

**UNC Workgroup 0691S Minutes
CDSP to convert Class 2, 3 or 4 meter points to Class 1 when
G1.6.15 criteria are met**

Tuesday 19 May 2020

Via Teleconference

Attendees

Lorraine O'Shaughnessy (Chair)	(LOS)	Joint Office
Karen Visgarda (Secretary)	(KV)	Joint Office
Andy Clasper	(AC)	Cadent
Carl Whitehouse	(CW)	Shell UK
David Mitchell	(DM)	SGN
Ellie Rogers	(ER)	Xoserve
Fiona Cottam	(FC)	Xoserve
Kirsty Dudley	(KD)	E.ON
Lorna Lewin	(LL)	Orsted
Louise Hellyer	(LH)	Total Gas & Power
Mark Bellman	(MB)	ScottishPower
Mark Jones	(MJ)	SSE
Rhys Kealley	(RK)	British Gas
Rob Johnson	(RJ)	Waters Wye Associates
Steven Britton	(SB)	Cornwall Insight

Apologies

Sallyann Blackett	(SB)	E.ON
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**via teleconference*

Copies of all papers are available at: <http://www.gasgovernance.co.uk/0691/190520>

The Workgroup Report is due to be presented at the UNC Modification Panel by 18 June 2020.

1. Introduction and Status Review

Lorraine O'Shaughnessy (LOS) confirmed that Rhys Kealley (RK) had been in discussions with Ellie Rogers (ER) and David Mitchell (DM) in relation to the content of the Modification and the Legal Text. RK provided an update to the Business Rules in advance of the meeting for discussion in the Workgroup Report which had been developed. RK agreed following the Workgroup discussion and agreement of these changes he would submit a revised Modification V10.0 to align these changes following the meeting. This would become V10.0 of the Modification.

1.1. Approval of Minutes (21 April 2020)

The minutes from the previous meeting were approved.

1.2. Approval of Late Papers

Lorraine O'Shaughnessy (LOS) advised the Workgroup that there had been no late papers published.

2. Review of Legal Text

LOS welcomed David Mitchell (DM) to discuss the revised draft Legal Text and noted that this had been based on the reordering of Section G, as part of the Modification 0708 - *Re-ordering of the UNC in advance of Faster Switching* and that the renumbering was in-line with Modification 0708, which was being presented at the May Panel.

Kirsty Dudley (KD) agreed that this was a sensible approach, however, asked what provisions were in place if Modification 0708 was not implemented. DM said that if this scenario arose, then he could supply modified Legal Text in a short-time frame, and added that as Modification 0708 was not contentious, this was why the Legal Text had been based on Modification 0708. It was agreed this approach had been the most sensible, as it was on a case by case basis.

Post Meeting Update: Modification 0708 was agreed to be implemented during the May Panel Meeting, however the timing of implementation should be aligned to IGT and therefore this may not be applied until July 2020.

DM then provided a walkthrough of the draft Legal Text and brought the Workgroups attention to the drafting notes detailed below. A full version of the draft Legal Text document can be viewed: <https://www.gasgovernance.co.uk/0691/190520>

2.2.6 (Drafting Note)

DM said the drafting note was in relation to *the DM Service Provider satisfying the C1 MMRs if the Transporter had not already done so by that stage in the process introduced by the Modification*. He said this was linked to Business Rule (BR) 1 & 6. and that this had now been moved further up in the process. Ellie Rogers (ER) agreed that this was appropriate, in relation to the Central Data Systems Provider (CDSP). She explained that this would be picked up within the DSC Service Line and so she was not sure if this did need to be included in the Code as well. Both DM and RK agreed that this did need to be included in Code, and ER said in that case, that there would be an element of duplication. KD, RK and DM said that this was acceptable, as it provided greater clarity, as the drafting had taken a slightly different approach in this instance. LOS then made the necessary changes to the Business Rules in the Workgroup report live on screen to add to BR 1 *as well as any DM Services Provider appointed by the relevant Transporter of the same*. ER also noted a correct to reference to the daily files (EDL – Daily Load and requested this was deleted and replaced with NNL – AQ notification) The Workgroup agreed to these changes and this was deleted from BR 6. *At this Point the CDSP should also notify the DM Service Provider to satisfy the Class 1 Meter Read Requirements, where the Transporter has not already done so.*

2.2.7 (Drafting Note)

As per the drafting note, DM questioned in section b) Requested Supply Point Capacity should be the Prevailing SPC per what used to be G5.2.3 (c) and is now Annex B-3.2.3. or to the Supply Point Capacity.

ER said that this did not have to be prevailing capacity, as at that point the Shippers have the opportunity to say what the capacity is in Class 1 and the values are allowed validations, she added that if there were no values, then a default value would be used as defined in BR 5. Both DM and RK said these were in line with the solution as per BR 5. RK had provided an update to include to BR 5 that the notification by the CDSP should also provide a request for a Supply Point Capacity and Supply Point Offtake Rate. If either, or both, of these values are not provided, then the CDSP should in place of the missing values, use default values as outlined in the 'Default Values for Transfer' Section.

2.2.8 (Drafting Note)

As per the drafting note (b) (i) a brief discussion took place in relation to the referencing of Modification 0665 - *Changes to Ratchet Regime*. All agreed that this section was to stay unchanged.

(b) (ii) A further lengthy discussion regarding *Default Values for Transfer* took place, as to whether this was addressed in the draft Legal Text and the Modification 0691S. ER felt that this area might need to be rewritten to include the default values within section 2.2.8. (b) (ii) in the Legal Text. DM said that he would have to discuss this with his Legal Team to seek clarity. LOS said that from a timing perspective, and formalising the draft Legal Text and the amended Modification V10.0, then these two documents would be required by the second week of June 2020, in order to be completed in time for submission to the 18 June 2020 Panel. She added that perhaps an extension by one month might be worth considering, and stated that if the Modification was completed for the June 2020 Panel, then it could be submitted as planned, but an extension would provide a 'buffer' until July, if that was needed. All agreed with the proposed extension request.

New Action 0501: Joint Office (LOS) to request a one-month extension at the May 2020 Panel. **Closed.**
Post Meeting Update: The May Panel agreed to an extension of one month for Modification 0691S and so the action is now closed.

2.2.9

A brief discussion took place regarding the registered Supply Meter Point and the association with Modification 0710 - *CDSP provision of Class 1 read service* and LOS advised that the timetable for this Modification was being presented at the June 2020 Panel and was presently allocated to the Distribution Workgroup and there was a likelihood both these Modifications would follow the same timeline.

DM said that Modification 0691S was already on the direction of travel and that the implementation could be immediate and said with Modification 0710 that was not likely to be implemented until later in the Summer or the Autumn.

ER added that there were no system changes with Modification 0710 and so it would follow a contractual release, whereas Modification 0691S would require a structured release in relation to the system changes. LOS said that she would discuss internally with Alan Raper, the Distribution Workgroup Chair, any potential risks regarding these two Modifications going to Panel simultaneously.

Post Meeting Update: 0710 sought an extension at the May Panel to September 2020.

New Action 0502: Joint Office (LOS) to discuss with AR any associated risks with both the following Modifications going to the June 2020 Panel simultaneously; Modification 0710 - *CDSP provision of Class 1 read service* and Modification 0691S - *CDSP to convert Class 2, 3 or 4 meter points to Class 1 when G1.6.15 criteria are met*

2.2.11 (Drafting Note)

ER said in relation to a *breach* she needed to go and further investigate this area, as she was not sure if this clause was still required regarding the change of supplier and if a site was above the AQ threshold. A lengthy discussion on this topic then took place and RK said that this area needed re-assessing from the logic perspective and that more information was required regarding if a Shipper was rejected, and if they were in the wrong class. ER added that there was an obligation in Code to address this issue, as they had 20 Supply Point Business Days to be re-classified by the CDSP. RK said he did think that the clause was appropriate in relation to when the metering equipment was sold. ER said if the logic was kept the same, then the clause 2.2.11. would no longer be required. RK said he would re-write the paragraph in BR 7. to reflect this and agreed that he would work with ER to provide an 'avoidance of doubt statement', and he felt there was no need for a re-classification as the Shipper would be in class 1 and so 2.2.11 could then be removed and DM agreed. LOS noted that for avoidance of doubt statement, it was agreed that this was updated to confirm that once the site has met the Class 1 requirement (including the period defined in G1.6.15) any incoming Shipper User will only be able to take on the Supply Meter Point within Class 1. The Workgroup concurred with this statement and agreed that the obligation to reclassify shall fall upon the Registered Shipper User, and where they fail to do so the CDSP shall do this on their behalf, should be deleted. DM would discuss with Lawyer if 2.2.11 of the Legal Text should be amended or removed and would provide confirmation back to workgroup in the revised version of the Legal Text.

New Action 0503: British Gas (RK) and Xoserve (ER) to provide an 'avoidance of doubt statement' in relation to the removal of 2.2.11 of the Legal Text and amendment or removal of Business Rule 7 to aid clarity.

LOS said following the various discussions regarding the draft Legal Text and the development of the Workgroup, that RK would send a revised Modification to align the Modification to the Workgroup Report Business Rules and Modification 0691S v10.0. RK said he would provide the formally amended Modification v10.0 in the shortest timeframe possible to enable DM to align the draft Legal Text accordingly.

New Action 0504: British Gas (RK) to provide a formally amended Modification V10.0 to allow the draft Legal Text to be updated in-line with the changes made. **Closed**
Post Meeting Update: RH submitted the formally amended Modification 0691S v10.0 on 20 May 2020, so the above action is now closed.

New Action 0505: SGN (DM) to re-align the draft Legal Text in-line with the amended Modification 0691S v10.0

3. Finalise Workgroup Report

Following the review of the Workgroup Report Business Rules to align these with the Legal Text, LOS provided a full walkthrough of the Workgroup Report, which had been based on v9.0 of the Modification. All sections relating to Cross Code Impacts, Relevant Objectives and Workgroup impact assessment were reviewed. The Workgroup provided some minor amendments which were made, and the Workgroup agreed with the content.

LOS advised that following the meeting, once the V10.0 of the Modification was received, DM would be able to finalise the Legal text detailed in Item 2.

Workgroup participants agreed that a review of the revised Modification and Legal Text once submitted by SGN would be reviewed and any comments sent directly to DM and RK.

LOS advised that the Legal Text would be published alongside the Workgroup Report for participants to review for submission to June 2020 Panel. However, if significant changes to Legal Text are required, the Workgroup agreed to take this back to Workgroup and give a full review of the Legal text again for July 2020 Panel.

KD noted that she agreed with this approach so that Panel would not return to Workgroup if the Legal text was not finalised.

New Action 0506: Joint Office (LOS) to update the Workgroup Report to align with the amended Modification v10.0.

4. Next Steps

LOS said her aspirations for the 16 June 2020 meeting were to meet the June 2020 Panel timetable as follows:

- Review of the amended Modification v10.0
- Workgroup to review the revised draft Legal Text provided by DM
- Review of the updated Workgroup Report
- Agree extension to July 2020 should a further month review be required.

5. Any Other Business

5.1. UNC Elections Process

LOS provided an overview of the UNC Elections Process and confirmed that the User Representatives appointment procedure had now commenced, whereby the Single Point of Contacts (SPoCs) would be confirmed towards the end of June 2020, in readiness for them to submit their nominated representatives for the Committees.

6. 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
10:30 Tuesday 16 June 2020	5pm Monday 08 June 2020	Via Teleconference	<p>Review of the amended Modification v10.0</p> <p>Workgroup to review the revised draft Legal Text provided by DM</p> <p>Review of the updated Workgroup Report</p> <p>Agree extension to July 2020 should a further month review be required.</p>

Action Table (as at 19 May 2020)

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
0501	19/05/20	2.0	<p>Joint Office (LOS) to request a one-month extension at the May 2020 Panel. Closed.</p> <p>Post Meeting Update: The May Panel agreed to an extension of one month for Modification 0691S and so the action is now closed.</p>	Joint Office (LOS)	Closed <i>(as per post meeting update)</i>
0502	19/05/20	2.0	<p>Joint Office (LOS) to discuss with AR any associated risks with both the following Modifications going to the June 2020 Panel simultaneously; Modification 0710 - CDSP provision of Class 1 read service and Modification 0691S - CDSP to convert Class 2, 3 or 4 meter points to Class 1 when G1.6.15 criteria are met</p>	Joint Office (LOS)	Pending
0503	19/05/20	2.0	<p>British Gas (RK) and Xoserve (ER) to provide an 'avoidance of doubt statement' in relation to the removal of 2.2.11 of the Legal Text and amendment or removal of Business Rule 7 to aid clarity.</p>	British Gas (RK) & Xoserve (ER)	Pending
0504	19/05/20	2.0	<p>British Gas (RH) to provide a formally amended Modification V10.0 to allow the draft Legal Text to be updated in-line with the changes made. Closed</p> <p>Post Meeting Update: RH submitted the formally amended Modification 0691S v10.0</p>	British Gas (RH)	Closed <i>(as per post meeting update)</i>

			on 20 May 2020, so the above action is now closed.		
0505	19/05/20	2.0	SGN (DM) to re-align the draft Legal Text in-line with the amended Modification 0691S v10.0	SGN (DM)	Pending
0506	19/05/20	3.0	Joint Office (LOS) to update the Workgroup Report to align with the amended Modification v10.0.	Joint Office (LOS)	Pending