

**UNC Workgroup 0674 Minutes
Performance Assurance Techniques and Controls
Wednesday 23 September 2020
via Teleconference**

Attendees

Alan Raper (Chair)	(AR)	Joint Office
Karen Visgarda (Secretary)	(KV)	Joint Office
Andy Clasper	(AC)	Cadent
Carl Whitehouse	(CW)	Shell Energy
Catherine Mulliss	(CM)	E.ON
Claire Louise Roberts	(CLR)	ScottishPower
Fiona Cottam	(FC)	Xoserve
Gurvinder Dosanjh	(GD)	Cadent
Karen Kennedy	(KK)	British Gas
Kirsty Dudley	(KD)	E.ON
Liam King	(LK)	Ofgem
Louise Hellyer	(LH)	Total Gas & Power
Mark Bellman	(MB)	ScottishPower
Richard Pomroy	(RP)	Wales & West Utilities
Sally Hardman	(SH)	SGN
Shelley Rouse	(SR)	PAFA (Gemserv)

** via teleconference*

Copies of all papers are available at: <https://www.gasgovernance.co.uk/0674/230920>

The Workgroup Report is due to be presented at the UNC Modification Panel by 21 January 2021.

1.0 Introduction and Status

1.1. Approval of minutes (24 August 2020)

The minutes from the previous meeting were approved.

1.2. Review of Outstanding Actions

Action 0605: ScottishPower (MB) and Gemserv (SR) to perform a crossmatch exercise against the legal text and the PAF Document to ensure no duplication exists.

Update: MB said this action could now be closed as the crossmatch exercise had been completed. **Closed.**

Action 0701: ScottishPower (MB) to investigate encompassing a template into the PAF D in relation to setting out targets and performance in Peer Review Techniques.

Update: MB said that a Peer Review template had now been added into the PAF D v4.3 and he provided an overview of how the document should be completed. He then confirmed this action could then be closed. **Closed.**

Action 0702: ScottishPower (MB) to investigate the nature of the decision and provide examples/adding into the PAF D Document and Joint Office (AR) to request a new agenda at the UNCC August meeting on the Terms of Reference regarding the proposed Appeal process.

Update: AR said that the UNCC area had been incorporated into the PAC arrangements in relation to referrals and MB said this had reference as to what was expected from the UNCC in this regard. MB said the action was completed and could be closed. **Closed.**

Action 0705: ScottishPower (MB) to alter the wording in the proposed legal text, Section V16.11.1 to reflect the knowledge and seniority required change the word 'representative' to 'delegate' and reflect these changes in the PAF D as well.

Update: MB showed the updated text within V16.11.1 and it was agreed that the wording of representative was still appropriate as it was relating to the per shipping entity as a whole, from a group perspective and so this wording as still appropriate. He then agreed the action could be closed. **Closed.**

Action 0707: Xoserve (FC) and ScottishPower (MB) to investigate how the CAMs are constituted with the existing DSC arrangements within Section 16.0

Update: MB confirmed this area had been updated with the relevant wording and referencing and that the action could be closed. **Closed.**

Action 0709: ScottishPower (MB) to include an example into section 19.5 Request for Resolution Plan, similar to the existing EFR plan used in electricity.

Update: MB confirmed that an example Error and Failure Resolution, (EFR) table had been included within Section 20.0 of the updated PAF D v4.3 document and he provided an overview of the content of the table and how it would be completed and confirmed the action could be closed. **Closed.**

Action 0801: Joint Office (AR) to seek an extension from Panel until October 2020.

Update: AR confirmed an extension had been granted until January 2021, adding that his intention was to submit the Workgroup Report to the November 2020 Panel. The action was then closed. **Closed**

Action 0802: Joint Office (AR) to invite Ofgem; Jon Dixon and Liam King to the meeting on 23 September 2020.

Update: AR noted that he had invited Liam King to the meeting and he was present, although Jon Dixon was unable to attend. The action was closed. **Closed**

Action 0803: ScottishPower (MB) to change the wording of 4.2.4. *A single alternate may not represent more than one (1) other PAC Member, unless a quorum cannot be achieved without this happening.* to be in-line with the Modification Panel process

Update: MB confirmed he had made the necessary amendments to reconsider the quorum requirement to ensure this section was now aligned to the present UNC Modification Panel procedure and the action was then closed. **Closed**

Action 0804: ScottishPower (MB) to provide the updated amended Modification v14.0

Update: MB confirmed the amended Modification v14.0 had been produced and so the action could be closed. **Closed**

Action 0805: ScottishPower (MB) to review the timescale in relation to the 14 Business Days as defined in Section V16.8.3 (g).

Update: MB confirmed that the 14 Business days had been confirmed and so the action could be closed. **Closed**

Action 0806: ScottishPower (MB) to use the wording from Modification 0732FT - Performance Assurance Committee voting arrangements, to populate proposed legal text Section V16.5.2 to ensure consistency.

Update: MB said that the wording had been updated and a protracted general discussion then took place in relation to the voting arrangements and if PAC had raised any Modifications in the past albeit via a sponsor. Liam King (LK) said that a list of past Modifications raised in association with PAC, i.e. *Modification 0664 - Transfer of Sites with Low Valid Meter Reading Submission Performance from Classes 2 and 3 into Class 4* would be useful and moving forward, from a monitoring perspective. He added that the rationale and process needed clarification within the 'Why' Section of the Modification from a codifying perspective. MB said that he would encompass this aspect into the amended Modification.

New Action 0901: ScottishPower (MB) and Joint Office (AR) to include the rationale in relation to PAC raising Modifications within the 'Why' Section of the amended Modification v15.0 to provide clarity.

AR said that all the Modifications were governed by the application of the UNC Modification Rules and the specific Workgroups that the Modifications were allocated to. AR and MB agreed to provide the rationale to be included within the amended Modification, which would become v15.0. The action was then closed. **Closed**

New Action 0902: ScottishPower (MB) to provide an amended Modification v15.0.

Action 0807: ScottishPower (MB) to include numbers aligned to the bullets in the sections of the amended Modification v14.0

Update: MB confirmed that he had undertaken a re-numbering exercise and had now numbered the previous bullets, Kirsty Dudley (KD) thanked MB and said that this would be very beneficial at the consultation stage. The action was then closed. **Closed**

Action 0808: ScottishPower (MB) to discuss with Dentons Section V16.2.4 the wording of 'without prejudice' regarding the appeal process.

Update: MB provided a walkthrough of the PAF D v4.3 document drawing attention to specific areas of interest and a short general discussion took place in relation the appeals process it was agreed that MB would sense check with Dentons from a Legal perspective, point V16.8.7 C (ii) and so this action was carried forward. **Carried forward.**

Action 0809: Joint Office (AR) to investigate the definitions in Code from a Legal Text perspective in relation to gender neutral, as some of the Legal Text in Modification 0674 refers to 'his' and 'he'.

Update: AR confirmed that this section in the Modification had now been gender neutralised, however he added that some areas still remained in the UNC Code itself. KD said that she was raising a new Modification to address this matter. AR then agreed this action could be closed. **Closed**

Action 0810: ScottishPower (MB) to add the word 'delegate' to Section V16.11.1 Appointment of PAC Representative.

Update: MB said the change had been made the action could be closed. **Closed**

Action 0811: Joint Office (AR) to obtain confirmation as to who is responsible for producing the reports as defined in Section V16.13.1, either the DNOs or the CDSP.

Update: AR and Fiona Cottam (FC) both confirmed this was now a Data Services Contract (DSC) obligation and it was included on the Central Data Service Provider (CDSP) Service Line deliverables. FC said that all the PAC Modifications were in flight during the overall Funding, Governance Ownership (FGO) process. Andy Clasper (AC) said he would update the Legal Text accordingly in-line with the FGO principles. This action was then closed. **Closed**

New Action 0903: Cadent (AC) to update the wording regarding who is responsible for raising the reports, in line with the Funding, Governance Ownership (FGO) process.

Action 0812: Cadent (GD) to provide updated Legal Text 2.1, Mapping Table and a reverse Mapping Table.

Update: AC confirmed the Legal Text and Mapping Tables had been provided and so the action could be closed. **Closed**

Action 0813: ScottishPower (MB) to re-word the 'periodic updates' Section 7.1 to provide clarity on the notice period and the PAFA's role in this activity and the period of the current review.

Update: MB said the period updates area had been amended in the PAF D and so the action could now be closed. **Closed**

Action 0814: ScottishPower (MB) to add into Section 12.0 Provision of data or information to the PAFA reference to the Data Discovery Platform (DDP).

Update: MB confirmed reference to the DDP had now been included in the PAF D and so this action could be closed. **Closed**

Action 0815: ScottishPower (MB) to discuss with the PAFA producing a diagrammatic representation of the PAF Delivery Plan to be encompassed within Section 17.0 Annual PAF Delivery Plan, Review and Consultation section.

Update: MB said that the diagrammatic representation of the PAF Delivery Plan had now been included in the PAF D and so the action could be closed. **Closed**

2.0 Review of amended Modification v14.0

Mark Bellman (MB) provided a walkthrough of the amended Modification v14.0 and drew attention to specific areas of interest, in relation to the sections that had been amended. He explained a further amended Modification v15.0 would now be provided in view of comments and suggested minor alterations discussed with the Workgroup participants, especially regarding the comments made by Andy Clasper (AC) in relation to the square brackets [] which were still present in some sections.

3.0 Review of Legal Text 2.1 (Denton's version 8.0)

AC provided a brief walkthrough of the Legal Text and explained this had been produced in-line with the amended Modification v14.0. A brief general discussion took place in relation to the number of alternates and the reference to 'two' alternates was questioned, (V16.6.1), MB stated this wording and context was correct regarding the alternates area. AC said that certain sections of the Legal Text now needed be amended and that these changes would be undertaken once the amended Modification v15.0 was available.

New Action 0904: Cadent (AC) to update the Legal Text in-line with the amended Modification v15.0.

AC continued to narrate through the Legal Text and drew attention to areas that required clarification in respect of the square bracket [] areas, (V16.8.4(e), V16.9.3(e) and MR6.1.1(e)(ii)). He added that in relation to the to the wording of Business days point 16.8.6, within the Legal Text he had noted these were defined as 15 days, yet in the Modification these were described as two weeks. MB said he would amend the Modification to ensure it was now defined as 15 days. AC said regarding point V16.11.1 he had noted the word 'seniority' which was not included in the Modification and so he would alter this accordingly, once the amended Modification v15.0 was available.

4.0 Review of revised Mapping Table and Reverse Mapping Table

AR explained how the Mapping Tables were referenced throughout the solution and how the numbering and links were aligned to the Legal Text to assist with the navigation through the associated documentation, he confirmed that none of the references had been amended.

5.0 Review of revised consolidated PAF Document v4.3

AR provided an on-screen overview of the additions and alterations within the PAF Document v4.3 and drew attention to areas that were of interest.

KD questioned the word 'Party', as it was a defined term in the context of the PAF D v4.3 and she had noticed in certain sections of the document, this was not referred to as a defined term. Shelley Rouse (SR) agreed to amend the document and sense check all these areas, as well as the Business and Working days references.

New Action 0905: PAFA (SR) to amend the PAF Document and create v4.4 to ensure 'Party' is referred to as a defined term and the consistency of Business and Working days.

AR continued to narrate through the document and he explained v4.3 of the document had been discussed and reviewed by the PAC Members at the 14 September 2020 meeting and that all the members had provided an approval statement in relation to the context and content of the document. AR said he would precis that section of the minutes and this statement information would be included in the Workgroup Report. SR concurred with this suggestion and added that all the PAC members had appreciated being involved in the development of the document and all supported the intent. MB said he did not understand why the PAC Members had not voted formally on the acceptance of this document. Richard Pomroy (RP) said that this was because there were distinctions between UNC Modification business areas and PAC business areas, as the Modifications were developed and agreed within the specific Workgroup in question. Both KD and Karen Kennedy (KK) agreed and said that it was good that PAC had given their approval, albeit informally and that the document had now been endorsed.

6.0 Consideration of the Reporting Timeline & Development of Workgroup Report

AR said that he had updated the Workgroup Report aligned it to the amended Modification v14.0 and that he would further amend it to align with the amended proposal, v15.0. He confirmed he would encompass the PAC Members endorsement statement concerning the PAF Document 4.3 and that it was his aspiration the Workgroup Report would be submitted to the November 2020 Panel.

He explained that once he had updated the Workgroup Report this would be published and he requested all the Workgroup participants to provide comments and feedback prior to the next meeting on 21 October 2020, which he confirmed would be the final Workgroup meeting.

New Action 0906: All to provide any comments and feedback in relation to the Workgroup Report by Tuesday 13 October 2020 directly to Alan Raper alan.raper@gasgovernance.co.uk

A brief general discussion took place regarding Document 5 – the PAC Letter of Confirmation that the PAC Members sign annually. All agreed that this was a PAC driven responsibility and SR said that she would review and re-draft the letter as appropriate should the Modification be approved.

New Action 0907: PAFA (SR) to monitor and re-draft Document 5 – PAC Letter of Confirmation should the Modification be approved.

KD enquired if MB had an implementation date in mind, as she thought some reference should be made to this, as to whether it would be two months for example with a ‘soft landing’ approach. She said that this information would be useful and provide clarification during the consultation period. MB said that this area could be muted within the consultation as to what factual impacts there might be that could affect a party unfairly and that he would approach Panel to add in a question words to this effect. He also stated that in real terms, the implementation date was likely to be in February 2021. AR added that from an implementation perspective, the Legal Text and PAF D v4.4 would both go live at the same time.

KK asked how would this affect parties who were already on an improvement plan from a ‘go live date’ point of view and if they would stay with their old regime or move across to the new regime. MB said the PAFA were working on a communications/engagement piece that would outline the transition plan/techniques and the approach, and suggested this should be added to Section 20.12 or in a new section 22, if more appropriate, as this area could be defined as a time-limited stand-alone piece within the PAF D v4.4.

New Action 0908: PAFA (SR) to include the Communications/Engagement plan within the PAF D v4.4 to encompass the following elements - transition/techniques and the approach.

KD requested that reference was also made the IGT changes, to ensure there was a seamless delivery and hence this should be noted within Section 20.12 within the PAF D v4.4. MB confirmed this aspect had already been noted and included.

7.0 Next Steps

AR said his expectations for the meeting on 21 October 2020 were to:

- Review of the amended Modification v15.0
- Review of the revised Legal Text v9.0
- Review of the PAF D Document v4.4
- Review of the amended Workgroup Report v3.0
- Submission to the November 2020 Panel

8.0 Any Other Business

None

9.0 Diary Planning

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

Workgroup meetings will take place as follows:

Time / Date	Venue	Workgroup Programme
10.00 Wednesday 21 October 2020	Teleconference	Standard Agenda, plus: <ul style="list-style-type: none">• Review of the amended Modification v15.0• Review of the revised Legal Text v9.0• Review of the PAF D Document v4.4• Review of the amended Workgroup Report v3.0• Submission to the November 2020 Panel

Action Table (as at 23 September 2020)

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
0605	24/06/20	2.0	ScottishPower (MB) and Gemserv (SR) to perform a cross-match exercise against the legal text and the PAF Document to ensure no duplication exists.	ScottishPower (MB) and Gemserv (SR)	Closed
0701	29/07/20	1.0	ScottishPower (MB) to investigate encompassing a template into the PAF D in relation to setting out targets and performance in Peer Review Techniques	ScottishPower (MB)	Closed
0702	29/07/20	2.0	ScottishPower (MB) to investigate the nature of the decision and provide examples/adding into the PAF D Document and Joint Office (AR) to request a new agenda at the UNCC August meeting on the Terms of Reference regarding the proposed Appeal process.	Joint Office (AR) ScottishPower (MB)	Closed
0705	29/07/20	3.0	ScottishPower (MB) to alter the wording in section 16.11.1 to reflect the knowledge and seniority required change the word 'representative' to 'delegate' and reflect these changes in the PAF D as well.	ScottishPower (MB)	Closed
0707	29/07/20	4.0	Xoserve (FC) and ScottishPower (MB) to investigate how the CAMs are constituted with the existing DSC arrangements in Section 16.0	Xoserve (FC)	Closed
0709	29/07/20	4.0	ScottishPower (MB) to include an example into section 19.5 Request for Resolution Plan, similar to the existing EFR plan used in electricity.	ScottishPower (MB)	Closed
0801	24/08/20	1.0	Joint Office (AR) to seek an extension from Panel until October 2020.	Joint Office (AR)	Closed
0802	24/08/20	1.0	Joint Office (AR) to invite Ofgem; Jon Dixon and Liam King to the meeting on 23 September 2020.	Joint Office (AR)	Closed

0803	24/08/20	1.2	ScottishPower (MB) to change the wording of 4.2.4. A single alternate may not represent more than one (1) other PAC Member, unless a quorum cannot be achieved without this happening. to be in-line with the Modification Panel process.	ScottishPower (MB)	Closed
0804	24/08/20	1.2	ScottishPower (MB) to provide the updated amended Modification v14.0	ScottishPower (MB)	Closed
0805	24/08/20	1.2	ScottishPower (MB) to review the timescale in relation to the 14 Business Days as defined in Section V16.8.3 (g).	ScottishPower (MB)	Closed
0806	24/08/20	2.0	ScottishPower (MB) to use the wording from Modification 0732FT - Performance Assurance Committee voting arrangements, to populate proposed legal text, Section 16.5.2 to ensure consistency.	ScottishPower (MB)	Closed
0807	24/08/20	2.0	ScottishPower (MB) to include numbers aligned to the bullets in the sections of the amended Modification v14.0	ScottishPower (MB)	Closed
0808	24/08/20	3.0	ScottishPower (MB) to discuss with Dentons Section 16.2.4 the wording of 'without prejudice' regarding the appeal process.	ScottishPower (MB)	Carried forward
0809	24/08/20	3.0	Joint Office (AR) to investigate the definitions in Code from a Legal Text perspective in relation to gender neutral, as some of the Legal Text in Modification 0674 refers to 'his' and 'he'.	Joint Office (AR)	Closed
0810	24/08/20	3.0	ScottishPower (MB) to add the word 'delegate' to Section 16.11.1 Appointment of PAC Representative.	ScottishPower (MB)	Closed
0811	24/08/20	3.0	Joint Office (AR) to obtain confirmation as to who is responsible for producing the reports as defined in Section 16.13.1, either the DNOs or the CDSP.	Joint Office (AR)	Closed

0812	24/08/20	3.0	Cadent (GD) to provide updated Legal Text 2.1, Mapping Table and a reverse Mapping Table.	Cadent (GD)	Closed
0813	24/08/20	4.0	ScottishPower (MB) to re-word the 'periodic updates' Section 7.1 to provide clarity on the notice period and the PAFA's role in this activity and the period of the current review.	ScottishPower (MB)	Closed
0814	24/08/20	4.0	ScottishPower (MB) to add into Section 12.0 Provision of data or information to the PAFA reference to the Data Discovery Platform (DDP).	ScottishPower (MB)	Closed
0815	24/08/20	4.0	ScottishPower (MB) to discuss with the PAFA producing a diagrammatic representation of the PAF Delivery Plan to be encompassed within Section 17.0 Annual PAF Delivery Plan, Review and Consultation section.	ScottishPower (MB)	Closed
0901	23/09/20	1.0	ScottishPower (MB) and Joint Office (AR) to include the rationale in relation to PAC raising Modifications within the 'Why' Section of the amended Modification v15.0 to provide clarity.	ScottishPower (MB) and Joint Office (AR)	Pending
0902	23/09/20	1.0	ScottishPower (MB) to provide an amended Modification v15.0.	ScottishPower (MB)	Pending
0903	23/09/20	1.0	Cadent (AC) to update the wording regarding who is responsible for raising the reports, in line with the Funding, Governance Ownership (FGO) process.	Cadent (AC)	Pending
0904	23/09/20	3.0	Cadent (AC) to update the Legal Text in-line with the amended Modification v15.0.	Cadent (AC)	Pending
0905	23/09/20	5.0	PAFA (SR) to amend the PAF Document and create v4.4 to ensure 'Party' is referred to as a defined term and the consistency of Business and Working days.	PAFA (SR)	Pending

0906	23/09/20	6.0	All to provide any comments and feedback in relation to the Workgroup Report by Tuesday 13 October 2020 directly to Alan Raper alan.raper@gasgovernance.co.uk	ALL	Pending
0907	23/09/20	6.0	PAFA (SR) to monitor and re-draft Document 5 – PAC Letter of Confirmation should the Modification be approved.	PAFA (SR)	Pending
0908	23/09/20	6.0	PAFA (SR) to include the Communications/Engagement plan within the PAF D v4.4 to encompass the following elements - transition/techniques and the approach.	PAFA (SR)	Pending