

**UNC Request Workgroup 0783R Minutes
Review of AQ Correction Processes
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/0783/080322>

The Workgroup Report is due to be presented at the UNC Modification Panel by 21 July 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 0201: *Reference Validation Applied to Reject AQ Corrections with a Value of 1* – Correla (JH) to examine the generation field reasons and provide a view on how these are being utilised correctly or otherwise.

Update: Ellie Rogers (ER) provided an overview of the ‘UNC 0783R – Review of AQ Correction Processes – MI Pack’ presentation during which the key points were noted (by exception), as follows:

MARCH ADDITIONAL SLIDE

Xoserve Action from February Workgroup – slide 18

When ER pointed out that the issue had been more related to a single event, John Harris (JH) advised that Xoserve had witnessed circa 5k submissions, which constituted a significant peak volume. Although notable, in Xoserve's view, there does not appear to be an underlying issue with either the AQ's or read submissions which would suggest that the party concerned is deliberately attempting to abuse the system, (via the backstop date mechanism).

When asked whether there might be a more fundamental industry wide (AQ Review Process) issue that needs addressing, ER responded by reiterating that all indications would suggest there is no deliberate actions being undertaken. However, this remains a matter that could be considered within a subsequent UNC Modification (inc. how to address AQ aspects / issues of concern) should one be raised as an outcome of the 0783R deliberations.

JH noted that this matter had been debated at length in previous 0783R Workgroup meetings and that perhaps the provision of a new reason code could remove / resolve some of these AQ correction type issues going forward.

At this point, parties in attendance agreed that action 0201 could now be closed. **Closed**

Moving on to consider the remainder of the presentation, reveals:

Eligible Cause – Change in Consumer Plant (Reason Code 2) – slide 23

It was noted that this slide links into discussions on slides 33 and 34 later in the presentation.

Clare Manning (CM) explained how E.ON had been inadvertently caught out when they felt that the only reasonable code to use was Reason Code 2 (RC2), and agrees with the general consensus that having additional RC's would be beneficial to avoid simply defaulting to RC2.

March Review Group Meeting – slide 30

ER explained that new slides 30 through to, and including 34, build upon discussions undertaken at the 08 February 2022 Request Workgroup meeting.

ER went on to advise that Xoserve intend to keep monitoring, although ultimately a view from Shippers attending these meetings would be beneficial.

Follow-up considerations from February Workgroup Session – slide 31

ER highlighted the peak values for the February, March and July 2021 dates, which are largely due to a (single) Shipper challenging the default AQ allocated to some UIP and GT sites.

Follow-up considerations from February Workgroup Session continued: Further reason code suggestions – slide 31

ER advised that the information on this slide builds on the February 2022 Workgroup discussions around the three RCs for 'change in use', 'vacant sites' and 'spurious read history'.

When asked whether a separate code for Net Zero trials would actually resolve an issue, Fiona Cottam (FC) responded by advising that it is simply a flag to allow Shippers to interrogate the information and surrounding circumstances.

Role of Oversight – slide 33

ER drew attention to the fact that the PAFA is not currently funded to undertake any sampling or audit type work.

ER suggested that what additional oversight or corrections work might be needed would require further consideration (i.e. what level of policing and who would be required to do it etc.).

When AR suggested that there are both PAC and/or Code aspects to this matter, Guv Dosanjh (GD) wondered whether there would be value in asking PAC Members what level of oversight they think might be needed. Responding, FC suggested that it might be better for the Request Workgroup to approach PAC with a narrative as to why they are being asked for a view, rather than simply approaching the committee cold.

When Andy Clasper (AC) made reference to previous discussions on the role of the PAC, ER explained that the discussions had focused on a timing issue.

When GD enquired whether there would be value in looking for more sampling exercises being undertaken by the PAC, for perhaps a 6-month period, ER responded by suggesting that it would be better for this Request Workgroup to consider what additional information is needed in order to better identify what the true sampling requirements might be, before approaching the PAC.

In noting that at the 08 February 2022 meeting, attention centred on the RC2 free text field use, AR wondered whether undertaking a quick sample exercise of some of the Shippers information and approaching them to seek clarification as to why they entered the information they did, and how this helped to apparently reduce their AQs might be beneficial – the net effect would be to highlight to Shippers that this matter is being investigated from several sides / angles.

ER went on to point out that whilst RC2 shows the highest number of differing reasons, the majority bore little or no relationship to the 'change in consumer plant' definition, but care would be needed at this stage to avoid further spurious data being used to support AQ changes. Perhaps this is a matter for consideration within a new UNC Modification in due course.

At this point, CM suggested that we should not close off RC2 route until we have new and more relevant RC's to utilise – links back to the previous discussions on slide 23 above.

Role of Oversight – slide 34

When ER questioned where the work of this Request Workgroup would lead (for instance, new reason codes. change of use refinement, a solution for vacant site and for solving spurious read history etc.), AR referred to the work being undertaken within Request Workgroup 0778R, suggesting that we may wish to leave the issue of vacant sites to that Request Workgroup to consider.

ER went on to point out that further consideration of RC2 validation aspects and also RC3, (with its 3-month timing restriction), would be beneficial, AR suggested that it appeared as though the group was narrowing down the areas of concern, which is a positive move. He went on to suggest that where parties are using 'change of plant' as a justification, it might be prudent to consider undertaking some sampling and ask the parties concerned for some justification / evidence of why they used this definition – whilst acknowledging these good points, ER reminded everyone in attendance, that this would not be within the current PAFA scope and would therefore require an additional funding provision.

In noting that it might be beneficial to create a new RC to cover this area before undertaking and investigative work, an action was assigned to Xoserve (ER) to consider provision of new RCs and what rules would be needed to support them and provide a view at a future meeting.

<p>New Action 0301: <i>Reference Development of New Reason Codes – Xoserve (ER) to consider provision of new RCs and what rules would be needed to support them and provide a view at a future meeting.</i></p>
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2. Consideration of Potential PAC Oversight Role

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

3. Consideration of Existing / New Reason Codes

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

4. Consideration on when to Switch to a UNC Modification

In noting the discussions under item 1.3 above, and specifically those relating to the presentation material, AR suggested that in his opinion (based upon the direction of the discussions), this Request Workgroup has possible one or two meetings needed in order to reach a point where a decision on if and when to switch to a UNC Modification could be made.

5. Next Steps

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

- Consideration of draft Shipper raised UNC Modification (inc. Business Rules, solution and Framework aspects), and
- Consideration and Development of existing and new Reason Codes

6. Any Other Business

None.

7. 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 08 March 2022)

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
0201	08/02/22	4.	<i>Reference Validation Applied to Reject AQ Corrections with a Value of 1 – Correla (JH) to examine the generation field reasons and provide a view on how these are being utilised correctly or otherwise.</i>	Correla (JH)	Update provided. Closed
0301	08/03/22	1.3	<i>Reference Development of New Reason Codes – Xoserve (ER) to consider provision of new RCs and what rules would be needed to support them and provide a view at a future meeting.</i>	Xoserve (ER)	Pending Update due on a date to be determined