# UNC Workgroup 0828R Minutes Introduction of an Independent Shrinkage Expert Wednesday 01 February 2023 via Microsoft Teams

Attendees		
Rebecca Hailes (Chair)	(RHa)	Joint Office
Mike Berrisford (Secretary)	(MiB)	Joint Office
Ben Hanley	(BH)	Northern Gas Networks
Ben Mulcahy	(BM)	Northern Gas Networks
Colin Wainwright	(CW)	SGN
David Morley	(DMo)	Ovo Energy
Ellie Rogers	(ER)	Xoserve
Emma Buckton	(EB)	Northern Gas Networks
Guv Dosanjh	(GD)	Cadent
Louise Hellyer	(LH)	TotalEnergies Gas & Power
Magali Aurand	(MA)	Guidehouse
Mark Jones	(MJ)	SSE
Mark Perry	(MP)	Correla
Matt Marshall	(MM)	Cadent
Paul O'Toole	(PO)	Northern Gas Networks
Richard Pomroy	(RP)	Wales & West Utilities
Steve Mulinganie	(SM)	SEFE Energy Limited
Tom Stuart	(TS)	Wales & West Utilities
Tracey Saunders	(TSa)	Northern Gas Networks

The Workgroup Report is due to be presented at the UNC Modification Panel by 15 June 2023.

Please note these minutes do not replicate/include detailed content provided within the presentation slides, therefore it is recommended that the published presentation material is reviewed in conjunction with these minutes. Copies of all papers are available at: <a href="https://www.gasgovernance.co.uk/0828/010223">https://www.gasgovernance.co.uk/0828/010223</a>

#### 1. Introduction and Status Review

Bob Fletcher (BF) welcomed parties to the meeting and briefly outlined the quoracy requirements, and how these would potentially impact on any approvals should it be needed, during which time the meeting was deemed to be quorate.

#### 1.1 Approval of Minutes (02 December 2022)

When asked David Morley (DMo) provided an overview of his 'Commentary on December Minutes 0828R Minutes' paper during which the following key high-level discussion points were noted (by exception), as follows:

- 1. There's no mention in the minutes of how any findings made under the DPLA will not make their way into the SLM for several years 5-10 years. a. I noted within the session that this is too long
  - SM noted that the ISE could use go early and use DPLA data as it becomes available
  - b. It is not appropriate to delay as this impacts:
    - Greenhouse gas emissions

#### ii. Customer bills

Matt Marshall (MM) explained that at a recent Shrinkage Forum meeting both he and Magali Aurand (MA) had suggested an aspiration that the DPLA would make inroads in to their SLM in circa 2 to 3 years. Although parties are asked to note that as yet there are no funding provisions in place, and that with a prospective 14 March deadline looming, there are no guarantees there would be in time, especially as the full specifications are not yet defined. However, proposals are for a fully transparent provision which will reside within the public domain.

MA went on to point out that the DPLA would be engaging interested industry parties outside of this Request Workgroup. To date, the Alpha phase (of circa 6 months) had recently finished and this would be followed up next by the Beta phase – the expectation being that full rollout would be achieved in around 5 years.

- 2. In section 2.1.3 we were to consider intended benefits to consumers. After the note "DMo clarified his understanding that this is covered in pass-through costs, but at the very least Transporters would be incentivised to repair gas leaks for efficiently due to regulatory oversight" please insert:
  - a. I believe that I noted that depending on the volume of shrinkage a proportion of shrinkage will be able to be passed through to shippers to bill customers. However, accurately accounting for Shrinkage in the SLM will allow Ofgem via RIIO to set the cap at a rate which they deem to be economically and environmentally efficient. Depending on the level of UIG that is pushed into Shrinkage via the actions of the ISE, and how the cap is set by Ofgem, will dictate the savings that can be passed through to customers via Shippers. This in turn should incentivise GDNs to repair gas leaks.

The response kindly provided by DMo was duly noted by those parties in attendance.

- 3. 2.1.3 also notes: "DMo challenged that the benefit would be dependent on further actions which could be potentially be expensive and would have to be justified on the basis of the benefit, which is not necessarily a direct benefit to consumers"
  - a. I recall I noted that UIG is decided at Line in the sand. My point here is that creating a more accurate picture of Shrinkage will allow Ofgem to incentivise accurately. There is no negative cost to customers, unless the ISE discovers that GDNs have been overestimating Shrinkage rates, which is proven to not be the case.
  - b. "further actions which could be potentially be expensive" may have been referring to the actions that GDNs may take eg mains replacement and the values that are applied to GDNs under RIIO-GD2.

The response kindly provided by DMo was duly noted by those parties in attendance.

- **4.** "SM noted that a plus or minus UIG is a margin of error, the outcome may be more or less gas in UIG, but the Shrinkage % would be less if accurately identified and targeted."
  - a. Is this accurate?

Steve Mulinganie (SM) suggested that he supported an argument for the provision of a more accurate and open shrinkage assessment process that engages with wider industry participants rather than a single party.

- **5.** "Workgroup agreed that communication, in principle, with other groups such as AUG Committee, AUGE, PAC and REC (Retail Energy Code) performance board would be of benefit."
  - a. Should this have been an action?

When BF explained that once the time was right, the Request Workgroup (or subsequent UNC Modification Workgroup) would create an appropriate action that would seek to engage with other industry forums – an approach supported by the majority of those in attendance.

- **6.** "When RP asked if the Independent Shrinkage Expert will use innovative means, is it envisaged that they only assess work (mains replacements) already done, DMo confirmed he is not suggesting the role is a consultative one."
  - a. This is not correct. My proposal is that the ISE uses the National Leakage Tests, yes (if they deem them to be fit for purpose), and also innovative means, such as direct air measurement and other methods proposed under the DPLA.

During a brief discussion it was agreed that the term 'not' should be removed from the above statement.

It was noted that during the discussion on the minutes, additional meeting participants had joined, and the meeting was now quorate. Thereafter, the minutes from the previous meeting were approved.

## 1.2 Approval of Late Papers

When BF observed that all the meeting materials were submitted late (five (5) documents), parties in attendance agreed to consider the various documentation at short notice.

# 1.3 Review of Outstanding Actions

**1201:** Transporters to provide details of an Ofgem contact who can then be invited to attend the Workgroup.

**Update**: It was noted that the matter had been discussed at the 15 December 2022 UNC Panel meeting (please refer to the discussion summary under item 302.11(a) within the minutes).

Please note: a copy of the 15 December 2022 UNC Panel meeting minutes can be found on the Joint Office web site at: https://www.gasgovernance.co.uk/panel/151222

Steve Mulinganie (SM) noted that whilst Ofgem's comments at Panel had not necessarily been helpful, care would still be needed in encouraging Ofgem's participation in Workgroup 0828R meetings going forward.

In noting that the Transporter's do have an Ofgem contact that could be engaged in discussions before any Business Rules are finalised, BF suggested and parties in attendance agreed the action could now be closed. **Closed** 

**1202:** Proposer (DMo) to draft a set of ISE procurement principles for consideration by Workgroup.

**Update**: When David Morley (DMo) apologised for the late provision of his draft set of principles (inc. roles, parties, job specifications and pricing elements) document, parties in attendance agreed the action could now be closed. **Closed** 

**1203:** Joint Office to notify the UNC Modification Panel that there might be an IGT UNC Cross Code impact and request IGT attendance at future meetings.

**Update**: BF apologised for the lack of progress on this action and advised that he would look to raise the matter at the forthcoming 16 February 2023 UNC Panel meeting.

Ellie Rogers (ER) advised that the IGT Panel employs a Cross Code Tracker which currently indicates a (based upon a pre-Christmas snapshot) zero value for Shrinkage reflecting a view that the IGT Network is predominately comprised of PE pipework. Concerns were voiced around the apparent IGT assumption that there is zero leakage in their Network – this is a view not supported by some parties at this meeting, especially considering potential joint leakages. BF suggested that this could be considered in more detail during development of the (0828R) Business Rules and options.

SM observed that the UNC and IGT systems are subtly different and as a consequence, the role of a 'Shrinkage Expert' in either arena could be expected to be subtly different too.

BF suggested that if Ovo Energy were an IGT Shipper they should be in a position to raise an equivalent IGT Modification which could in theory run parallel with Request 0828R (or any associated UNC Modification) – the key consideration being how the IGT references to the Uniform Network Code. ER responded by explaining how under 'normal' conditions the IGT side monitor any UNC developments before advising that she would raise the matter with the IGT Code Administrator in due course.

**New Action 0201:** Reference UNC – IGT – UNC Cross Code Impacts – Xoserve (ER) to engage with the IGT parties to ensure suitable Cross Code monitoring is in place.

When asked, parties in attendance agreed to close the action. Closed

**1204:** Joint Office to add DPLA consideration to the Terms of Reference.

**Update**: It was noted that the Terms of Reference are already included in the Request which can be viewed &/or downloaded from the Joint Office web site at: <a href="https://www.gasgovernance.co.uk/0828">https://www.gasgovernance.co.uk/0828</a>

When BF confirmed that consideration of the DPLA had also been added within the draft Workgroup Report to capture the required considerations, parties in attendance agreed the action could now be closed. **Closed** 

**1205:** Joint Office to publish the presentation material considered at the last Shrinkage Forum and publish on the meeting page for the next Workgroup 0828R meeting.

**Update**: When BF advised that the materials had been published on today's meeting page, parties in attendance agreed the action could now be closed. **Closed** 

#### 2. Consideration of Business Rules

#### 2.1 Framework for the Appointment of an Independent Shrinkage Expert (ISE)

Opening discussions, BF suggested that as the document was provided as a late paper ahead of the meeting, parties should conduct a high-level review at this meeting with the intention of undertaking a more detailed review at a subsequent Request Workgroup meeting.

DMo provided an overview and supporting rationale behind the document before orchestrating a line-by-line review during which the following key points were noted (by exception), as follows:

#### 2. The Framework

 Concerns voiced that should this result in automatic updating or replacing information gained through the National Leakage Tests (NLTs). In addition, care would be needed to avoid the potential 'steering' of how an ISE might be appointed.

#### 4. Tendering process

 It was noted that there are similarities between these proposals and the existing AUGE process and commonality of approached should be used where applicable, and \_\_\_\_\_

 The suggested governance approach for tender evaluation is to utilise a stakeholder or evaluation group based approach where the UNCC provided a number of members to support the process.

#### 5. Generic Terms of Reference for Appointed ISE

- Deliberately broad Terms of Reference should be used to avoid constraining the scope of the Independent Shrinkage Expert;
  - Consensus was to exclude the DPLA from the Terms of Reference at this stage;
- Consider including 'stakeholder' reference in paragraph 5.1.2 to ensure their concerns are captured;
- BF noted that if further levels of detail are required to be included within the Uniform Network Code (UNC), then a 'tie in' for the obligations would need to be included within any associated Legal Text for inclusion within the Guidelines. Although if the proposal is to site the obligations outside of the UNC, then more care would be needed in how these are given authority;
- In noting that a reference to the Shrinkage and Leakage Model (SLM) could be included to act as a checkpoint in order to establish and prove where the data is being sourced from;
  - Clarity around what data is required and any associated timeline provisions and responsibilities will be needed in due course;
  - Stakeholder engagement and challenge to provide data will need further consideration – paragraph 5.1.4 needs expanding to include a statement around compelling parties to provide the date in a timely manner;
- Consideration of who will provide the shrinkage figure (ISE or DNOs) to be given further consideration;
  - One option is for the ISE to provide a multiplier value for the DNOs to utilise either individually or collectively;
  - Both methodology and calculations will need further consideration;
  - o The aim is to provide a transparent and challengeable process;
  - Development of a robust framework will be of paramount importance;
- Initial thoughts favour a yearly methodology review, although a more 'reactionary' process may also prove beneficial under certain circumstances;
- One option suggested would be to adopt an annual ISE shrinkage calculation supported by an intermittent methodology review (as and when deemed appropriate) – to be considered in more detail with views of the DNOs sought;
- Scenarios involving gas leakage modelling could form a component of the methodology, with a shrinkage calculation undertaken as required, which could follow a similar route to the AUGE process;
- It was noted that Unidentified Gas (UIG) requirements (inc. theft of gas) are subtly different and some parties believe that shrinkage should have a more reactive capability;
  - Potential for a cost v's benefit assessment to be considered further;
  - Methodology has a key role;

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- BF advised that eventually this Request Workgroup would / could produce a report
  that contains various recommendations that could be carried through to a
  subsequent UNC Modification (should that be deemed the appropriate course of
  action);
  - Any feedback from Workgroup 0828R could be included within the 'follow up' UNC Modification(s);
  - Any network related impacts could / should be incorporated into the methodology (inc. performance monitoring aspects);
- It was acknowledged that it remains difficult to clearly identify how one off incidents would / could potentially impact on shrinkage and how this could be factored into an annual process;
- In referring to the paragraph 5.1.5 statement, DMo agreed to consider whether Workgroup would wish to limit who could submit questions, should it be limited to UNC stakeholders – there is inconsistent use of terminology elsewhere within the document;
- In referring to paragraph 5.1.9, and the point about the ISE procuring data (the
  concerns being the use of derived data), it was noted that these draft Business
  Rules were developed before the DPLA were involved perhaps a wait and see
  matter;
- Concerns were voiced around ISE procuring services / data and the management and control of any potential incurred costs;
  - Any costs outside of the identified contractual costs would need a suitable approval mechanism (i.e. via the UNCC and DSC processes);
    - The degrees and sphere of control around potential spend is of paramount importance;
    - One option would be to adopt a consultation based process, although this
      is heavily dependent upon how and who would have the authority to
      control said costs could need UNCC viries similar in nature to the PAC
      and DSC Change Proposals mechanisms;
  - Consideration of the governance of 'normal' v's 'additional' cost would be needed:
- Potential Transporter Licence impacts / conflicts need assessing and finding the right balance will be challenging;
- Ultimately a view from the DNOs around whether they could adopt any of the proposals put forward would be needed;
- The basic principle that the ISE's could procure services is a sound one, but care is needed around managing costs;
- In noting that the proposed provisions within paragraphs 5.1.11 and 5.1.12 would allow for the Transporters to comply with their licence conditions, some thought it preferrable to alter the statement to read as 'stakeholders' on the grounds that the Transporters respective licence obligations would determine what they needed to do:
- When BF suggested that perhaps a more simplified approach, whereby it refers to a Code Administrator submission or publication might be beneficial. It was noted that there might be Ofgem approval elements to consider – DNOs to discuss offline with their respective SMEs and thereafter provide clarity around the SLM approvals process;

needed, and

In suggesting that statement within paragraph 5.1.13 needs further controls as it was also noted that there are potential commercial sensitivities and GDPR impacts to consider (i.e. Intellectual Property Rights which are usually managed via the procurement processes) - any IPR and an Xoserve role going forward would be

In referring to the similarities between these proposals and the existing AUGE and

PAFA roles, it was noted that there could potentially be an obligation on either Transporters, Shippers or the CDSP to consider – a point noted by DMo.

#### 6. Responsibilities for the creation of the ISE

- Referring to the paragraph 6.1 statement, BF suggested that if the CDSP are procuring the contract then they (the CDSP) would seek views:
  - ER pointed out that the AUGE process involves a yearly feedback mechanism which is presented to the AUG Sub-Committee and the UNCC, so perhaps this could be 'mirrored' for the ISE process - it was noted that either the Transporters or the CDSP could procure the ISE (the CDSP could provide independently or as an agency of Transporters dependant on how the obligation is established);
    - ER also highlighted an example where the Transporter obligation for obtaining Daily Reads would be moving to the CDSP in the near future;
    - ER also explained how the current AUGE funding activities operate (inc. service line provisions);

New Action 0202: Reference Existing AUGE processes – Xoserve (ER) to provide an explanation on how the AUGE process works (inc. the feedback cycle, contractual arrangements and funding aspects).

- BF provided a brief overview of the AUGE process was set up and how the CDSP role had developed;
- Referring to the paragraph 6.2 statement, BF observed that this relates largely to what would we expect to happen where parties do not comply with data requests and how best to 'incentivise' them to do so;
  - ER pointed out that as far as the AUGE process was concerned, the CDSP retains the data rather than individual parties providing it directly to the AUGE - parties are asked to note that the CDSP does not currently hold shrinkage related data;
  - When DMo suggested that perhaps a clause is needed for the ISE to obtain data from alternative sources. BF wondered whether a request for a report that would go to the authorising committee (so that they could better understand any issues) would prove beneficial;
- It was noted that paragraph 6.4 provisions are broadly similar to the current AUGE process;
- Referring to the paragraph 6.5.1 statement, BF suggested that this is dependant on what would the committee be expected to approve and any potential impacts with the Gas Transporters licence conditions and/or Ofgem's role therein;
  - The role of the (sub) committee remains unclear at this point and needs further clarification;

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In reflecting that there are differences between the various documentation and the SLM (and what the Transporters might, or might not, do with the SLM), it was recommended that the documentation (inc. SLM) need to align with Transporter's licence obligations – the AUGE process around approvals is subtly different and reflects Transporter licence obligations. SM noted that alignment was required with Transporter licence conditions and that it should be noted that any ISE provided results were recommendations for Transporters to adopt and could not be mandated;

**New Action 0203:** Reference the interaction between the SLM and Transporter Licence Obligations – Ovo Energy (DMo) to clarify how the ISE provided SLM and approvals mechanisms will work and any interactions with the Transporter's licence obligations.

- Richard Pomroy (RP) pointed out that as drafted, the licence places final responsibility for compliance upon Transporters and therefore as a consequence the SLM can only ever make a recommendation, which the Transporters may, or may not, wish to adopt;
  - It was noted that in the event of the Transporter's not taking up a recommendation, they (the Transporters) would need to provide sufficient justification to Ofgem as to why they do not feel the need (or are unable) to adopt a recommendation;
  - It was noted that under certain circumstances a 'conflicted vote' (where Transporters do not support a recommendation) at the UNCC approval level may be witnessed;
- When asked, ER advised that whilst the Section 6 proposals address her contractual concerns, it remains clear that further detailed discussions would be required going forward, and
- It was noted that the current AUGE wording within UNC forms a good starting point for further development.

#### 7. Creation of SLM

- Referring to the paragraph 7.1.1 statement, parties suggested using the term 'stakeholders' (inc. Ofgem etc.) rather than 'Transporters', in a similar manner to the AUGE process;
- Utilisation of a transparent process via the Joint Office web site is recommended for any information other than commercially sensitive data types;
- Concerns were voiced around the proposed timeline events, especially relating to the 01 June date which some parties believe is too tight – other SLM processes and timescales need further consideration;
  - SM suggested to place any proposed dates within [.....] to enable a level of additional flexibility around future discussions, including possible use of 'backstop' date statements etc.;
- When asked whether it is envisaged that the ISE would engage with various industry stakeholders ahead of development of a draft SLM and supporting documentation, DMo responded by quoting licence condition 4.10 and suggested perhaps adopting a 2 month leading timeline – some parties believe that working backwards from the proposed recommendation date might prove more beneficial;
  - RP pointed out that the current Shrinkage data provision and calculation is NOT a small task and involves the utilisation of several hundred data points;

- It was noted that it potentially boils down to whether we are looking to provide a methodology that seeks to provide a (shrinkage) factor to the Transporters for them to utilise;
- It was acknowledged that currently the Transporters are obliged to provide the shrinkage model at which point Emma Buckton (EB) provided a brief outline of the current modelling (re)calculation process timelines suggesting that at this time it is difficult to agree any dates without first fully understanding the proposed methodology;
- Some parties are of the view that it is simply a data input / refresh exercise although it is recognised that any methodology changes would involve more complexity, cost and time;
- o A 'no later than' statement to be developed and included in due course, and
- Changes to the SLM will involve a consultation process.
- Referring to the paragraph 7.1.2(b) statement, RP raised concerns that the
  methodology would need to be produced well in advance of creation of any model
  (as per the licence obligation placed upon Transporters to provide both the
  methodology and model for calculating shrinkage). He went on to outline the
  process for undertaking changes to the methodology as being:

Consultation – build model – consultation – run model

- Acknowledging the point, DMo advised that he would look to include an additional step between current sections 6 and 7 to cater for creation of the methodology;
- Referring to the paragraph 7.1.3 statement, BF confirmed that where UNCC / Sub-Committee approval is being sought on the 3<sup>rd</sup> Thursday of the month a more suitable date (rather than the stated 15 July one) would be needed (possibly by 30 June for example) and supported by an appropriately worded statement to that effect, and
  - It was felt by those parties in attendance that provision of a high-level timeline plan would be beneficial.
  - SM suggested that the last date for Transporters seeking approval should be identified and the process worked back to ensure it fits with Transporter licence obligations.

**New Action 0204:** Reference UNCC / Sub-Committee Approval Process – Ovo Energy (DMo) to look to provide a high-level timeline plan.

- Referring to the paragraph 7.1.7 statement, BF suggested that this links in with the timeline overview, although care is needed around process recommendations and approvals timeline tensions;
  - It was suggested that one option might be to look to adopt the AUGE timeline / industry engagement and subsequent approvals process.
- Referring to the paragraph 7.1.8 statement, it was noted that the output would take the form of an SLM recommendation, and that further consideration of any timeline interactions would be needed.

#### 2.2 Transporter Licence Conditions Review Document

Opening discussions, BF enquired whether parties wished to review the document at this meeting or defer consideration until the 21 February 2023 meeting, at which point RP advised that having undertaken a quick review he had several concerns that would not allow him to agree with the content.

In noting that he would look to provide a more formal response after the meeting, RP provided a brief overview on the following key points:

Reference 4.4.7 and 4.4.8 - only if DNOs agree;

Reference 4.4.9 - relates to an assertion rather than a fact;

Reference 4.10 and 4.4.11 – the DNOs would require absolute access to the model;

In noting that this interplays with the previous discussions relating to Intellectual Property Rights, it was suggested that perhaps a clause relating to levels of access being facilitated within the (ISE) contract, would provide reassurance.

Reference 4.4.12 and 4.4.13 – any methodology and model could only be approved by the Authority;

In noting that previous discussions had proposed that the SLM could only make a recommendation, DMo advised that he would be looking to update this document after the meeting for further consideration at the next meeting.

#### 3. Further Considerations

Not specifically discussed at the meeting.

#### 4. Next Steps

The Request Workgroup agreed, to consider the following future meetings:

 Undertake a further review of the updated Business Rules and Licence Conditions spreadsheet summary at the 21 February 2023 meeting.

## 5. Any Other Business

None.

## 1.0 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	Workgroup Programme
10:00 Tuesday 21 February 2023	5pm 10 February 2023	Microsoft Teams	Review of updated BRs and Licence Conditions S/S
10:00 Tuesday 21 March 2023	5pm 10 March 2023	Microsoft Teams	<ul> <li>Transitional Issues</li> <li>A PAFA type role for the Independent Shrinkage Expert</li> <li>Creation of a Steering Committee with a group of parties overseeing the tasks</li> </ul>
10:00 Tuesday 18 or 25 April 2023		Microsoft Teams	Development of Workgroup Report
10:00 Tuesday 16 or 23 May 2023		Microsoft Teams	Conclusion of Workgroup Report

# Action Table (as of 01 February 2023)

Action Ref	Meeting Date(s)	Minute Ref	Action	Reporting Month	Owner	Status Update
1201	02/12/22	2.1.1	Transporters to provide details of an Ofgem contact who can then be invited to attend the Workgroup.	January 2023	Transporters	Update provided. Closed
1202	02/12/22	2.1.2	Proposer (DMo) to draft a set of ISE procurement principles for consideration by Workgroup	January 2023	Proposer (DMo)	Update provided. Closed
1203	02/12/22	2.1.5	Joint Office to notify the UNC Modification Panel that there might be an IGT UNC Cross Code impact and request IGT attendance at future meetings.	February 2023	Joint Office (BF)	Update provided. Closed
1204	02/12/22	2.3	Joint Office to add DPLA consideration to the Terms of Reference.	January 2023	Joint Office (BF)	Update provided. Closed

1205	02/12/22	3.0	Joint Office to publish the presentation material considered at the last Shrinkage Forum and publish on the meeting page for the next Workgroup 0828R meeting.	January 2023	Joint Office (BF)	Update provided. Closed
0201	01/02/23	1.3	Reference UNC – IGT – UNC Cross Code Impacts – Xoserve (ER) to engage with the IGT parties to ensure suitable Cross Code monitoring is in place.	February 2023	Xoserve (ER)	Pending
0202	01/02/23	2.1	Reference Existing AUGE processes – Xoserve (ER) to provide an explanation on how the AUGE process works (inc. the feedback cycle, contractual arrangements and funding aspects).	February 2023	Xoserve (ER)	Pending
0203	01/02/23	2.1	Reference the interaction between the SLM and Transporter Licence Obligations – Ovo Energy (DMo) to clarify how the ISE provided SLM and approvals mechanisms will work and any interactions with the Transporter's licence obligations.	February 2023	Ovo Energy (DMo)	Pending
0204	01/02/23	2.1	Reference UNCC / Sub- Committee Approval Process – Ovo Energy (DMo) to look to provide a high-level timeline plan.	February 2023	Ovo Energy (DMo)	Pending