP would not need to make these changes anyway, as all Shippers may have already made any capacity reductions required, but she was aware that doing so required site consultation as previously mentioned.

RH suggested considering the proposed Modification be split into two, with one detailing solely the Legal Text renumbering that could then be fully fast-tracked. TS restated her hope to raise a single Self Governance Modification that would go straight to consultation as the CDSP permissions included would simply be specifying in Code something that had already been accepted in Workgroup long ago. She added that she would appreciate the views of the Workgroup, especially any Modification Panel members present.

Mark Jones (MJ) stated that he agreed that two Modifications were required as he did not think the single Modification would get approved without at least one Workgroup. TS responded by highlighting the risk of Shippers going into breach, which the proposed additional Legal Text, if put in place promptly, would help mitigate.

ER advised that the CDSP are currently undertaking an interim process to advise Shippers where capacities were currently in breach of agreed NExAs, noting that this affects a very low volume of sites.

RH asked if the affected sites are just on the NGN Network and TS confirmed that whilst it was only Class 1 sites affected, the CDSP had previously confirmed this was across more than one DNO Network. RH suggested TS approach a representative from another DNO to raise the Modification and noted for the Workgroup's awareness that the July Distribution Workgroup was expected to be held across two days.

TS shared that she was minded, contrary to her usual practice, that the Modification would be driven by the Legal Text. She noted the advice given in the Workgroup and promised to do all she could to get the proposal to the July Modification Panel. She was going to raise the proposal as Self Governance given that she felt that was no materiality since the CDSP actions were already agreed. SM concurred with this view.

TS wrote a later update in the meeting chat stating that her revised intention was to undertake a more in-depth Pre-Modification review in the July Distribution Workshop, for which she would submit a version of the draft Modification. She was of the view that this will allow it to be fully formed for the August Modification Panel, and potentially that it could go directly to consultation. She felt this was more advisable than rushing the legal text for the July Modification Panel and risk issues. Accordingly, she asked that the Joint Office add the Pre-Modification to the July Distribution Workgroup agenda.

**New Action 0602:** Joint Office to add NGN (TS) Pre-Modification to July Distribution Workgroup Agenda

#### 1.5.1 Extending the Annually Read PC4 SMP read submission window.

David Morley (DMo) was invited to talk the workgroup through his Pre-Modification, which was shared on screen for the Workgroup to review. He explained that it was currently as broad as possible in remit to garner the most feedback and allow him to subsequently narrow the scope. He explained that for Class 4 sites, Shippers currently have a timeframe of 25 Supply Point Systems Business Days to submit a read for settlement and this time window is too short where actions are required, such as contacting the customer, obtaining photographs, etc to resolve an issue. With the sites being Annually read it may be another year before this is attempted again, often resulting in multiple-year gaps in settlement reads. DMo quoted the Elexon time window for NHH electricity readings being 14 months, which he acknowledged may be too long a period for this Modification but was provided for comparison, suggesting an extension to the current PC4 timeframe to a 40- or 60-day window might prove reasonable. Alternatively, some form of industry process that allows validated reads where issues have occurred to be submitted. He suggested that such a Modification would help settlement and generally be beneficial for the industry.

RP made a point for detail that this wouldn't affect UIG though it could affect reconciliation errors. He noted that the Modification states it would affect must-reads which he professed an interest in, observing that whilst Transporters do not have a direct interest in must-reads, anything that increases the volume of reads in settlement is certainly a good thing.

RH asked if the Proposer had spoken to Xoserve in regard to the Pre-Modification, to which DMo replied that he had not yet, though had asked to discuss it with them. ER explained that currently if a meter read is submitted after the 25-day window it would be rejected. She advised that she would need to speak to Subject Matter Experts (SMEs) within the CDSP to get full details on the issue but that in some initial conversations, triggers in RGMA had been discussed, and that she was happy to catch up with the Proposer offline to discuss potential scenarios.

Jenny Rawlinson (JR) asked if the proposer had been able to quantify the extent of reads rejected due to the current time window. DMo stated that he had data on this, but it was not to hand. JR confirmed such data would be useful in understanding the extent of reads that do and do not get through.

RH asked if this information should be in the Modification, suggesting this be an Xoserve-based metric to avoid divulging such information from a party's portfolio. JR suggested that portfolio information could be provided as percentages to avoid that concern and was also interested if other Shippers were experiencing the same issue. She was also keen to understand how Smart factored into the considerations and understood that electricity was dropping to a four-month window (from 14 months) because of the impact of Smart. She also questioned any interaction with retrospective adjustments.

DMo responded regarding the impact of Smart that DCC meters that were impacted by the short time window either had intermittent communications or had a site permission issue under which only annual reads can be collected, otherwise, Smart meters are likely to be in PC3, with most meters affected by this issue expected to be non-Smart.

ER noted that Modification 0825 - 'Removal of the remaining Retrospective Asset, Address and Supply Point (RAASP) elements of the Retrospective Adjustment arrangements put in place under Modification 0434 'and Modification 0434 - 'Project Nexus – Retrospective Adjustment' looked at the meter information. She was of the impression that the meter read retrospective element that was approved but not yet implemented is going to be removed as part of Modification 0825. However, she was going to investigate this to confirm, noting that the relevant text was all in Section M of the TPD.

**Post Meeting Notes**: *ER later confirmed that the retro arrangements that had been introduced, and in place since Nexus, were primarily concerned with the replacement of reads, which allowed for consumption adjustments to be calculated. As such, to her understanding, reads submitted later than the currently agreed timescales were not within the scope of the arrangements.* 

SM suggested exploring why the industry settled on 25 days in the first place and RP similarly suggested a Review Group would be the best route forward if there are several solution options that warranted exploration.

Lee Greenwood (LG) deliberated that if the time window was extended to a longer period, it made the scenario possible where, whilst the issue is being addressed, a later read was uploaded. This could mean that the problematic read, when subsequently resolved, would get rejected as that later read had already been accepted. He also believed it would push back the M-2 business rule for Performance and the related monitoring by the Performance Assurance Committee (PAC).

RH observed that the proposed Modification appeared to have performance assurance implications.

SM suggested that if the Modification improves the number of readings taken into settlement it actively helps performance and thus would be well received by PAC. He felt a key consideration was why the time window was currently set at 25 days over any other period. He was not committed to 25 days if a longer period was better and suggested part of the work for this Modification should be a Request for Information (RFI) to all parties to find the ideal timeframe.

DMo confirmed that he was happy for the proposal to go into a Review Group and develop a solution that either extended that timeframe or introduced new rules for submitting failed reads, or a combination of the two with the aim of getting more valid reads into Settlement. He also commented that he thought the idea of an RFI was a good one.

Louise Hellyer (LH) agreed that a Review Group was a good idea and remarked that the current time lag on performance metrics was already frustrating in its current form, postulating that a cut-off period for Performance with a clear definition for PAC to apply would be required. She commented that she was not advocating against extending the time window for providing reads but was mindful that it was important to avoid the potential unintended consequence of slowing the submission of reads, stating it would not be acceptable, for example, for parties to consider waiting 13 months to submit reads appropriate.

MJ recalled a performance metric that existed pre-Nexus that parties needed to get a percentage of reads submitted within 25 days and the rest at a later point.

SM agreed that leaving the door open should be avoided and that an RFI would be useful, hypothesising that if it was found, for example, that extending the window by 10 days got 90% of reads in and an exemption process was available for the rest then it would surely be worthwhile, observing that it is counterintuitive not to get valid reads into Settlement.

DMo summarised that he would accordingly look to request a Review Group and seek to get an RFI issued.

RH commended the opportunity for Workgroup Participants with an active interest to sit on PAC as there was an imminent opportunity and advised seeing things from the perspective of PAC would prove useful. She advised that as the SPOC for OVO, DMo would get an email from the Joint Office around 30 June asking for nominations to PAC and parties were welcome to nominate themselves.

#### 2. CSS REC Consequential Changes Update

David Addison (DA) provided the Workgroup with an update on CSS REC Consequential Changes, advising that there had been two (2) missing messages in May which were both linked to supplier-less sites. The scenario occurs when a switch is accepted by CSS who then also allows a deactivation by the incumbent supplier, resulting in the registration failing. He advised that since the earlier fix was enacted on 30 March, this was the only circumstances under which the CDSP observed missing messages. A resolution was available, in which the incoming supplier performs a 'first supplier' switch. He advised that this was good news for Settlement as it did not create a mismatch between the UK Link and CSS.

RH noted that she was aware that there had been some concerns from the REC regarding Change timescales. DA acknowledged this and advised that it related to REC0067 and was because the Code Manager was concerned that DSC hasn't approved the Change costs. He had the impression that he had subsequently convinced the Code Manager that there is not a hard need for DSC approval to progress REC Change. He acknowledged that there could be a situation where a REC-approved Change is later refused funding by DSC but stated that was true of any REC Change and did not think it appropriate for DSC to be pre-approving REC Changes before REC approves them anyway. He shared that he felt that the matter was resolved and informed the Workgroup that the CDSP was to speak with the REC Code Manager in July to discuss an optimal timing mechanism for DSC and REC approval, anticipating a need to consider each on a case-by-case basis.

#### 3. Workgroups

3.1. 0812R – Review of Alternatives to "Must Read" Arrangements

(Report to Panel 21 September 2023)

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

3.2. 0819 - Establishing/Amending a Gas Vacant Site Process

(Report to Panel 17 August 2023)

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

3.3. 0825 - Removal of the remaining Retrospective Asset, Address and Supply Point (RAASP) elements of the Retrospective Adjustment arrangements put in place under Modification 0434

(Report to Panel 17 August 2023)

https://www.gasgovernance.co.uk/0825

3.4. 0831 - Allocation of LDZ UIG to Shippers Based on a Straight Throughput Method 0831A - Allocation of LDZ UIG to Shippers (Class 3 and 4) Based on a Straight Throughput Method

(Report to Panel 21 September 2023)

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

3.5. 0836S - Resolution of Missing Messages following Central Switching Service implementation and integration with REC Change R0067

(Report to Panel 17 August 2023)

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

#### 4. Distribution Workgroup Change Horizon

ER presented the content of the update provided by the CDSP and published as the UNC Regulatory Change Roadmap June 2023 at <a href="https://www.gasgovernance.co.uk/Dist/220623">https://www.gasgovernance.co.uk/Dist/220623</a>.

ER suggested that it might be beneficial to provide a CSS Update in the July Distribution Workgroup, noting that there was not much change to report since presenting it in May. She observed that whilst nothing had been removed due to being implemented, two new Modifications had been added as they had recently been approved by the Modification Panel, namely Modification 0816S - *Update to AQ Correction Processes*, which showed an indicative date in February 2024, and Modification 0829S *Updates to the Supplemental Agreement Amendments Process* which had no CDSP impacts.

ER noted that there might be a possibility that the industry may soon be getting more of a view as to the state of play for Modification 0651 - Changes to the Retrospective Data Update provisions, and that the notification in this Workgroup that a September 2023 decision from Ofgem on Modification 0696V - Addressing inequities between Capacity booking under the UNC and arrangements set out in relevant NExAs would mean that the CDSP will need to consider how best to consider the potential implications for DSC should it be approved by the Authority.

#### 5. Issues

SM expressed concern that the Workgroup may have been temporarily non-quorate as attendance dropped later in the day and the only other Shipper representative was shown as 'On Hold' briefly. He asked if it was worth considering drawing a line at a specific earlier time.

RH observed that the Distribution Workgroup was calendarised to run from 10:00 to 16:00 and that this was communicated to all representatives. She reflected that the volume of work for the Workgroup remained substantial, with the July meeting planned to be held over two days because of it, and as such, reducing the allotted time would exacerbate the issue. She suggested that it may be worth considering reversing the order of Modification Workgroups each month as those scheduled for earlier in the day tended to be better attended.

SM commented that this seemed a good idea and would go some way to ensuring all Proposers had a better opportunity for wider industry input in the Workgroups.

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

#### 6. Any Other Business

None

#### 7. Diary Planning

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

Time / Date	Paper Publication Deadline	Venue	Programme
Thursday 10:00	5 pm	Microsoft	Standard Agenda including any Modification Workgroups relating to Distribution Workgroup
27 July 2023	18 July 2023	Teams	
Thursday 10:00	5 pm	Microsoft	Standard Agenda including any Modification Workgroups relating to Distribution Workgroup
24 August 2023	15 August 2023	Teams	
Thursday 10:00	5 pm	Microsoft	Standard Agenda including any
28 September 2023	19 September 2023	Teams	Modification Workgroups relating to

			Distribution Workgroup
Thursday 10:00	5 pm	Microsoft	Standard Agenda including any Modification Workgroups relating to Distribution Workgroup
26 October 2023	17 October 2023	Teams	
Thursday 10:00	5 pm	Microsoft	Standard Agenda including any Modification Workgroups relating to Distribution Workgroup
23 November 2023	14 November 2023	Teams	
Monday 10:00	5 pm	Microsoft	Standard Agenda including any Modification Workgroups relating to Distribution Workgroup
11 December 2023	30 November 2023	Teams	

	Action Table (as of 22 June 2023)						
Action Ref	Meeting Date	Minute Ref	Action	Reporting Month	Owner	Status Update	
0501	25/05/23	1.4	RH to discuss the expected decision date for Modification 0696V with Ofgem.	June 2023	Joint Office (RH)	Closed	
0502	25/05/23	0831.3	Meter Point Class Constraints – Action from 0831/0831A WG Discussion to develop an understanding of system restrictions on Product Class capacities and the options available to address perceived future requirements.	June 2023	CDSP (ER)	Closed	
0601	22/06/23	1.3	Joint Office to add new Item 5 'Product Class Capacity' to Distribution Workgroup agenda from July 2023 forward.	July 2023	Joint Office (BM)	Pending	
0602	22/06/23	1.5	Joint Office to add NGN (TS) Pre- Modification to July Distribution Workgroup Agenda	July 2023	Joint Office (BM)	Pending	
0603	22/06/23	5	Joint Office to adjust Workgroup order in each subsequent Distribution Workgroup to facilitate consistent industry engagement for proposed Modifications.	July 2023	Joint Office (BM)	Pending	

# UNC Workgroup 0812R Minutes Review of Alternatives to "Must Read" Arrangements Thursday 22 June 2023 via Microsoft Teams

Attendees		
Rebecca Hailes (Chair)	(RH)	Joint Office
Ben Mulcahy (Secretary)	(BM)	Joint Office
Aleksandra Cebo	(ACe)	EDF
Andy Clasper	(AC)	Cadent
Anne Jackson	(AJ)	Gemserv (PAFA)
Charlotte Gilbert	(CG)	BU-UK
Dan Stenson	(DS)	Brook Green Trading
David Mitchell	(DM)	SGN
Ellie Rogers	(ER)	Xoserve
Harry Hailwood	(HH)	Brook Green Trading
Helen Bennett	(HB)	Joint Office
James Lomax	(JL)	Cornwall Insight
Jenny Rawlinson	(JR)	BU-UK
Kathryn Adeseye	(KA)	CDSP (Xoserve)
Kevin Clark	(KC)	Utilita
Louise Hellyer	(LH)	TotalEnergies Gas & Power
Lee Greenwood	(LG)	British Gas
Mark Jones	(MJ)	SSE Energy Supply
Oorlagh Chapman	(OL)	Centrica
Richard Pomroy	(RP)	Wales & West Utilities
Sally Hardman	(SH)	SGN
Steve Mulinganie	(SM)	SEFE

The Workgroup Report is due to be presented at the UNC Modification Panel by 21 September 2023.

Please note these minutes do not replicate/include detailed content provided within the material published, therefore it is recommended that the published material is reviewed in conjunction with these minutes.

Copies of all papers are available at: https://www.gasgovernance.co.uk/0812/220623

#### 1.0 Introduction and Status Review

Rebecca Hailes (RH) welcomed everyone to the meeting and gave a brief overview of the scheduled items for discussion.

#### 1.1. Approval of Minutes (25 May 2023)

The minutes from the meeting held on 25 May 2023 were approved.

#### 1.2. Approval of Late Papers

There were no late papers.

#### 1.3. Review of Outstanding Actions

**Action 0501:** Rebecca Hailes (RH) to complete Workgroup Report for review at the next, and final, Review Workgroup in June.

**Update:** The Draft Request Workgroup Report for Workgroup discussion has been published by the Joint Office for WG to review (see Section 2.0).

Action closed.

#### 2.0 Finalise Workgroup Report

RH confirmed that the Proposer, Richard Pomroy (RP) had provided some feedback. She advised the Workgroup of the intention to send the report to the July Modification Panel, and with this in mind, shared the report in detail with the Workgroup.

RP speculated how analogous IGT159's terms were regarding considering other reads, such as Smart, to which Ellie Rogers (ER) advised that it excluded Smart, AMR or Active DCC meters from the process which had been, until then, included in the IGT UNC Must Reads process.

Jenny Rawlinson (JR) agreed, stating that most of the changes introduced by IGT159 were improvements to the IGT Must read process, though as she was not close to the UNC process, she was not able to comment on how analogous they were.

Steve Mulinganie (SM) expressed his understanding that the challenge was why inclusions in the IGT UNC process are not considered applicable here, adding that the counterargument was that the IGT UNC inclusion was related to the different commercial basis. JR and ER agreed with this view.

The Workgroup reviewed the analysis of read volumes provided by the CDSP for the Review, and ER agreed to send RH a link to the figures for those Must Reads that initially failed to pass validation and of those the percentage that later passed due to manual intervention. This included a discussion between SM, ER and RH about reporting the impact of these reads successfully being uploaded on the £2m cost reported.

The Workgroup then considered providing a statement regarding where it was felt the responsibility for providing must reads should lie. ER commented that when she revisited the Workgroup minutes from the March 2023 meeting it seemed that the general view was that it should be moved to the CDSP, but later in the April and May meetings that position seemed to change but without any real clarity as to why this was the case. She acknowledged that the Performance Assurance Committee (PAC) did not provide a steer in this regard but was concerned there were still questions about how the CDSP could manage the process should this route for service delivery still be considered as a potential, giving as an example how the Transporters right to access facilitated obtaining meter reads, which was a power that the CDSP did not possess.

ER also suggested adding commentary about Solution Option 3b being considered the less efficient way of managing the process, and offered to provide text to this effect, RH agree to add descriptions of Solution options of 3a and 3b.

Anne Jackson (AJ) gave a view as PAFA that her understanding was that PAC did not provide a view on the best route forward, instead providing feedback on the role of PAC in the Must-read considerations, accepting its responsibly for the risk to Settlement of a lack of reads and recognised that Must Reads provided mitigation of this risk. She clarified that whilst PAC are interested in the data collated from parties collecting reads, including volumes of reads collected, read rejection reasons and the like, their view was that Shippers are responsible for how they approach their obligations, their subsequent actions and the results. In this context Must Reads is something that PAC might monitor but are not responsible for.

The Workgroup revisited the statement from the PAC Chair that was definitive about Transporters not being the correct party to be collecting Must Reads. This was followed by discussion of an apparent disparity between the PAC Chair statement and the minutes of the pertinent PAC meeting, with PAFA stating that there was not a record of an agreed PAC view that Transporters should perform the Must Reads process or not.

JR, whilst acknowledging PAFA's commentary on the PAC records, asked that if Workgroup Participants here were present at any PAC discussion of the matter, was it possible to record

their commentary on that discussion within the Workgroup Report in this meeting, providing the understanding as to the Transporter role was correct and there was scope for alteration in activities for the PAC.

AJ noted that the PAC remit and responsibilities are specified in the Performance Assurance Framework Document (PAFD), which can be changed, advising that PAC did not think Must Reads was its responsibility.

RH suggested that the Workgroup could ask PAC to add an item to their agenda to discuss this.

SM shared his view that the Workgroup should ask the PAC Chair about the apparent disparity between the Chair Statement and the PAC minutes, thinking it prudent to clarify for public record.

RP agreed, observing that the rationale to close this Review Group was due to the lack of progress but that it did not need to report back to the Modification Panel until September, so had the time and capacity to clarify this.

SM acknowledged the Proposer's comments affirmed his own view, and that the Review Workgroup should request that PAC consider the statement made in their next meeting and feedback to the Workgroup.

JR asked if the request was specifically regarding the minutes and the statement discrepancy, which SM confirmed, noting that the Workgroup cannot draw an explicit confirmation from the minutes, and thus needed to get a clear response from PAC, suggesting it be made the first item on the next PAC agenda.

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

#### 3.0 Next Steps

The Workgroup is to review the anticipated response from PAC and any ensuing changes to the draft Workgroup Review Report.

#### 4.0 Any Other Business

None

#### 5.0 Diary Planning

Time / Date	Paper Publication Deadline	Venue	Programme
Thursday 10:00 27 July 2023	5 pm 18 July 2023	Microsoft Teams	<ul><li>Review PAC response</li><li>Consider WGR</li></ul>

#### Action Table (as of 22 June 2023)

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
0501	25/05/23	1	Rebecca Hailes (RH) to complete Workgroup Report for review at the next, and final, Review Workgroup in June.	Joint Office (RH)	Closed

#### Joint Office of Gas Transporters

0601	22/06/23	2	Joint Office (RH) to communicate Workgroup concern about disparity between PAC Chair Statement and PAC minutes to PAC for consideration and response.	Joint Office (RH)	Pending
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## UNC Workgroup 0819 Minutes Establishing/Amending a Gas Vacant Site Process

#### 10:00 Thursday 22 June 2023

#### via Microsoft Teams

Attendees		
Rebecca Hailes (Chair)	(RH)	Joint Office
Ben Mulcahy (Secretary)	(BM)	Joint Office
Aleksandra Cebo	(ACe)	EDF
Andy Clasper	(AC)	Cadent
Charlotte Gilbert	(CG)	BU-UK
Dan Stenson	(DS)	Brook Green Trading
David Mitchell	(DM)	SGN
Ellie Rogers	(ER)	Xoserve
Harry Hailwood	(HH)	Brook Green Trading
Helen Bennett	(HB)	Joint Office
James Lomax	(JL)	Cornwall Insight
Jenny Rawlinson	(JR)	BU-UK
John Harris	(JH)	CDSP (Xoserve)
Kathryn Adeseye	(KA)	CDSP (Xoserve)
Kevin Clark	(KC)	Utilita
Louise Hellyer	(LH)	TotalEnergies Gas & Power
Lee Greenwood	(LG)	British Gas
Mark Jones	(MJ)	SSE Energy Supply
Oorlagh Chapman	(OL)	Centrica
Sally Hardman	(SH)	SGN
Steve Mulinganie	(SM)	SEFE

Copies of all papers are available at: <a href="https://www.gasgovernance.co.uk/0819/220623">https://www.gasgovernance.co.uk/0819/220623</a>

The Workgroup Report is due to be presented at the UNC Modification Panel by 17 August 2023.

Please note these minutes do not replicate/include detailed content provided within the presentation slides, therefore it is recommended that the published presentation material is reviewed in conjunction with these minutes. Copies of all papers are available at: <a href="https://www.gasgovernance.co.uk/0819/220623">https://www.gasgovernance.co.uk/0819/220623</a>

#### 1.0 Introduction and Status Review

Rebecca Hailes (RH) welcomed everyone to the meeting and gave a brief overview of the scheduled items for discussion.

#### 1.1. Approval of Minutes (25 May 2023)

The minutes from the meeting held on 25 May 2023 were approved.

#### 1.2. Approval of Late Papers

No late papers had been received, and the Proposer confirmed an amended version of the Modification has not yet been provided.

#### 1.3. Review of Outstanding Actions

Action 0501: Cadent (AC) to add Business Rule references in the Explanatory Text.

**Update:** Andy Clasper (AC) confirmed that the Explanatory Text had been updated with the Business Rules references, but this version had not yet been submitted to the Joint Office.

Action closed.

**Action 0502:** Cadent (AC) to consider detailing criteria for Vacant Site eligibility within Legal Text and in particular those given in 3d. of the current Guidance Document.

**Update:** AC explained that there were two issues to consider, supply type and the eligible cause which, if addressed, would make the Legal Text a lot simpler and remove the need to point to the Guidance Document. The Modification Proposal would need amending to be more specific about relevant supply points, their type and meter.

Lee Greenwood (LG) confirmed he was prepared to amend the Modification, expressing an awareness that there were some issues around using the term 'dumb meters' for Non-AMR or DCC registered Smart meters.

AC confirmed that the lawyers had stated that 'dumb meters' is not a term in the Code, but there is a way to state that a meter is neither AMR nor Smart.

LG highlighted that Business Rule 1 would need to be amended, as it currently said in the Guidance Document that a meter must be a non-active AMR or DCC non-active meter noting that it seemed the Workgroup wanted this requirement to be part of the Legal Text.

Steve Mulinganie (SM) confirmed that the requirement needed to be in Code rather than the Guidance Document, with RH clarifying that the view had been expressed that it was considered too easy to make later changes to UNC-related documents, so it was preferred that such definitions be in the Code itself. AC also stated that a route needed to be steered to avoid putting the Guidance Document into Code.

#### Action closed.

**Action 0503:** Proposer (LG) and Cadent (AC) provider to produce a clear rule set for CDSP actions in relation to Vacant site designation.

**Update:** AC observed that he could not recall this action and that it did not sound like something that needed to be added to Code.

Ellie Rogers (ER) shared her understanding that this requirement was to be provided in the Guidance Document enabling the CDSP to reject requests for Vacant status that did not meet the criteria, explaining that clarity was required to ensure there was no 'wriggle room' in how the criteria are applied.

LG showed the Workgroup a new version of the Guidance Document he was currently working on. He suggested a data field flag could be made available that indicated to the CDSP that the sending Shipper was requesting that a supply be allocated Vacant status and that this could be accompanied by a date from which the requested status would commence, thereby enabling a backdate facility to the request. He commented that he wanted to avoid producing a very dense Guidance Document providing too much detail by endeavouring to cover every possible circumstance in the application of the criteria.

ER acknowledged that the requesting Shipper could provide a backdated proposed starting date for the Vacant status which the CDSP could validate against, which she noted, was not a mechanism considered in the ROM, but it could be developed. An alternative would be for the CDSP to check back over a fixed (say) 3-month or 6-month window to validate such a request.

LG advised that he had considered this option but suggested there was an issue in that if there were a single meter read within that fixed window, be it 6 or 4 months ago, it would fail the criteria and be rejected, irrespective of whether the requesting Shipper was aware of the read or not (such as if the meter read had been provided by a previous Shipper).

RH commented that the date that the site was first recognised as Vacant should be used regardless of the data management challenges this resulted in.

ER agreed with this as a principle and that the CDSP was prepared to do what was required but noted that as another data item in the process, it would need to be considered in the ROM together with related costs.

LG expressed concern that the application of the current criteria to a backdate could prove troublesome, asking if, for example, a move from Class 3 to Class 4 within the backdate period would be pertinent to the CDSP's validations.

SM summarised the tenet that a rejection would be due to site circumstances that are non-compliant with the criteria, if the intention was to consider a backdated check, a clear list of conditions that the CDSP can reject against was required.

LG asked if this meant that all the criteria listed on page 2 of the Guidance Document needed to be considered, potentially setting up a timeline for the CDSP to consider questions as to whether specific criteria are static throughout the backdated period, or if changes, such as movement between Class 3 and Class 4, would need to be considered.

SM noted that only Class 4 supplies are suitable for Vacant site status, asking if the prior Class status would matter. LG stated that he did not think it would but was conscious the criteria statement needed to be fully considered and appropriate.

ER confirmed that a statement was needed for each criterion for the CDSP to apply, for example, "Should the requesting Shipper be incumbent throughout the requested backdated period?".

LG acknowledged the request, noting it would make for a very detailed list, with nuances such as whilst the supply must currently be live, and should it have been live throughout the backdated period.

SM agreed with the need to test against each criterion, but only for those that are not subjective, citing as an example that the CDSP would not know if the site is unoccupied.

LG asked what the Workgroup thought regarding criteria should a supply become isolated between the two qualifying Shipper attempted site visits.

SM replied noting the distinction between an interim issue and an enduring one, stating that should a site be allocated Vacant status, there are separate rules about what circumstances trigger it to become no longer Vacant.

LG clarified that his question was concerning getting the Vacant status applied for commodity (charge) considerations, on the basis that the Shipper was comfortable with doing so and is requesting the status change. How would the CDSP consider a backdate that included a period with isolated status?

ER stated that in looking at the criteria to pass the test the CDSP would take note that, currently, it would be at the CDSP's discretion but suggested that the criteria proposed for implementation in the immediate term may not all apply to backdates of periods of possibly 9 months.

LG suggested that the criteria be in two parts – criteria 1 to 7 in the Guidance Document being the first and read history the second. The meter read history would be the only retrospective used part, all the other criteria being only considered against the current circumstances, therefore the CDSP would reject a backdated request only because there had been meter reads recorded in the last 9 months (maximum).

ER asked if the CDSP would need to check if the same Shipper had been in place for the retrospective validation.

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SM questioned why a Shipper would request a backdate beyond when they became the supply incumbent.

Jenny Rawlinson (JR) asked what would happen if a Change of Supply (COS) request was in progress at the time of the request.

SM noted that the incumbent could reject a current COS request and shared the experience of receiving group COS requests as part of larger consumer portfolios, such as local authorities, that may inadvertently sweep up supplies that had changed ownership or similar. As a test for the CDSP to apply as a reason to reject it would seem subjective as the COS may not be authorised.

SM explained that as the incumbent, a Shipper would not necessarily be aware of a change of site ownership and in making the Vacant status their request would pass CDSP validation. If a COS was then enacted the supply would exit Vacant status anyway, suggesting there to be no negative consequence of this approach.

ER confirmed that a COS being accepted was an exit criterion, with the site considered no longer vacant. The new Shipper would need to apply again to install the Vacant status if they so required.

LG commented on the need to include the specifications discussed within this workgroup session within the Modification's Business Rules (BR). ER suggested that BR2 would be the appropriate place to do so, specifying the requirement that the CDSP would check against current criteria and against meter reads for backdates.

LG noted that BR2 could also advise that the reasons for CDSP rejecting applications would be detailed in the Guidance Document.

ER agreed, stating they did not need to be in the Legal Text, and using an 'avoidance of doubt' statement would flag to the Legal Text provider that such would be in the Guidance Document.

RH clarified that it would be necessary to state within the Legal Text that the CDSP will need to check against the criteria specified in the Guidance Document.

ER observed that once the criteria were finalised, she thought a revised ROM would be needed to ensure accuracy to the Modification's requirements.

JR asked if the Proposer perceived this process appropriate for IGT sites as well, given that there are slight differences in IGT processes, giving the example that IGTs do not cease charges until the meter is removed. She shared that the Modification had been mentioned in a recent IGT Workstream meeting as something that needs consideration and how it would be applied to IGT supplies. She offered to review this with the Proposer in an offline discussion, noting that whilst the changes might be identical, their effect would not be and suggested a more informed position would be beneficial to assess this.

LG, as the Proposer was receptive to this and indicated that Oorlagh Chapman had already approached IGT representation in this regard.

RH advised that given the volume of work yet to be completed the Workgroup needed an extension to the current Modification Panel Reporting date and she would look to request an extension until October 2023.

#### Action closed.

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

**Action 0504:** Proposer (LG) to update BR5 part 5 to include the distinction 'reads relevant to the period of vacancy', when the LT provider (AC) will then consider an approach to including this in the Legal Text

**Update:** effectively covered in discussion and subsequent Action in 0503 above.

Action closed.

#### 2.0 Amended Modification

ER raised the Gas Enquiry Service (GES) as a consideration, suggesting that there would be benefits for GES users to see a flag denoting a supply having the Vacant status. She advised of the CDSP's intention to raise this in REC Change Process discussions and was keen to get Shipper & Transporters' views on this, asking if a flag was sufficient or if any dates should be provided. She asked if representatives could consider this for later discussion in Workgroup or to feedback directly to her.

SM asked that given the Vacant status does not transfer between Shippers, he was unclear why other parties would need visibility of it. He also noted that doing so could have commercial impacts.

ER advised that she thought it also included Shipper Portfolio / DDP considerations and agreed with the view expressed about the wider community view.

LG stated his view was that such flags should not be in GES but could see a value for them to be included in DDP, making the comparison that isolation status is not provided in GES but is detailed in DDP. ER responded that she was not sure if isolation status was shown in GES. LG reaffirmed this, stating that it was present in the portfolio view reporting, but Shippers should already be aware of such status changes as they requested them.

ER advised that as REC manage GES the CDSP do need to flag that this Modification is going through, she suggested that REC might decide to put it in the DAM (Data Access Matrix) or something similar, but she could not guarantee what steps might be taken.

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

#### 3.0 Review of draft Legal Text

The Legal Text proposed in the May Workgroup had not yet been revised as the Modification and Guidance Documents are subject to further development.

#### 4.0 Development of the Workgroup Report

RH lead the Workgroup in reviewing Section 6 Impacts and Other Considerations for consideration in the next meeting.

#### 5.0 Next Steps

RH confirmed the following:

- An Amended Modification and UNC Related Document (the Guidance Document) were to be submitted by the Proposer.
- An amended ROM may be required.
- The Proposer was to hold discussions with both the IGT Representatives and the Legal Text provider.
- The Workgroup Modification Reporting date needed to be extended to October 2023.
- The Workgroup Report was to be developed, including consideration of Section 6.

#### 6.0 Any Other Business

None

#### 7.0 Diary Planning

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

Workgroup meetings will take place as follows:

Time / Date	Paper Publication Deadline	Venue	Programme
Thursday 10:00 27 July 2023	5 pm 18 July 2023	Microsoft Teams	<ul> <li>Review amended Modification Proposal and Guidance Document.</li> <li>Consider amended ROM request.</li> <li>Review IGT Impact</li> <li>Development of Workgroup Report.</li> </ul>

#### Action Table (as of 22 June 2023)

Action Ref	Meeting Date	Minute Ref	Action	Owner	Reporting Month	Status Update
0501	25/05/23	2	Cadent (AC) to add Business Rule references in the Explanatory Text.	Cadent (AC)	June 2023	Closed
0502	25/05/23	2	Cadent (AC) to consider detailing criteria for Vacant Site eligibility within Legal Text, and in particular those given in 3d. of the current Guidance Document.	Cadent (AC)	June 2023	Closed
0503	25/05/23	2	Proposer (LG) and Cadent (AC) provider to produce clear rule set for CDSP actions in relation to Vacant site designation.	Proposer (LG) & Cadent (AC)	June 2023	Closed
0504	25/05/23	2	Proposer to update BR5 part 5 to include the distinction 'reads relevant to the period of vacancy', when the LT provider will then consider an approach to including this in the Legal Text	Proposer (LG) & Cadent (AC)	June 2023	Closed
0601	22/06/23	1.3	Proposer (LG) to provide amended Modification Proposal and Guidance Document defining which criteria the CDSP are to use to accept Vacant status requests and when to apply them.	Proposer (LG)	July 2023	Pending
0602	22/06/23	2	CDSP (ER) to provide awareness of 0819 in REC space regarding GES and DAM	CDSP (ER)	July 2023	Pending

#### **UNC Workgroup 0825 Minutes**

## Removal of the remaining Retrospective Asset, Address and Supply Point (RAASP) elements of the Retrospective Adjustment arrangements put in place under Modification 0434

## 10:00 Thursday 22 June 2023 via Microsoft Teams

Attendees		
Rebecca Hailes (Chair)	(RH)	Joint Office
Ben Mulcahy (Secretary)	(BM)	Joint Office
Aleksandra Cebo	(ACe)	EDF
Andy Clasper	(AC)	Cadent
David Mitchell	(DM)	SGN
Ellie Rogers	(ER)	CDSP (Xoserve)
Harry Hailwood	(HH)	Brook Green Trading
James Lomax	(JL)	Cornwall Insight
Kathryn Adeseye	(KA)	CDSP (Xoserve)
Kevin Clark	(KC)	Utilita
Louise Hellyer	(LH)	TotalEnergies Gas & Power
Mark Jones	(MJ)	SSE Energy Supply
Sally Hardman	(SH)	SGN
Steve Mulinganie	(SM)	SEFE

Copies of all papers are available at: https://www.gasgovernance.co.uk/0825

The Workgroup Report is due to be presented at the UNC Modification Panel by 17 August 2023

Please note these minutes do not replicate/include detailed content provided within the presentation slides, therefore it is recommended that the published presentation material is reviewed in conjunction with these minutes. Copies of all papers are available at: <a href="https://www.gasgovernance.co.uk/0825/220623">https://www.gasgovernance.co.uk/0825/220623</a>

#### 1.0 Introduction and Status Review

Rebecca Hailes (RH) welcomed all to the Workgroup and asked the Proposer, Aleksandra Cebo (ACe) for a view as to the status of the Modification Proposal.

ACe stated that she expected this to be the last Workgroup meeting with just one Action to address regarding IGT Impact. She had just sent feedback to the Joint Office on the draft Workgroup Report to ensure alignment between the latest version of the Modification Proposal.

#### 1.1 Approval of Minutes (25 May 2023)

The minutes from the meeting held on 25 May 2023 were approved.

#### 1.2 Approval of Late Papers

The Proposer returned a copy of the Workgroup Report with suggested amendments as a late paper which was accepted by the Workgroup.

#### 1.3 Review of Outstanding Actions

**Action 0301:** Proposer (ACe) to update the Modification to confirm impact or no impact to IGT UNC.

**Update:** ACe advised the Workgroup that she had attended an IGT Workstream meeting on 08 June which provided the initial view that there was no impact to the IGT UNC with the recommendation that the UNC Legal Text be reviewed to confirm this. Since that meeting, the Legal Text review had been conducted and ACe confirmed there will be an IGT impact which she will pursue with the IGTUNC.

Ellie Rogers (ER) confirmed that as most of the IGT UNC points to section M of the UNC, they will check that all links across the Codes will remain valid.

#### **Action Closed**

#### 2.0 Amended Modification

ACe confirmed that she had produced an amended Modification, and it had been published on the Workgroup page for May, but she had not yet confirmed it was the final version. She stated that the changes were minor, being some date and numbering updates and a clarification added to the Summary emphasising the request to the Authority regarding their previous instruction for UNC 0651 - Changes to the Retrospective Data Update provisions. This clarification was subsequently discussed in detail as part of the Development of the Workgroup Report. She confirmed she would instruct the Joint Office via an email that the modification she had previously sent in as a draft could be processed as an amended Modification which will be the final Modification.

#### 3.0 Development of Workgroup Report

The Workgroup reviewed the Workgroup Report and made changes according to the discussion.

Workgroup discussed the delayed implementation of Modification 0651 and recalled the discussion at meeting 227 of the Uniform Network Code Committee (UNCC) held on 20 October 2022 in which it was agreed that a period of hiatus in the development of XRN4914 (for Modification 0651) would be pragmatic until the status of Modification 0825 was clearer, with Modification 0651 to be a standing agenda item at every DSC Change Management meeting to stay abreast of any progress made without committing costs or resources in the interim. (Full details can be found here: <a href="https://www.gasgovernance.co.uk/uncc/201022">https://www.gasgovernance.co.uk/uncc/201022</a>)

Workgroup further discussed the lack of involvement of Ofgem in Workgroup discussions except for Ofgem's attendance at the Workgroup meeting on 29 November.

ACe then took the opportunity to thank all parties for their time and efforts in developing the Modification.

#### 4.0 Next Steps

ACe confirmed that she had sent an email asking the Joint Office to process and publish the document she had previously sent in as the final version 4.0. The Workgroup report was finished, and Workgroup agreed there was nothing to be added.

#### 5.0 Any Other Business

None

#### 6.0 Diary Planning

Further details of planned meetings are available at: <a href="www.gasgovernance.co.uk/events-calendar/month">www.gasgovernance.co.uk/events-calendar/month</a> No further planned meetings.

Action Table as at Action Table as of 22 June 2023

Action Ref	Meeting Date	Min Ref	Action	Owner	Reporting Month	Status Update
0301	23/03/23	2.0	Proposer (ACe) to update the Modification to confirm impact or no impact to IGT UNC.	•	April 2023 May 2023 June 2023	Closed

#### **UNC Workgroup 0831/0831A Minutes**

### Allocation of LDZ UIG to Shippers Based on a Straight Throughput Method

## Allocation of LDZ UIG to Shippers (Class 3 and 4) Based on a Straight Throughput Method

#### 10:00 Thursday 22 June 2023

#### via Microsoft Teams

Attendees					
Rebecca Hailes (Chair)	(RH)	Joint Office			
Ben Mulcahy (Secretary)	(BM)	Joint Office			
Aleksandra Cebo	(ACe)	EDF			
Andy Clasper	(AC)	Cadent			
Dan Stenson	(DS)	Brook Green Trading			
David Mitchell	(DM)	SGN			
Ellie Rogers	(ER)	CDSP (Xoserve)			
Fiona Cottam	(FC)	CDSP (Xoserve)			
Harry Hailwood	(HH)	Brook Green Trading			
James Lomax	(JL)	Cornwall Insight			
Kathryn Adeseye	(KA)	CDSP (Xoserve)			
Kevin Clark	(KC)	Utilita			
Louise Hellyer	(LH)	TotalEnergies Gas & Power			
Mark Jones	(MJ)	SSE Energy Supply			
Sally Hardman	(SH)	SGN			
Steve Mulinganie	(SM)	SEFE			

Copies of all papers are available at: <a href="https://www.gasgovernance.co.uk/0831">https://www.gasgovernance.co.uk/0831</a>

The Workgroup Report is due to be presented at the UNC Modification Panel by 21 September 2023.

Please note these minutes do not replicate/include detailed content provided within the presentation slides, therefore it is recommended that the published presentation material is reviewed in conjunction with these minutes. Copies of all papers are available at: <a href="https://www.gasgovernance.co.uk/0831/220623">https://www.gasgovernance.co.uk/0831/220623</a>

#### 1. Introduction and Status Review

Rebecca Hailes (RH) welcomed everyone to the meeting.

#### 1.1. Approval of Minutes (25 May 2023)

The minutes from the meeting held on 25 May 2023 were approved.

#### 1.2. Approval of late papers

No late papers had been submitted.

#### 1.3. Review Outstanding Actions

**Action 0501:** BR1 is to be amended by Proposer (MJ), working with CDSP (ER) and Cadent (AC) to ensure that the requirements to appoint the AUGE are removed.

#### **Update:**

Mark Jones (MJ) advised that he had added the UIG table to the Solution as a fixed value table and had replaced the text in Business Rules 1 and 2 to simplify them. He also replaced the original Business Rules 3, 4 and 5. The new Business Rule 3 states the rationale behind the requirement to keep the UIG table in Code. Business Rules 4 and 5 were also new and, in turn, remove the AUG processes from Code and the Framework for Appointment as a UNC Related Document respectively.

MJ also highlighted to the Workgroup the text that had been added to the Implementation section regarding timings, stating that if an implementation decision should be issued before 18 August 2023, then the Modification should be implemented on 01 Oct 2023. He stated that he was aware that with the steps still yet to be completed before an implementation decision could be made, including issuing consultations, a decision before 18 August did not seem possible, so was minded to remove this sentence.

Ellie Rogers (ER) suggested that the Modification could state that implementation be made as soon as possible after the decision is made, provided it stipulated that it would have to be the first day of the month and allowed the 6 weeks specified in the ROM.

RH agreed with this suggestion asking the Proposer to ensure the stipulations stated were included.

MJ then asked the Workgroup if the Modification was now ready for Legal Text to be produced, and Andy Clasper (AC) agreed to progress this.

RH requested that the Proposer make the amendments discussed in Workgroup to the Modification Proposal and then send it to the Joint Office as formally amended version 4.0. MJ confirmed he would do this, with the Joint Office likely to receive it the following week.

#### **Action Closed**

**Action 0502:** Proposers to provide Joint Office with new drafts of 0831/0831A Modifications with revised BRs to be provided to JO before 14 June

#### **Update:**

A new draft of 0831 was to be provided as discussed under action 0501 and the Proposer for 0831A agreed to provide a new draft of their Modification Proposal to the Joint Office once the new draft of 0831 had been made available.

#### **Action Carried Forward.**

Action 0503: CDSP (ER) to review and clarify timebound requirements within ROM.

#### Update:

This action was addressed in the ROM discussions under Item 5 below.

#### **Action Closed**

Action 0504: CDSP (ER) to review ROM wording regarding forward AUGE contractual costs.

#### **Update:**

This action was addressed in the ROM discussions under Item 5 below.

#### **Action Closed**

**Action 0505:** Proposer (MJ) and CDSP (ER) to discuss and agree revised implementation timeline.

#### **Update:**

This action was addressed in the discussion under Action 0501 above.

#### **Action Closed**

#### 2. Amended Modification 0831

Amendments to Modification were discussed under Action 0501 above.

#### 3. Amended Modification 0831A

Harry Hailwood (HH), as the new Proposer for this Modification with the initial Proposer due to leave the business soon, confirmed he intends to revise the Modification to consider solely Product Class 1, and verified that he would look to copy across the new Implementation text from UNC 0831.

As noted under Action 502 HH proposed providing the amended Modification once the new version of 0831 had been produced to use as a template for the common considerations.

#### 4. Legal Text consideration

AC confirmed that he would speak with the lawyers who would be producing the Legal Text after this Workgroup meeting to get the process underway but noted that they would need to see Modification 0831A as soon as possible to facilitate this.

RH asked that the Proposer of 0831A provide the amended Modification to the Joint Office and Legal Text provider as soon as possible, noting that much of the Legal Text would be the same for both Modifications and could include separate entries for each.

#### 5. Rough Order of Magnitude (ROM)

ER advised that the ROM had not changed regarding either cost saving or testing but noted in the last Workgroup meeting there had been a few clarification requests about the annual process remaining in place and about midyear implementation.

Regarding the annual process, ER informed the Workgroup this was the current internal CDSP process where the AUG values are loaded in the system, and it had been asked why it was described as to be retained in the ROM. ER stated that the CDSP was intending to preserve this process as Gemini and the UK Link will maintain the concept of weighting factors. Accordingly, the CDSP will still load this data into the system, albeit the same table each time, as part of an internal process until/unless the idea of weighting factors is removed.

Addressing the issue of timescales and midyear implementation ER explained that for the commencement of AUG factor use on 01 October, the CDSP loads the factors into the system at the end of August, so the implementation could target this time, otherwise the given lead time for is 5 to 6 weeks.

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Steve Mulinganie (SM) asked if this meant the reference to mid-year is in relation to a 01 October implementation only, with any other implementation date requiring a lead time of six weeks.

ER confirmed this understanding was correct and offered to produce a revised version of the ROM if it would assist.

RH noted there was a reference within the ROM to progressing the Change at risk. ER confirmed this was an option, especially as there were no costs in doing so given that AUGE 2023 had already been delivered and AUGE 2024 is already being worked on. She elaborated that there was no CDSP charge to produce a detailed design as they would not be building it from a system perspective.

SM commented that the lead time commentary was confusing.

ER clarified stating that the change management process was commencing with the Change Proposal, XRN5658, to be raised in the July meeting of the DSC Change Management Committee. She stated that as it was not a new design, the expectation was that it should go through the process fairly quickly. She also noted that the contract costs given were dependent on the timing of when the Authority approved the Modification.

SM asked if details were available to review any regret spend regarding the AUGE contract.

ER stated that the CDSP could not provide exact contract costs but that the ROM did include a saving figure range of £300k to £400k per annum. She explained that the AUGE was already working on the 2024 figures with the next stipulated contract breakpoint available in March 2024 adding that the CDSP could break the contract at any point with a cost implication.

SM acknowledged the cost-saving figure per annum and asked if a contract cancellation cost was available.

ER reaffirmed that if the contract breakpoint in March 2024 is passed then any subsequent contract break would have a fixed cost.

SM accepted this and presumed that this was accounted for in the range of the saving figures of £300k to £400k.

Fiona Cottam (FC) advised that the provider (Engage) was a month or two into the process, with most of their work done between June and Sept and was committed spend.

#### 6. Development of Workgroup Report

Development of the Workgroup Report was deferred pending the submission of amendments to both Modifications.

RH shared a view of the Rough Order of Magnitude (ROM) Assessment and the Workgroup agreed wording around progressing through DSC Governance.

#### **Next Steps**

- Both Proposers to provide amended Modification Proposals to the Legal Text Provider and Joint Office.
- Legal Text request to be progressed.
- Development of the Workgroup Report

#### 7. Any Other Business

None.

#### 8. Diary Planning

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

Workgroup meetings will take place as follows:

#### Joint Office of Gas Transporters

**Paper Publication Workgroup Programme** Time / Date Venue **Deadline** Consider Amended Modification 0831 Thursday 10:00 5 pm Microsoft Consider Amended Modification 0831A 27 July 2023 **Teams** Consider Update on Legal Text 18 July 2023 Develop the Workgroup Report 0831/A (combined report)

#### Action Table (as of 22 June 2023)

Action Ref	Meeting Date	Minutes Ref	Action	Owner	Reporting Month	Status Update
0501	25/05/23	3	BR1 is to be amended by Proposer (MJ), working with CDSP (ER) and Cadent (AC) to ensure that the requirements to appoint the AUGE are removed.	Proposer (MJ)	June 2023	Closed
0502	25/05/23	3	Proposers to provide Joint Office with New drafts of 0831/0831A Modifications with revised BRs to be provided to JO. before 14 June	Proposers 0831(MJ) 0831A (HH)		Carried Forward
0503	25/05/23	5	CDSP (ER) to review and clarify timebound requirements within ROM.	CDSP (ER)	June 2023	Closed
0504	25/05/23	5	CDSP (ER) to review ROM wording regarding forward AUGE contractual costs	CDSP (ER)	June 2023	Closed
0505	25/05/23	5	Proposer (MJ) and CDSP (ER) to discuss and agree revised implementation timeline.	Proposer (MJ) and CDSP(ER)	June 2023	Closed

#### **UNC 0836S Workgroup Minutes**

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

#### 10:00 Thursday 22 June 2023

#### via Microsoft Teams

Attendees					
Rebecca Hailes (Chair)	(RH)	Joint Office			
Ben Mulcahy (Secretary)	(BM)	Joint Office			
Aleksandra Cebo	(ACe)	EDF			
Andy Clasper	(AC)	Cadent			
Dan Stenson	(DS)	Brook Green Trading			
David Addison	(DA)	CDSP (Xoserve)			
David Mitchell	(DM)	SGN			
Ellie Rogers	(ER)	CDSP (Xoserve)			
Fiona Cottam	(FC)	CDSP (Xoserve)			
Harry Hailwood	(HH)	Brook Green Trading			
James Lomax	(JL)	Cornwall Insight			
Kathryn Adeseye	(KA)	CDSP (Xoserve)			
Kevin Clark	(KC)	Utilita			
Mark Jones	(MJ)	SSE Energy Supply			
Sally Hardman	(SH)	SGN			
Steve Mulinganie	(SM)	SEFE			

Copies of all papers are available at: https://www.gasgovernance.co.uk/0836

The Workgroup Report is due to be presented at the UNC Modification Panel by 17 August 2023.

Please note these minutes do not replicate/include detailed content provided within the presentation slides, therefore it is recommended that the published presentation material is reviewed in conjunction with these minutes. Copies of all papers are available at: <a href="https://www.gasgovernance.co.uk/0836/220623">https://www.gasgovernance.co.uk/0836/220623</a>

#### 1.0 Introduction and Status Review

Rebecca Hailes (RH) welcomed everyone to the meeting and gave a brief overview of the scheduled items for discussion.

#### 1.1. Approval of Minutes (25 May 2023)

The minutes from the meeting held on 25 May 2023 were approved.

#### 1.2. Approval of Late Papers

There were no late papers to consider.

#### **Review of Outstanding Actions**

**Action 0501:** Proposer (GD/DA) to review BRs and consider adding an 'Avoidance of Doubt' statement confirming that the CDSP would not reassess the materiality test should a Shipper change reads after the test was performed.

**Update:** David Addison (DA) stated that this has been included in the updated Modification he intended to provide the Joint Office.

#### **Action Closed**

**Action 0502:** Proposer to check for consistency in the application of the REC Threshold, that a reference to the REC is used, and to consider the timing to allow for replacement reads.

**Update:** DA confirmed that this had also been included in the updated Modification he intended to provide the Joint Office.

#### **Action Closed**

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

**Update:** DA advised the Workgroup that the ROM was being progressed and he intended to be able to provide it for the July Workgroup.

#### **Action Carried Forward**

#### 2.0 Amended Modification

DA shared a view of his screen to present the draft amended version of the Modification Proposal he was intending to provide to the Joint Office. He highlighted the updates made since the last Workgroup meeting, discussing how meter readings would be inserted where they do not otherwise exist and would be valid for Reconciliation and Annual Quantity (AQ) use.

He confirmed that the proposal looks to use the thresholds previously discussed set out in the Retail Energy Code (REC) and that he had accordingly spoken with the Legal Text provider lawyer to emphasise that a reference to REC Schedule 30 was required to ensure that, should that REC threshold alter, it would not necessitate a change to the UNC Legal Text. DA also highlighted this reference to the REC Code Manager but was conscious future cross-code considerations may prove difficult so had also flagged the consideration to the REC Professional Services (RPS) code manager as well, noting that, as stated whilst threshold value changes should not be an issue, any future changes to the pertinent text of either Code may prove problematic.

DA also talked through the commentary under the 'Timeline for Assessment of the Materiality Test' added to section 3 of the Modification. He explained how the text laid out the timeline proposed and the adjustments that could be undertaken depending on the results of the test. He highlighted the avoidance of doubt commentary about how subsequent replacement meter reads would not trigger a second test.

RH noted the use of square bracketing in the text of Section 3 which DA committed to remove.

DA also committed to adding commentary under 'Reference Documents' in Section 4 Code Specific Matters regarding how readers could access the REC portal and to add the latest version of R0067 as an appendix to the Modification. He noted that there were 20 related documents on the REC Change page and suggested for reasons of practicality that he only add the core REC Change Request as an appendix, which RH agreed was appropriate.

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

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#### 3.0 Development of Workgroup Report

RH shared a view of the Workgroup Report and committed to updating it once the pending amended Modification had been received by the Joint Office.

In response to a question about IGT impact, DA replied that once the Legal Text was produced it should be possible to see if there is anything other than direct references between Codes to consider. He advised that the invoicing perspective was dealt with separately and that the charging after the DNO offtake probably did require alteration and would benefit from checking.

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

DA expressed a view that he did not believe the Modification's impact to be materially sufficient to affect settlement or PAC consideration and was asked to compose commentary to this effect as a response to the Modification Panel question.

**New Action 0603:** Proposer to produce proposed text in response to Panel question about materiality for invoicing arrangements and consequential impacts on stakeholders.

RH noted that the Workgroup is scheduled to report to the Modification Panel in August and as such visibility of the proposed Legal Text was needed very soon.

DA advised that he had spoken with the Legal Text provider and should have the text soon, he asked if there was a risk regarding processing the Legal Text request. RH agreed to double-check this, and if the Legal Text was not requested in time would look to make an extension request.

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

#### 3.0 Next Steps

- Proposer to provide amended Modification.
- Provision of ROM for next Workgroup.
- Provision of the initial draft of Legal Text for review.
- Finalisation of Workgroup report

#### 4.0 Any Other Business

None.

#### 5.0 Diary Planning

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

Workgroup meetings will take place as follows:

Time / Date	Paper Publication Deadline	Venue	Programme
Thursday 10:00	5 pm	Microsoft	<ul> <li>Review amended Modification</li> <li>Review ROM</li> <li>Review Legal Text</li> <li>Finalisation of the Workgroup Report</li> </ul>
27 July 2023	18 July 2023	Teams	

Action Table (as of 22 June 2023) Action Meeting Minute Reporting Status Action Owner Month Ref Ref Update Date Proposer to review BRs and consider adding an 'Avoidance of Doubt' statement confirming that the CDSP would not Proposer 0501 2.0 25/05/23 Closed June 2023 reassess the materiality test should a (GD/DA) Shipper change reads after the test was performed. Proposer to check for consistency in the application of the REC Threshold, that a Proposer 0502 2.0 reference to the REC is used, and to Closed 25/05/23 June 2023 (GD/DA) consider the timing to allow replacement reads. June 2023 CDSP (ER/DA) to produce a ROM for the Carried 0503 25/05/23 2.0 CDSP (DA) June 2023 Workgroup. Forward July 2023 Proposer to add REC Portal access guidance and REC Change Request as Proposer 0601 22/06/23 | 2.0 an Appendix to Modification. Proposer Pending July 2023 (GD/DA) also to remove any square brackets in the document. Proposer to discuss potential IGT Impact Proposer 0602 22/06/23 3.0 **Pending** July 2023 with Anne Jackson (GD/DA) Joint Office (RH) to request Legal Text for Joint Office 0604 22/06/23 3.0 Pending July 2023 0836S at July Panel. (RH)