

UNC Distribution Workgroup Minutes
Thursday 24 March 2022
via Microsoft Teams

Attendees		
Rebecca Hailes (Chair)	(RHa)	Joint Office
Helen Cuin (Secretary)	(HCu)	Joint Office
Clare Manning	(CM)	E.ON Energy
Dan Fittock	(DF)	Corona Energy
David Mitchell	(DM)	SGN
Elisa Trout	(ET)	NGN
Fiona Cottam	(FC)	Correla on behalf of Xoserve
Gareth Evans	(GE)	Waters Wye Associates
Guv Dosanjh	(GD)	Cadent
Hursley Moss	(HM)	Cornwall Insight
Jaimee LeResche	(JLR)	Xoserve
James Doyle	(JD)	Foxglove Energy Supplies
Louise Hellyer	(LH)	Totalenergies Gas & Power
Mark Jones	(MJ)	SSE
Priya Punj	(PP)	Cadent
Richard Pomroy	(RP)	WWU
Robert Johnstone	(RJ)	Utilita
Rhys Kealley	(RK)	British Gas
Steve Easterbrook	(SE)	Cadent
Tom Stuart	(TSt)	WWU
Tracey Saunders	(TSa)	Northern Gas Networks

Copies of all papers are available at: <https://www.gasgovernance.co.uk/dist240322>

1. Introduction and Status Review

Rebecca Hailes (RHa) welcomed everyone to the meeting and gave a brief overview of the scheduled items for discussion confirming that Workgroup 0763R discussions would be postponed until April due to no papers being available for discussion and the Proposer being unavailable.

1.1. Approval of Minutes (24 February 2022)

The minutes from the previous Distribution Workgroup were approved.

1.2. Approval of late papers

RHa advised there were two late papers for Workgroup to consider, relating to item 1.5 Pre-Modification Discussions and a late paper from Ofgem. The Workgroup approved the papers provided based on the light agenda.

1.3. Review Outstanding Actions

0201: Modification 0797 (Urgent) Authority Decision - Joint Office (RHa) to confirm what the timeline is for a judicial review.

Update: RHa advised of the assumption that the timeline for a judicial review is 3-months and suggested proceeding on that basis until Ofgem could confirm. **Carried Forward.**

0301: Registration Timeline with REC - Xoserve (DA) to advise Workgroup what the arrangements will be in the event of late notification of secured active messages from CSS.

Update: Rebecca Hailes (RHa) provided an update on behalf of David Addison (DA) clarifying that Xoserve are progressing the issue with DCC. Xoserve are seeking assurance from DCC that the design has sufficient capacity to discharge the necessary messages to the GRDA (the role that Xoserve performs when interfacing UK Link systems and the CSS) in sufficient timescales that UKL / Gemini and CSS are aligned.

The NFR states that CSS must provide 90% of messages to the GRDA within 40 minutes at peak volumes (c120,000 Switches in a day). Xoserve have raised CRD129 to seek to get 100% within 60 minutes.

Time Behaviour (Response Time)	PERF051	CSS shall process the securing of switches and send synchronisation messages of secured switches at Gate Closure to the Gas Central Data Service (UK Link currently) (from the time of Gate Closure to the point at which CSS sends the last message) as follows: - at average daily volume, mean time of 20 minutes or less - at average daily volume, 90th percentile time of 25 minutes or less - at peak daily volume, mean time of 35 minutes - at peak daily volume, 90th percentile time of 40 minutes	CSS	M	Of
Time Behaviour (Response	PERF060	The system shall respond to synchronisation by CSS	Smart Metering, ECOES,	M	SV

Xoserve raised two design issues **DI-2832 UK Link Processing Times for CSS Update Messages** and **DI-2833 E2E gate closure process** and are chasing the System Integrator (netcompany) for resolution / update on these issues.

They have also highlighted via the DSC Contract Management Committee (CoMC) that this issue may impact any Shippers who have registered for CSS Messages.

Should any Shippers wish to discuss the potential impacts then please contact: david.addison@xoserve.com or attend the CSS Design Forum.

Xoserve will present their concerns at the CSS Design Forum on 30 March 2022.

Carried Forward

1.4. Industry Update from Ofgem

Rebecca Hailes (RHa) provided the Ofgem update for the below listed items. For full details, please refer to the Industry Update from Ofgem published at: <https://www.gasgovernance.co.uk/Dist/240322>.

- Direction to distribute funding for the Strategic Innovation Fund
- SGN LTS Futures Project – Decision
- Consultation on Ofgem’s minded-to decision to fund detailed design studies for a Hydrogen Village Trial
- Decision notice for RIIO-GD2 draft annual reporting data templates and associated instructions and guidance
- UNC791: Contingency Gas Procurement Arrangements when a Supplier acts under a Deed of Undertaking – Authority Decision
- Article 28(2) TAR NC consultation with the non-UK regulatory authorities of all directly connected countries or territories, the Utility Regulator of Northern Ireland and the relevant stakeholders
- UNC785: Application of UNC processes to an aggregated Bacton (exit) Interconnection Point – Authority Decision

For an update on the “Code Modification / Modification Proposals with Ofgem for decision - Expected publication dates timetable”, please refer to Ofgem’s publication at: <https://www.ofgem.gov.uk/publications/code-modificationmodification-proposals-ofgem-decision-expected-publication-dates-timetable>

1.5. Pre-Modification discussions

1.5.1. Draft Modification for Legal Text clarification UNC0672

Jaimee LeResche (JLR) provided a presentation and draft proposed Modification explaining that a minor update is required to the legal text implemented as part Modification 0672S – *Target, Measure and Report Product Class 4 Read Performance*. This was proposed as a Fast Track Modification to amend UNC paragraph TPD M 5.9.18 to clarify the rules regarding submission of Valid Meter Readings that would qualify for the Target Read Performance.

JLR explained that during the solution development for Modification 0672S by the CDSP an inconsistency was identified. The inconsistency was presented to the Distribution Workgroup in December 2021 and participants agreed with the need for a Modification to progress a minor change. JLR explained that Business Rule 7 required a legal text update within TPD Section M 5.9.18 to change the reference ‘during calendar Month M+1’ to ‘during calendar M and M+1’.

Rebecca Hailes (RHa) referring to the Fast Track Self-Governance criteria and challenged whether the Modification satisfied the criteria as this did not appear to be correcting typographical error.

Tracey Saunders (TS) believed that this was not a typographical error and did not meet the Fast Track criteria. It was suggested as the Modification is making a minor change it should either be referred to Workgroup for one month to allow for transparency or requested that it is issued straight out for consultation.

Rhys Kealley (RK) enquired about the monitoring of meter read performance and if this change would result in a 2-month monitoring not 1 month. JLR explained that M+1 may not include all the reads submitted for that month, it needs to include the actual month and the month after due to the allowed 25 business days to submit a meter reading, to allow these to be picked up.

This was seen as an overlooked defect in the original legal drafting

JLR confirmed ScottishPower’s intention to submit the Modification to the April UNC Modification Panel.

1.5.2. Performance Assurance Reporting - Modification 0734

Rebecca Hailes on behalf of Steve Mulinganie (SM) advised of the need for a Modification to correct Modification 0734S - *Reporting Valid Confirmed Theft of Gas into Central Systems and Reporting Suspected Theft to Suppliers*, relating to the Performance Assurance reporting and some residual text which needs to be removed.

Fiona Cottam (FC) confirmed there is a comprehensive set of reports in the Modification, however Performance Assurance Committee (PAC) can approve the changes to PARR and this issue may not need a Modification unless there is something specific within the UNC legal text which needs to be changed.

1.6. Distributed Entry Gas Charging Review Update (11:30)

Stuart Easterbrook (SE) provided a presentation explaining the background and context of the charging review. SE explained the need for Gas Distribution Networks (GDNs) to make sure charging arrangements are reviewed and updated accordingly, therefore Cadent are looking at the options and connection charging arrangements, and are starting to draft a consultation document to share the thinking and to obtain views to draw conclusions on the final options to be presented to Ofgem.

SE explained the need to promote competition, the importance of any trade-offs and to consider the different electricity distribution approaches.

Priya Punj (PP) provided an overview of the four options (listed below) that have been developed and the key drivers of entry reinforcements costs, which were Capacity and location.

1. Reinforcement Prices
2. Differential % Contributions
3. High-Cost Cap
4. All or Nothing Cap

PP presented an assessment of the new options against the objectives, confirming that Option 3 High-Cost Cap was the preferred option which Cadent will be proposing within the consultation.

For full details, please refer to the presentation that will be published at: <https://www.gasgovernance.co.uk/Dist/240322>.

SE confirmed that the consultation will begin in April with a view to formally approaching Ofgem in July/August 2022.

2. **CSS Consequential Changes – Detailed Design Report**

Rebecca Hailes (RHa) provided an update on behalf of David Addison (DA) advising that SCR [0804 - Consequential UNC changes for Switching SCR \(REC 3.0\)](#), Draft Modification Report had been issued for consultation and parties are invited to submit a response by 01 April 2022, to: enquiries@gasgovernance.co.uk.

Please note a response template is available at: <https://www.gasgovernance.co.uk/0804>.

DA offered that if anyone wished to discuss any comments or questions in advance to contact him at: david.addison@xoserve.com

3. **Workgroups**

3.1. **0763R - Review of Gas Meter By-Pass Arrangements**

(Due to report to Panel 21 July 2022) *discussion postponed until May*

<https://www.gasgovernance.co.uk/0763>

3.2. **0781R - Review of the Unidentified Gas Process**

(Due to report to Panel 21 July 2022)

<https://www.gasgovernance.co.uk/0781>

3.3. **0782 - Creation of Independent AUGE Assurer (IAA) role Deferred to January 2021**

(Due to report to Panel 19 May 2022)

<https://www.gasgovernance.co.uk/0782>

4. **Issues**

None raised.

5. **Any Other Business**

5.1. **Value at Risk (VAR) Calculation**

Richard Pomroy (RP) provided a presentation on the Value at Risk – change to calculation methodology, confirming that WWU has reviewed its VAR methodology, and will be making a change to the way part of it is calculated from April 2022.

RP explained the background to the change, provided the VAR methodology formula from April 2022 and an illustrative example to demonstrate the impact of the change.

RP confirmed that this change should reduce volatility in VAR calculations and revise the approach to potentially be more consistent with the legal text, which can be interpreted in two ways (TPD V3.2.1 d ii), noting if a portfolio does not change the 20 day VAR will not change.

For full details please refer to the presentation published.

Rebecca Hailes (RH) asked if the other Networks will be undertaking this change. Elisa Trout (ET) confirmed that NGN currently use the existing (pre-change) method but will consider the change in approach by WWU.

RP confirmed conversations have been undertaken with other Networks and was open to delaying the change to allow the other GDNs to consider the approach. Tracey Saunders (TS) explained the difficulty with changing the formula due to the complex calculations that are programmed, and the need to understand the impacts of this change particularly to credit limits.

RP highlighted that the intent of VAR is to protect the Network from bad debt, explaining that if a Shippers' portfolio capacity does not change the VAR should not change and that this change could reduce the volatility and therefore the number of notices.

Louise Hellyer (LH) noted the significance of the change was minimal.

The Workgroup considered how VAR worked and the lag effect of portfolio changes. LH understood/expected proactive contact if a portfolio was significantly increasing to request more security and pro-actively avoid breaching the 80/100% VAR.

The Workgroup agreed with the proposed change, which did not require a UNC Modification. However, a request was made for WWU to postpone this to allow the other GDNs to consider making the same change at the same time. RP agreed to postpone the change for April.

It was agreed for Shippers to consider any unforeseen impacts and GDNs to confirm this is an appropriate change for all GDNs to undertake.

New Action 0103: Shippers to consider any unforeseen impacts from changing the Value at Risk calculation methodology, proposed by WWU.

New Action 0203: All Transporters (including National Grid) to consider WWU proposed change to the Value at Risk calculation methodology and consider making the same change at the same time.

6. Diary Planning

Further details of planned meetings are available at: <https://www.gasgovernance.co.uk/events-calendar/month>

Time / Date	Paper Publication Deadline	Venue	Programme
Thursday 10:00 28 April 2022	5pm 19 April 2022	Microsoft Teams	Standard Agenda
Thursday 10:00 26 May 2022	5pm 17 May 2022	Microsoft Teams	Standard Agenda
Thursday 10:00 23 June 2022	5pm 14 June 2022	Microsoft Teams	Standard Agenda
Thursday 10:00 28 July 2022	5pm 19 July 2022	Microsoft Teams	Standard Agenda
Thursday 10:00 25 August 2022	5pm 16 August 2022	Microsoft Teams	Standard Agenda
Thursday 10:00 22 September 2022	5pm 13 September 2022	Microsoft Teams	Standard Agenda
Thursday 10:00 27 October 2022	5pm 18 October 2022	Microsoft Teams	Standard Agenda

Thursday 10:00 24 November 2022	5pm 15 November 2022	Microsoft Teams	Standard Agenda
Monday 10:00 12 December 2022	5pm 01 December 2022	Microsoft Teams	Standard Agenda

Action Table (as of 24 March 2022)						
Action Ref	Meeting Date	Minute Ref	Action	Reporting Month	Owner	Status Update
0201	27/01/22	1.4	<i>Modification 0797 (Urgent) Authority Decision</i> - Joint Office (RH _a) to confirm what the timeline is for a judicial review	April 2022	Joint Office (RH _a)	Carried Forward
0302	27/01/22	2.0	<i>Registration Timeline with REC</i> - Xoserve (DA) to advise Workgroup what the transition arrangement will be.	April 2022	Xoserve (DA)	Carried Forward
0103	24/03/22	5.1	Shippers to consider any unforeseen impacts from changing the Value at Risk calculation methodology, proposed by WWU.	April 2022	Shippers	Pending
0203	24/03/22	5.1	All Transporters (including National Grid) to consider WWU proposed change to the Value at Risk calculation methodology and consider making the same change at the same time.	April 2022	Transporters	Pending

**UNC Workgroup 0781R Minutes
Review of the Unidentified Gas process
Thursday 24 March 2022
via Microsoft Teams**

Attendees		
Rebecca Hailes (Chair)	(RHa)	Joint Office
Helen Cuin (Secretary)	(HCu)	Joint Office
Clare Manning	(CM)	E.ON Energy
Dan Fittock	(DF)	Corona Energy
David Mitchell	(DM)	SGN
Elisa Trout	(ET)	NGN
Fiona Cottam	(FC)	Correla on behalf of Xoserve
Gareth Evans	(GE)	Waters Wye Associates
Guv Dosanjh	(GD)	Cadent
Hursley Moss	(HM)	Cornwall Insight
Jaimee LeResche	(JLR)	Xoserve
James Doyle	(JD)	Foxglove Energy Supplies
Louise Hellyer	(LH)	Totalenergies Gas & Power
Mark Jones	(MJ)	SSE
Priya Punj	(PP)	Cadent
Richard Pomroy	(RP)	WWU
Robert Johnstone	(RJ)	Utilita
Rhys Kealley	(RK)	British Gas
Steve Easterbrook	(SE)	Cadent
Tom Stuart	(TSt)	WWU
Tracey Saunders	(TSa)	Northern Gas Networks

Copies of all papers are available at: <http://www.gasgovernance.co.uk/0781/240322>

The Workgroup Report is due to be presented at the UNC Modification Panel by 21 July 2022.

1.0 Introduction and Status Review

1.1. Approval of Minutes (27 February 2022)

The minutes from the previous meeting were approved.

1.2. Approval of Late Papers

RHa confirmed there was one paper for the Workgroup to consider.

1.3. Review of Outstanding Actions

0102: Proposer (DF) and GE to re-evaluate the Options Definition Table using a 1-5 methodology.

Update: See item 2.1. **Closed.**

2.0 Initial Analysis

2.1. Option Definition Table

Gareth Evans (GE) provided an overview of the options and presented an assessment using a 1-5 colour coding:

LOW
LOW/MEDIUM
MEDIUM
MEDIUM/HIGH
HIGH

He asked the Workgroup for views on the assessment and whether the options needed to be weighted/ranked against the Workgroups view on the most important factors (columns).

	Options to consider within 0781R	Polluter pays (dynamic)	Feasibility	Drives improvement	Year on year stability	Easy to explain	Robust	Not likely to be continually challenged
-	Current situation	HIGH/MED	HIGH	MEDIUM	LOW/MEDIUM	MEDIUM	MEDIUM	LOW
1	Uniform Allocation model based on volume ("vanilla smear")	LOW	HIGH	LOW/MEDIUM	HIGH	HIGH	HIGH	HIGH
2	Static Model	LOW	HIGH/MED	LOW	HIGH	HIGH	HIGH/MED	LOW
3	Static Model (with regular audit)	LOW	HIGH	LOW/MEDIUM	HIGH	HIGH	HIGH/MED	LOW/MEDIUM
4	Utilise existing industry datasets	MEDIUM	HIGH	HIGH	HIGH	HIGH	MEDIUM	HIGH
5	Utilise existing industry datasets (AUGE topup)	HIGH/MED	HIGH	MEDIUM	MEDIUM	HIGH	LOW/MEDIUM	LOW/MEDIUM
6	Balancer of last resort	LOW	LOW	LOW	HIGH	HIGH	HIGH	HIGH/MED
7	Smoother transition of scaling factor changes	LOW	MEDIUM	LOW/MEDIUM	MEDIUM	MEDIUM	MEDIUM	LOW
8	UIG Framework responsibility of sub-committee	MEDIUM	HIGH	HIGH/MED	MEDIUM	LOW	MEDIUM	HIGH
9	Lengthen the duration of the AUGE term	HIGH/MED	HIGH	MEDIUM	MEDIUM	LOW	MEDIUM	LOW
10	Apply some method of smoothing/mitigation when transitioning from one AUGE regime to the next.	MEDIUM	MEDIUM	LOW	MEDIUM	LOW	MEDIUM	LOW
	Improve allocation process (several)							
	Increase NDM sample size							
	use shrinkage (not in ToR)							

The Workgroup considered the variations and benefits of each option, and what elements should be focussed on.

It was challenged if the model should focus on polluter pays, year on year stability, robustness, or a combination of the most important elements. GE suggested that the polluter pays should not be the main or single focus.

On the initial assessment, the Workgroup considered discounting Option 7, that Option 2 had good year on year stability but may not drive improvement. In contrast Options 4 and 5 looked like good options.

Fiona Cottam (FC) explained the purpose of the AUGÉ was to provide an independent expert who would determine which sectors contribute most to Unidentified Gas (UIG) and the charges targeted (polluter pays).

The main downfall noted for the static model was this would require UNC Modifications to change.

The Workgroup considered how best to rank the options and which were the most important factors (columns). It was agreed to take this review offline to allow individuals to consider the assessment in more detail.

Louise Hellyer (LH) suggested consideration is given how the service aids competition, as the current method is complicated, with many factors, and huge estimations. LH expressed a preference of having an industry standard that was clear cut for the customer so no matter who they go to, the cost of UIG would be the same.

The Workgroup considered how a UIG premium is built into contracts based on estimates, the difficulties and importance of making sure it is correct and as reflective as possible.

It was agreed to allow the Workgroup more time to consider the assessment for further discussion next month with a view to parties providing their view of the top 3 options.

New Action 0301: Workgroup to consider the presented option assessment and share view of the top 3 options at next meeting.

3.0 Next Steps

Further consideration of the presented options assessment.

4.0 Any Other Business

None.

5.0 Diary Planning

Further details of planned meetings are available at: www.gasgovernance.co.uk/events-calendar/month

Time / Date	Paper Publication Deadline	Venue	Programme
Thursday 10:00 28 April 2022	5pm 19 April 2022	Microsoft Teams	Standard Agenda
Thursday 10:00 26 May 2022	5pm 17 May 2022	Microsoft Teams	Standard Agenda

Action Table (as at 24 March 2022)

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
0102	24/02/22		Proposer (DF) and GE to re-evaluate the Options Definition Table using a 1-5 methodology.	Proposer (DF) and GE	Closed
0301	24/03/22	2.1	Workgroup to consider the presented option assessment and share view of the top 3 options at next meeting.	All	Pending

**UNC Workgroup 0782 Minutes
Creation of Independent AUGE Assurer (IAA) role
Thursday 24 March 2022
via Microsoft Teams**

Attendees		
Rebecca Hailes (Chair)	(RHa)	Joint Office
Helen Cuin (Secretary)	(HCu)	Joint Office
Clare Manning	(CM)	E.ON Energy
Dan Fittock	(DF)	Corona Energy
David Mitchell	(DM)	SGN
Elisa Trout	(ET)	NGN
Fiona Cottam	(FC)	Correla on behalf of Xoserve
Gareth Evans	(GE)	Waters Wye Associates
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James Doyle	(JD)	Foxglove Energy Supplies
Louise Hellyer	(LH)	Totalenergies Gas & Power
Mark Jones	(MJ)	SSE
Priya Punj	(PP)	Cadent
Richard Pomroy	(RP)	WWU
Robert Johnstone	(RJ)	Utilita
Rhys Kealley	(RK)	British Gas
Steve Easterbrook	(SE)	Cadent
Tom Stuart	(TSt)	WWU
Tracey Saunders	(TSa)	Northern Gas Networks

Copies of all papers are available at: <http://www.gasgovernance.co.uk/0782/240322>

The Workgroup Report is due to be presented at the UNC Modification Panel by 19 May 2022.

1.0 Introduction and Status Review

1.1. Approval of Minutes (27 February 2022)

The minutes from the previous meeting were approved.

1.2. Approval of Late Papers

RHa confirmed there were papers for Workgroup to consider.

1.3. Review of Outstanding Actions

None to discuss

2.0 Initial Discussion

Dan Fittock (DF) explained the reason for the Modification, being of the opinion that an Independent AUGE Assurer (IAA) is still required and therefore he wished to go back to developing a proposal to amend the regime.

The Workgroup considered the current audit process, check points undertaken and how the process addresses any compliance issues.

DF saw the IAA as a more fluid role that can be utilised at any point if a Shipper has concerns to look at specific issues and mediate, where issues have been raised and not addressed/resolved. Whereas the current audit approach was more rigid.

Fiona Cottam (FC) explained the AUGGE process and the need for audits to have flexibility within ongoing interaction, with a speedier procurement process.

Gareth Evans (GE) believed the audits simply check if the process is being operated in line with the process and did not incorporate an opinion on whether it was the AUGGE was addressing best option/solution.

Referring to the AUG Proposed Final Statement discussed at the AUG Sub-Committee on 11 March 2022 (<https://www.gasgovernance.co.uk/aug/110322>) FC explained the intention is to add a suite of checks to be procured as part of the statutory audit. The aim is to have checks and reassurances that Xoserve have complied with the process, they procured the right product, and secured the right outcomes. FC assured the Workgroup that Xoserve are looking to provide the right re-assurances. Various aspects were discussed including the extent to which the findings will be made public, whether there would be interim reporting and how soon the additional audit could begin. FC confirmed the current AUGGE process for 2022/23 would be unlikely to be covered, or could be covered retrospectively. It is likely the audit could properly start in July 2022.

Upon further discussion it was agreed that the Proposer and Xoserve would continue discussions offline on the specification of audits and reassurance steps. It was agreed that next month an overview would be provided on the specification and what gaps currently exist.

New Action 0301: Corona (DF) / Xoserve (FC) to provide an overview of the AUGGE Audit specification and identification of any current gaps in the process.

2.1. Issues and Questions from Panel

2.1.1. Consider alignment of other work being carried out in respect of AUGGE process

Workgroup briefly discussed how Review 0781R interacts with this Modification concluding that if 0781R were to lead to a Modification it would take a considerable time to develop.

2.2. Initial Representations (Citizen Advice)

Consideration deferred.

New Action 0302: Corona (DF) to provide an initial response to the Citizen Advice Representation.

2.3. Terms of Reference

Consideration deferred.

3.0 Amended Modification

The Modification has not been amended.

4.0 Development of Workgroup Report

Consideration deferred.

5.0 Next Steps

RHa confirmed that Workgroup discussions will continue next month, and she will request an extension at the April Panel for a month.

6.0 Any Other Business

None.

7.0 Diary Planning

Further details of planned meetings are available at: www.gasgovernance.co.uk/events-calendar/month

Time / Date	Paper Publication Deadline	Venue	Programme
Thursday 10:00 28 April 2022	5pm 19 April 2022	Microsoft Teams	Standard Agenda

Action Table (as at 24 March 2022)

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
0301	24/03/22	2.0	Corona (DF) / Xoserve (FC) to provide an overview of the AUGE Audit specification and identification of any current gaps in the process.	Corona (DF) / Xoserve (FC)	Pending
0302	24/03/22	2.2	Corona (DF) to provide an initial response to the Citizen Advice Representation.	Corona (DF)	Pending