

**Record of Determinations: Panel Meeting 244 20 June 2019**

| Modification  | Vote Outcome  | Shipper Voting Members |    |         |    |    |         | Transporter Voting Members |    |    |    |    | IGT Voting Member | Consumer Voting Member | Consumer Voting Member | Determination Sought   |
|---|---|------------------------|----|---------|----|----|---------|----------------------------|----|----|----|----|-------------------|------------------------|------------------------|--|
|   |   | AG                     | DF | MB (MJ) | MJ | RF | SM (AG) | DL                         | GD | DM | SC | TS | AT                | JA                     | EP (AG)                |  |
| <b>0693R - Treatment of kWh error arising from statutory volume-energy conversion</b>                                 | Request issued to Workgroup 0693R with a report to be presented to the 19 December 2019 Panel - <i>unanimous vote in favour</i>       | ✓                      | ✓  | ✓       | ✓  | ✓  | ✓       | ✓                          | ✓  | ✓  | ✓  | ✓  | ✓                 | ✓                      | ✓                      | Should Request be issued to Workgroup 0693R with a report presented to the 19 December Panel?            |
| <b>0694R - CDSP provision of Class 1 Read service</b>   | Request issued to Workgroup 0694R with a report to be presented to the 19 December 2019 Panel - <i>unanimous vote in favour</i>       | ✓                      | ✓  | ✓       | ✓  | ✓  | ✓       | ✓                          | ✓  | ✓  | ✓  | ✓  | ✓                 | ✓                      | ✓                      | Should Request be issued to Workgroup 0694R with a report presented to the 19 December Panel?            |
| <b>0695 - Obligations on Shippers to pass Transporter compensation payments on to consumers, via Suppliers</b>        | Not related to the Significant Code Review - <i>unanimous vote against</i>  | X                      | X  | X       | X  | X  | X       | X                          | X  | X  | X  | X  | X                 | X                      | X                      | Is Modification related to Significant Code Review?  |
|   | Is a Self-Governance Modification - <i>majority vote in favour</i>  | ✓                      | X  | ✓       | ✓  | ✓  | ✓       | ✓                          | ✓  | ✓  | ✓  | ✓  | ✓                 | ✓                      | ✓                      | Does Modification 0695 satisfy Self-Governance criteria?   |
|   | Modification issued to Workgroup 0695S with a report to be presented to the 19 September 2019 Panel - <i>unanimous vote in favour</i> | ✓                      | ✓  | ✓       | ✓  | ✓  | ✓       | ✓                          | ✓  | ✓  | ✓  | ✓  | ✓                 | ✓                      | ✓                      | Should Modification be issued to Workgroup 0695S with a report presented to the 19 September 2019 Panel? |
| <b>0696 - Addressing inequities between Capacity booking under the UNC and arrangements set out in relevant NExAs</b> | Not related to the Significant Code Review - <i>unanimous vote against</i>  | X                      | X  | X       | X  | X  | X       | X                          | X  | X  | X  | X  | X                 | X                      | X                      | Is Modification related to Significant Code Review?  |
|   | Is not a Self-Governance Modification - <i>unanimous vote against</i>   | X                      | X  | X       | X  | X  | X       | X                          | X  | X  | X  | X  | X                 | X                      | X                      | Does Modification 0695 satisfy Self-Governance criteria?   |
|   | Modification issued to Workgroup 0696 with a report to be presented to the 18 July 2019 Panel - <i>majority vote in favour</i>        | ✓                      | ✓  | ✓       | ✓  | ✓  | ✓       | ✓                          | X  | X  | X  | X  | X                 | ✓                      | ✓                      | Should Modification be issued to Workgroup 0696 with a report presented to the 18 July 2019 Panel?       |
| <b>0647 - Opening Class 1 reads to Competition</b>  | Consideration of 0647 deferred - <i>unanimous vote in favour</i>  | ✓                      | ✓  | ✓       | ✓  | ✓  | ✓       | ✓                          | ✓  | ✓  | ✓  | ✓  | ✓                 | ✓                      | ✓                      | Should consideration of 0647 be deferred?  |

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| Modification   | Vote Outcome   | Shipper Voting Members |    |         |    |    |         | Transporter Voting Members |    |    |    |    | IGT Voting Member | Consumer Voting Member | Consumer Voting Member | Determination Sought |   |
|--|--|------------------------|----|---------|----|----|---------|----------------------------|----|----|----|----|-------------------|------------------------|------------------------|----------------------|---|
|  |  | AG                     | DF | MB (MJ) | MJ | RF | SM (AG) | DL                         | GD | DM | SC | TS | AT                | JA                     | EP (AG)                |                      |   |
| <b>0677R - Shipper and Supplier Theft of Gas Reporting Arrangements</b>                                      | Request 0677R returned to Workgroup with a report presented by 19 October 2019 Panel - <i>unanimous vote in favour</i> | ✓                      | ✓  | ✓       | ✓  | ✓  | ✓       | ✓                          | ✓  | ✓  | ✓  | ✓  | ✓                 | ✓                      | ✓                      | ✓                    | Should Request 0677R be returned to Workgroup with a report presented by 19 October 2019 Panel?                                   |
| <b>0681S - Improvements to the quality of the Conversion Factor values held on the Supply Point Register</b> | Proceed to Consultation, with consultation closing out on 11 July 2019 - <i>unanimous vote in favour</i>               | ✓                      | ✓  | ✓       | ✓  | ✓  | ✓       | ✓                          | ✓  | ✓  | ✓  | ✓  | ✓                 | ✓                      | ✓                      | ✓                    | Should Modification 0681S be issued to Consultation, closing on 11 July 2019 and be considered at Short Notice at the July Panel? |
| <b>0682 - Market Participant MDD Migration to UNC Governance from the SPAA</b>                               | Proceed to Consultation, with consultation closing out on 11 July 2019 - <i>unanimous vote in favour</i>               | ✓                      | ✓  | ✓       | ✓  | ✓  | ✓       | ✓                          | ✓  | ✓  | ✓  | ✓  | ✓                 | ✓                      | ✓                      | ✓                    | Should Modification 0682 be issued to Consultation, closing on 11 July 2019 and be considered at Short Notice at the July Panel?  |
| <b>0683S - Offtake Arrangements Document (OAD) Review Updates – Phase 1</b>                                  | Workgroup 0683S reporting date extended to 19 September 2019 Panel - <i>unanimous vote in favour</i>                   | ✓                      | ✓  | ✓       | ✓  | ✓  | ✓       | ✓                          | ✓  | ✓  | ✓  | ✓  | ✓                 | ✓                      | ✓                      | ✓                    | Should Workgroup 0683S reporting date be extended to 19 September 2019 Panel?   |
| <b>0667 - Inclusion and Amendment of Entry Incremental Capacity Release NPV test in UNC</b>                  | No new issues were identified during Consultation - <i>unanimous vote against</i>                                      | X                      | X  | X       | X  | X  | X       | X                          | X  | X  | X  | X  | X                 | X                      | X                      | X                    | Were new issues identified during Consultation?   |
|  | Modification 0667 recommended for implementation - <i>majority vote in favour (10 votes in favour)</i>                 | ✓                      | ✓  | ✓       | ✓  | ✓  | ✓       |                            |    | ✓  |    |    | ✓                 | ✓                      | ✓                      | ✓                    | Should Modification 0667 be implemented? ( Yes votes only)  |
| <b>0675S - Enabling changes to the BBL Interconnection Agreement to facilitate physical reverse flow</b>     | Is a Self-Governance Modification - <i>unanimous vote in favour</i>  | ✓                      | ✓  | ✓       | ✓  | ✓  | ✓       | ✓                          | ✓  | ✓  | ✓  | ✓  | ✓                 | ✓                      | ✓                      | ✓                    | Does Modification 0675S satisfy the Self-Governance criteria?   |
|  | Modification 0675S implemented - <i>unanimous vote in favour</i>   | ✓                      | ✓  | ✓       | ✓  | ✓  | ✓       | ✓                          | ✓  | ✓  | ✓  | ✓  | ✓                 | ✓                      | ✓                      | ✓                    | Should Modification 0675S be implemented? ( Yes votes only)   |
| <b>0680S - UNC Changes as a Consequence of 'no deal' United Kingdom Exit from the European Union</b>         | Consideration of Modification 0680S deferred to 18 July Panel - <i>unanimous vote in favour</i>                        | ✓                      | ✓  | ✓       | ✓  | ✓  | ✓       | ✓                          | ✓  | ✓  | ✓  | ✓  | ✓                 | ✓                      | ✓                      | ✓                    | Should consideration of Modification 0680S be deferred to the 18 July Panel?  |

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|---|--|------------------------|----|---------|----|----|---------|----------------------------|----|----|----|----|-------------------|------------------------|------------------------|----------------------|--|
|   |  | AG                     | DF | MB (MJ) | MJ | RF | SM (AG) | DL                         | GD | DM | SC | TS | AT                | JA                     | EP (AG)                |                      |  |
| <b>0685 - Amendment of the UNC term 'Gas Deficit Warning' to 'Gas Balancing Notification'</b> | No new issues were identified during Consultation - <i>unanimous vote against</i>    | X                      | X  | X       | X  | X  | X       | X                          | X  | X  | X  | X  | X                 | X                      | X                      | X                    | Were new issues identified during Consultation?            |
|   | Modification 0685 recommended for implementation - <i>majority vote in favour</i>    |                        |    | ✓       | ✓  |    |         | ✓                          | ✓  | ✓  | ✓  | ✓  | ✓                 | ✓                      | ✓                      |                      | Should Modification 0685 be implemented? ( Yes votes only) |
| <b>0686 - Removal of the NTS Optional Commodity Rate with adequate notice</b>                 | No new issues were identified during Consultation - <i>unanimous vote against</i>    | X                      | X  | X       | X  | X  | X       | X                          | X  | X  | X  | X  | X                 | X                      | X                      | X                    | Were new issues identified during Consultation?            |
|   | Modification 0686 not recommended for implementation - <i>with 2 votes in favour</i> |                        |    |         |    |    |         |                            | ✓  | ✓  |    |    |                   |                        |                        |                      | Should Modification 0686 be implemented? ( Yes votes only) |

|           |               |             |              |
|-----------|---------------|-------------|--------------|
| In favour | Not in Favour | Not Present | No Vote Cast |
|-----------|---------------|-------------|--------------|

**UNC Modification Panel**

**Minutes of the 244 Meeting held on Thursday 20 June 2019**

**at**

**Elaxon, 4th Floor, 350 Euston Road, London NW1 3AW**

**Attendees**

**Voting Members:**

| <b>Shipper<br/>Representatives</b>   | <b>Transporter<br/>Representatives</b>  | <b>Consumer<br/>Representatives</b> |
|--|---|-------------------------------------|
| A Green (AG), Total and alternate for S Mulinganie and E Proffitt<br>D Fittock* (DF), Corona Energy<br>M Jones (MJ), SSE and alternate for M Bellman<br>R Fairholme (RF), Uniper | D Lond (DL), National Grid NTS<br>G Dosanjh (GD), Cadent<br>D Mitchell (DM), SGN<br>S Coughlan (SC), Wales & West Utilities<br>T Saunders (TS), Northern Gas Networks<br>A Travell (AT), BUUK | J Atherton (JA), Citizens Advice    |

**Non-Voting Members:**

| <b>Chairperson</b>    | <b>Ofgem Representative</b> | <b>Independent Supplier Representative</b> |
|-----------------------|-----------------------------|--|
| M Shurmer (MS), Chair | J Dixon (JD)                |  |

**Also in Attendance:**

A Bates (AB), South Hook; D Addison (DA), Xoserve; D Hawkin\* (DH), TPA Solutions; F Cottam\* (FC), Xoserve; G Evans\* (GE), WatersWye; J Randall (JR), National Grid; P Dhesi (PD), Interconnector; P Garner (PG), Joint Office; R Fletcher (BF), Secretary; R Hailes (RH), Joint Office; R Hewitt (RH) BBL; S Barr\* (SB), Northern Gas Networks and S Jones\* (SJ), Xoserve.

*\*by teleconference*

**Record of Discussions**

**Introduction**

MS welcomed all attendees and introduced Mark Jones as a newly appointed Shipper representative. MS then set out the order of business for the meeting, advising that Sian Jones, CEO, Xoserve, would be joining the meeting to provide an urgent update on an evolving issue related to the migration of sites from Product

Class 4 to Product Class 3.

**244.1 Note of any alternates attending meeting**

A Green for Steve Mulinganie, Gazprom and E Proffitt, MEUC  
A Travell for J Cooper, BUUK  
D Mitchell for H Chapman, SGN  
J Dixon for L King, Ofgem  
M Jones for M Bellman, ScottishPower  
S Coughlan for R Pomroy, Wales & West Utilities

**244.2 Record of Apologies for absence**

E Proffitt, MEUC  
H Chapman, SGN  
L King, Ofgem  
M Bellman, ScottishPower  
J Cooper, BUUK  
R Pomroy, Wales & West Utilities  
S Britton, Cornwall Insight  
S Mulinganie, Gazprom

**244.3 Minutes and Actions of the Last Meeting(s)**

Following consideration Members then approved the minutes from 16 and 23 May 2019 meetings.

**Action PAN 01/05:** AC to provide an update on the latest version of Legal Text provided to Ofgem and advise of any issues or conflicts identified in then Legal Text.

**Update:** GD advised that the Legal Text has been provided to Ofgem and that the initial consultation process for the Switching Programme has commenced. **Closed**

**244.4 Consider Urgent Modifications**

None presented.

**244.5 Consider New Non-Urgent Modifications**

**a) Request 0693R - Treatment of kWh error arising from statutory volume-energy conversion**

FC introduced Request 0693R in the proposers absence, explaining the reasons why the review was being requested, its aims.

AT noted a similar exercise to review the conversion factors was unable to identify where the standard factor had been established and how long it had been in place, will similar analysis be needed for this review. He asked whether FC had found any historic research into this issue. FC noted that the AUGE had identified a reference to a report which might support the review process which had established some initial analysis against conversion factors and temperature of gas. FC also noted that the time of year and seasonal impacts would need to be considered.

AT noted the Thermal Regulations as statutory instruments cannot be changed under the UNC, BEIS would need to be requested to change the regulations. JD agreed, as previous consideration of this issue had failed to justify changes to the conversion factors at that time. However, if further evidence came forward Ofgem would be in a position to lobby BEIS to make the changes. In addition, this would not prevent Xoserve billing Shippers based on a different use of conversation factors, although this needed to be tested against Licence and Legal obligations for all parties.

Workgroup Questions:

- None

For Request 0693R Members determined:

- That Request 0693R is issued to Workgroup 0693R with a Report presented to the 19 December 2019 Panel, by unanimous vote.

**b) Request 0694R - CDSP provision of Class 1 Read service**

TS introduced Request 0694R in the proposers absence, explaining the reasons why the review was being requested, its aims and that the topic should be issued to Workgroup.

DL noted the similarity to Modification 0647. TS explained that the Proposer planned to withdraw Modification 0647 should this Request be issued to Workgroup.

Workgroup Questions:

- None

For Request 0694R Members determined:

- That Request 0694R is issued to Workgroup 0694R with a Report presented to the 19 December 2019 Panel, by unanimous vote.

**c) Modification 0695 - Obligations on Shippers to pass Transporter compensation payments on to consumers, via Suppliers**

TS introduced Modification 0695, explaining the reasons why the Modification was being raised, its aims and that the topic should be issued to Workgroup. TS noted concerns that the pre-modification process had not been followed and that she hoped that as this Modification was straight forward that this shouldn't be an issue.

TS advised the main aim is to ensure clarity in the process and that consumers receive the compensation they are due and within reasonable timescales.

AT noted that there would need to be an IGT UNC impact and a reciprocal modification would need to be raised.

RF raised concerns that embedded generators who are shippers, how could the obligation apply where there is no Supplier involved. TS advised the aim is to follow existing practice and place it in Code so it shouldn't be an issue if there is no Supplier as the existing process would be followed.

DF noted GSOP in general, is it appropriate to put Licence obligations into Code. For this reason, he did not feel it should be Self-Governance as it is a new process based on established licence conditions.

TS noted the concerns but that the process currently follows existing practice and would make it clear to consumers the route for compensation and establish reasonable timescales.

JD noted the concerns about Licence but did not feel this impacted the materiality criteria, therefore it is immaterial by nature and removes the interpretation of custom and practice. JD expressed a view that Licence doesn't provide sufficient detail and this Modification would bridge that gap and that is not uncommon across Codes.

Workgroup Questions:

- None

For Modification 0695 Members determined:

- It is not related to the Significant Code Review, by unanimous vote;
- The criteria for Self-Governance are met as this Modification is not likely to have a material impact on the contractual arrangements between Transporters, Shippers and Suppliers by majority vote;
- That Modification 0695S is issued to Workgroup 0695S with a Report presented to the 19 September 2019 Panel, by unanimous vote

**d) Modification 0696 - Addressing inequities between Capacity booking under the UNC and arrangements set out in relevant NExAs**

GE introduced Modification 0696 in the absence of the proposer, explaining the reasons why the Modification was being raised, its aims and that the topic should be issued to Workgroup.

DL asked if the intention is for DNO NExAs to be impacted or would this impact NTS NExAs. GE agreed to review this issue but felt that this time it is unlikely as capacity booking does not follow similar timelines.

DM noted that a Shipper can be party to the NExA. GE noted the Shipper

involvement, however the NExA usually sets out operational parameters for offtake by the consumer and usually has very little Shipper involvement.

TS noted that NExAs lack a degree a visibility and that they are currently looking for ways to flag a NExA in the system against impacts Supply Meter Points which might resolve some of the issues identified. TS felt a review would be beneficial as it would get wider industry support to adopt a solution that works for all parties.

GE is supportive of a wider review but would prefer if this specific issue is addressed sooner rather than wait for a wider review to deliver.

GD supported a wider review that to target a specific issue as it would be more efficient. He was also concerned that any retrospective elements would be included and would prefer a longer development time than 1 month as currently set out in the modification to be able to analyse the impacts of including retrospection.

RF noted that a similar issue was discussed and reviewed in the Transmission Workgroup previously, as there is no link between connection activities and booking capacity. This took time to development leading to the PARCA process.

Workgroup Questions:

- Justification for retrospective implementation.

For Modification 0696 Members determined:

- It is not related to the Significant Code Review, by unanimous vote;
- The criteria for Self-Governance are not met as this Modification is likely to have a material impact on the contractual arrangements between Transporters and Shippers by unanimous vote;
- That Modification 0696 is issued to Workgroup 0696 with a Report presented to the 18 July 2019 Panel, by majority vote

#### **244.6 Existing Modifications for Reconsideration**

- a) None

#### **244.7 Consider Workgroup Issues**

- a) None

#### **244.8 Workgroup Reports for Consideration**

- a) **Modification 0647 - Opening Class 1 reads to Competition**

Members noted that the discussion for Request 0694R and noted that the Proposers intention is to withdraw this Modification.

For Modification 0647, Members determined:

- To defer consideration, by unanimous vote.

**b) Request 0677R - Shipper and Supplier Theft of Gas Reporting Arrangements**

It was noted that the Workgroup was requesting 4 months extension. RF noted the need for a realistic plan to be produced by the Workgroup to address the multiple issues identified.

For Request 0677R, Members determined:

- should be referred back to Workgroup 0677R for further assessment, with a report by the 17 October 2019 Panel, by unanimous vote.

**c) Modification 0681S - Improvements to the quality of the Conversion Factor values held on the Supply Point Register**

Members noted the recommendations made by the Workgroup.

For Modification 0681S, Members determined:

- It should be issued to consultation with a close out date of 11 July 2019 and considered at Short Notice at the July Panel, by unanimous vote.

**d) Modification 0682 - Market Participant MDD Migration to UNC Governance from the SPAA**

Members noted that the Workgroup Report recommendations.

For Modification 0682, Members determined:

- It should be issued to consultation with a close out date of 11 July 2019 and considered at Short Notice at the July Panel, by unanimous vote.

**244.9 Consideration of Workgroup Reporting Dates and Legal Text Requests**

Members determined unanimously to extend the following Workgroup reporting date(s):

| <b>Workgroup</b>   | <b>New Reporting Date</b> |
|--|---------------------------|
| 0683S - Offtake Arrangements Document (OAD) Review Updates – Phase 1 | 19 September 2019         |

Members determined unanimously to request Legal text for the following modification(s):

| <b>Modification</b> |
|---------------------|
| None                |

#### **244.10 Consider Variation Requests**

None discussed.

#### **244.11 Final Modification Reports**

##### **a) Modification 0667 - Inclusion and Amendment of Entry Incremental Capacity Release NPV test in UNC**

Panel discussion: see the Final Modification Report published at:  
<https://www.gasgovernance.co.uk/0667>

Members then determined:

- that there were no new issues requiring a view from Workgroup, by unanimous vote;
- recommended implementation of Modification 0667, by majority vote.

##### **b) Modification 0675S - Enabling changes to the BBL Interconnection Agreement to facilitate physical reverse flow**

Panel discussion: see the Final Modification Report published at:  
<https://www.gasgovernance.co.uk/0675>

RF noted that in the minutes of the Workgroup meeting, Ofgem considered the Modification should be Self-Governance. JD confirmed that Ofgem felt this Modification should be Self-Governance as there was no material changes required to the UNC.

DL agreed with this view as it is an enabling Modification to effect changes to a bilateral interconnection agreement and does not change UNC.

Members then determined:

- That Modification 0675S is a Self-Governance Modification, by unanimous vote;
- To implement of Modification 0675S, by unanimous vote.

##### **c) Modification 0680S - UNC Changes as a Consequence of 'no deal' United Kingdom Exit from the European Union**

DL advised that due the uncertainties around BREXIT and being consistent with the previous month, he was requesting Panel to defer consideration of the Final Modification Report until there was more certainty on a potential date for a no deal scenario implementation.

Members then determined:

- that consideration of the Final Modification Report should be deferred until the 18 July 2019 Panel, by unanimous vote.

**d) Modification 0685 - Amendment of the UNC term 'Gas Deficit Warning' to 'Gas Balancing Notification'**

Panel discussion: see the Final Modification Report published at:

<https://www.gasgovernance.co.uk/0685>

Member then determined:

- that there were no new issues requiring a view from Workgroup, by unanimous vote;
- to recommend implementation of Modification 0685, by majority vote

**e) Modification 0686 - Removal of the NTS Optional Commodity Rate with adequate notice**

Panel discussion: see the Final Modification Report published at:

<https://www.gasgovernance.co.uk/0686>

JA, Consumer Representative, asked what the logic was for dropping the current shorthaul charge altogether rather than updating the charge. The Panel Chair allowed the Proposer of Modification 0686, DH, to respond, who then clarified that Modification 0636 sought to update the current short-haul charge; however, Ofgem decided such a commodity charge would not be compliant with the Tar Code. Further Proposer DH also stated that all of the Modification 0678 proposals have excluded the current shorthaul charge (which is a commodity charge).

Members then determined:

- that there were no new issues requiring a view from Workgroup, by majority vote;
- not to recommend implementation of Modification 0686, with 2 votes in favour of implementation.

**244.12 AOB**

**a) Migration of Supply Meter Points from Class 4 into Class 3**

SJ provided an overview of an issue and a significant risk to UK Link Systems due to the predicted transfer of sites from Product Class 4 into Class 3 from 01 October 2019.

SJ explained that the changes to the AUG Table weighting factors used for allocating UIG from October will create a commercial advantage for moving sites from Product Class 4 to Product Class 3.

The system has been designed to accept 30m reads per days based on the SMART metering programme roll out and targets. Product Class 3 allows

for the collation of up to a month of daily reads for a site to be submitted in a batch. There are no rules around the submission timescales, other than a cut-off date for a month. Based on Shipper predictions, batched reads submitted on the same day by a number of Shippers could exceed 100m reads on a day which would create significant problems for UK Link in terms of its capability to process the information.

SJ advised that significant investment is required to allow submission of read volumes. Alternatively smaller batches more regular batch read submission could be agreed but this will be difficult to manage based on previous industry experiences and the issues related to UIG.

A workshop is to be arranged to discuss the issue and to look for options to be able to manage this issue. An Urgent Modification is likely to be raised by July Panel should a solution option be identified.

AG asked if this is one party was triggering the problem or is the issue based on forecasts from a number of Shippers. SJ advised that many Shippers were indicating they were in the process of or intending to move sites into Class 3. Scenario planning had identified a worst-case peaking at 700m reads per day and this would not be sustainable.

TS asked why a review isn't being requested, so that the meetings are documented, and options fully explored. SJ noted the concerns but felt there was insufficient time to manage the usual governance approach, the pressure to get a solution in place is driving urgency.

PG noted that the industry concerns and that the Joint Office would support the requirement if needed. They would look to engage with Xoserve to agree a way forward to manage industry expectations and the process required.

AT asked if Xoserve have a solution to the problem ready for discussion. SJ advised that they felt an industry approach should factor weighting values to SMART or AMR capable meters and that Product Class shouldn't be a factor in decide UIG values. However, they were open to the industry agreeing an acceptable solution or alternative approach.

SJ noted that the risk is real today as parties could jump class early and impact UK Link prior to October UIG factors driving migration.

DF wanted to understand the potential impacts on UK Link if the predicted reads were submitted, would create a queue of reads or would the system freeze. SJ advised that the system is managing complex work activities across a number of different processes at different times of day. It is likely processing batch of reads would be prioritised and the other jobs would start to fail which would generate data accuracy issues, leading to a risk the system would fail.

SJ noted the issue is theoretical but Xoserve need to plan against a forecast for October. If the risk materialises it is likely this would impact their ability to fulfil Transporter obligations.

JD noted the issues raised and why these were not considered as part of Nexus. He noted at a PAFA workshop this week, it was noted that some Shippers were moving out of Class 3 due to process issues as they were unable to meet the requirements for Class 3. He wanted to know what the

capacity issues are longer term not just on a short-term demand for services. The risk needs to be taken seriously even based on forecasts. Ofgem would support a practical way forward to make sure there is no risk to the system, however there needs to be assurance around the capability of the system to support SMART Metering as it rolls out.

SJ advised that if Shippers moved from Class 4 to Class 2 this wouldn't be an issues, it's the batching of readings which is the issue. The concern is that metering technology is not a rule to prevent moving class and there is no commercial come back for failing to provide sufficient reads to be in Class 3. However, Shippers might be getting their house in order and Xoserve needed to plan for Shippers being capable of supporting batch read submissions.

AG asked if it is being proposed to stop Shippers nominating sites into Class 3. SJ was against this approach as Xoserve shouldn't be telling customers how to run their business. However, there needs to be consideration of the operation of systems and their actual capability plus the Shippers capability to fulfil it meter reading obligations.

TS was concerned that there could be an impact on meeting Transporter obligations and wanted assurances that these obligations would be prioritised. SJ noted and agreed with this view. The options will be based around meter technology and applying weighting factors.

PG noted that formally the process wouldn't be supported with the establishment of a Workgroup until a Modification or similar is raised. DA requested that if parties had options to manage the issue, could they raise these sooner so that they could be evaluated as a possible option.

**b) Statement of Modification Panel Member Behaviour**

PG provided an update on the responses received so far, confirming that following a reminder a number of Members and Alternates had provided signed copies and that a further update will be provided at the next meeting.

MS asked if Members could provide signed confirmation prior to the next meeting so the item can be removed from the agenda.

**c) Panel Member Alternates**

Members noted that there were a number of Members with no or one alternate nominated. MS requested the Panel Secretary write to those members and ask them to provide nominations by the next meeting.

**NEW ACTION PAB01/06:** BF to write to members with outstanding alternate member nominations requesting alternates be appointed by the July 2019 meeting.

**d) SPOC Registration**

BF advised that the process for Shipper Single Point of Contact (SPOC) registration had commenced.

**e) CACoP Annual Review**

PG advised that the CACoP annual review is to be undertaken during the summer. To aid this process a CACoP industry awareness meeting is to be hosted by Elexon during July.

**f) Panel Member Attendance**

MS reminded members that following the implementation of Modification 0656, members would be considered to cease as members if they failed to attend 3 consecutive meetings of Panel.

BF advised the interpretation is 3 consecutive standard meetings and extraordinary meetings would be excluded from the count for Member attendance.

TS asked if the extraordinary meeting in May could be counted towards meeting attendance as this was a full day meeting. MS agreed this should be included and requested that the register of attendance be published on the Panel website page.

AG challenged why an absence is counted when a Member nominates an alternate. BF advised this rule was included to counter the issues of the previous year where Members nominated alternates for extended periods of time when it was felt they should have resigned to allow for the nomination/election process for a new member.

MS noted the concerns and it was agreed that the issue should be considered further by the Governance Workgroup.

**NEW ACTION PAN02/06:** The Code Administrator to ensure the Governance Workgroup review the appropriateness of counting members as absent who provide an alternate when considering *Modification Rules - Ceasing to be a Member 4.4 b) (i) the Member is absent.*

**244.13 Date of Next Meeting**

- 10.30, Thursday 18 July 2019, at Elexon

**Action Table (20 June 2019)**

| <b>Action Ref</b> | <b>Meeting Date</b> | <b>Minute Ref</b> | <b>Action</b>  | <b>Owner</b> | <b>Status Update</b> |
|-------------------|---------------------|-------------------|--|--------------|----------------------|
| <b>PAN 01/05</b>  | 16/05/19            |                   | AC to provide an update on the latest version of Legal Text provided to Ofgem and advise of any issues or conflicts identified in then Legal Text.   | AC Cadent    | <b>Closed</b>        |
| <b>PAN 01/06</b>  | 20/06/19            | 244.12c)          | BF to write to members with outstanding alternate member nominations requesting alternates be appointed by the July 2019 meeting.  |              | <b>Pending</b>       |
| <b>PAN 02/06</b>  | 20/06/19            | 244.12f)          | The Code Administrator to ensure the Governance Workgroup review the appropriateness of counting members as absent who provide an alternate when considering <i>Modification Rules - Ceasing to be a Member 4.4 b) (i) the Member is absent.</i> |              | <b>Pending</b>       |