

UNC Workgroup 0851R
Extending the Annually Read PC4 Supply Meter Point (SMP) read submission window
Thursday 23 May 2024
via Microsoft Teams

Attendees		
Dan Simons (Chair)	(DS)	Joint Office
Nikita Bagga (Secretary)	(NB)	Joint Office
Andy Clasper	(AC)	Cadent Gas
Anne Jackson	(AJ)	PAFA (representing PAC)
Charlotte Gilbert	(CG)	BU-UK
David Mitchell	(DMi)	Southern Gas Networks
David Morley	(DMo)	Ovo Energy
Edward Allard until 13:02	(EA)	Cadent Gas
Ellie Rogers	(ER)	CDSP
Fiona Cottam	(FC)	CDSP
Helen Bennett	(HB)	Joint Office
James Lomax	(JLo)	Cornwall Insight
Josie Lewis	(JL)	CDSP
Kathryn Adeseye	(KA)	CDSP
Louise Hellyer	(LH)	Total Energies
Mark Jones	(MJ)	SSE
Martin Attwood	(MA)	CDSP
Oorlagh Chapman	(OC)	Centrica
Rebecca Hailes	(RHa)	Joint Office
Steve Mulinganie	(SM)	SEFE Energy Limited
Susan Helders	(SH)	Northern Gas Networks
Tom Stuart	(TSu)	Wales & West Utilities
<p><i>This Workgroup meeting will be considered quorate provided at least two Transporter and two Shipper User representatives are present.</i></p> <p><i>Please note these minutes do not replicate 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 papers are available at: https://www.gasgovernance.co.uk/Dist/230524.</i></p>		

1. Introduction and Status Review

Dan Simons (DS) welcomed all parties to the meeting.

1.1 Approval of Minutes (28 March 2024)

The minutes from the previous meeting were approved.

1.2 Approval of Late Papers

There were 2 papers submitted late due to a crossover with the timing of the Performance Assurance Committee (PAC) meeting, however, both were approved.

1.3 Review of Outstanding Actions

1201: PAC to consider whether they want staggered benchmarks and if so, does the suggestion on slide 5 work for PAC? If not, can PAC suggest anything else? Consideration of wording in TPD Section M 5.9.4.

Update: Please see the discussions at point 2, following the presentation of slides by Anne Jackson (AJ). The staggered benchmarks were discussed, and it was noted that going beyond the 25 days is seen more as an exception rather than a rule. It was therefore agreed to close this action.

Closed.

2. Review Discussion

AJ provided an [overview of the feedback obtained from the previously issued Performance Assurance Committee \(PAC\) RFI](#).

AJ advised that it was apparent from the responses that Parties deal with meter readings in different ways which resulted in some inconsistent results with often only limited data available.

AJ then presented some headline statistics from the RFI responses:

- 81% of respondents validate for the meter reading 25 business day submission window.
- 16% of respondents do not validate for the meter reading 25 business day submission window.
- 90% of respondents would not send in meter readings that fail their validation.
- Most respondents are not able to determine how many reads were obtained that, due to validation failures, were not sent to the CDSP.
- Parties average for valid readings being submitted within 10 business days is 95% with an additional 3% (Party average) being submitted within 11-25 business days. For many organisations, the breakdown across rejection criteria was not available.
- One organisation could determine the impact that changing the 25-day submission window would have:
 - 35% of meter readings requiring remedial work take longer than 25 business days to complete.
 - 27% of the readings obtained fall into the remedial work pot.

DMo queried whether additional analysis could be taken to infer portfolio size whilst also maintaining anonymity. AJ advised this would be possible, however not on an individual basis, it would need to be done as a group.

The Workgroup then discussed the results.

The Workgroup discussed rejected reads and the reasons for this, with Steve Mulinganie (SM) suggesting the option of internal checks being conducted. AJ advised that a common reason for rejected readings was due to readings being submitted too frequently. This is a rejection reason identified that cannot be rectified through remedial work.

AJ provided an overview of the considerations and views obtained from the PAC.

The PAC noted that Party processes seem to largely be automated, and that transparency of system validation is poor.

There does not appear to be evidence to support the benefit or otherwise of amending the current 25 business-day cut-off. PAC noted that respondents indicated that a high percentage of reads received (91%) are submitted within 10 business days.

PAC indicated that the evidence supported that the current submission arrangements were

working for the parties that were able to provide information. PAC felt that the 25-business day submission deadline could be extended but that it should only be used as the exception rather than for normal 'business as usual'. The main purpose of extending the window would be for proportionally low volumes of difficult-to-resolve rejections that needed additional time to resolve.

The Workgroup discussed the impact of amending the 25-business day cut off to an alternative date and the implications this may have for meter reading performance and on the amendment invoices. In relation to the time required to 'fix' reads, PAC confirmed that they did not have a view on this.

The Workgroup discussed the option of amending the wording of "obtained" to "required" and the potential impact this could have on those who may not be performing well. When comparing reads that should have been obtained against what has been obtained, AJ advised it is important to exercise caution as the ratio may differ. DMO advised that the Business Rules had been updated to include a Business Rule 2 which states the amended wording. Section 5.9.4 states one must obtain valid readings, the word "obtained" will be replaced with "required".

SM raised that it might be worth monitoring other business day cut-offs to see if there is a shift in behaviour to indicate whether a change is required. SM advised that SEFE Energy Limited are looking to raise an alternative to the Modification suggesting 45 business days as opposed to 25.

DMO advised that the rationale for including the wording "required" is that it will allow for reporting to be produced by CDSP for PAC. Ellie Rogers (ER) added that "obtained" means after the event, having to wait to understand what has been obtained. If someone wants to consider the data at a moment in time, amending the word to "required" would allow CDSP to do this. DMO advised that in the event PAC wish to conduct a reporting exercise, having the data ahead of time will be useful. Considering this, DMO advised that he still wishes to propose the addition of Business Rule 2.

SM advised that SEFE Energy Limited will be proposing to PAC to monitor the data at 10, 25 and 45 days. SM added that it has been useful to learn that the majority of reads are submitted within 10 days however, SEFE Energy Limited will propose extending the window to 45 days on the basis that it would be unlikely to have any material impact on the volumes of valid meter readings that are being submitted within the 10 days but may allow for an increased volume of reads to be submitted (or resubmitted) beyond the current 25 days.

Workgroup participants agreed that the analysis provided by AJ was very useful and would help to inform the next steps.

Please refer to the presentation slides published for further details.

2.1. Assessment of any data available and any further data required

Please see the discussions at item 2 above.

2.2. Workgroup assessment of options for a Modification

Please see the discussions at item 2 above.

3. Development of Workgroup Report

DS advised that he would commence the drafting of the Workgroup Report for review at the next meeting, before going to Panel in July.

DMO advised that the Business Rules are unlikely to change apart from the inclusion of the staggered benchmarks. Further details changed within the document can be covered in a single Workgroup meeting.

Rebecca Hailes (RHa) advised that to reduce the workload, it is recommended that SM raises the alternative Modification whilst Modification 0851R is live, this will reduce the amount of reporting required. RHa will try and obtain some advice from the Joint Office in relation to proposals. SM advised that the intention is to align the alternate with DMO's Modification. Considering this, RHa suggested that it might be worth considering closing Modification 0851R and for SM to contact the Joint Office to raise the alternate.

SM discussed the rationale for considering 45 business days, stating that the invoicing amendments window is largely unimpacted in relation to the analysis for 45 business days. There are concerns about misusing the process if considering going beyond 45 business days. The potential misuse scenarios were discussed in the Workgroup.

4. Next Steps

Workgroup to consider the following:

- Review of the Workgroup Report at the next meeting.

Post Meeting Note:

The Joint Office has since received a request from the Proposer for this Request to be Closed. This has been added to the UNC Panel Agenda on 20 June 2024.

5. Any Other Business

None.

6. Diary Planning

0851R Meetings are listed at: <https://www.gasgovernance.co.uk/0851R>

Further details of planned meetings are available at: www.gasgovernance.co.uk/events-calendar/month

Time / Date	Paper Publication Deadline	Venue	Workgroup Programme
10:00 Thursday 27 June 2024	5pm Wednesday 19 June 2024	Microsoft Teams	• Completion of Workgroup Report

Workgroup 0851R Action Table						
Action Ref	Meeting Date	Minute Ref	Action	Reporting Month	Owner	Status Update
1201	11/12/2023	2	PAC to consider whether they want staggered benchmarks and if so, does the suggestion on slide 5 work for PAC? If not, can PAC suggest anything else. Consideration of wording in TPD Section M 5.9.4.	December 23	PAC	Closed