UNC Request Workgroup Report	At what stage is this document in the process?
# UNC 0778R: ## Gas Vacant Sites Process review	01 Request 02 Workgroup Report 03 Final Modification Report

Purpose of Request:

Review the process and treatment of Long-Term Vacant Sites in Settlement

	The Workgroup recommends that the Panel now consider this ~~interim~~ report and approves the closure of this Request Workgroup~~an extension to Month/Year Panel Meeting~~.
	High Impact: None
	Medium Impact: Shippers, Transporters, CDSP
	Low Impact: None

Contents

About this document:

This report will be presented to the panel on 21 July 2022.

The panel will consider whether the Request should proceed with a modification or return to the workgroup for further assessment.

Any questions?

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1 Request

Why is the Request being made?

At present gas Shippers are unable to effectively reduce settlement and transportation cost exposure to sites that are vacant.

This problem was considered in great detail in relation to the electricity market in 2005 under Issue 142 of the Balancing and Settlement Code and subsequently resulted in the successful introduction of MOD1963 ("Treatment of Long-Term Vacant Sites in Settlement"); Modification 196 was introduced in February 2007.

The basis of MOD196 is that where a Suppliers receives two "notification of failure to obtain reading" flows, with the "site visit check code" noted as "not occupied", of more than 3 months and no more than seven months apart, they can apply for the site to have the Estimated Annual Quantity (EAC) set to zero. Exclusions apply and there are monitoring and ongoing management requirements for sites assigned Long Term Vacant status and rules to outline when a site no longer qualifies.

At the present time in the gas market the AQ for a site can only be altered downwards, where metering readings suggest that there has been a reduction in the gas consumed at a site. However, with a vacant site a Shipper/Supplier cannot gain access to the site to determine that there has been no consumption. The Shipper is left with no re-address in respect of changing the AQ of the site or reducing transportation costs to the site.

A modification for this subject was raised and unsuccessfully progressed back in 2010[1], following which we have seen the introduction of Project Nexus and in more recent times the COVID-19 pandemic; a situation that we expect to increase the number of vacant sites, especially in the commercial sector.

Scope

The scope of the review should include but not be limited to:

1. The existing arrangements as defined in the UNC for amending AQs; and
2. The accuracy of Settlement data recorded within industry systems such as UK Link.
3. What criteria must be met to classify a site as Vacant;
4. How long a site can be classified as Vacant for;
5. and what reading should be entered into settlement.
6. How could a Vacant Site Process Interact with other Industry Processes?
7. How could sites that are classified as Vacant be reviewed and audited?

Impacts & Costs

Undertaking a detailed review vacant site arrangements may necessitate input from Shippers, Gas Transporters, and the CDSP.

This Request should also consider any potential Cross Code impacts, in particular Independent Gas Transporter (IGT) UNC and REC governance.

[1] UNC Modification 0282 / 282A

Recommendations

Panel is requested to put in place a review of the arrangement of vacant sites to ensure they continue to remain fit for purpose and that the associated settlement processes within industry systems remains accurate. It is anticipated that the workgroup could recommend changes to the industry arrangements and codes if warranted by the findings of the review.

2 Impacts and Costs

Consideration of Wider Industry Impacts

Consumer Impacts

The creation of a vacant site status is principally aimed at supply points that do not have an identified customer, (energy consumer), where it can be reasonably ascertained, by a number of prescribed tests, that no gas is being consumed, Consequently, the benefit of this change is principally targeted at the shipper, since the vacant status would effectively pause energy allocation and the associated requirement to obtain a meter read to trigger a reconciliation. The benefit, therefore, relates to the cost of procuring energy to meet a non-existent demand and wait for that energy to be reconciled with the time offset effect of gas costs that such a process could incur. As such this facility will largely benefit the Registered User at a vacant site.~~must provide their view of the impacts on all consumer groups that may be affected. The Workgroup must provide an assessment of the impacts on all consumer groups that may be affected.~~

Commented [AR1]: May be a customer it's the access that's the problem - still no gs being consumed

Change in Consumer Experience~~If 'none', please also explain.~~

~~The key impacts of this Request are currently considered to be:-~~

- ~~Possible changes to central systems, business processes and UNC to implement a new process for the treatment of Vacant sites.~~

~~*What is the current consumer experience and what would the new consumer experience be?*~~The Workgroup concluded that there would be no change to the consumer experience

~~Proposer should explain:~~

~~*1. the common end consumer's experience of the issue the modification seeks to address; and*~~

~~*2. the experience of end consumers if this modification is not implemented.*~~

~~*3. how the end consumer experience will change with the introduction of the modification, setting out both positives and negatives.*~~

~~Insert text here.~~

~~When filling in the table below please consider and record impacts for each consumer group:~~

- ~~Domestic Consumers~~
- ~~Small non-domestic Consumers~~
- ~~Large non-domestic Consumers~~

- ~~Very Large Consumers~~

Impact of the change on Consumer Benefit Areas:

Area	Identified impact
Improved safety and reliability As part of these discussions, due consideration was given to the Ofgem decision letter relating to ~~*Will this change mean that the energy system can operate more safely and reliably now and in the future in a way that benefits end consumers?*~~ ~~*This area would relate to changes which balance the system safely, securely and at optimum cost, particularly for consumers in vulnerable situations.*~~ Modification 0282, which rejected the proposal, mainly on the grounds of safety. In this regard, the Workgroup noted two significant factors that may have a bearing on any future decision in this matter: Firstly the 2-year meter inspection rule is no longer a blanket requirement, rather any inspections that take place now are the result of a risk-based assessment, and. Secondly, even if the meter is not inspected, the proposed rules for a site remaining Vacant would be a requirement for the premises to be revisited periodically, ensuring better knowledge gathering by shipper	Positive~~/Negative/None~~
Lower bills than would otherwise be the case There is an overall benefit derived from the fact that settlement would become ~~Will this change lower consumers' bills by controlling, reducing, and optimising spend, for example on balancing and operating the system?~~ ~~This area would relate to changes that are likely to benefit end consumers. This could include any change where it has been demonstrated that it could lower bills for end consumers. It would also consider changes which introduce flexibility across the market to flow energy at the most efficient profile, lower operational costs. and make sure GB consumers can access the cheapest sources of energy.~~ ~~If possible, this section should include any quantifiable benefits.~~ accurate. While this would not crystallise as a benefit to an individual consumer, the overall improvement in settlement accuracy would provide better cost targeting and allow shippers to avoid unnecessary costs. Also, the proposed rules for Vacant status would suspend the Must-Read requirement and exclude the meter from read performance, thereby avoiding associated. ~~*What costs or benefits will pass through to consumers?*~~	Positive~~/Negative/None~~

Commented [AR2]: For sites to stay vacate site need to be visited (although no access) required more often - also note 2 year inspections has been dropped. Note "new" maintain requirements to stay vacant

Commented [AR3]: Overall benefit better because settlement more accurate - individually consumer benefit minimal. Must read costs avoided as read performance also suspended

Reduced environmental damage ~~*Will this Modification Proposal support:*~~ ~~• *a reduction in Greenhouse Gas emissions?*~~ ~~• *new providers and technologies?*~~ ~~• *a move to hydrogen or lower greenhouse gases?*~~ ~~• *the journey toward statutory net-zero targets?*~~ ~~• *decarbonisation?*~~ ~~*This area would relate to changes which demonstrate innovative work to design solutions which ensure the system can operate in an environmentally sustainable way both now and in the future.*~~ ~~*Proposers must provide the impact (if any) of the Modification proposed on Greenhouse Gas Emissions, if it is likely to be material. The Proposer shall assess the quantifiable impact of such Modification in accordance with the Authority's Carbon Costs Guidance*~~ It is anticipated that the proposed rules would have neither a positive nor negative impact on the environment	~~Positive/Negative/~~None
Improved quality of service ~~*This area would focus on demonstrating why and how the change can improve the quality of service for some or all end consumers. Improved service quality ultimately benefits the end consumer due to interactions in the value chains across the industry being more seamless, efficient, and effective.*~~It is anticipated that the proposed rules would have neither a positive nor negative impact on the quality of service	~~Positive/Negative/~~None
Benefits for society as a whole It is anticipated that the proposed rules would have neither a positive nor negative impact on the society as a whole~~*This area would relate to any other identified changes to society, such as jobs or the economy.*~~ ~~Insert text here~~	~~Positive/Negative/~~None

Cross-Code Impacts

As vacant status would be a site specific attribute, if the use of the vacant facility was required on IGT networks, it is expected ~~The Workgroup is to identify and assess any other impacted energy code – a full list is available in the CACoP (Ofgem) - and the extent of those impacts e.g. a similar modification has been raised in another Code.~~

a modification to the IGT UNC would be required to reflect the UNC arrangements.

During discussions it was noted that P196 references information gathered in the gas market but there would be no formal linking of the BSC and UNC in this respect.

Commented [AR4]: Checked with AJ

Central Systems Impacts

~~*The Workgroup must provide an assessment of the impacts on central systems (inc. Gemini and UK Link) that may be affected; this will be supported by further input from the Central Data Services Provider (Xoserve) later in the process. If 'none', please also explain.*~~

Since this a Review Group, no ROM / XRN has been commissioned however, initial CDSP view is that a change to record and develop the functionality processing of a Vacant "flag" would be significant and would affect a number of system platforms. - (CHECK CDSP HAPPY)

Commented [AR5]: Nothing at this stage - Assessed once requirements are refined thro mod

Panel Questions

1. Review Modification 0282 as along similar lines which Ofgem rejected previously

   As stated in the customer benefits section, above, the changes to the meter inspection arrangements, coupled with increased visiting of these sites should offer a degree of comfort that a Modification of this nature could now be contemplated in the revised regulatory / safety framework.

2. Why are existing process(es) not suitable.

   None of the existing business process, (identified during Work group discussions and listed in this report below), provide the same level of convenience and relief from the exposure of procuring gas for non-consuming sites as an ability to simply input a "flag" on to UK Link to reflect the zero consumption. It is felt that to have specific data items to reflect vacancy and processing of vacant site represents the cleanest and most transparent way of dealing with sites categorised as vacant. ~~(current provisions, isolations/withdrawals, costs of reinstalling meter, AQ amendment, meter reads, impacts on charges (commodity and capacity), energy balancing, treatment of capacity)~~

3. Request Workgroup to provide Quarterly updates to Panel

   An interim presentation of progress was provided to the February Panel. It is anticipated that this Workgroup will conclude in June and this final Workgroup Report will be submitted to the July Panel

Workgroup Impact Assessment:

Summary of Work group discussions

Meeting #1

At the initial Workgroup, discussions centred around current arrangements and the mitigations available to shippers to avoid gas being allocated, (and subsequently being reconciled) at supply

points where it is suspected there is no consumption taking place. At the time it was noted that the recent COVID-19 pandemic had exacerbated the mismatch between the energy being allocated to a site, based on its AQ / EUC band, and that actually being consumed and that measures to intervene in the normal running energy allocation rules were introduced on a temporary basis to partially nullify this effect. It was also recognised that despite the COVID-19 effect on consumption, differences between allocated energy and consumption exist to varying degrees on an ongoing basis and mechanisms and process have been introduce int the Code over time to mitigate this effect.

The mitigations available currently to shippers were describe in this initial session and are listed below:

- Access via Landlord (to obtain a reconciliation read)
- Access via Warrant, where theft or debt suspected
- Discussions around 2-yearly meter inspections and associated access rights
- Use of Isolation: suspends energy allocation
- Use of Isolation and Withdrawal: suspends energy & transportation charges
- Provisions introduced to mitigate COVID-19 effect and it was noted that temporary closures that may become permanent & other associated uncertainty factors
- Meter clamping / Meter removal & GS(M)R cut-off processes

It was noted that in terms of processing currently, where no meter readings are obtained, (for whatever reason), the key billable attributes are treated as follows:

- Site properties (AQ / SOQ / EUC) remain static: no read means no periodic revision
- No temporary cessation to allocation: any over allocation resolved when Meter eventually read / reconciled

Also discussed at this meeting was Modification 282/A and the reasons why this was not approved by Ofgem, in line with the Panel vote on both Modifications. It was noted that while Ofgem considered that the aspect of the modification that dealt with allocation had merit there was overriding safety concern that should a site be classified as vacant that routine meter readings and inspections would not be undertaken. It was bnote that Vacant sites would have to be visited periodically for the vacant status to remain valid.

At this meeting it was also noted that the Balancing and Settlement Code, (BSC), Section S, did contain provisions and processes that allowed sites to be classified as vacant. The process in question was introduced by BSC Modification P196[2] ,(P196), and seemed to offer many of the features that had previously been discussed during Modification 282/A. It was therefore decided to examine the P196 process in more detail to see if it offered a template that could be transferred into the UNC.

[2] Legal text for BSC Modification P196

At this meeting the CDSP was asked to provide an overview of the effect on energy balancing of sites depending on their AQ and status. The response to this action may be found here (CDSP Response):

Meeting #2

At the second meeting there was considerable discussion of the P196 Process.

The key points noted were as follows:

- Process Trigger: should a supplier fail in its attempts to obtain a meter reading on two occasions it may submit a data flow to settlement system to record a site as vacant. The two attempts to gain access / read the4 meter must be at least three months apart.
- Supplier must endeavour to read meters and this may include:
  - A check on the gas situation to see if access issues are comparable;
  - Track down possible key holders – Estate agents etc
- Must attempt access at least every 7 months and re-evaluate status;
- Audit trail must be maintained;
- To ensure that the process has been rigorously adhered to the BSC Performance assurance Board possessed audit rights;
- Change of Supplier would remove Vacant status.

During these discussions a number of points were made by participants:

- Product Class (PC) coverage: largely agreed Vacant provisions should be available to all PC, although it was noted that AMR, available on many, and mandated on some PC2 and PC3, meters, should provide reads and should reduce AQ by virtue of the Rolling AQ mechanism.
- It was also suggested that the increase in Smart meters, (and their ability to transmit reads without access to a property being achieved), may mean that the issue of vacancy relates more to “dumb”, (or Smart meters in dumb mode), meters.
- Even an empty premises may still consume energy: e.g. frost-protection thermostat and building-fabric preservation heating.
- Vacant status should have to be periodically (re)-validated.
- Solution options may be cross-code and impact REC.
- CDSP may be able to offer a validation service, (outwith UNC).

Meeting #3

The third meeting of the Request Workgroup concentrated on two key aspects:

The first aspect built on earlier discussions relating to relevance of a vacant status with respect to AMR meters, noting Smart meters should be able to identify and report zero consumption promptly but that also many Smart meters can default to dumb under certain circumstances. Also reiterated was a requirement not to repeat the result of Modification 282/A and that lessons of the outcome of that modification should be learnt, principally into the safety aspects that factored into the Authority decision.

The second aspect of the discussion set out some initial consideration as to what the entry and exit criteria should be for a site to qualify for vacant relief.

Descriptions of a vacant site included:

- No evidence that the property was occupied,
- Gas not being consumed,
- No access to the meter,

Although it was noted at this stage this was not a fully developed nor exclusive set of criteria.

It was also recognised that there may be a requirement for a related document that could form a user-guide and that a process flow diagram could help with the visualisation of the vacant entry and exit process. It was recognised that meter reading agencies would have a key role to play and that the application of the rules across such agencies would need to be uniform.

At this meeting it was also noted that it was important that a vacant status was not misappropriated as doing could have a detrimental effect of an individual sites settlement accuracy as well as adversely affecting UIG.

Meeting #4

The fourth meeting considered two aspects of a potential modification:

First the Workgroup considered the criteria for defining a vacant site and discussed how they could be more accurately defined. The criteria discussed, and their associated definitions, were:

- Unoccupied,
- Non-consuming,
- No Access.

Secondly, the group considered some of the supporting business rules that could be required to make the process operate. It was note that consideration needs to be given to the following aspects of the process:

What would be the “switch-off” or exit criteria / provisions, for instance:

- Receipt of an incrementing read:

Change of Tenancy, and

any other automated resetting of the vacant status

What would be the precise nature of the financial relief would be offered by declaring Vacant Status:

Which shipper costs would be avoided: Energy allocation or both Energy & Transportation;

Would this be different for short-term vacant as opposed to long-term vacant;

What role does the AQ amendment process play.

What should be the financial ramifications, (if any) of misappropriating vacant status or site changing status unbeknown to the shipper

Simple reconciliation of consumption may not reflect all avoided costs;

Should more elaborate financial remedies be applied;

What should the Performance Assure Committee have a policing role to play.

Should there be periodic revalidation of Vacant Status, as is required by P196.

Meeting #5

At the fifth meeting, the majority of the discussion revolved the effect of the current UNC process for ceasing energy allocation and transportation charges, with a view to seeing whether any existing UNC rules or system functionality provided a solution for vacant sites.

Capacity and Commodity Charging

Class 3 and 4 meter points (NDM)	Capacity Charges	Commodity Charges	Meter Point Reconciliation
Meter point is isolated	Capacity Charges are billed based on SOQ (Peak day consumption)	Commodity Charges are zero as there is no daily energy allocation for Isolated sites	Meter reads are not accepted for Isolated sites. Any gas usage during a period of Isolation would be billed as reconciliation when the first actual reading is accepted after "re-establishment". Energy price is SAP (System Average Price) for the relevant period.
AQ = 1 (or other negligible value), meter point is not Isolated	Capacity Charges are zero as the SOQ (peak day consumption) is negligible	Commodity Charges are zero as there is no daily energy allocation due to a negligible AQ	Meter point rec compares actual usage based on meter reads to original allocation of zero and bills any actual usage on the Amendment invoice as energy and commodity charges. Energy price is SAP for the relevant period. Note that reads may be rejected due to tolerance failures.
AQ >1, meter point is not Isolated	Capacity Charges are billed based on SOQ (Peak day consumption)	Commodity Charges are billed based on daily gas allocation (derived from the AQ and the NDM Algorithm)	Meter point rec compares actual usage based on meter reads to original allocation and bills the difference (over or under) on the Amendment invoice as energy and commodity charges. Energy price is SAP for the relevant period.

The view remained the same that while existing processes provide some relief from certain chargers none of the existing provisions appropriately address the requirements of vacant sites.

At the conclusion of this meeting it was agreed that the time was probably right to move to a developing the first iteration of the business rules, (Modification Solution), and develop these in

subsequent Workgroups to the point where the Workgroup could recommend to the Request Workgroup proposer that the draft Modification should be raised as a Modification.

Meeting #6

At the sixth meeting of the Workgroup, the principal topic of discussion was the first draft of the business rules. Following that discussion, which covered:

Vacant Site test (eligibility criteria)

Audit & Monitoring of use of vacant facility

Recertification of vacant status

Process life-cycle

12-month review of vacant status and links to the AQ amendment process

It was agreed that a further iteration of the business rules should be provided to the next Workgroup and that the next draft of the modification should include some analysis of the relevant objectives

Outcome of Topic Discussions at Workgroup~~Topics~~ ~~*to consider from ToR and Workgroup Meetings*~~

1. The existing arrangements as defined in the UNC for amending AQs; ~~and~~

   There was some discussion in the Workgroup regarding the use of the AQ amendment process to reduce the quantity of energy allocated to a site classed as vacant. The prevailing view appears to be that AQ should not be the primary tool to reduce allocation, rather energy allocation should be "switched off" when the vacant criteria are met. There was, however, a view that that one the site had been vacant for a year, there would be some logic in allowing an AQ amendment to reduce allocation on a more permanent basis, with the additional effect of reducing transportation charges at these sites.

2. The accuracy of Settlement data recorded within industry systems such as UK Link:

   It is proposed that any existing settlement data in UK link would be unaffected accurate, with any vacant site process layered on top of any existing business processes. All data associated vacant sites would need to be retained by the shipper for examination should PAC suspect any processing anomalies.

3. What criteria must be met to classify a site as Vacant;

   These are listed earlier in this section and in the main relate to non-occupancy, non-consumption and meter access criteria and will be further developed in the Business Rules of any modification.

4. How long a site can be classified as Vacant for;

   No time-based criteria have been developed for vacant site classification purposes.

5. And what reading should be entered into settlement:

   As one of the criteria for vacant status is an inability to obtain a read, no reads would be input into the system, It is expected that a proposed modification would recognise Incrementing reads, amongst other criteria, would be a trigger to cease a site being classed as vacant.

6. How could a Vacant Site Process interact with other i~~I~~ndustry p~~P~~rocesses:

Commented [AR6]: Re-phrase audit

Commented [AR7R6]: Done

To be completed once modification is finalised.

7. How could sites that are classified as vacant be reviewed and audited:~~? Understanding the objective~~

The view is that new PARR reports would need to be developed and the level of vacant sites status use monitored. Other performance metrics, other than just vacant sites as a proportion of portfolio may need to be considered and developed. An "aged" report, that is to say how long sites remain vacant and how many site exit vacant status may also be useful reporting for PAC

8. Comparison to P196 Electricity Process:

P196 has be discussed and the relevant elements (entry criteria, exit criteria and revalidation requirements) being considered.

9. Performance Assurance Reporting and Monitoring:

PAC reports and monitoring would be required – further thought required

10. Compliance with Health and Safety Legislation - Gas Safety (Installation & Use) Regulations (GSI~~U~~R Regs):

The Workgroup noted two significant factors that may have a bearing on any future decision in this matter:

Firstly the 2-year meter inspection rule is no longer a blanket requirement, rather any inspections that take place now are the result of a risk-based assessment, and.

Secondly, even if the meter is not inspected, the proposed rules for a site remaining Vacant would be a requirement for the premises to be revisited periodically, ensuring better knowledge gathering by shipper.

11. Treatment of Charges (Commodity and Capacity):

Currently this is largely an energy-based modification with the prospect of transportation being affected in the medium term. It has been discussed that after a year in a vacant status there is logic in including this as a valid reason for reducing the AQ, (potentially to 1), to reflect the previous 12-month's consumption.

12. Impact to Energy Balancing.

The proposed extent of the modification does not affect energy balancing. While the introduction of a vacant status would; move allocation from vacant site to other site, the rational is that allocating zero energy to a non-consuming site is the right thing to do as, ultimately initial allocation accuracy is improved and reconciliation would be reduced. Meter readings, whether incrementing or not, would still continue to be inputted into the reconciliation process.

Commented [AR8]: Vacant will largely be a procerss on its own but obviouly will effect have an effect on alloaction / rec. Also it s anticipated that the AQ amendement process will be called upon at some point to drop AQ to [1]

Commented [AR9]: Probably also an "aged" report, possibly "leavers" too

Commented [AR10]: Cut & Paste from above

Commented [AR11]: Obligations suspended - any readings would trigger vacant exit

Impacts

Impact on Central Systems and Process	
Central System/Process	Potential impact
UK Link	• Given discussion to date, it is anticipated that the UK Link system would need to be modified to: a) record the status of a site as vacant b) process the consequences of the status~~Improvement to data accuracy~~
Operational Processes	• Improved clarity in relation to vacant site arrangements

Impact on Users	
Area of Users' business	Potential impact
Administrative and operational	• Users would need to put in place processes to record a site entering, remaining and exiting vacant status • Users would need to put in place a process to gather information on a site from their suppliers and / or meter reading agencies~~Improved clarity in relation to vacant site arrangements and UNC requirements.~~ • CDSP activity too for managing new opartional requirements
Development, capital and operating costs	• Cost would be incurred but these have not been quantified at this stage~~None Identified~~
Contractual risks	• None Identified
Legislative, regulatory and contractual obligations and relationships	• Improved clarity in relation to settlement arrangements and improved clarity in relation to settlement accuracy.
Impact on Transporters	
Area of Transporters' business	Potential impact
System operation	• None identified
Development, capital and operating costs	• None
Recovery of costs	• None
Price regulation	• None Identified
Contractual risks	• None identified
Legislative, regulatory and contractual obligations and relationships	• None identified

Impact on Transporters	
Standards of service	• None identified

Impact on Code Administration	
Area of Code Administration	Potential impact
Modification Rules	• None identified
UNC Committees	• None identified
General administration	• None identified
DSC Committees	• None identified

Impact on Code	
Code section	Potential impact
	• To be determined through review

Impact on UNC Related Documents and Other Referenced Documents	
Related Document	Potential impact
Network Entry Agreement (TPD I1.3)	• None identified
General	Potential Impact
Legal Text Guidance Document	• None identified
UNC Modification Proposals – Guidance for Proposers	• None identified
Self-Governance Guidance	• None identified
TPD	Potential Impact: During discussions relating the Vacant status classification, it was suggested that a new "user guide" to vacant classification may help with the application of the proposed rules
Network Code Operations Reporting Manual (TPD V12)	• None identified
UNC Data Dictionary	• None identified
AQ Validation Rules (TPD V12)	• None identified
AUGE Framework Document	• None identified
Customer Settlement Error Claims Process	• None identified
Demand Estimation Methodology	• None identified

Impact on UNC Related Documents and Other Referenced Documents	
Energy Balancing Credit Rules (TPD X2.1)	• None identified
Energy Settlement Performance Assurance Regime	• During discussions it was suggest that PAC should have PARR reporting available to it the monitor user activity~~None identified~~
Guidelines to optimise the use of AQ amendment system capacity	• None identified
Guidelines for Sub-Deduct Arrangements (Prime and Sub-deduct Meter Points)	• None identified
LDZ Shrinkage Adjustment Methodology	• None identified
Performance Assurance Report Register	• PAC may require new reporting to monitor activity~~None identified~~
Shares Supply Meter Points Guide and Procedures	• None identified
Shipper Communications in Incidents of CO Poisoning, Gas Fire/Explosions and Local Gas Supply Emergency	• None identified
Standards of Service Query Management Operational Guidelines	• None identified
Network Code Validation Rules	• None identified
OAD	Potential Impact
Measurement Error Notification Guidelines (TPD V12)	• None identified
EID	Potential Impact
Moffat Designated Arrangements	• None identified
IGTAD	Potential Impact
DSC / CDSP	Potential Impact
Change Management Procedures	• None identified
Contract Management Procedures	• None identified
Credit Policy	• None identified
Credit Rules	• None identified
UK Link Manual	• To be considered through review group

Commented [AR12]: Would not affect PAFD only PARRS

Impact on Core Industry Documents and other documents	
Document	Potential impact
Safety Case or other document under Gas Safety (Management) Regulations	• None identified
Gas Transporter Licence	• None identified

Other Impacts	
Item impacted	Potential impact
Security of Supply	• None identified
Operation of the Total System	• None identified
Industry fragmentation	• None identified
Terminal operators, consumers, connected system operators, suppliers, producers and other non code parties	• None identified

3 Terms of Reference

Background

Due to a site being vacant, there is no means to get a meter reading, there is also no method to update the AQ. Consumers are liable for costs despite a clear likelihood of no consumption at the site. It is anticipated that the number sites affected by this situation is likely to increase, especially for commercial sites following the pandemic. The result of this is inefficient and inaccurate Settlement arrangements for these sites.

Topics for Discussion

- Understanding the objective
- Assessment of alternative means to achieve objective
- Development of Solution (including business rules if appropriate)
- Assessment of potential impacts of the Request (including cross code impacts)
- Assessment of implementation costs of any solution identified during the Request
- Assessment of legal text or likely areas of code to require updates

Outputs

- Produce a Workgroup Report for submission to the Modification Panel, containing the assessment and recommendations of the Workgroup including a draft modification where appropriate.
- Suggested timeline for completion of Workgroup Report is 6 months.

Composition of Workgroup

The Workgroup is open to any party that wishes to attend or participate.

A Workgroup meeting will be quorate provided at least two Transporter and two Shipper User representatives are present.

Meeting Arrangements

Meetings will be administered by the Joint Office and conducted in accordance with the Code Administration Code of Practice.

4 Recommendations

Workgroup's Recommendation to Panel

The Workgroup asks Panel to consider the development work done to date in this Request Workgroup and either:

- Approve the closure of the Workgroup
- Approve the closure of the Workgroup and proceed with a draft Modification Proposal
- Recommend that the Request Workgroup undertake more assessment of the issue: