

**UNC Workgroup 0864S Minutes
Update of UNC Code Communication Methods
Thursday 14 March 2024
Via Microsoft Teams**

Attendees		
Kate Elleman (Chair)	(KE)	Joint Office
Harmandeep Kaur (Secretary)	(HK)	Joint Office
Andy Clasper	(AC)	Cadent
David Mitchell	(DM)	Scotia Gas Networks
Edward Allard	(EA)	Cadent
Ellie Rogers	(ER)	Xoserve
Gavin Williams	(GW)	Northern Gas Networks
Josie Lewis	(JL)	Xoserve
Malcolm Montgomery	(MM)	National Gas Transmission
Marina Papathoma	(MP)	Wales & West Utilities
Mark Cockayne	(MC)	Joint Office
Oorlagh Chapman	(OC)	Centrica
Sally Hardman	(SHa)	SGN
Susan Ann Helders	(SH)	Northern Gas Networks
Vanessa Mufandaizda	(VM)	Crown Gas and Power

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

The Workgroup Report is due to be presented at the UNC Modification Panel by 16 May 2024.

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/0864/140324>.

1.0 Introduction and Status Review

Kate Elleman (KE) welcomed all parties to the meeting.

1.1 Approval of Minutes (05 February 2024)

The minutes from the previous meeting were approved.

1.2 Approval of late papers

There were no late papers.

1.3 Review of Outstanding Actions

0101: Following a review of the examples, CDSP (ER) to check whether there are any other more appropriate alternatives to fax and consider which industry Workgroup is the most appropriate to discuss the technical aspects.

Update: Ellie Rogers (ER) confirmed that CDSP have been working with the proposer to look at the current obligations. ER noted that although they store the data, they will not be the party using the methods of communication as that is REC's role. ER highlighted the need to look at the requirements of each reference to fax to determine the best way of communication. Gavin Williams (GW) noted that the spreadsheet (appendix to the Modification) covers different forms

of communication for each case and if there is an alternative to fax, it is likely already listed in this spreadsheet and already being used by parties.

The Workgroup agreed to close the action further to consideration of each reference of fax and the possible alternatives for each reference. **Closed.**

0201: The Workgroup to consider whether the replacement of fax with another form of communication could work. The Workgroup is to consider any alternative means of communication that may already be in operational use.

Update: Kate Elleman (KE) confirmed that JO have not received any suggestions for alternative forms of communication. The Workgroup agreed that no new forms of communication, other than the ones already listed by the proposer have been identified. The Workgroup agreed to close the action. **Closed.**

0202: The Workgroup to review the REC change, R0157, raised in relation to the replacement of fax and facsimile and discuss in the Workgroup meeting.

Update: GW informed the Workgroup that the REC change R0157 has some similarities with Modification 0864S as it the rationale behind the change is to retire the fax machines and the timescale is similar to the deadline of December 2025. GW noted that REC are also doing some housekeeping updates with this change. GW highlighted the key differences are that there are no instances of facsimile being the only option in the REC code as all references to fax/facsimile include other alternatives such as email or post. Due to this, REC will simply be removing references to fax without inserting other forms of communication. **Closed.**

0203: GW (NGT) to group the instances in the Code where fax is used as a follow-up method to email and test this with control rooms to ensure fax is not being used and consider any alternatives being used instead.

Update: GW noted that the transporters have confirmed fax is not being used and NGT would like to understand what alternatives are currently in use. Tracey Saunders (TS) noted that NGN have confirmed that fax is not being used, however, the alternative has not been confirmed.

Kate Elleman (KE) proposed that the action be assigned to the Transporters to check whether their control rooms are still using fax and if not, which methods of communication are being used, specifically, in the case of interruptible sites.

The action amended as below: **Closed.**

<p>Action 0301: The Transporter representatives at Workgroup to confirm with their control rooms that fax is not being used and confirm what alternatives are being used instead.</p>
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Carried Forward.

2.0 Amended Modification

GW presented the clause that has been proposed to be added as a potential solution which would enable parties to decide which form of communication they wish to use other than email according to what best suits the situation. GW noted that email may not be the best option in every scenario as fax provides instant receipt. This clause would allow parties to use alternative options.

For full details please see the published papers.

Susan Helders (SH) noted that fax provides instant receipt when the machine has received an item, it does not confirm whether the recipient has read it. Ellie Rogers (ER) expressed nervousness around adding a general clause that applies to everything as it adds more uncertainty. ER noted that in the case of an emergency, a set process is required to contact the necessary parties. GW clarified that this option is presented as an alternative solution while still working on amending each reference to include alternative forms of communication. GW confirmed that the text of the clause is being finalised along with Legal.

Mark Cockayne (MC) expressed concern about setting a precedent that is not tenable or sustainable. MC suggested that the Legal Text provider look at it again to ensure the text does not open up NGT and other parties to risk as the wording appears to be very generic. ER agreed with MC and added that each fax reference needs to be reviewed to understand the best possible solution for that scenario. MC noted that for every formal notice, the purpose of the notice along with the delivery option needs to be considered as the requirements will be different for each case.

KE thanked GW for preparing the clause and noted that although it may not be the best-suited option, it has been useful to highlight that the detailed approach to each fax references is the better solution going forward.

Fax Text Analysis:

GW presented the fax text analysis prepared by NGT with CDSP's support. The analysis has been broken down into different groups according to the options of communications included alongside references to fax. Each group is accompanied by solution options that apply to those particular scenarios. The references have been grouped into the below 5 categories:

1. by email already an option, ordered by total number of communication methods
2. by Batch Transfer, ordered by telephone Y/N
3. by 2+ comms methods still available (excluding email)
4. by 1 comms methods only available (excluding email)
5. by 0 comms methods only available (excluding email)

The Workgroup reviewed each group and the references on a line-by-line basis and considered the proposed solutions. The Workgroup discussed the importance of reviewing each reference to fax and facsimile in order to understand the impact on the process of removing the reference and to consider the best alternative option.

Group 1: by email already an option, ordered by total number of communication methods

GW proposed removing references to fax and facsimile in this group without the need for adding an alternative as these 9 clauses already have alternative methods in place and these examples do not relate to emergencies. GW confirmed that this approach aligns with REC's approach. The workgroup reviewed the references and the proposed solutions.

Group 2: by Batch Transfer, ordered by telephone Y/N

In relation to the second group, GW proposed replacing fax with email which is currently not an option. This group includes 12 clauses with references to fax. GW proposed replacing email with fax in 6 clauses where telephone is already available as another method of communication. For the other 6, GW proposed replacing fax with email and adding telephone as the additional method of communication, or alternatively, adding the caveat clause presented earlier in the meeting which would allow parties to choose their preferred method of communication.

GW clarified that Batch Transfer is a method of communication using IX file which is managed by CDSP. The references to fax in these clauses say what the alternative to Batch Transfer could be. GW noted that some clauses are contingency clauses whereas others relate to following up after a Batch Transfer. ER confirmed the information provided by GW in relation to Batch Transfers and added that a notification goes out a month before a batch transfer.

KE queried whether CDSP are informed when someone uses Batch Transfer to send information. ER explained that it depends on who sends it as if it is interruptible, it might go from Shipper User to Transporter rather than going via CDSP. ER noted that interruptibles have not been sent in a long time, therefore, there is no way of testing. Malcolm Montgomery noted that the clauses in Group 2 are Transitional Rules and suggested checking whether they are still relevant as if the text has already reached the end date, it can be ignored. ER noted that there are also several repetitions in the Transitional Rules which might need a separate review. GW pointed out that CDSP have pointed out the repetitions in Column Q of the spreadsheet. KE noted that the repetitions in the Transitional Rules will be considered as part of the Transitional Arrangements project.

MC queried whether this opportunity should be used to replace email with 'electronic communication' as systems continue to develop. KE asked the proposer to consider the suggestion. ER advised that the use of 'electronic communication' may create multiple types of electronic communication methods which would be unsustainable or inconsistent. The Workgroup agreed that 'electronic communication' would not be used in this Modification.

GE pointed out Column E to the Workgroup and asked whether they would be happy with email being the replacement without an alternative. MC noted that if interrupting a supply, and queried whether the transporter will have met their obligation with an email and whether a verbal notification would be required to ensure the notification was received. ER noted that the common theme with adding an email address is confirming receipt. ER suggested that with time-sensitive references, it may be best to add something that says if a response is not received in [X] number of days, it is deemed received.

MC agreed with ER and using the Credit Notice as an example explained that the notice is a trigger for the next action. MC noted that the cut-off date needs to be defined in order to allow the party to take the next step.

The Workgroup then considered Clause 5.2.5(d), which advises that *"e-mail... shall be deemed to have been received one hour after being sent in the absence of any undeliverable return receipt received by the sender during that period"*. GW noted that the key difference is that in facsimile, receipt would be immediate whereas there is a one-hour delay with an email. GW asked the Workgroup whether the one-hour delay was critical to any of the obligations. GW highlighted that where telephone is listed, that option is available to get an immediate receipt with a call. KE proposed that GW raise this as a question in the consultation. ER asked whether Clause 5.2.5 is a generic clause that applies to all email notices. KE confirmed that it does apply to all.

MC highlighted termination notices as a point to review, explaining that the notices are usually issued with a specified time, and they can be effective before the next gas day to avoid the obligation of a full day of balancing gas exposures. MC suggested that CDSP consider this point to ensure that the blanket statement in 5.2.5 does not create a challenge for them. ER agreed to check this and noted that CDSP do not have 24hrs monitoring so the notice would be done within work hours.

KE noted that specific examples, that CDSP had reviewed to ensure that the correct change has been made, can be included in the Impact section of the Modification Report in order to show to the Panel that everything has been considered. KE questioned whether adding telephone as another means of communication be appropriate for Batch Transfer examples where the only form of communication will be email (when facsimile is replaced with email). MC noted that it would not be possible to give the details of the batch transfer over the phone, however, the telephone could serve as a notification of the information being sent.

The Workgroup concluded that in the case of batch transfer group, where the reference to facsimile is being replaced with email and there is no other form of communication, the best solution is to replace facsimile with email and not add another form of communication. It was noted that the other form of communication would be telephone and it would not be possible to share all the information from a Batch Transfer over a phone call.

Group 3: by 2+ comms methods still available (excluding email)

The Workgroup considered Group 3 where there are 2+ methods of communication already available, however, email is not included. Considering 4.2.5, it was noted that no other forms of communication have been identified.

MC highlighted that in addition to replacing the references to facsimile, the text around the reference also needs to be checked to ensure that any other references regarding receipt etc has also been amended. GW agreed.

The Workgroup agreed with the proposer's recommendation of replacing fax with email for Group 3.

Group 4: by 1 comms methods only available (excluding email)

The Workgroup discussed Group where there are 2+ methods of communication already available, however, email is not included. The clauses included in this Clauses revolve around Interruptible supply points.

KE noted that as there are not many interruptible notifications, it is difficult to test which alternative method of communication would best work in these situations. KE further highlighted that replacing fax with email may add an obligation on the relevant parties to monitor emails for 24 hours. GW contested this by saying email would not be more of an obligation than monitoring a fax machine.

MC highlighted that a particular nominated contact will be needed as the point of contact with an agreed method of communication. ER noted that based on the information received so far, fax is not being used, however, they continue to hold fax data. ER highlighted that in the with interruptible sites, the person of contact needs to be available 24hrs to address an emergency situation. ER referenced back to the point made in relation to the caveat clause and noted that if the caveat clause is used, it will raise the question of where the information that confirms the point of contact and the method that will be used to contact be held.

The workgroup considered two options as possible solutions for all 5 groups. First, facsimile is replaced with email which will impose the requirement of email being monitored for 24hrs. Second, reference to facsimile is removed without adding any alternatives, leaving telephone as the only option.

The workgroup noted that there are not many Shippers in the call and their input is required to understand the impact the change will have on their operations. Oorlagh Chapman (OC) suggested that the proposer can decide what they believe the best solution to be and raise the point about consequential impact in the consultation. If no negative consequences are highlighted, the Modification proceeds with the proposer's solution.

When discussing clause 5.8.3, Malcolm Montgomery (MM) noted that DN's perspective is required as NGT does not have interruptibles. Andy Clasper (AC) noted that it is difficult for them to advise as Cadent have not had any interruptibles recently and the method needs to be tested. Susan Ann Helder (SH) agreed with AC. GW asked whether having telephone as the first option be useful. AC confirmed that calls work well in emergencies and noted that he disagreed with the point about the difficulty of monitoring emails as these are available on the phone and accessible 24hrs and a dedicated Inbox can be assigned for these situations.

The Workgroup completed a detailed review of each clause and noted that any clauses that present timebound situations need to be called out at consultation to confirm the consequential impact.

Group 5: by 0 comms methods only available (excluding email)

Group 5 includes clauses that only have references to fax without any other alternative methods of communication. The first 4 clauses relate to the Transitional Document. The Workgroup agreed that these clauses be reviewed again to check whether these are outdated.

New Action: 0302: JO to review the Transitional Arrangement clauses to check whether these are still relevant or in the normal part of the document (if duplicated).

When discussing Clause 5.2.6, the Workgroup discussed replacing the reference to facsimile with email and following up with a first-class post. MC noted that when referring to termination notices, a receipt confirmation is required in order to take the next steps. MC suggested that CDSP's Credit team review the impact of the change on the process in order to ensure that it does not cause any other subsequent issues for them.

New Action: 0303: CDSP (ER) to review the impact of replacing facsimile with email in GTB 5.2.6 on their Operation Credit process.

3.0 Development of Workgroup Report

Deferred to the next meeting.

4.0 Next Steps

KE asked GW to consider whether the Modification needs to be amended and if so, to make the amendments and submit it as Version 2. Where the solution is not straightforward, this will be reviewed as part of the legal text. GW confirmed that version 2 of the Modification is required.

CDSP agreed to start preparing the ROM. KE confirmed that the Modification Report, Legal Text, and ROM will be reviewed in the next meeting and a one-month extension will be requested at the UNC panel.

5.0 Any Other Business

GW noted that the Offtake Communication document contains more than 150 references to fax and suggested attending the Offtake Arrangement meeting to raise this.

KE explained that GW can either notify Offtake Arrangements that this Modification is being raised and ask that they attend this Workgroup or await the outcome of Modification 0864S, update the Offtake Communication document, and take it to the Committee for approval.

6.0 Diary Planning

0864S meetings are listed at: <https://www.gasgovernance.co.uk/0864>

All other Joint Office events are available via: www.gasgovernance.co.uk/events-calendar/month

Time/Date	Meeting Paper Deadline	Venue	Programme
10:00 Monday 11 April 2024	5pm Friday 03 April 2024	Microsoft Teams	Standard Agenda
10:00 Monday 9 May 2024	5pm Friday 1 May 2024 2024	Microsoft Teams	Standard Agenda
10:00 Monday 26 June 2024	5pm Friday 18 June 2024	Microsoft Teams	Standard Agenda

0864S Action Table						
Action Ref	Meeting Date	Min Ref	Action	Reporting Month	Owner	Status Update
0101	08/01/24	2.0	Following a review of the examples, CDSP (ER) to check whether there are any other more appropriate alternatives to fax and consider which industry Workgroup is the most appropriate to discuss the technical aspects.	March 2024	CDSP	Closed
0201	05/02/24	2.0	The Workgroup to consider whether the replacement of fax with another form of communication could work. The Workgroup is to consider any alternative means of communication that may already be in operational use.	March 2024	All	Closed
0202	05/02/24	2.0	The Workgroup to review the REC change, R0157, raised in relation to the replacement of fax and facsimile and discuss in the Workgroup meeting.	March 2024	All	Closed
0203	05/02/24	2.0	GW (NGT) to group the instances in the Code where fax is used as a follow-up method to email and test this with control rooms to ensure fax is not being used and consider any alternatives being used instead.	March 2024	NGT (GW)	Carried forward
0301	14/03/24	1.4	The Transporter Representatives at Workgroup to confirm with their control rooms that fax is not being used and confirm what alternatives are being used instead.	April 2024	All	Pending
0302	14/03/24	2.0	JO to review the Transitional Arrangement clauses to check whether these are still relevant or in the normal part of the document (if duplicated).	April 2024	JO	Pending

0303	14/03/24	2.0	CDSP (ER) to review the impact of replacing facsimile with email in GTB 5.2.6 on their Operation Credit process.	April 2024	CDSP (ER)	Pending
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