Performance Assurance Committee Minutes Tuesday 14 February 2017 at Consort House, 6 Homer Road, Solihull B91 3QQ

Attendees

(LJ)	Joint Office
(MB)	Joint Office
(AC)	Transporter Member
(AL)	Shipper Member
(CB)	Shipper Member
(FC)	Observer, Xoserve
(FM)	Transporter Member
(JW)	Shipper Member Alternate
(LS)	Shipper Member
(MJ)	Shipper Member
(RH)	Observer, Xoserve
(RHa)	Observer, Joint Office
(RP)	Transporter Member
(SK)	Transporter Member
(TQ)	Ofgem
(MD)	Shipper Member
(HCh)	Transporter Member
	(MB) (AC) (AL) (CB) (FC) (FM) (JW) (LS) (MJ) (RH) (RHa) (RP) (SK) (TQ)

^{*}via teleconference

Copies of non-confidential papers are available at: http://www.gasgovernance.co.uk/PAC/140217

1. Introduction and Status Review

LJ welcomed everyone to the meeting explaining that this is the first meeting utilising the agreed modified agenda layout.

1.1 Confirm Quorate Status

The meeting was declared quorate.

1.2 Apologies for absence and note of Alternates

Mitch Donnelly (Shipper Member) absent, and

Hilary Chapman (Transporter Member) absent, and

John Welch as Alternate for Edd Hunter (Shipper Member).

Fraser Mathieson as Alternate for Hilary Chapman

1.3 Review of Minutes (10 January 2017)

The minutes of the previous meeting were approved.

2. Procurement of a Performance Assurance Framework Administrator (PAFA) - Update

FC advised that the process remains on track. Further updates on progress made will be provided when appropriate. (This agenda item will remain as a 'place holder' until such time as Xoserve has relevant information to impart to the PAC.)

3. Performance Assurance Framework (PAF) Document for the (Gas) Energy Settlement Performance Assurance Regime (Framework Document)

Framework Document

LJ displayed the draft document (v1.7 dated January 2017) on screen for Members to review the recent amendments whilst reminding those present that at the January meeting it had been agreed to split out the various PAC Documents, as defined in item 10 on page 8 of the document.

Moving on, LJ indicated that the document is almost ready for formal submission to the February 2017 UNCC for approval.

The only outstanding item was in relation to Action 0804a regarding a new section proposed to be included about budgeting. CB explained that she had established that PAC had no specific budget and that expenditure should be requested via the Change Control procedure on an as-needed basis. Concerns were voiced about a situation where other committees might prevent PAC from spending the budget, and AL reminded that the original intent was that PAC should be able to commission whatever it felt was required without the risk of other (budget-holding) committees blocking the request. LJ suggested, and parties agreed, to include a 'place holder' statement to capture this intent, rather than simply removing any reference to the budget aspects.

In response to the discussions, LJ undertook onscreen amendments to the document by added a new statement under item 8 on page 7. LJ suggested that until an actual problem is experienced, this is the most pragmatic solution.

Concluding the discussion LJ advised that he would finalise the document and submit it for formal approval at the February 2017 UNCC meeting.

4. Risks

4.1 Revised Risk Methodology – Review/Approve

Draft Risk Methodology review

During an onscreen review, JW explained the progress made to date on the draft document (v3.0, dated February 2017), explaining that it now reflects the previous committee discussions around throughput and probability aspects along with the inclusion of a control factor (similar in nature to the equivalent electricity market model) which would discount the inherent risk according to the controls in place. JW provided a brief walkthrough of how the control factors had influenced the examples provided within the map – it was noted that a range of possible risks have been provided for representational purposes in order to demonstrate a range of possible scenarios. He felt that the impact risks would be mitigated, which was illustrated by the horizontal movement (discounting in overall risk rating). LJ highlighted that this wasn't necessarily true, that it was sometimes possible to mitigate the likelihood, and so the discount should be illustrated according to the actual mitigations (meaning that a risk could move vertically in the diagram, or obliquely).

In response to a question about the level of the control factors, LJ explained that you can never have a control factor >1. JW advised that the factors were set at the same level as for the electricity scheme and so members accepted them as shown.

It was suggested that there were 'gaps' in the ranges defined for risk scores, by way of example <60% in one range and >60% in the next, omitting 60% was quoted. JW agreed to amend the information accordingly.

In noting that the principles behind the proposals appear sound, LJ enquired as to

whether or not parties wanted to approve the document today (subject to JW tweaking parts of the text/map), or whether they would prefer more time to consider the information provided – in the end it was agreed to leave the matter open until the end of the week to enable parties to provide direct feedback to JW, who can then finalise the document thereafter.

Review of the Joint Office Performance Assurance Committee web page (including Terms of Reference)

LJ provided a quick update on the changes made to the main PAC web page and noted the UNCC 19 January 2017 approval of the updated Terms or Reference.

4.2 Review Engage Report documentation

The Engage Report documentation was reviewed and the risks described therein were discussed, as follows.

Gas Market Settlement Risk Assessment document

Initially focusing attention on Appendix 9.1 – Matrix of all Risks, it was noted that it is not specifically this committee's role to undertake a 'deep dive analysis' of the documentation, as primarily PACs role is really to look at how best to prioritise the risks (in essence, analysis of this type forms part of the PAFA's role). However, after a brief discussion it was agreed that undertaking a sense check of the circa two years old Engage Report documents would/could prove beneficial especially when bearing in mind that the market has moved on since 2015 when the exercise was first undertaken by Engage.

It was agreed that PAC should first review the inherent Assumptions - item 3.2 -to establish their current viability (i.e. are they still correct, relevant or now redundant etc.).

The notable points of discussion on each of the eight (8) assumptions, are captured as follows:

Assumption 1 – The UK Link replacement system operates in accordance to the design specified within the BRDs

It was suggested that special attention is need around RAASP aspects (i.e. retrospective adjustment, capacity amendments, ratchets and unique sites etc.) and what are deemed to be cutover and what are potentially enduring considerations.

Assumption 2 – Xoserve cannot be subject to a performance assurance regime unless every action they complete is fully documented

Concerns were voiced around the number and scale of the potential Project Nexus manual workaround processes being developed for which little or no supporting documentation has been provided to date. Responding, RH advised that Xoserve is currently working towards providing a list identifying potential workaround processes.

When it was suggested that the Xoserve manual workarounds should be considered to be 'in scope', LJ suggested that a better assumption might be that all causes behind impacts to settlement should be addressed.

An alternative assumption was put forward that any processes associated with the settlement regime should be documented and complied with by all participants – this met with the approval of those in attendance.

Assumption 3 – A high number of read submissions or AQ corrections will not impact system performance

It was agreed that this assumption remains valid.

Assumption 4 – Where the BRDs provide detail of several options it is assumed the preferred option in the BRD will be built

It was noted that what is in the BRD has been built and therefore this assumption is no

longer valid and can be removed on the grounds that assumption 1 above covers off the requirement.

When asked, LJ confirmed that the provisions of UNC Modification 0610S 'Project Nexus – Miscellaneous Requirements' would not necessarily require a change to the BRDs should the modification be approved.

Assumption 5 – A significant number of supply points will be elected into product 2 and 3 as a result of the mandated smart and AMR rollout

Some parties suggested that UNC 0594R Workgroup discussions indicate that the take up of product 3 may not be as high as initially anticipated – this was not a universally supported view however, as some believe that the SMART rollout will help to build take up levels over time. FC also questioned the true benefits of class 4 over class 3 products including their respective expected take up levels.

It was suggested that removal of the 'and 3' statement might make this assumption more meaningful and representative as it remains unclear at this time who would actually opt for products 2 and 3. Responding to the many views on this topic, LJ reminded everyone that the main purpose of the assumption is to enable the industry to move forward in a world that lacks clarity, and as a consequence, the committee needs to consider a best-fit assumption.

When some parties enquired as to how long this assumption is expected to apply, it was agreed to include some form of time limitation. FC observed that Xoserve is struggling to source any meaningful market information around the potential take up of products, due in part to the commercially sensitive nature of the information.

It was agreed to amend the assumption to include a 2-3 year statement appertaining to the new settlement regime aspects and to also provide an indication that figures are expected to increase and that SMART rollout needs to be tracked – it is not expected that any figures would be higher than the actual SMART rollout figures.

Assumption 6 – Should UNC Modification be approved it is assumed Independent Gas Transporters (IGTs) will follow the same settlements processes as directly connected sites

It was agreed that this has now become a fact and therefore this assumption can now be removed.

Assumption 7 – Risks have been considered following the full and complete operation of the UK Link replacement system

It was agreed that this has also now become a fact and everything except RAASP aspects have been delivered and therefore this assumption can now be removed.

Assumption 8 – UNC Modification 0473/0473A is assumed to be out of scope of this piece of work and if approved will change the current Nexus arrangements.

In light of the fact that the AUGE and 0473 modifications have been approved, it was agreed that this assumption can now be removed.

When asked if there are any new assumptions that parties would like adding to the list, AL suggested that iGT contribution to settlement through Nexus process related impacts might prove a valuable addition – however, this was not necessarily a universally supported request, especially once JW pointed out the final sentence on page 11 that reads "As this report focuses on the enduring settlement arrangements, we have assumed that any misallocation to iGT shippers will diminish following the implementation of individual meter point reconciliation".

Concluding discussions around the assumptions, LJ indicated that a revised list of assumptions would be prepared for consideration at the March meeting.

New Action 0201: Reference Gas Market Settlement Risk Assessment document – Framework of Analysis Assumptions - Joint Office (LJ/MB) to prepare a list of updated assumptions for consideration at the March 2017 Committee meeting.

Discussions once again focused on the table of risks provided to the December meeting (within JW's slides), whereupon participants debated the best way forward whether that is to review the risks on a 'yes' / 'no' basis now (i.e. are they still valid), or alternatively request that the PAFA undertakes a review on behalf of the committee.

It was noted that not only is it prudent to consider the Engage Reports list of risks and establish whether or not any of these have changed over time but to also look to include other relevant risk areas, such as LDZ related errors.

When LJ suggested that perhaps it would be beneficial to send the list of risks to the PAFA and ask them to re-evaluate (validate) the risks given the time that has passed since they were first identified, FC quoted the Xoserve PAFA commission request which includes a request to reassess the Engage model. The consensus of those in attendance was that having the PAFA re-evaluate the risks would be a worthwhile exercise.

When AL also suggested that there could also be value in including a request to look at the Project Nexus manual workaround requirements at the same time, LJ asked her to give some thought to what potential risks are associated with the PN manual workaround solutions – reference existing action PAC0104.

When asked, parties indicated that they are now reasonably happy with the base risks and assumptions, as discussed.

5. Monthly Review Items

5.1 Issues List

LJ briefly summarised the current issues and the PAC reviewed the status.

PAC002 - Update due 01 May 2017. Carried Forward.

PAC007 – RP reported that he could find no explicit Code requirement to provide this reporting. In quoting the discussions on item 5 at the last meeting, RP proposed that we either continue on a 'as-is' basis (i.e. informally), or alternatively consider raising a UNC modification to address the matter via suitable amendments to TPD Section V.

CB highlighted that there was an overlap with the Contract Managers meeting (for the Agency Services Agreement). LJ reminded everyone that the UNCC had originally asked PAC to look into this but since it had been demonstrated that relatively low levels of materiality applied, it might be best to let the Contract Managers continue their investigations. It was agreed to refer the matter to the Contract Managers and await their output.

When asked, there were no new issue raised.

5.2 Implementation Plan

The brief review focused on the January 2017 draft Plan with special attention being paid to the February and March columns.

Performance Assurance Committee - month-to-month activity

The PAC reviewed the Q1 activities line by line, and AL noted the amendments to dates (February and March) – a brief line on line summary follows:

Lines 5, 8, 9 and 12 – covered elsewhere in the meeting;

Line 16 – Risk methodology – to be confirmed at the next meeting inc. industry supporting message. Due to conclude in March;

Line 17 – Period changes – already completed;

Line 21 – pre-Nexus Reports – covered on agenda;

Line 29 – Review the PARR – committee to take a view at March meeting;

Line 42 – Create workplan (inc. budget) – new agenda item to be added to consider components and content of PACs workplan. Also consider whether budget aspects remain relevant;

Line 50 – PAFA pre-Nexus reports – move out to March;

Line 57 – Industry communication on progress and performance areas of concern – in essence, the workplan;

AL will update the Workplan to reflect the changes.

TQ advised that Ofgem has also produced a high-level four part plan.

Concluding discussions, LJ explained that at the next meeting the focus would be on March / April items.

5.3 Ofgem Update

TQ provided a brief status update on the two SPAA Theft Incentives related modifications (327 and 337), and explained that 327 covers the scope of the theft scheme whilst 337 looks at an alternative scheme.

TQ went on to indicate that Ofgem are minded to accept 327, but reject 337. It is now expected that Ofgem will issue a letter to request that the industry considers reviewing the scheme in circa 12 to 18 months time.

In wondering whether or not this potentially indicates the level of effectiveness associated to the SPAA theft incentive scheme, some parties voiced concerns around the potential risks that the scheme appears to create, especially the promotion of inappropriate behaviours – in short, a perverse incentive.

Noting the concerns being voiced, LJ enquired whether it was appropriate for the PAC to look at the SPAA theft schemes (inc. TRAS aspects etc.). It was suggested that perhaps the working assumption should be that there was to be a high-severity risk about theft, and that such schemes were control factors and naturally then their effectiveness would come into scope.

TQ also suggested that perhaps PAC should also look at AUGE audit aspects, concerns were voiced about how this would fit with the AUGE process, however FC noted that there is no funding available to carry out an audit. Members felt that this was not an area that should be considered at this time.

LJ suggested that PAC needs to be mindful of being pulled from 'pillar to post' by miscellaneous areas of concern, especially when there is already an agreed approach in place – in short, they (the PAC) should focus on the highest risks and resolve these first.

5.4 UNC Standards of Service Report

LJ pointed out that this item had been covered elsewhere in the meeting (please refer to item 5.1 above).

5.5 PARR Schedule 1 Reporting

FC opened by explaining that the PARR Schedule 1 (i.e. attributable and including Shipper Short Codes etc.) reports are ready for issue. During a discussion around who should / should not receive these reports, it was suggested that Committee members and named alternatives with confidentiality letters in place, but not Ofgem, should receive copies via email. It was agreed that Ofgem could receive paper copies only. It was noted that until the PAFA is in place, this email should only go out to appropriate parties. The anonymised report would be available on Xoserve's secure (password protected) web site pages.

RP requested that an action is placed on Xoserve to provide documentation of the agreed process in order that PAC can formally approve at the March meeting.

New Action 0202: Reference PARR Schedule 1 Reporting provision – Xoserve (FC) to document the communication processes for formal PAC approval at the March 2017 meeting.

At this point in the meeting, discussions centred on the confidential aspects and matters associated with the PARR Schedule 1 reports and it was agreed that the Joint Office should NOT minute the discussions per se.

However, a high-level non-confidential summary of the ensuing discussion is kindly provided by FC for inclusion within the minutes, as follows.

"PAC reviewed the first draft of the Mod 0520A reports, in non-anonymised format.

These were only provided to PAC Shipper and Transporter members.

FC briefly explained the 4 reports:

1. Sites >732,000 AQ with standard correction factors.

All these sites should have a site-specific conversion factor.

2. Sites with no meter recorded

All sites, unless Isolated, should have a meter present and recorded on central systems. Without a meter, reads cannot be loaded, and reconciliation cannot take place, and a revised AQ can not be calculated.

FC commented that the Appendix to Mod 0520A specifies that this report should be in whole numbers, however that would make British Gas easily identifiable. The draft provided by Xoserve had used percentage of performance instead. After a brief discussion, PAC agreed that the anonymised reports should show percentages, but the PAC version should show whole numbers to show the materiality of the issue better.

Ultimately a UNC Mod would be required to formally amend the PARR.

3. Sites with no opening read

FC explained that this report would be produced a month in arrears each time, due to the length of the window for submitting reads.

4. No reads for 2-3 years, 3-4 years, >4years

FC confirmed that the figures represented number of sites in each category as a percentage of the Shipper's portfolio.

RP asked what the process would be for providing the reports in future and what would the timing be. FC agreed to document the proposed monthly processes and timing for both anonymised and non-anonymised reports for the next meeting.

AL asked what PAC was expected to do with the information in these reports. The ensuing discussion focussed on using the reports to understand the range of performance or behaviour and levels of risk. At present there is no incentive or penalty scheme associated with performance, and no expectation that poorer-performing Shippers would be asked to appear at PAC, unlike the Electricity arrangements."

Concluding the discussions, FC advised that the PARR Schedule 1 reports would shortly be made available on the Xoserve.com web site with a supporting narrative and an email issued via the Joint Office in due course.

6. Review of Actions Outstanding

PAC 0804a: Framework document - CB to produce a draft section on the Budgeting process, and provide to the Joint Office as soon as possible.

Update: It was agreed that this action could now be closed. **Closed**

PAC 1004: PARR Schedule 2 Reports - Xoserve to collate report development questions/recommendations for review by PAC at a future meeting.

Update: Ongoing; deferred to next meeting. Carried Forward

PAC1103: *PAF Framework Document* – JW to provide a risk rating scale based on throughput, and suggested amendments to the current section wording; and also provide a separate Risk Approach document.

Update: LJ asked parties to provide their comments to JW by close of play on Friday 17 February 2017 after which JW would finalise Risk rating and approach documentation in time for consideration at the March meeting. **Carried Forward**

PAC 1202: *Electricity Incentive Regime* - GM to prepare and present information on this at the March 2017 meeting.

Update: To be presented on 14 March 2017 as a separate agenda item. **Carried Forward**

PAC 0101: SoS Report TSL 3 and 4 - Xoserve to check what happens to the reporting on the standard in the future once it is removed.

Update: RH confirmed that these had been removed. Closed

PAC 0102: SoS Report TSL 11b - Xoserve to establish why the reporting on TSL 11b has stopped.

Update: RH reported that this matter had been discussed and agreed at the 09 February 2017 UKLC meeting. **Closed**

PAC 0103: SoS Report - Removal of obsolete/inappropriate TSLs - RP to establish what is driving the Transporter Standards and review what action is required/draft a self-governance 'house keeping' modification.

Update: It was agreed that this action could now be closed. Closed

PAC 0104: "Nexus Manual Workaround Report" - AL and RH to bring to the next meeting for discussion.

Update: RH advised that a list of the Xoserve manual workaround processes would be available in time for consideration at the May 2017 meeting, and that she would provide a copy to AL in due course. **Carried Forward**

7. Agree Key Messages and Next Steps

7.1 Key Messages

It was agreed that the following information should be communicated:

- Procurement activities for the Performance Assurance Framework Administrator (PAFA) are on track.
- A revised Performance Assurance Framework (PAF) document has been completed and will be submitted to UNCC for approval.
- PAF risk methodology has been agreed in principle.
- The assumptions and initial risks identified in the Engage report have been reviewed and an initial set for PAF risk register agreed (will be a key input for the PAFA).
- Transporter Standards and Liabilities report has been deferred to the Contract Managers' meeting to avoid duplication of effort.
- PAC had initial consideration of the Performance Assurance Schedule 1 Reports (attributable versions).
 - unattributable versions are expected to be available from Xoserve by the end of the week.

7.2 Next Steps

Items scheduled for the next meeting (March):

- Procurement of a Performance Assurance Framework Administrator (PAFA) -Progress update if appropriate
- Risk Register Review
- Confirmation of Risk Methodology and Assumptions
- Electricity Incentive Regime presentation by British Gas Shipper Member
- Regular monthly review/update items (Issues List; Implementation Plan; Ofgem update and PARR Schedule 1 Reporting update)
- Review of Actions outstanding
- Agree Key Messages and Next Steps

8. Any Other Business

8.1 UNCC Approval of the PAC Terms of Reference

LJ explained that the UNCC had formally approved the revised PAC terms of reference at the 19 January 2017 meeting.

8.2 Xoserve Question relating to the PAC Terms of Reference

LJ explained that A Miller of Xoserve had voiced some concerns that it appears that the PAC has unwittingly de-scoped National Grid NTS's PAC membership rights.

Members were uncertain precisely what the concern was. They were reminded that membership was a specific category that permitted visibility of attributable information and voting rights, neither of which were relevant to NTS. Members pointed out that any source of disruption to settlement is in scope, including NTS and even Xoserve themselves.

LJ then agreed to respond to AM directly.

9. Diary Planning

Further details of planned meetings are available at: www.gasgovernance.co.uk/Diary

Time/Date	Venue	Programme	
10:30, Tuesday 14 March 2017	Room LG8, Energy UK, Charles House, 5-11 Regent Street, London SW1Y 4LR	Electricity Incentive Regime presentation	
		The main focus will be to consider:	
		Procurement of a Performance Assurance Framework Administrator (PAFA) - Progress update (where appropriate)	
		Review the Risk Register	
		Confirmation of Risk Methodology and Assumptions	
		Electricity Incentive Regime presentation by British Gas Shipper Member	
		Regular monthly review/update items	
10:30, Tuesday 11 April 2017	Consort House, 6 Homer Road, Solihull B91 3QQ	To be confirmed	

10:30, Wednesday 03 May 2017	Elexon, 350 Euston Road, London NW1 3AW	To be confirmed
10:30, Tuesday 13 June 2017	Solihull	To be confirmed
10:30, Tuesday 11 July 2017	Rooms LG5/6 combined, Energy UK, Charles House, 5- 11 Regent Street, London SW1Y 4LR	To be confirmed
10:30, Tuesday 08 August 2017	Solihull	To be confirmed
10:30, Tuesday 12 September 2017	Room LG8, Energy UK, Charles House, 5-11 Regent Street, London SW1Y 4LR	To be confirmed
10:30, Tuesday 10 October 2017	Solihull	To be confirmed
10:30, Tuesday 14 November 2017 Room LG8, Energy UK, Charles House, 5-11 Regent Street, London SW1Y 4LR		To be confirmed
10:30, Tuesday 12 December 2017	Solihull	To be confirmed

Action Table (as at 14 February 2017)

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
PAC 0804a	31/08/16	4.	Framework Document - CB to produce a draft section on the Budgeting process, and provide to the Joint Office as soon as possible.	PAC Member (CB)	Update provided.
PAC 1004	10/10/16 (reworded 08/11/16)	7.	PARR Schedule 2 Reports - Xoserve to collate report development questions/recommendations for review by PAC at a future meeting.	Xoserve (RH)	Carried Forward
PAC 1103	08/11/16 (reworded 13/12/16)	3.	PAF Framework Document – Provide a risk rating scale based on throughput, and suggested amendments to the current section wording; and also provide a separate Risk Approach document.	PAC Member (JW)	Carried Forward

Action Table (as at 14 February 2017)

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
PAC 1202	13/12/16	4.	Electricity Incentive Regime - GM to prepare and present information on this at the March 2017 meeting.	PAC Member (GM)	Present on 14 March 2017 Carried Forward
PAC 0101	10/01/17	5.	SoS Report - TSL 3 and 4 - Xoserve to check what happens to the reporting on the standard in the future once it is removed.	Xoserve (FC/RH)	Update provided.
PAC 0102	10/01/17	5.	SoS Report TSL 11b - Xoserve to establish why the reporting on TSL 11b has stopped.	Xoserve (FC/RH)	Update provided.
PAC 0103	10/01/17	5.	SoS Report - Removal of obsolete/inappropriate TSLs - RP to establish what is driving the Transporter Standards and review what action is required/draft a self-governance 'house keeping' modification.	PAC Member (RP)	Update provided. Closed
PAC 0104	10/01/17 (reworded 14/02/17)	6.	"Nexus Manual Workaround Report" - AL to liaise with RH and bring to the next meeting for discussion.	PAC Member (AL) & Xoserve (RH)	Carried Forward
PAC 0201	14/02/17	4.2	Reference Gas Market Settlement Risk Assessment document – Framework of Analysis Assumptions - Joint Office (LJ/MB) to prepare a list of updated assumptions for consideration at the March 2017 Committee meeting.	Joint Office (LJ/MB)	Pending
PAC 0202	14/02/17	5.5	Reference PARR Schedule 1 Reporting provision – Xoserve (FC) to document the communication processes for formal PAC approval at the March 2017 meeting.	Xoserve (FC)	Pending