

**UNC Workgroup 0819 Minutes  
Establishing/Amending a Gas Vacant Site Process  
10:00 Thursday 22 June 2023  
via Microsoft Teams**

<b>Attendees</b>		
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
Dan Stenson	(DS)	Brook Green Trading
David Mitchell	(DM)	SGN
Ellie Rogers	(ER)	Xoserve
Harry Hailwood	(HH)	Brook Green Trading
Helen Bennett	(HB)	Joint Office
James Lomax	(JL)	Cornwall Insight
Jenny Rawlinson	(JR)	BU-UK
John Harris	(JH)	CDSP (Xoserve)
Kathryn Adeseye	(KA)	CDSP (Xoserve)
Kevin Clark	(KC)	Utilita
Louise Hellyer	(LH)	TotalEnergies Gas & Power
Lee Greenwood	(LG)	British Gas
Mark Jones	(MJ)	SSE Energy Supply
Oorlagh Chapman	(OL)	Centrica
Sally Hardman	(SH)	SGN
Steve Mulinganie	(SM)	SEFE

Copies of all papers are available at: <https://www.gasgovernance.co.uk/0819/220623>

The Workgroup Report is due to be presented at the UNC Modification Panel by 17 August 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/0819/220623>

## 1.0 Introduction and Status Review

Rebecca Hailes (RH) welcomed everyone to the meeting and gave a brief overview of the scheduled items for discussion.

### 1.1. Approval of Minutes (25 May 2023)

The minutes from the meeting held on 25 May 2023 were approved.

### 1.2. Approval of Late Papers

No late papers had been received, and the Proposer confirmed an amended version of the Modification has not yet been provided.

### 1.3. Review of Outstanding Actions

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

**Update:** Andy Clasper (AC) confirmed that the Explanatory Text had been updated with the Business Rules references, but this version had not yet been submitted to the Joint Office.

**Action closed.**

**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.

**Update:** AC explained that there were two issues to consider, supply type and the eligible cause which, if addressed, would make the Legal Text a lot simpler and remove the need to point to the Guidance Document. The Modification Proposal would need amending to be more specific about relevant supply points, their type and meter.

Lee Greenwood (LG) confirmed he was prepared to amend the Modification, expressing an awareness that there were some issues around using the term 'dumb meters' for Non-AMR or DCC registered Smart meters.

AC confirmed that the lawyers had stated that 'dumb meters' is not a term in the Code, but there is a way to state that a meter is neither AMR nor Smart.

LG highlighted that Business Rule 1 would need to be amended, as it currently said in the Guidance Document that a meter must be a non-active AMR or DCC non-active meter noting that it seemed the Workgroup wanted this requirement to be part of the Legal Text.

Steve Mulinganie (SM) confirmed that the requirement needed to be in Code rather than the Guidance Document, with RH clarifying that the view had been expressed that it was considered too easy to make later changes to UNC-related documents, so it was preferred that such definitions be in the Code itself. AC also stated that a route needed to be steered to avoid putting the Guidance Document into Code.

**Action closed.**

**Action 0503:** Proposer (LG) and Cadent (AC) provider to produce a clear rule set for CDSP actions in relation to Vacant site designation.

**Update:** AC observed that he could not recall this action and that it did not sound like something that needed to be added to Code.

Ellie Rogers (ER) shared her understanding that this requirement was to be provided in the Guidance Document enabling the CDSP to reject requests for Vacant status that did not meet the criteria, explaining that clarity was required to ensure there was no 'wriggle room' in how the criteria are applied.

LG showed the Workgroup a new version of the Guidance Document he was currently working on. He suggested a data field could be included in the vacant site request that indicated to the CDSP when the sending Shipper had carried out their "first qualifying No Access visit". The CDSP would then retrospectively check for exit criteria from the 'date of the first qualifying No Access visit', up to and including, the 'date the vacant site request is received by the CDSP'. There was then further discussion on whether the CDSP should check for all of the exit criteria (outlined in BR5) between those two dates, or just certain criteria.

It was eventually landed on by industry participants that the CDSP would use the 'first qualifying No Access visit date' provided by the Shipper along with the 'date the vacant site request was received' to check for meter readings only between the two dates. If meter readings were submitted to the CDSP central systems during that time period, this would indicate that the site

is not vacant, and the vacant site request would be rejected. ER stated that this mechanism was not considered in the current ROM Response, but a new ROM could be raised which does include this requirement.”

An alternative would be for the CDSP to check back over a fixed 3-month or 6-month window to validate such a request.

LG advised that he had considered this option but suggested there was an issue in that if there were a single meter read within that fixed window, be it 6 or 4 months ago, it would fail the criteria and be rejected, irrespective of whether the requesting Shipper was aware of the read or not (such as if the meter read had been provided by a previous Shipper).

RH commented that the date that the site was first recognised as Vacant should be used regardless of the data management challenges this resulted in.

ER agreed with this as a principle and that the CDSP was prepared to do what was required but noted that as another data item in the process, it would need to be considered in the ROM together with related costs.

LG expressed concern that the application of the current criteria to a backdate could prove troublesome, asking if, for example, a move from Class 3 to Class 4 within the backdate period would be pertinent to the CDSP’s validations.

SM summarised the tenet that a rejection would be due to site circumstances that are non-compliant with the criteria, if the intention was to consider a backdated check, a clear list of conditions that the CDSP can reject against was required.

LG asked if this meant that all the criteria listed on page 2 of the Guidance Document needed to be considered, potentially setting up a timeline for the CDSP to consider questions as to whether specific criteria are static throughout the backdated period, or if changes, such as movement between Class 3 and Class 4, would need to be considered.

SM noted that only Class 4 supplies are suitable for Vacant site status, asking if the prior Class status would matter. LG stated that he did not think it would but was conscious the criteria statement needed to be fully considered and appropriate.

ER confirmed that a statement was needed for each criterion for the CDSP to apply, for example, “Should the requesting Shipper be incumbent throughout the requested backdated period?”.

LG acknowledged the request, noting it would make for a very detailed list, with nuances such as whilst the supply must currently be live, and should it have been live throughout the backdated period.

SM agreed with the need to test against each criterion, but only for those that are not subjective, citing as an example that the CDSP would not know if the site is unoccupied.

LG asked what the Workgroup thought regarding criteria should a supply become isolated between the two qualifying Shipper attempted site visits.

SM replied noting the distinction between an interim issue and an enduring one, stating that should a site be allocated Vacant status, there are separate rules about what circumstances trigger it to become no longer Vacant.

LG clarified that his question was concerning getting the Vacant status applied for commodity (charge) considerations, on the basis that the Shipper was comfortable with doing so and is requesting the status change. How would the CDSP consider a backdate that included a period with isolated status?

ER stated that in looking at the criteria to pass the test the CDSP would take note that, currently, it would be at the CDSP’s discretion but suggested that the criteria proposed for implementation in the immediate term may not all apply to backdates of periods of possibly 9 months.

LG suggested that the criteria be in two parts – criteria 1 to 7 in the Guidance Document being the first and read history the second. The meter read history would be the only retrospective

used part, all the other criteria being only considered against the current circumstances, therefore the CDSP would reject a backdated request only because there had been meter reads recorded in the last 9 months (maximum).

ER asked if the CDSP would need to check if the same Shipper had been in place for the retrospective validation.

SM questioned why a Shipper would request a backdate beyond when they became the supply incumbent.

Jenny Rawlinson (JR) asked what would happen if a Change of Supply (COS) request was in progress at the time of the request.

SM noted that the incumbent could reject a current COS request and shared the experience of receiving group COS requests as part of larger consumer portfolios, such as local authorities, that may inadvertently sweep up supplies that had changed ownership or similar. As a test for the CDSP to apply as a reason to reject it would seem subjective as the COS may not be authorised.

SM explained that as the incumbent, a Shipper would not necessarily be aware of a change of site ownership and in making the Vacant status their request would pass CDSP validation. If a COS was then enacted the supply would exit Vacant status anyway, suggesting there to be no negative consequence of this approach.

ER confirmed that a COS being accepted was an exit criterion, with the site considered no longer vacant. The new Shipper would need to apply again to install the Vacant status if they so required.

LG commented on the need to include the specifications discussed within this workgroup session within the Modification's Business Rules (BR). ER suggested that BR2 would be the appropriate place to do so, specifying the requirement that the CDSP would check against current criteria and against meter reads for backdates.

LG noted that BR2 could also advise that the reasons for CDSP rejecting applications would be detailed in the Guidance Document.

ER agreed, stating they did not need to be in the Legal Text, and using an 'avoidance of doubt' statement would flag to the Legal Text provider that such would be in the Guidance Document.

RH clarified that it would be necessary to state within the Legal Text that the CDSP will need to check against the criteria specified in the Guidance Document.

ER observed that once the criteria were finalised, she thought a revised ROM would be needed to ensure accuracy to the Modification's requirements.

JR asked if the Proposer perceived this process appropriate for IGT sites as well, given that there are slight differences in IGT processes, giving the example that IGTs do not cease charges until the meter is removed. She shared that the Modification had been mentioned in a recent IGT Workstream meeting as something that needs consideration and how it would be applied to IGT supplies. She offered to review this with the Proposer in an offline discussion, noting that whilst the changes might be identical, their effect would not be and suggested a more informed position would be beneficial to assess this.

LG, as the Proposer was receptive to this and indicated that Oorlagh Chapman had already approached IGT representation in this regard.

RH advised that given the volume of work yet to be completed the Workgroup needed an extension to the current Modification Panel Reporting date and she would look to request an extension until October 2023.

**Action closed.**

**New Action 0601:** Proposer to provide amended Modification Proposal and Guidance Document defining which criteria the CDSP are to use to accept Vacant status requests and when to apply them.

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

**Update:** effectively covered in discussion and subsequent Action in 0503 above.

**Action closed.**

## 2.0 Amended Modification

ER raised the Gas Enquiry Service (GES) as a consideration, suggesting that there would be benefits for GES users to see a flag denoting a supply having the Vacant status. She advised of the CDSP's intention to raise this in REC Change Process discussions and was keen to get Shipper & Transporters' views on this, asking if a flag was sufficient or if any dates should be provided. She asked if representatives could consider this for later discussion in Workgroup or to feedback directly to her.

SM asked that given the Vacant status does not transfer between Shippers, he was unclear why other parties would need visibility of it. He also noted that doing so could have commercial impacts.

ER advised that she thought it also included Shipper Portfolio / DDP considerations and agreed with the view expressed about the wider community view.

LG stated his view was that such flags should not be in GES but could see a value for them to be included in DDP, making the comparison that isolation status is not provided in GES but is detailed in DDP. ER responded that she was not sure if isolation status was shown in GES. LG reaffirmed this, stating that it was present in the portfolio view reporting, but Shippers should already be aware of such status changes as they requested them.

ER advised that as REC manage GES the CDSP do need to flag that this Modification is going through, she suggested that REC might decide to put it in the DAM (Data Access Matrix) or something similar, but she could not guarantee what steps might be taken.

**New Action 0602:** CDSP (ER) to provide awareness of 0819 in REC space regarding GES and DAM

## 3.0 Review of draft Legal Text

The Legal Text proposed in the May Workgroup had not yet been revised as the Modification and Guidance Documents are subject to further development.

## 4.0 Development of the Workgroup Report

RH lead the Workgroup in reviewing Section 6 Impacts and Other Considerations for consideration in the next meeting.

## 5.0 Next Steps

RH confirmed the following:

- An Amended Modification and UNC Related Document (the Guidance Document) were to be submitted by the Proposer.

- An amended ROM may be required.
- The Proposer was to hold discussions with both the IGT Representatives and the Legal Text provider.
- The Workgroup Modification Reporting date needed to be extended to October 2023.
- The Workgroup Report was to be developed, including consideration of Section 6.

## 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](http://www.gasgovernance.co.uk/events-calendar/month).

Workgroup meetings will take place as follows:

Time / Date	Paper Publication Deadline	Venue	Programme
Thursday 10:00 27 July 2023	5 pm 18 July 2023	Microsoft Teams	<ul style="list-style-type: none"><li>• Review amended Modification Proposal and Guidance Document.</li><li>• Consider amended ROM request.</li><li>• Review IGT Impact</li><li>• Development of Workgroup Report.</li></ul>

**Action Table (as of 22 June 2023)**

<b>Action Ref</b>	<b>Meeting Date</b>	<b>Minute Ref</b>	<b>Action</b>	<b>Owner</b>	<b>Reporting Month</b>	<b>Status Update</b>
<b>0501</b>	25/05/23	2	Cadent (AC) to add Business Rule references in the Explanatory Text.	Cadent (AC)	June 2023	<b>Closed</b>
<b>0502</b>	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	<b>Closed</b>
<b>0503</b>	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	<b>Closed</b>
<b>0504</b>	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	<b>Closed</b>
<b>0601</b>	22/06/23	1.3	Proposer (LG) to provide amended Modification Proposal and Guidance Document defining which criteria the CDSP are to use to accept Vacant status requests and when to apply them.	Proposer (LG)	July 2023	<b>Pending</b>
<b>0602</b>	22/06/23	2	CDSP (ER) to provide awareness of 0819 in REC space regarding GES and DAM	CDSP (ER)	July 2023	<b>Pending</b>