

UNC Request Workgroup 0778R Minutes Gas Vacant Sites Process review

Friday 27 May 2022
via Microsoft Teams

Attendees

Alan Raper (Chair)	(AR)	Joint Office
Maitrayee Bhowmick-Jewkes (Secretary)	(MBJ)	Joint Office
Clare Manning	(CM)	E.ON Next
Dave Mitchell	(DM)	SGN
Ellie Rogers	(ER)	Xoserve
Fiona Cottam	(FC)	Correla on behalf of Xoserve
John Harris	(JH)	Correla on behalf of Xoserve
Lee Greenwood	(LG)	British Gas
Michelle Brown	(MB)	Energy Assets
Nicky Kingham	(NK)	Correla on behalf of Xoserve
Paul Senior	(PS)	Utilita Energy

Copies of all papers are available at: <https://www.gasgovernance.co.uk/0778/270522>

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 (19 April 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 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 reiterated the discussions covered in the previous workgroups around the P196 process and technical solutions required to replicate these in the gas market. AR suggested this action could be closed and the topic would be covered in the Modification arising from this Review Workgroup. **Closed**

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

Update: Lee Greenwood (LG) advised that he was drafting a Modification which would address this topic. AR suggested the action would be resolved as part of developing the Modification and, accordingly, for the purposes of this Workgroup, the action should be closed. **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: AR suggested this action could be closed and the topic would be covered in the Modification arising from this Review Workgroup. **Closed**

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.

Update: Ellie Rogers (ER) noted that Xoserve have been supporting LG through the Modification development process and would be involved in developing the technical solutions. It was agreed this action could be closed. **Closed**

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

LG advised that he had been developing the draft Modification further to the last Workgroup and presented the revised solution for discussion. The key points raised have been captured below:

- LG presented the updated Vacant Site criteria.
- Fiona Cottam (FC) noted that sometimes vacant properties could have heating on which would result in consumption, and this would need to be reflected in the criteria.
- AR advised that if all the Vacant Site criteria are met, despite consumption, the property could still be classed as vacant and questioned whether or not this should be the case .
- LG noted that when there was a request from a Shipper to verify if a property was vacant, checks would be required for whether reads were being submitted.
- The Workgroup discussed the “audit” process being proposed.
- ER suggested that the Performance Assurance Committee (PAC) was not enabled to act as an auditor and therefore this process would need to be carried out by another party. However, ER noted that Shippers would also have to maintain their records.
- ER also requested additional details around the audit process to be made clear as she did not believe that the process being proposed was an audit.
- AR agreed and clarified that the proposed rules did not require a formal audit, they more a requirement to have auditable trail of evidence behind the rationale for classifying a site as vacant.
- The Workgroup discussed the Vacant Status Exit criteria proposed and how the AQ amendment process could be utilised in this regard.
- LG asked whether capacity relief could be applied on a site that was possibly vacant.
- AR advised that it would be beneficial to keep the Modification solution being developed should focus on the primary concerns and incorporate additional elements if benefits could be determined.
- FC suggested that the Business Rules in the draft Modification were trying to address issues around settlement and compliance, but the technical solution could perhaps be simpler by focussing on the primary concerns. LG accepted this noting some of the points he had raised may not be applicable for the solution, but he was trying to pre-empt any future concerns.

LG noted the draft Modification was now well developed but needed some refinement before it could be raised. AR agreed with this view.

AR suggested that this Review Workgroup could be concluded once the Workgroup Report was completed, and a draft Modification could be raised separately. AR noted that the Modification development process would be significant and would include raising related Change Proposals to assess CDSP impacts. AR noted these impacts could be identified once all the Business Rules were confirmed. AR additionally noted that, given the HSE concerns raised in the decision letter for Modification 0282, special attention would be required to address safety concerns raised at the time.

3. Development of Workgroup Report

AR presented the draft Workgroup Report for consideration.

The Workgroup discussions were captured in the Workgroup Report.

New Action 0501: Joint Office (MBJ) to publish Ofgem’s decision letter to not implement Modification 0282 - *Introduction of a process to manage Vacant sites* on the meeting page for Modification 0778R for clarity around safety concerns.

Post Meeting Update: The decision letter has been published. **Closed.**

AR confirmed that a revised version of the Workgroup Report would be published prior to the next meeting with a view to closing the group and presenting the report to the July Panel.

4. Next Steps

AR then went on to confirm that the next meeting would focus on concluding the Workgroup Report.

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, 29 June 2022	17:00, 20 June 2022	Teams Meeting	Standard Request Workgroup Agenda

Action Table (as at 27 May 2022)

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
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)	Closed
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	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)	Closed
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)	Closed
0501	27/05/2022	3.	Joint Office (MBJ) to publish Ofgem’s decision letter to not implement Modification 0282 - Introduction of a process to manage Vacant sites on the meeting page for Modification 0778R for clarity around safety concerns. Post Meeting Update: Decision letter published.	Joint Office (MBJ)	Closed