

**UNC Workgroup 0819 Minutes
Establishing/Amending a Gas Vacant Site Process
09:30 Thursday 25 May 2023
via Microsoft Teams**

Attendees		
Rebecca Hailes (Chair)	(RH)	Joint Office
Ben Mulcahy (Secretary)	(BM)	Joint Office
Aleksandra Cebo	(ACe)	EDF
Andy Clasper	(AC)	Cadent
Charlotte Gilbert	(CG)	BU-UK
Clare Louise Roberts	(CLR)	Scottish Power
David Mitchell	(DMi)	SGN
Edd Green	(EG)	EON
Ellie Rogers	(ER)	CDSP
Guv Dosanjh	(GD)	Cadent
Harry Hailwood	(HH)	Brook Green Supply
Helen Bennett	(HB)	Joint Office
James Lomax	(JL)	Cornwall Insight
Louise Hellyer	(LH)	TotalEnergies Gas & Power
Mark Jones	(MJ)	SSE Energy Supply
Richard Pomeroy	(RP)	Wales & West
Steve Mulinganie	(SM)	SEFE Energy Limited

Copies of all papers are available at: <https://www.gasgovernance.co.uk/0819/250523>

The Workgroup Report is due to be presented at the UNC Modification Panel by July 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: <https://www.gasgovernance.co.uk/0819/250523>

1.0 Introduction and Status Review

1.1. Approval of Minutes (27 April 2023)

The minutes from the meeting held on 27 April 2023 were approved.

1.2. Approval of Late Papers

Legal text and the related Explanatory table were provided to Joint Office as Late Papers. Workgroup agreed to consider these late papers.

1.3. Review of Outstanding Actions

There are no outstanding actions.

2.0 Amended Modification

The Workgroup noted that new clean and change-marked versions of the Modification had been provided to the Joint Office on 11 May.

Rebecca Hailes (RH) observed that neither the Proposer nor any other Centrica attendees were present for the Workgroup. In their absence, Guv Dosanjh (GD) suggested that the Workgroup could be used to review the Legal Text which Cadent had provided. RH and Workgroup agreed.

Amended Legal Text

Andy Clasper (AC) provided a detailed walkthrough of the Legal Text changes which were shown in mark-up. The key changes were to Transportation Principal Document Section G Supply Points

AC talked through how the recent changes address eligible causes for both requesting Vacant status and for changes to the AQ. A detailed discussion then followed in which the Workgroup explored the interaction of the Legal Text clauses and their enactment of the Business Rules in the Modification, including when sites no longer met the Vacant site criteria. RH requested that Business Rule references be added to the Explanatory Tables to make these easier to trace.

New Action 0501: Cadent (AC) to add Business Rule references in the Explanatory Text.

Steve Mulinganie (SM) asked if the Workgroup was comfortable that the 'Amending a Gas Vacant Site Process Guidance Document, under differing governance to the UNC, sets Vacant site criteria and if this was the case if it could be recorded in the meeting minutes. He stated that his belief was that a lot of operational considerations can appropriately be in the subsidiary document, enabling operational changes as needed, but that this was different to having eligibility criteria within the Guidance Document.

Ellie Rogers (ER) agreed that as a subsidiary document, it could be changed via a majority vote for approval at the UNCC, in contrast to the Legal Text which would be governed under existing full UNC governance.

SM noted that the Guidance Document details the criteria for eligibility for a site to be designated as Vacant and that most are requirements (Points 3a to 3c) of a Product Class 4 site anyway. The requirement that the site has a standard (dumb) or Non-active AMR or SMETS meter with a Non-Active DCC Flag (Point 3d) was, in contrast, the test as to whether a Product Class 4 site can be designated a Vacant site, and as such was the true test. Accordingly, he suggested that this requirement should be included Code. AC agreed to review this.

New Action 0502: Cadent (AC) to consider detailing criteria for Vacant Site eligibility within Legal Text, and in particular those given in 3d. of the current Guidance Document.

ER noted if a site is vacant there is no value in PAC looking at read performance, as such standard read obligations would hold for vacant sites, similar to the current isolation process. She also requested clear rules be set for the CDSP to apply in consideration of the Vacant Site status to ensure there is no risk of subjectivity or discretion in processing such sites.

New Action 0503: Proposer (LG) and Cadent (AC) to produce a clear ruleset for CDSP actions in relation to Vacant site designation.

SM recognised that if a meter read were provided, and even should it prove to fail validation, it would trigger the site dropping out of the Vacant site status. Whilst this was reasonable, he asked what options would exist should the Shipper find that the read had erroneously been attributed to the wrong MPRN. If a Shipper identified such an error had been made, could it be resubmitted as Vacant, or would there be barriers to doing this?

AC advised that the site would indeed come out of Vacant status, but that there was nothing in the text preventing Shippers from reassigning the site to Vacant status. He did observe though that such an event would effectively 'reset the clock' for the 12-month minimum period required to change the Annual Quantity (AQ) to 1 to receive relief from charges.

ER clarified that the exit criteria, in terms of clause 10.4.1(e), were designed to be only applicable to new meter readings pertinent to a current period of Vacancy, and thus not applicable to reads provided as updates of earlier historical reads outside of the Vacant period which would not trigger the exit criteria.

SM suggested this be added to the legal text as Shipper Agreed Reads (SARs) etc. are appropriate and should not impact the Vacant process. He suggested the clear boundary of 'reads relevant to the period of vacancy' be used. Workgroup Participants subsequently agreed to request that BR5 be changed by the Proposer accordingly.

New Action 0504: Proposer (LG) to update BR5 part 5 to include the distinction 'reads relevant to the period of vacancy', when the LT provider will then consider an approach to including this in the Legal Text

ER and AC discussed the process for setting an AQ for a site exiting Vacant status and highlighted that 10.4.6 puts BR7 in text form. AC noted this clause was complicated and invited parties to review and feedback if there were any concerns.

AC advised that the Legal Text change to TPD Section V General adds the Amending a Gas Vacant Site Process Guidance Document as a UNC Related Document.

AC highlighted again how Modification 0816S has changed the section of code that this Modification is set to change, and as a result, the clause numbering no longer works. He stated the Workgroup needed to be aware of this, and that it probably required either a Fast-Track Modification or a Consent to Modify to address.

ER noted that parties needed to feedback to the CDSP on how they want sites that have the Vacant status to be made visible in the Gas Enquiry Service (GES) and any changes required to the Data Access Matrix (DAM, now part of REC).

The inclusion of IGTs was discussed, with the current CDSP Rough Order of Magnitude (ROM) inclusive of IGT sites, currently with no mechanism to exclude them. The Workgroup was advised that Centrica were thought to be raising an IGT Modification to explore this and ER confirmed herself to be attending the IGT Workstream on 8 June when this was to be discussed. Charlotte Gilbert (CG) stated that she too had record in her notes of Centrica raising an equivalent IGT UNC Modification. RH added a link to the IGT Cross Code Implications page <https://www.igt-unc.co.uk/modification-workstream-meetings/cross-code-modification-implications/>

3.0 Completion of the Workgroup Report

Recognising an extension request is pending, RH completed amendments within the meeting with the feedback provided by the Workgroup Participants in attendance.

4.0 Next Steps

- Workgroup understood the Proposer was on paternity leave, so it was agreed by the Workgroup that RH should request an extension to the Workgroup, asking to now report to Panel in August.
- The Legal Text provider and Proposer are to consider the actions assigned to them and provide amendments for the next Workgroup in June, if at all possible.
- Feedback on the inclusion of IGT supply points and subsequent consideration of the ROM.

5.0 Any Other Business

None.

6.0 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	Programme
Thursday 10:00 22 June 2023	5 pm 14 June 2023	Microsoft Teams	<ul style="list-style-type: none"> Review amended Modification and Legal Text iGT Considerations and effects to the ROM

Action Table (as of 25 May 2023)

Action Ref	Meeting Date	Minute Ref	Action	Owner	Reporting Month	Status Update
0501	25/05/23	2	Cadent (AC) to add Business Rule references in the Explanatory Text.	Cadent (AC)	June 2023	Pending
0502	25/05/23	2	Cadent (AC) to consider detailing criteria for Vacant Site eligibility within Legal Text, and in particular those given in 3d. of the current Guidance Document.	Cadent (AC)	June 2023	Pending
0503	25/05/23	2	Proposer (LG) and Cadent (AC) provider to produce clear rule set for CDSP actions in relation to Vacant site designation.	Proposer (LG) & Cadent (AC)	June 2023	Pending
0504	25/05/23	2	Proposer to update BR5 part 5 to include the distinction 'reads relevant to the period of vacancy', when the LT provider will then consider an approach to including this in the Legal Text	Proposer (LG) & Cadent (AC)	June 2023	Pending