

**UNC Request Workgroup 0778R Minutes
Gas Vacant Sites Process review
Tuesday 08 March 2022
via Microsoft Teams**

Attendees

Alan Raper (Chair)	(AR)	Joint Office
Mike Berrisford (Secretary)	(MB)	Joint Office
Andy Clasper	(AC)	Cadent
Clare Manning	(CM)	E.ON Next
David Mitchell	(DM)	Scotia Gas Networks
Ellie Rogers	(ER)	Xoserve
Fiona Cottam	(FC)	Correla on behalf of Xoserve
Guv Dosanjh	(GD)	Cadent
John Harris	(JH)	Correla on behalf of Xoserve
Kate Lancaster	(KL)	Xoserve
Lee Greenwood	(LG)	British Gas
Michelle King	(MK)	Energy Assets
Oorlagh Chapman	(OC)	Centrica
Paul Senior	(PS)	Utilita Energy
Stephanie Clements	(SC)	ScottishPower
Tom Stuart	(TS)	Wales & West Utilities
Tracey Saunders	(TSa)	Northern Gas Networks

Copies of all papers are available at: <https://www.gasgovernance.co.uk/0778/080322>

The Workgroup Report is due to be presented at the UNC Modification Panel by 18 August 2022.

1. Introduction and Status Review

Alan Raper (AR) welcomed all to the meeting.

1.1. Approval of Minutes (08 February 2022)

The minutes from the previous meeting were approved.

1.2. Approval of Late Papers

There were no late papers.

1.3. Review of Outstanding Actions

Action 0902: British Gas (LG) to provide an overview of the consequences of a failed audit. (i.e. what happens to a site that is discovered as occupied).

Update: When Lee Greenwood (LG) advised that investigations on this matter remain ongoing. He stated since the February meeting he had contacted Elexon and it had advised him that the BSC is currently undergoing an audit, (in respect of P196), and that in short, this does not include any financial penalty aspects.

The audit itself will look to assign a Green / Amber / Red rating at which point parties would be asked, (depending upon their rating), to complete an EFR (Error Failure Resolution)

plan within which they will need to outline resolution timescales etc. Parties should note that there could be potential 'parasitic' costs associated with the exercise and that where an EFR plan is not provided, or adhered to, the matter would be escalated to the Performance Assurance Board.

When LG advised that he would endeavour to provide a post-meeting written confirmation in support of the action, AR reminded those in attendance that this information could potentially be utilised during the development (including mirroring the Electricity model) of a subsequent UNC Modification following completion of the Request Workgroup considerations.

Thereafter, it was agreed to carry forward the action. **Carried Forward**

Action 0905: British Gas (LG) to provide a description on how Shippers/Suppliers satisfy themselves that their approach not to inspect meters at least once every 2 years complies with health and safety legislation.

Update: When LG advised that work on this action remains ongoing, AR also reminded parties in attendance that resolution of both 0902 and 0905 were crucial to development of suitable Business Rules which could be utilised in developing the subsequent UNC Modification, it was agreed to carry forward the action. **Carried Forward**

Action 1101: Joint Office (LOS) to ask CACoP to consider how the information required for the P196 process can be replicated in the Gas market and how the information can be passed to Shippers from Suppliers.

Update: When AR suggested that until the Request Workgroup have a firmer view on matters and a more refined framework to consider, progress of the action should be deferred, it was agreed to carry forward the action. **Carried Forward**

Action 1102: All Workgroup Members to review the impact and appetite for changing the Rolling or Formula Year AQ.

Update: When AR suggested that the Request Workgroup participants would need to consider what are we going to do when a site is vacant and how best to 'affect' any changes (i.e. what and how it would be potentially taken forward), it was agreed to defer progressing resolution of the action and re-assess during ongoing developments around the potential options. **Carried Forward**

Action 0101: *Reference Unoccupied and Vacant Sites* – British Gas (LG) to provide examples of current sites with various status's and how any new processes would cater for these.

Update: When LG provided a brief onscreen review of his working Word document, (which he is intending will help form the basis of a subsequent UNC Modification following completion of the Request Workgroup's deliberations), and accompanying PowerPoint presentation outlining a couple of vacant site examples, attention was focused on the Capacity / Commodity data (Yellow denoting Capacity and plain the Commodity related information).

When LG explained that in his examples any reconciliation is post the 'line in the sand date', and therefore only the post elements would be billed, FC confirmed that as far as Code is concerned, there can be no longer than 36 months between readings.

AR noted that there are no retrospective actions expected as this is about future positions and avoiding allocation issues wherever possible.

It was noted that the P196 process can be both a short and / or long-term solution, depending upon the vacant site status.

Once again, AR suggested that further development of a set of potential scenarios and examples of how and what to do, would be extremely beneficial, especially if supported

by some Business Rules and a guidance document which would help with practical understanding.

It was agreed to close the action and re-assess during ongoing developments of a new UNC Modification. **Closed**

Action 0102: *Reference Draft High-Level Business Rules* – British Gas (LG) to develop an initial high-level set of (draft) Business Rules for vacant sites (inc. any potential test criteria) and supporting guidance around unoccupied sites and potential ‘switch off’ criteria.

Update: When LG advised that he is continually updating his working Word document in the background as he receives more feedback from the Request Workgroup deliberations, AR offered Joint Office assistance in transposing the information into a meaningful UNC Modification when the time comes to do so and noted that Xoserve input into this process would also be beneficial.

It was agreed to carry forward the action and re-assess during ongoing developments around the two options. **Carried Forward**

Action 0201: *Reference UNC Modification 0723 (Urgent) provisions* – Xoserve (ER) to investigate whether some of the provisions could be adopted for 0778R purposes (inc. isolations aspects), and also clarify how the Modification dealt with the commodity element.

Update: Ellie Rogers (ER) provided an overview of the ‘0778R – Gas Vacant Sites Process review – CDSP Actions’ presentation during which the key points were noted (by exception), as follows:

Action 0201 – slide 2

ER noted that this matter was discussed at the 08 February 2022 Request Workgroup meeting during which both the long and short-term release aspects were considered.

Action 0201 – slide 3

ER pointed out that Xoserve are unable to recommend utilising the 0723 (Urgent) provisions for enduring Vacant site short or long-term relief process purposes, as it could potentially introduce data values that would misrepresent the way sites are recorded within the UK Link system.

Supporting this view, Tracey Saunders (TSa) pointed out that UNC Modification 0723 (Urgent) was part of a suite of Urgent (COVID) Modifications that were never intended to provide long-term solutions.

When LG enquired whether it would be feasible to utilise the basic 0723 (Urgent) framework for aspects such as the isolations and vacant sites data, AR responded by suggesting that whilst this could provide a possible solution, or prime concern at the moments is that the group should look to define the requirements.

In response, ER drew attention to the ‘Capacity and Commodity Charging’ table on slide 6 which she suggested might help guide LG in developing the subsequent UNC Modification.

Capacity and Commodity Charging – slide 6

In referencing the ‘Meter Point Reconciliation’ statements for the ‘Meter Point is isolated’ line, FC confirmed that the system provides for the requirement via the Meter Read Rejection Report, whilst AR noted that the vacant sites are different and therefore should a read be submitted, the vacant site flag should be removed – in short, this falls under the exit criteria. Acknowledging the points, LG advised he would look to include a provision within the draft UNC Modification in due course.

In noting that the information contained within the table might help parties to better visualise the vacant sites aspects, it was suggested that a 4th line could be added to the table to cater solely for the vacant site requirements, including an outline of what these might look like against this matrix. It is recognised that the isolations provisions naturally provide a higher level of confidence. When asked, FC confirmed that isolated sites are excluded from read performance statistics.

Actions – November – slides 9 to 12

Appended for information and background purposes.

In light of the discussion it was agreed to close the action. **Closed**

Action 0202: *Reference Transportation Charges Impacts – Wales & West Utilities (RP)* to provide a view on the potential impacts including the Customer Charge related aspects when a site AQ is set to zero.

Update: In noting that this action relates to Customer charges, FC made reference to the Transporter Pricing Statements and the Charge Calculator published on the Joint Office web site.¹

When it was further suggested that more consideration might be needed around what happens to a customer charge if and when a site is vacant, and what should happen, FC reiterated that parties are able to check the charges utilising the charge calculator.

In light of the discussion it was agreed to close the action. **Closed**

Action 0203: *Reference the Electricity (BSC) Safety Model Compliance – British Gas (LG)* to consider how that provision might be applied to 0778R going forward.

Update: When AR suggested that this provides some background information, it was agreed to carry forward the action and re-assess during ongoing developments. **Carried Forward**

2. Review of Existing Site Status & Potential Impact of New Processes

Please refer to discussions under both item 1.3 above and 5. below for more details.

3. Consideration of Draft Business Rules

Please refer to discussions under both item 1.3 above and 5. below for more details.

4. Consideration of Framework for Development of (draft) UNC Modification

Please refer to discussions under both item 1.3 above and 5. below for more details.

5. Consideration on when to Switch to a UNC Modification

During a brief discussion around when to potentially switch (further) development of the subject matter to fall under the auspices of a new UNC Modification, the following items were noted (by exception) as follows:

- Development of a process flow chart to identify the various interactions could assist the Request Workgroup in assessing when to close the Request Workgroup and focus attention on development of the new UNC Modification;
 - Joint Office will assist LG in developing and raising the new UNC Modification;
 - Pre-Modification discussions could prove valuable as a means to raising subsequent issues and concerns with the draft Modification;

¹ A copy of the Charging Calculator is available on the Joint Office web site at: <https://www.gasgovernance.co.uk/DNcharges>

- Provision of a draft set of Business Rules would be beneficial;
- Some concerns voiced that the Request Workgroup is not ready to be wound up just yet, on the grounds that there are still some unanswered questions;
 - Are we clear that we are looking for a capacity / commodity-based solution?
 - It was acknowledged that it would be down to the Proposer, (Centrica), of the Request, to decide the most appropriate time to switch development focus;
- It was noted that since the previous UNC Modification 0282 / 0282A '*Introduction of a process to manage Vacant sites*', the UNC and legislation had moved on, although elements of the original Modification would remain relevant and could form a baseline on which to build;²

In concluding the discussions, AR and LG agreed to work together outside the meeting in order to prepare a draft UNC Modification for consideration at the next Request Workgroup meeting.

New Action 0301: Reference a follow up UNC Modification for 0778R – Joint Office (AR), Centrica (LG), Xoserve (ER) and CDSP (FC) to work together to develop a draft UNC Modification, (inc. high-level Business Rules and solution statement), for consideration at the next Request Workgroup meeting.

6. Next Steps

AR then went on to confirm that the next meeting would focus on:

- Consideration of draft UNC Modification (inc. Business Rules, solution and Framework aspects);
- Consideration on any outstanding aspects of 0778R and when to switch from the Request Workgroup and raise a new UNC Modification

7. Any Other Business

None.

8. 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
10:00, on a date to be determined	17:00, on a date to be determined	Teams Meeting	Standard Request Workgroup Agenda

² Copies of the UNC Modification 0282 / 0282A documentation are available to view and/or download from the Joint Office web site at: <https://www.gasgovernance.co.uk/0282>

Action Table (as at 08 March 2022)

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
0902	23/09/21	1.0	British Gas (LG) to provide an overview of the consequences of a failed audit. (i.e. what happens to a site that is discovered as occupied).	British Gas (LG)	Carried Forward Update due on date to be determined
0905	23/09/21	1.0	British Gas (LG) to provide a description on how Shippers/Suppliers satisfy themselves that their approach not to inspect meters at least once every 2 years complies with health and safety legislation.	British Gas (LG)	Carried Forward Update due on date to be determined
1101	03/11/21	3.0	Joint Office (LOS) to ask CACoP to consider how the information required for the P196 process can be replicated in the Gas market and how the information can be passed to Shippers from Suppliers.	Joint Office (LOS)	Carried Forward Update due on date to be determined
1102	03/11/21	6.0	All Workgroup Members to review the impact and appetite for changing the Rolling or Formula Year AQ.	All Workgroup Members	Carried Forward Update due on date to be determined
0101	11/01/22	2.	<i>Reference Unoccupied and Vacant Sites</i> – British Gas (LG) to provide examples of current sites with various status's and how any new processes would cater for these.	British Gas (LG)	Update provided. Closed
0102	11/01/22	2.	<i>Reference Draft High-Level Business Rules</i> – British Gas (LG) to develop an initial high-level set of (draft) Business Rules for vacant sites (inc. any potential test criteria) and supporting guidance around unoccupied sites and potential 'switch off' criteria.	British Gas (LG)	Carried Forward Update due on date to be determined
0201	08/02/22	3.	<i>Reference UNC Modification 0723 (Urgent) provisions</i> – Xoserve (ER) to investigate whether some of the provisions could be adopted for 0778R purposes (inc. isolations aspects) , and also clarify how the Modification dealt with the commodity element.	Xoserve (ER)	Update provided. Closed

Action Table (as at 08 March 2022)

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
0202	08/02/22	3.	<i>Reference Transportation Charges Impacts</i> – Wales & West Utilities (RP) to provide a view on the potential impacts including the Customer Charge related aspects when a site AQ is set to zero.	Wales & West Utilities (RP)	Update provided. Closed
0203	08/02/22	3.	<i>Reference the Electricity (BSC) Safety Model Compliance</i> – British Gas (LG) to consider how that provision might be applied to 0778R going forward.	British Gas (LG)	Carried Forward Update due on date to be determined
0301	08/03/22	5.	<i>Reference a follow up UNC Modification for 0778R</i> – Joint Office (AR), Centrica (LG), Xoserve (ER) and CDSP (FC) to work together to develop a draft UNC Modification (inc. high-level Business Rules and solution statement) for consideration at the next Request Workgroup meeting.	Joint Office (AR), Centrica (LG), Xoserve (ER) & CDSP (FC)	Pending Update due on date to be determined