UNC Workgroup 0647 Minutes

Opening Class 1 reads to Competition (including IGT Modification 119 – Opening Class 1 read services on IGT Meter Supply Points to Competition)

Monday 17 December 2018

at Elexon, 350 Euston Road, London, NW1 3AW

Attendees

Bob Fletcher (Chair)	(BF)	Joint Office		
Kully Jones (Secretary)	(KJ)	Joint Office		
Alsarif Satti*	(AS)	Ofgem		
Andy Clasper	(AC)	Cadent		
Chris Warner	(CW)	Cadent		
Dave Addison	(DA)	Xoserve		
David Mitchell	(DM)	SGN		
Ellie Rogers	(ER)	Xoserve		
Gareth Evans	(GE)	Waters Wye Associates Ltd		
John Cooper*	(JC)	BUUK		
Kirsty Dudley*	(KD)	E.ON UK		
Lorna Lewin	(LL)	Orsted		
Lindsay Biginton*	(LB)	Utilitia		
Louise Hellyer*	(LH)	Total Gas & Power		
Mark Jones*	(MJ)	SSE		
Megan Coventry*	(MC)	SSE		
Michelle Whittington*	(MW)	EDF Energy		
Oorlagh Chapman*	(OC)	Centrica		
Rachel Clarke*	(RC)	Gemserv Ltd		
Richard Pomroy	(RP)	Wales & West Utilities		
Shanna Key*	(SK)	Northern Gas Networks		
Steve Britton*	(SB)	Cornwall Insight		
Steve Mulinganie	(SM)	Gazprom		
Tracey Saunders*	(TS)	Northern Gas Networks		
*via teleconference				

Copies of all papers are available at: <u>https://www.gasgovernance.co.uk/0647/171218</u>

1. Introduction and Status Review

Bob Fletcher (BF) welcomed all to the meeting.

1.1. Approval of Minutes (22 November 2018)

The minutes from the previous meeting were approved.

2. Review of Amended modification

Richard Pomroy (RP) presented a detailed walk through of the proposed changes to UNC 0647 for discussion and before submission as an amended Modification.

The Purpose of Modification and Summary had been amended to confirm that the proposed changes do not affect the arrangements for directly connected telemetered NTS Supply Meter Points.

The main changes were to the Solution section, including the addition of a new section titled *Transition* and a *Summary table of major changes in provision with timing*.

RP confirmed that there will be a transition period of three months following implementation at which point Shippers will be required to submit Class 1 reads. Workgroup participants confirmed that this is in line with discussions at the last meeting.

RP then provided a walkthrough of the summary table which provided details of:

- Transporter obligation
- Provision end or start date
- Shipper obligation
- Provision start or end date.

The following comments/observations arose during discussion of the summary table:

TPD M 1.9.2 Transporter makes consumption adjustments - DA in relation to making consumption adjustments if this is the reading date or submission date? For example, if responsibility transfers from a Transporter to a Shipper on 04 August and the read is submitted on 02 August it will be considered to be valid. RP is to consider an amendment of the Modification for responsibility for readings on a Gas Flow Day.

DA explained that at the deadline at the end of the Gas Flow Day a reading from the UDR file is considered and needs to be with the CDSP by 15:00 for Class 1 and 17:00 for Class 2 for the allocation runs to prevent estimates being used. In the change pack changes currently being drafted prioritisation is being given to Class 1 due to the size of the sites.

SM queried this approach suggesting that for some Shippers Class 2 could be large being just under the Class threshold and collectively Class 2 allocation could far exceed Class 1 sites. He also queried the reasoning for a different arrangement between Class 1 and Class 2 sites, seeking clarification of when the CDSP would require the data.

DA suggested the difference was because there is an assumption that there is a higher average volume of gas for Class 1 sites and hence the prioritisation. In addition, to prioritisation by average size of gas site there is consideration of the migration of Class 2 to Class 1 in the future.

SM suggested that a simple rule be applied based on getting all reads in by a certain time and not put in place any prioritisation by Class, particularly as Shippers will be responsible for providing all reads in future and this would make meter reading arrangements more straight forward to manage.

RP said that he was mindful for the potential for any unintended consequences that might lead to an increase in unidentified gas (UIG) and that prevention should be key. Although it was noted that PAC might consider further reporting and monitoring of Shipper read submissions in future. RP agreed to consider the following options:

- I. By D+5
- II. A specified time for Class 1
- III. A specified time for Class 2 (this would require a further Modification amendment)

TPD M5.6 Transporter submits reads to Shippers by 11am on D+1 so the time needs to be amended to be the time of first UDR file submission. A brief discussion took place with varying views and no agreement on whether it should be D+1 or D+5. SM emphasised the need to have alignment of Class 1 and Class 2 read arrangements. RP agree to review and amend TPD M 5.6 to make the obligation for Class 1 and 2 the same.

DA pointed out that there is a risk that readings submitted by the end of the Gas Flow D+1 will not be used for allocation.

New Action 1201: Wales & West Utilities (RP) to consider amending the current provisions in TPD M 5.6 to align the obligations for read submissions for Class 1 and Class 2 sites.

TPD G, J or M. RP stated that Shippers will be required to provide access to the pulse output on the meter or convertor for Transporters to obtain read information from the meter installation for network management purposes. In response to a question from SM about the term 'network management purposes' and whether it is defined, RP confirmed that it has not been defined yet.

New Action 1202: Wales & West Utilities (RP) to clarify the term 'network management purposes'.

In addition, in relation to TPD G, J or M, RP stated that Transporters will have a new right to install dataloggers at Class 1 Supply Meter Points for system management purposes but will not have an obligation to do so and neither will they be required to provide any data obtained to any other party.

RP then highlighted a number of consequential changes to TPD M stating that the working assumption is that no Class 2 meter will be telemetered for the purposes of the meter reading.

Finally, in relation to the transition rules RP explained that there are a couple of outstanding revisions that need to be made regarding implementation and central systems impacts. In addition, he stated that the rules on prime and sub-deduct arrangements will need to be approved for inclusion in UNC in due course.

3. Review of Gemini System Aspects

Discussion deferred to January meeting

4. Review of Business Rules

Discussion deferred to January meeting.

5. Development of Workgroup Report

Deferred to the January meeting.

6. Review of Outstanding Actions

There were no outstanding actions.

7. Next Steps

BF confirmed that the next meeting would focus on the amended Modification, consideration of the draft Legal Text and development of the Workgroup Report.

A brief discussion was held on whether a Rough Order of Magnitude (ROM) request was needed at this stage. DA confirmed that a final version of the Modification was needed but, in the meantime, he could start preparations for this work. RP confirmed that an amended Modification is likely to be provided by the end of the week.

New Action 1203: Joint Office (BF) to submit a formal ROM request to Xoserve for Modification 0647 subject to receipt of an amended Modification.

SM asked a general question in relation to implementation of the Modification and whether there should be an obligation on Transporters to assist Suppliers/Shippers.

New Action 1204: Transporters to consider what assistance can be provided to Suppliers and Shippers to support the implementation of the Modification and transition to the new regime.

BF concluded the meeting by asking Rachel Clarke (RC) if she had any comments to add from an IGT perspective. RC confirmed that she had no specific IGT related issues at this time.

8. Any Other Business

None.

9. Diary Planning

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

Time / Date	Venue	Workgroup Programme
10:30, Thursday 24 January 2019	Radcliffe House, Blenheim Court, Warwick Road, Solihull B91 2AA	 Review of Amended Modification
		Review of the Business Rules
		Review of Legal Text
		Review of Impacts and Costs
		 Development of Workgroup Report

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
1201	17/12/18	2.0	Wales & West Utilities (RP) to consider amending the current provisions in TPD M 5.6 to align the obligations for read submissions for Class 1 and Class 2 sites.	WWU (RP)	Pending
1202	17/12/18	2.0	Wales & West Utilities (RP) to clarify the term 'network management purposes'.	WWU (RP)	Pending
1203	17/12/18	7.0	Joint Office (BF) to submit a formal ROM request to Xoserve for Modification 0647 subject to receipt of an amended Modification.	Joint Office (BF)	Pending
1204	17/12/18	7.0	Transporters to consider what assistance can be provided to Suppliers and Shippers to support the implementation of the Modification and transition to the new regime.	Transporters	Pending

Action Table (as at 17 December 2018)