

UNC Request Workgroup 0778R Minutes Gas Vacant Sites Process review

Tuesday 19 April 2022

via Microsoft Teams

Attendees

Alan Raper (Chair)	(AR)	Joint Office
Maitrayee Bhowmick-Jewkes (Secretary)	(MBJ)	Joint Office
Andy Clasper	(AC)	Cadent
Clare Manning	(CM)	E.ON Next
Dan Stenson	(DS)	British Gas
Dave Mitchell	(DM)	SGN
Ellie Rogers	(ER)	Xoserve
Fiona Cottam	(FC)	Correla on behalf of Xoserve
Graeme Cunningham	(GC)	British Gas
Guv Dosanjh	(GD)	Cadent
John Harris	(JH)	Correla on behalf of Xoserve
Lee Greenwood	(LG)	British Gas
Michelle King	(MK)	Energy Assets
Paul Senior	(PS)	Utilita Energy
Steve Mulinganie	(SM)	Gazprom Energy

Copies of all papers are available at: <https://www.gasgovernance.co.uk/0778/190422>

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 March 2022)

The minutes from the previous meeting were approved.

1.2. Approval of Late Papers

AR advised a Draft Modification had been submitted for review by Lee Greenwood (LG) which was a late paper. The Workgroup accepted this paper for discussion.

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: Please refer to discussions under item 2. below for more details. **Closed**

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: Please refer to discussions under item 2. below for more details. **Closed**

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: AR noted that a greater understanding of the P196 process and mechanisms is required before this action could be closed. AR suggested that this could be discussed at a later date. **Carried Forward**

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: AR suggested that the Workgroup needed to consider the definition of a vacant site and it was likely that this and related topics would be reviewed under the Business Rules for the draft modification being developed. **Carried Forward**

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: Lee Greenwood (LG) shared the BSC audit flow P191 with the Workgroup for information. LG explained that under this process there are performance plans that can be set up if the criteria is not being met.

Steve Mulinganie (SM) suggested that the Performance Assurance Committee (PAC) Performance Assurance Report Registers (PARR) could also be utilised for the audit process. LG advised that a PAC reporting process was already in place if the AQ correction route was to be adopted. **Closed**

Action 0301: *Reference a follow up UNC Modification for 0778R* – Joint Office (AR), Centrica (LG), Xoserve (ER) and Corella (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.

Update: AR offered his support to LG for developing any draft Modifications. **Carried Forward**

2. **Consideration of (draft) UNC Modification (inc. BRs, solution and framework) of Existing Site Status & Potential Impact of New Processes**

LG presented the draft Gas Vacant Site Process Modification explaining that it sought to provide Shippers with the ability to manage vacant sites. AR noted that the Modification was a consolidation of discussions arising from previous Workgroups.

The Workgroup discussed the Modification. The key points of discussion are captured below:

- The Workgroup discussed the Shipper criteria. Fiona Cottam (FC) suggested making these clearer.
- SM suggested that the unoccupied property test should be clarified.
- SM noted that a site being unoccupied and that it was non-consuming should be the two key tests for determining when UIG (Unidentified Gas) was impacted detrimentally.
- AR suggested LG should review and revise these criteria in light of the Workgroup discussions. LG agreed with this suggestion.
- The criteria for meter reading and site visits were discussed. LG noted that these criteria for where for scenarios where there were no reads and no contact with the customer had been established.

SM suggested that further clarity was required around:

- premises entry criteria in these situations,
- what work should be carried out, and
- the different scenarios where these arrangements would be applicable.

- LH asked who would check these processes noting that in electricity the BSC (Balancing and Settlement Code) audit verifies that these criteria are being followed. LG asked whether a similar audit process should be set up for gas. SM suggested that the CDSP could carry out the monitoring process. AR noted that it would be important to discuss whether the process should become automated. Ellie Rogers (ER) stated that if the CDSP would be required to carry out the audit process, this would need to be explicitly set out in the Modification alongside clear rules for the arrangements.
- The rules for certification were discussed. LG noted that in electricity the window for this is around 121 days approximately and certification has to be reconfirmed every seven months. Electricity has a certified industry data flow which shows any new access, and it was noted that there were no similar data flows for gas.
- AR indicated that further discussions were required to develop additional front-end processes, including but not limited to:
 - the entry and exit criteria,
 - the monitoring criteria,
 - how this information is shared amongst Shippers,
 - the lifecycle of these processes.
- LG suggested that the maintaining or monitoring criteria can mirror the electricity process, but gas settlements obligations would need to be considered.
- ER asked LG to clarify the capacity and commodity relief in the solution. The Workgroup discussed and it was noted that capacity relief becomes optional at D+12 whilst commodity relief should be enduring.
- AR asked whether any costs would be incurred in a vacant site while it was flagged if there were checks every six months. LG confirmed the proposal was that there would be no costs incurred in this scenario.
- SM queried the six-month time limit for checks as this would not be appropriate for non-domestic or large premises. LG accepted this view and agreed to review the position.
- LG noted that the line in the sand would also need to be considered in the context of a vacant premises.
- AR suggested that allowing AQ correction at the end of 12 months could be beneficial as that would reflect the position had reads been obtained at the vacant premises.
- LG asked when a vacant site process was about to start, but the 12-month period had already been met within the entry criteria, could the capacity and commodity be reduced at the start of the process? SM stated that the problem would be a lack of visibility of reads within the gas system, which would necessitate the reduction of capacity and commodity after the 12 months period.
- AR noted that in the next draft of the Modification, more detailed information on the criteria would be set out in the Business Rules, alongside additional rules to reflect the discussions from this Workgroup. AR suggested the Relevant Objectives should also be added to the draft Modification for consideration by the Workgroup.
- AR asked whether the Workgroup should also consider the consequences should the process be misused and whether this would be addressed by the monitoring process. LG noted this could be difficult for capacity as costs would pass on to the Shipper. SM suggested adding a Business Rule to note that when the process was misused, any relief applicable would be negated and any benefits accrued by the shipper unwound.

3. Consideration of Outstanding 0778R Aspects and when to Switch to a UNC Modification

No further discussions required.

4. Next Steps

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

- Further development of the draft UNC Modification (inc. Business Rules, solution, Relevant Objectives and Benefits).
- Review Workgroup Report to be developed.
- At next meeting Workgroup to consider when this Review Workgroup should be closed.

5. Any Other Business

None.

6. 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

Action Table (as at 19 April 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)	Closed
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)	Closed
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 next meeting

Action Table (as at 19 April 2022)

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
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 next meeting
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 next meeting
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)	Closed
0301	08/03/22	5.	<i>Reference a follow up UNC Modification for 0778R</i> – Joint Office (AR), Centrica (LG), Xoserve (ER) and Corella (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) & Corella (FC)	Carried Forward Update next meeting