

**UNC Workgroup 0843
Establishing the Independent Shrinkage Charge and the Independent
Shrinkage Expert**

09:30 Wednesday 03 April 2024

via Microsoft Teams

Attendees		
Rebecca Hailes (Chair)	(RHa)	Joint Office
Ben Mulcahy (Secretary)	(BM)	Joint Office
David Morley (Proposer)	(DMo)	OVO Energy
Andy Clasper	(AC)	Cadent
Charlotte Gilbert	(CG)	BU UK
Colin Wainwright	(CW)	SGN
David Mitchell	(DMi)	SGN
Ellie Rogers	(ER)	Xoserve (CDSP)
Josie Lewis	(JL)	Xoserve (CDSP)
Julie Chou	(JC)	Wales & West Utilities
Kathryn Adeseye	(KA)	Xoserve (CDSP)
Louise Hellyer	(LH)	Total Energies (from Item 2 onwards)
Matt Marshall	(MM)	Cadent Gas
Paige Leigh-Wilkes	(PLW)	Cadent Gas
Tom Stuart	(TSt)	Wales & West Utilities
Susan Helder	(SH)	NGN

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

Please note these minutes do not replicate/include detailed content provided, therefore it is recommended that the published material is reviewed in conjunction with these minutes. Copies of all papers are available at: <https://www.gasgovernance.co.uk/0843/030424>.

The Workgroup Report is due to be presented at the UNC Modification Panel by 18 July 2024.

1. Introduction and Status Review

Rebecca Hailes (RHa) welcomed everyone to the meeting. The meeting was not initially quorate, but this was soon remedied when a second Shipper representative joined as Item 2 got underway.

1.1 Approval of Minutes (06 March 2024)

The minutes from 06 March 2024 were approved.

1.2 Approval of Late Papers

Whilst both the GDN Documentation for Action 0202 and the Rough Order of Magnitude (ROM) documentation were Late Papers they were both accepted by the Workgroup and considered in the meeting.

1.3 Review of Outstanding Actions

0101: RHa to investigate references regarding what happens if UNCC approval has not been obtained.

Update: RHa advised that she had reviewed the UNC in relation to the scenario considered under Section 3 of Appendix 2 and had not come to a satisfactory answer, other than to suggest that if the UNCC does not approve a proposed amendment then it would fall away and not be progressed.

David Morley (DMo) asked if this was current governance and if the questioned text in Section 3 of Appendix 2 should therefore just be removed. RHa responded it was and as such it could be removed, unless the intention was to change the current Governance, which would be a different matter.

DMo accordingly agreed to delete the text.

Action: Closed

0202: GDNs to provide collated text commentary responses to the studies referenced within Appendix 1 for inclusion within the WGR.

Update: TSt referred to the GDN Analysis of Modification 0843 provided in the Meeting papers as a response to this action and highlighted that the INA study referenced was the separate Meeting Paper attachment in the 25 January Workgroup files entitled '4.0 PE Leakage estimate for INA' (www.gasgovernance.co.uk/0843/250124)

Action: Closed

0203: RHa to discuss with DMO the format and structure for the inclusion of GDN Commentary on Appendix 1 studies within WGR and DMO's subsequent responses.

Update: RHA suggested that the GDN Commentary would be added as Appendix 5 of the Modification. DMO agreed with this approach.

Action Closed

2. Amended Modification

RHa suggested it would be helpful to Workgroup participants if DMO would talk through the process flow charts provided in June 2023 (available here www.gasgovernance.co.uk/0843/110723) to remind all of the proposed process within this complex Modification. DMO did not think this was the best use of the Workgroup's time but agreed to review the documentation offline to ascertain if any updates were required. It was agreed that the Workgroup would review the flowcharts at the next meeting.

<p>New Action 0401: DMO to review Flowchart documentation from June 2023 to ascertain if it requires updating to be consistent with the current Modification version and present at next meeting.</p>
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DMo then presented the latest version of the Modification (v12), adding that the changes made were in response to points raised in the previous March 2024 Workgroup, with some text moved to more appropriate sections.

Starting in Section 5 'Solution' (page 7 of v12) DMO noted the additional text to the entry on

Procurement and stated that this was text moved from Business Rule (BR) 17 as had been suggested in the last Workgroup.

Ellie Rogers (ER) noted the removal of the obligation on the CDSP concerning the Function of the ISE under BR2, which she credited to it being questioned by David Mitchell (DMi), the Legal Text Provider, and thanked both DMO and DMi for the amendment. She clarified to the Workgroup that whilst the obligation placed on the CDSP was to procure the ISE, the CDSP could not be held liable if the subsequently contracted ISE misrepresented the role, adding that the contract would ensure the CDSP would have controls in place, but this needed to be distinct from liability. She shared that she was comfortable awaiting the initial draft of the Legal Text to ensure this was captured but questioned if a sentence needed to be added to the Modification Solution text confirming that the CDSP's obligation would be to procure and appoint the party but would not be liable any subsequent shortcomings of the contracted party.

DMo acknowledged the suggestion sharing that he felt the current text was sufficient but did commit to checking if a similar call-out existed in UNC TPD Section E for the appointment of the AUGÉ (Aggregate User Unidentified Gas Expert) which would help inform if such text would be necessary.

New Action 0402: DMO to confirm if precedent exists in UNC TPD Section E text confirming liability for AUGÉ role did not sit with CDSP.

Returning to the BR text DMO noted that the 'avoidance of doubt statement' had been removed from 2.1 as it was considered superfluous, with the rest of the paragraph moved to the Framework under Section 10.

Under BR 4 'Costs' DMO stated he had added text to allow for contract variations that could be agreed as decided by the UNCC.

ER took a moment to confirm that the CDSP's preference had been that such governance be under the DSC Contract, as a commercial contract was central to the process but appreciated that the industry had agreed for this to sit under the UNCC. She commented that if the Modification is implemented it would be necessary to ensure the correct confidentiality arrangements were in place, suggesting a model similar to the agreements in place for the Performance Assurance Committee (PAC) adding she did not think this would need to be considered under this Modification unless others thought to the contrary. DMO acknowledged the commentary, committing to ensure this was discussed should the consideration arise. RHA added that the UNCC could vote to delegate the task if it was deemed appropriate.

The Workgroup moved its attention to BR6 'Recommending the ISC' where DMO highlighted the 'avoidance of doubt' text that had been placed as commentary under 6.1 and 6.2. ER asked for clarification regarding the reference to 15 March in the TPD Section N, 3.1.8 text this BR pointed to, and how this related to the disapproval mechanism, as she understood that SLAs could not be placed on Ofgem.

Colin Wainwright (CW) shared his understanding that the date was related to the current process and the two-week consultation period after the DNOs had made their submissions.

ER accepted that this made more sense rather than an Ofgem target date, noting that if the most recent ISC was disapproved then she understood the previous year's values would take effect and asked what the proposal was should there not be a previous year's value, such as if it was the first year of the process or should it prove that no previous year's values had yet been adopted.

DMo responded that if the ISC was not approved the previous value would apply, be that a DNO or ISE-sourced figure.

ER asked how the Legal Text would see this apply, as it was important for the Code to make as much sense to a reader 'cold' to the subject as it did to the more aware participants of this Workgroup.

DMi remarked that this was a fair point and he would look to ensure some words existed in the LT to address it along the lines of if a value was available these requirements would apply, if there was not a value then other requirements would need to be met.

ER felt a key consideration was how clear the text was if there was a previous year's value where the ISC had been approved or if there wasn't one or one had not been approved.

DMo asked if there was a similar section of text when Shrinkage was first implemented and if it had a 'step back' measure, though when nobody present was able to confirm, he questioned if such was necessary.

RHa asked DMi if, as Legal Text provider, this was indeed required. DMi responded that it was required as certainty was a requirement to produce good text.

DMo commented that there was presumably no existing precedent for this, to which DMi noted a starting point was necessary.

RHa asked DMi if he would ask for a view from the lawyers producing the LT if they needed more clarity in this regard. DMi replied whilst he was prepared to ask the question, he already knew what their answer would be. In response, RHa asked that DMo aim to provide directions for the implementation of a value should a disapproval be issued where no previous ISC had been applied.

New Action 0403: DMo to provide direction as to what shrinkage charge should apply if a Disapproval is issued where no previous ISC had been applied.

Moving to BR 9.1 DMo conveyed that he had moved the text to become a 'for avoidance of doubt' statement as agreed in the previous Workgroup, which DMi confirmed meant that this would not be included in the legal text.

DMo highlighted that the text that had been BR 10.5 was now part of BR10.4 as it made more sense being the opposite scenario dealt within that earlier sentence, and that BR11 saw the addition of IGTs to clarify that ISC did apply to them.

Changes to BR12 were made, DMo explained, to ensure that where instances of UNC Parties that were non-compliant in providing requested data to the ISE, they could be escalated to Ofgem by the ISE.

DMi asked, in following the earlier theme of discussion regarding the Authority response, what the process was should the Authority not respond to such an escalation notification from the ISE. DMo responded that if Ofgem did not respond they would be effectively signalling that they did not have confidence in the ISE.

RHa suggested that this would be equivalent to the existing experience of PAC escalating some matters to the Authority for which no response is received.

DMi asked if it was possible that a lack of Authority response to an ISE escalation due to a Party not providing requested data could stop the whole process.

RHa responded that she did not think it was possible to include anything further that went beyond the reach of the UNC.

DMi acknowledged this, whilst sharing that this could prove to be a nagging concern and one which Parties could raise in the consultation stage. It could also prove challenging in producing

the Legal Text.

ER sought to clarify that the text that had now been moved to an 'Avoidance of Doubt' statement in BR12, as it was not clear if the Data Permissions Matrix would indeed need changing.

RHa observed the last sentence in this paragraph was not part of the UNC quote and should not therefore be italicised. DMO confirmed he would amend this.

Tom Stuart (Tst) asked to clarify BR6 as he wanted to understand the logic of applying a previous year's ISC. He suggested that if Ofgem disapproved the current year ISC they presumably agreed the shrinkage calculations were accurate and as the ISC is intended to address model error presumably such a disapproval would mean the model was accurate.

DMO suggested that it was not possible to pre-empt the logic behind a disapproval being issued. RHa added that the Authority could provide guidance as they choose but acknowledged the point that the previous year's ISC would be based on the model error in the previous year's calculations.

TSt suggested that much could change within a year and as such applying a previous year's ISC gave him pause, and whilst he acknowledged that if the Authority provided guidance in a disapproval it would help but he was not sure if they would, adding that his understanding was that they would only be commenting on the current year's ISC. RHa confirmed this was correct, to which TSt confirmed that this made the matter unclear to him and suggested this was something that needed to be considered. RHa agreed it was a good point to consider i.e. "is it appropriate to apply the previous year's ISC should that of the current year be disapproved?" This is considered in the action already set out above (Action 0403).

Moving to BR13, DMO advised the 'avoidance of doubt' statement had been deleted as this was already addressed in the Terms of Reference for the Independent Shrinkage Sub-Committee.

DMO also shared that BR15 had been moved to the Further Solution as an 'avoidance of doubt statement'. He noted that the errant clause number 14.2 should be removed.

New BR17 was the Glossary that DMO explained had been moved up from the Appendix with the only new entry being 17.12 Reconciliation Statement.

RHa, in reading 17.6, asked how a charge could be the same as a quantity, to which DMO replied that it was in comparison to 17.4, recognising that there were currently no IGT shrinkage quantities at the moment. RHa sought to clarify if 17.6 would be in quantities (kWh?) or currency (p/kWh?), and DMO committed to checking Section M of the UNC to confirm.

ER questioned if the clause should be futureproofed in some manner to allow for any subsequent change in the IGT approach to Shrinkage, with a statement of zero here meaning a further Modification would be required should matters change. DMO confirmed his view that a secondary Modification would be the necessary route as futureproofing the text in this Modification would be a large task.

DMO then completed his presentation of the BRs, highlighting that the text related to Licence Changes in the Further solution notes section had been updated following requests by the GDNs and was now a 'for avoidance of doubt' statement.

Susan Helder (SH) advised that after discussing this with colleagues they were happy with this new wording, though did suggest the changes required should be called out as this may make it easier for the Authority to consider and issue approval quicker. DMO acknowledged the feedback and stated he would take it into consideration.

Reviewing the rest of the Modification, DMO acknowledged his note to complete the contents

list in Appendix 1.

3. Framework Overview

DMo reviewed changes in Appendix 2 - the Framework for the Appointment and Operation of an Independent Shrinkage Expert, noting that the definition of the Stakeholder Evaluation Panel had been changed in response to a CDSP request so that it was no longer nominated by DSC Contract Management Committee. ER confirmed this, explaining that doing so enabled the Panel to be drawn from a wider group of interested parties than just those nominated by the DSC Contract Management Committee.

RHa asked if the Stakeholder Evaluation Panel members would have to be UNC parties, which ER confirmed was the case. RHa asked if this meant the Panel would have the necessary remit to reject random parties. ER asked if the suggestion was to change the text from 'interested parties' to 'interested UNC Parties'. DMo advised that it was stated that the CDSP would assemble the Panel from a broad range of industry participants.

DMo highlighted that the Publication of the Reconciliation Statement had been added to the processes listed as described under Section 2 of the Framework noting it was just as important as the Independent Shrinkage Statement (ISS).

5.1.12 had also been changed so that it now aligns with the disapproval mechanism.

Section 7 'Creation of ISMM and variation of contract' has been removed from the Framework as the process was already detailed in the BRs.

DMo noted the housekeeping changes made in 8.1.2, adding the reference to the models used by the ISE and generally cleaning the flow of the sentence. The references in 8.1.6 had also been updated.

Under 9.1 text had been added to note the dates that the values provided to the Authority and the CDSP would be uploaded into Gemini.

RHa observed that 9.2 stated that the Authority had the choice to roll over the previous year's ISC. DMo acknowledged this, stating that as he would rather change the Framework than the BRs he would remove this paragraph.

TSt recognised that the text in 9.2 contradicts the BRs, adding that he felt the point was if the Authority was dis-applying the current year ISC they should provide a method on historical ISCs.

RHa commented that if the Authority was going to disapprove of an ISC they would give guidance on what to do next. TSt noted that if there was a BR that stated in the case of disapproval being issued, he was uncertain how historical ISCs would be clarified without placing obligations on the Authority.

DMo commented that BRs placing obligations on the Authority were problematic and advised that he would look to see if there was a statement that requires clarification on the previous ISC, though if there was not, he would not look to add one, confirming that he would either remove 9.2 completely or replace the text with [not used] if more suitable.

Moving to the table under Section 10 which provided the timescales for the ISS, DMo noted he had received some commentary about the process lasting longer than a year, explaining that as the processes were separate one could commence when the other was finalising.

ER replied that whilst this made sense and that reconciliation rolls over, she stated that it

seemed odd that Step 3 spans from May to February as the ISC need to start publishing with a draft in mind from November onwards. This seems to suggest that they could still be undertaking data retrieval when they have published a final draft.

RHa suggested this is similar to how the AUG process works. ER acknowledged this in principle but noted that the bulk of the data collation occurred early in the AUG process, with later steps being data refreshes.

DMo asked if the conflict was between step 3 and step 5. ER agreed that it did seem the case as she was not sure if it made sense that data retrieval could be up until February if the data is provided on 01 November.

DMo highlighted that in Step 5, the ISS would be republished in Jan under Step 9 and the final document would not be published until February in Step 10, adding that he thought this was broadly in line with the AUGE.

ER responded that she thought data refreshes could be done in the AUGE process and asked if that also worked for the ISE, noting that the data for the AUGE was quite set and well-known, whereas for the ISE the data would be new. She conceded that it may be correct to allow data to come into consideration even this late in the process and keep getting it refreshed or it might still be an issue.

DMo noted that it was currently unknown what data the ISE would be looking for, and as such it seemed advisable to leave in place some flexibility to enable them to steer as they required. He added that the main point was that this was an iterative process so changes could be made and altered as it developed.

ER noted that the AUG Statement gets approved for publishing in April, so had five or six months until it is used in late September where it doesn't change and 'sits', whereas the ISS would go straight into use. She concluded that it probably meant her commentary was irrelevant, as she was thinking the new later data might hinder the process, but she recognised it was currently unknown what the ISE might want and when they might want it.

RHa asked if this would see the iteration in the ISE's calculation of the ISC. DMo confirmed that it would be the data used in the ISM via the ISMM to create the ISS and the ISC, acknowledging these middle steps needed to be called out.

RHa sought to clarify if the ISE needed to give notice about how the model is produced, to which DMo responded that this was what would be developed between May and February. RHa added that for the AUGE process, the CDSP has provided a timetable and that it would be useful to have a similar ISE timetable to show the overlap and how it worked.

DMo confirmed he was aware of the single-page diagram referred to, which ER added her understanding that there was a standard format timetable always present on the AUG webpage (indicative AUGE process timetable <https://www.gasgovernance.co.uk/index.php/aug>).

RHa suggested it would be beneficial to add this to the Section 10 table. DMo expressed concern that the more 'moving parts' that were added to the Appendix the more difficult to manage it was likely to become, adding that the CDSP could consider producing the same separately as part of their subsequent procurement process.

RHa proposed adding it instead to the Workgroup Report (WGR).

<p>New Action 0404: DMo and RHa to consider adding a single-page diagram of the ISC creation time cycle.</p>

DMo completed reviewing the changes to the Framework document noting that 10.5 had been added to enable the ISE to provide more granularity to the data where it could assist pipeline owners resolve causes of Shrinkage model error.

4. Rough Order of Magnitude (ROM)

ER presented this item. She explained that whilst the previous ROM had been produced in November 2023 last year an opportunity did not present itself to review until this year and this, together with the changes made to the BRs etc, made it seem best to review the whole document and up-version it. As such this was v2 of the ROM, and whilst she did not intend to go through the document line by line, she would review the changes made and invited Workgroup participants to question any part of the document whilst she did.

A copy of the ROM can be reviewed at www.gasgovernance.co.uk/0843/030424

Starting at Change Overview on Page 2 ER highlighted the addition of the ISS in the items to be established by the ISE. When asked DMO confirmed that the ISS is a collection of the data outputs from the Independent Shrinkage Model Methodology (ISMM).

An extra part had been placed in the Procurement cost noting that a price range to procure and maintain an ISE was not included in the ROM as the CDSP would need to go into the procurement exercise first to get a view of the likely costs.

Under 'Loading and assigning daily shrinkage' the ROM now called out three potential scenarios around the Ofgem decision:

Scenario A was considered 'deemed approval', where Ofgem had not issued a disapproval before the start of the Formula Year on 01 April, meaning that the ISC shrinkage values applied and would be loaded into Gemini.

Scenario B sees Ofgem issue Disapproval before the start of the Formula year, meaning that the current business-as-usual model would be maintained and the DNO shrinkage estimates would be uploaded into Gemini.

The last scenario, Scenario C, saw Ofgem issue disapproval of the ISC after the start of the Formula year., This would mean that the DNO and iGT ISC applied up into the disapproval would need to be reversed and only the shrinkage estimates provided by the DNOs would be applied.

ER also drew the Workgroup's attention to the new commentary on page 6 stating that the proposed solutions in the ROM were based on the assumption that the required licence changes would be in place for DNOs and IGTs to enable the purchase of ISC as proposed.

In the Overview of Impacts, Scenario A deemed approval – no change to the existing ROM response was thought necessary. Similarly for Scenario B there was thought to be no changes necessary from the original ROM, though they did note that if disapproval was issued less than the minimum 10 BD notice of the start of the Formula year the CDSP would make all reasonable endeavours to action this but would maintain a hard cut off of 2 BDs before 01 April.

For Scenario C, disapproval post start of Formula Year, there would have to be an adjustment for the ISC charges submitted that now should not apply. ER shared that questions as to how this could be achieved had been given to her colleagues in the CDSP SME Team and they had confirmed that there were existing processes that could 'reverse' the shrinkage costs.

DMo commented that Ofgem had mentioned that LDZ Shrinkage values can be submitted at

any time, and the mechanism that already existed, though he was unsure if it had ever been used. ER replied that she had no recollection of that happening, though clearly, the CDSP had the adjustment functionality already.

ER commented that it was only when the work reached XRN or further levels of development that the fine details of the processes would be produced, and shared that the DNO ORD file was a central part of the end-of-year reconciliation process, so the CDSP would need the ISC to use this file format as well to manage them both. This would be part of the specification of the procurement documentation, and they would look to the tendering parties to provide this information.

Reconciliation of shrinkage from Page 9 showed the start of the process with loading the values. and detailed the current process where DNOs provide OAD files. As the CDSP understood the updated BRs, if Ofgem does not issue disapproval to the ISCs when the DNOs produce their OAD files the ISE file would be produced and added.

ER pointed out that if the DNO and ISC OAD files are received in the same invoice month there will be no means to discriminate the two from the results in the same pot as both would be part of the same reconciliation. If they were issued in separate months, it would be possible to denote the changes generated from the DNO values and then subsequently those of the ISC. ER added that the CDSP did not think this was an issue but invited others to advise if they thought otherwise.

It was also noted that if, at the start of the process, Ofgem did issue disapproval, the ISE would still produce their data, but the CDSP would then add the DNO data only. ER added that the CDSP would ask the ISC to submit via the IX Link in the same format and manner as the DNOs did, and again the lower-level detail of this process would be called out in the detailed design. She advised that they were not proposing any changes to the ORD file format with the ISE use mirroring existing use.

ER noted that a sentence had been added to the cost element, as the figure did not include the Procurement part of the contract. Because this had been called out no changes to the cost range of £175k to £300k had been made as the figures still only covered the estimate for Change from a systems perspective. ER confirmed it was a complicated ROM, though added that it should prove to be the final version.

She shared that there had been some subsequent emailed conversations with DMO as Proposer from which a very minor wording tweak was required as a housekeeping change, namely the removal of the words 'be those' at the top of Page 5. The CDSP would provide a new version of the ROM when this was done.

5. Consideration of IGT Impacts

There was no commentary on this item in the meeting.

6. Legal Text Update

RHa asked the Workgroup Participants and the LT provider if the Modification was at an appropriate stage of development to request Legal Text.

DMo noted that there was not a vast amount of change to the Modification made and DMi agreed to look to provide the LT. Other participants agreed that requesting LT was a good next step.

DMi requested a copy of the Modification with any changes discussed in this meeting be made available to him. DMO agreed and committed to providing a tracked change and clean copy of

the next version (v13) of the Modification to provide to DMi and the Joint Office.

New Action 0405: DMi to provide first draft of the Legal Text.

Post Meeting Note:

Modification 0843 v13 was published on 08 April 2024: <https://www.gasgovernance.co.uk/0843>

RHa confirmed that a formal Legal text request would be made to the April UNC Modification Panel.

7. Development of Workgroup Report

This item will be covered in later Workgroups.

8. Next Steps

RHa confirmed the next meeting would include a quick review of the latest version of the Modification (v13) and of the first draft of the Legal Text.

9. Any Other Business

ER shared that an earlier question had been raised by a Transporter about the ability to create a subcommittee. She advised that the CDSP did some looking using the AUGÉ as an example and advised that it appeared to be that it was created through the UNCC, through a process of creation and approval, which she thought ought to be added to the WGR.

RHa agreed that this was correct and committed to add this to the WGR.

10. Diary Planning

0843 Meetings are listed at: <https://www.gasgovernance.co.uk/0843>

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

DMo commented that he believed he would be unavailable on 01 May and thus would check and to confirm back to the Joint Office.

Time / Date	Paper Publication Deadline	Venue	Workgroup Programme
13:00 Wednesday 01 May 2024	5 pm 22 April 2024	Microsoft Teams	<ul style="list-style-type: none"> Review v13 of the Modification. Review the first draft of the Legal Text
13:00 Wednesday 05 June 2024	5 pm 27 May 2024	Microsoft Teams	<ul style="list-style-type: none"> Development of Workgroup Report

Workgroup 0843 Action Table						
Action Ref	Meeting Date	Minute Ref	Action	Reporting Month	Owner	Status Update
0101	25/01/2024	2.0	RHa to investigate references regarding what happens if UNCC approval has not been obtained.	March	RHa	Closed
0202	23/02/2024	2.0	GDNs to provide collated text commentary responses to the studies referenced within Appendix 1 for inclusion within the WGR	March	GDNs	Closed
0203	23/02/2024	2.0	RHa to discuss with DMo the format and structure for the inclusion of GDN Commentary on Appendix 1 studies within WGR and DMo's subsequent responses.	March	RHa & DMo	Closed
0401	03/04/2024	2.0	DMo to review Flowchart documentation from June 2023 to ascertain if it requires updating to be consistent with the current Modification version and present at next meeting.	May	DMo	Pending
0402	03/04/2024	2.0	DMo to confirm if precedent exists in UNC TPD Section E text confirming liability for AUGE role did not sit with CDSP.	May	DMo	Pending
0403	03/04/2024	2.0	DMo to provide direction as to what shrinkage charge should apply if a Disapproval is issued where no previous ISC had been applied.	May	DMo	Pending
0404	03/04/2024	3.0	DMo and RHa to consider adding a single-page diagram of the ISC creation time cycle.	May	DMo & RHa	Pending

Workgroup 0843 Action Table						
Action Ref	Meeting Date	Minute Ref	Action	Reporting Month	Owner	Status Update
0405	03/04/2024	6.0	DMi to provide first draft of the Legal Text	May	DMi	Pending