# UNC Workgroup 0691S Minutes CDSP to convert Class 2, 3 or 4 meter points to Class 1 when G1.6.15 criteria are met

# **Tuesday 21 January 2020**

# at Radcliffe House, Blenheim Court, Warwick Road, Solihull B91 2AA

#### **Attendees**

Rebecca Hailes (Chair)	(RH)	Joint Office
Karen Visgarda (Secretary)	(KV)	Joint Office
Andy Clasper	(AC)	Cadent

Carl Whitehouse\* (CW) Shell Energy Retail

David Mitchell (DM) SGN

Derek Clark\* (DC) Contract Natural Gas

Fiona Cottam (FC) Xoserve James Rigby Xoserve (JR) E.ON Kirsty Dudley\* (KD) Liam King\* (LK) Ofgem Lorna Lewin\* (LL) Orsted SSE Mark Jones (MJ) Mark Palmer\* (MP) Orsted Rhys Kealley (RK) **British Gas** 

Rob Johnson\* (RJ) Waters Wye Associates

Steven Britton\* (SB) Cornwall Insight

Tracey Saunders (TS) Northern Gas Networks

Copies of all papers are available at: <a href="http://www.gasgovernance.co.uk/0691/210120">http://www.gasgovernance.co.uk/0691/210120</a>

The Workgroup Report is due to be presented at the UNC Modification Panel by 19 March 2020.

#### 1. Introduction and Status Review

#### 1.1. Approval of Minutes (26 November 2019)

The minutes from the previous meeting were approved.

# 2. Amended Modification v6.0 (January)

Rhys Kealley (RK) confirmed the amended Modification v6.0 had been submitted in December 2019. Rebecca Hailes (RH) and RK then overviewed the various amendments as highlighted in the 'track change' version, of the Modification drawing attention to specific areas of interest.

<sup>\*</sup>via teleconference

A brief general discussion took place regarding the current NExA process in relation to the defined nomination procedure moving a Shipper to Class 1, and whether this could be bypassed. Some Workgroup Participants noted the existing process whereby the Shipper notifies the Transporter via the nomination referral process, this triggers the Transporter to perform various tasks, some related to any NExA in existence. The existence of any relevant NExA may not be known to all parties involved. Some Workgroup Participants reiterated their concerns that this process could effectively be bypassed and that there should be some mechanism whereby the nomination referral process should still be carried out in some way and that TPD Section G 2.3.4. should be consulted for clarity.

David Mitchell (DM) said from a Legal Text perspective that he would need to see how the NExA referral process currently worked in order to understand if there were any impacts, in relation to TPD Section G G.2.3.4. RK said that this area needed to be further explored with both Xoserve, SGN and British Gas.

**New Action 0101:** British Gas (RK), SGN (DM) and Xoserve (FC) to investigate and explain if and how the nomination referral process operates and ensure this process is not bypassed.

A general discussion then ensued in relation to what would happen if there was a change of Shipper during this process. The principle appeared to be that the 28 day notice should not begin if it was known that a change of Shipper was in flight, but rather it should begin once the new Shipper had fully taken ownership, and also, if the change of Shipper occurred during the 28 day notice, the clock should be re-set.

# 3. Consideration PARR Report specification/format (January)

Fiona Cottam (FC) confirmed the PARR Report specification had been discussed within the PAC meeting held on 21 January 2020 and that all the PAC Members were in full agreement.

## 4. Legal Text provision and review (January)

Dave Mitchell (DM) said that the draft Legal Text had been progressed and that he wanted to flag that the formal Legal Text Request had not yet been submitted by the Panel. RH said this was due to the fact the December meeting had been deferred at the instruction of the Proposer and RK confirmed this. DM said that once the formal Legal Text request and the amended Modification v7.0 were received then the Legal Text would be developed further. RH confirmed the Legal Text request would be submitted at the February Panel.

# New Action 0102: Joint Office (RH) to request the Legal Text at the February 2020 Panel.

Some Workgroup participants noted that the Legal Text had used the wording *Individual Valid Meter Reading Requirement* and *Aggregate Valid Meter Reading Requirement*, where the Modification used the phrase *Minimum Percentage Requirement* and *Minimum Performance Measure*. Both RK and DM said that these points would be addressed to ensure uniformity.

DM provided an overview of the draft Legal Text and drew attention the two drafting notes, reproduced below:

1.11.6 DRAFTING NOTE – The Draft Modification refers to Shipper making a Supply Point Reconfirmation. That seems correct as Annex G-1 (SP Amendments) doesn't obviously cater for a meter reading being provided – which is part of this solution. Three options are available under 1.11.1 (a) and (b), of which Supply Point Confirmations didn't seem appropriate so were excluded. For Workgroup to decide whether to narrow wording here - and in other places.

- 1.11.7 e (iii) DRAFTING NOTE The words quoted in the Draft Modification appear to refer to the text in M 5.4.1(b) Workgroup to confirm. M 5.4.1 seems designed to apply when the UNC requires an estimated Metered Volume for a Day to be determined in respect of a Class 1 or a Class 2 Supply Meter. Two points:
- 1) at the time the application of the clause is made the Supply Meter is not a Class 1 meter, and in an uncertain number of cases will not be a Class 2 meter. Question is it viable to utilise 5.4.1(b)?
- 2) 5.4.1 relates to where the Code requires the estimate for a Day, not for "any period" as referred to elsewhere. Can we use provision apply to determine not just where a number is needed in respect of a Day, but multiply it up to cover, say, the number of months since the last read? If not, there are other paragraphs in 5.4.1 which the Workgroup could work through to decide if these could form a solution and if so detail its specification accordingly.

A brief general discussion took place regarding the Drafting Notes and RK agreed to update the Modification in the areas highlighted by the Drafting Notes, to ensure consistency.

RK and the Workgroup briefly considered the potential overlap with Modification 0710 - *CDSP* provision of Class 1 read service, in relation to the Transporter Daily Read equipment and it was agreed RH would email Richard Pomroy as the Proposer of 0710 concerning this matter.

**New Action 0103:** Joint Office (RH) to contact the Proposer (Richard Pomroy) of Modification 0710 - *CDSP provision of Class 1 read service,* to confirm if there would be an overlap in relation to the Transporter Daily Read equipment and Modification 0691S - *CDSP to convert Class 2, 3 or 4 meter points to Class 1 when G1.6.15 criteria are met.* 

DM raised the question of 'codified' as defined in *Business Rule 1. The CDSP should consider* notifying both the Shipper and relevant Transporter immediately upon a site meeting the Class 1 qualifying conditions under G1.6.15 – however this is not proposed to be **codified**.

He said he did not understand why this was stated in the Business Rule, as the CSDP already notified the Shipper and the relevant Transporter. RK said he would amend Business Rule 1 and change the wording to make it explicit that the CDSP 'should' notify the Shipper and Transporter respectively.

**New Action 0104:** British Gas (RK) to amend the wording within Business Rule 1, to say the CDSP 'should' notify the Shipper and relevant Transporter *immediately upon a site meeting the* Class 1 qualifying conditions under G1.6.15 – however this is not proposed to be codified.

Likewise, some of the Workgroup Participants further noted that clarification was required in respect of Business Rule 4. In the Modification there is no mention of any weighting or not in terms of the length of month. Workgroup were happy that the specific text used in the Legal Text met the intent of the solution.

Kirsty Dudley (KD) said that from the implementation wording perspective that this needed to state that the DSC Change Management Committee would need to sanction this and RK said he reword this section in the Modification to reflect this requirement.

#### 5. Review of ROM

RH said that she would request clarification from Xoserve regarding the ROM content and costings as she was aware that the original ROM XRN4958 was produced in June 2019.

**New Action 0105:** Joint Office (RH) to contact Xoserve to clarify if the ROM XRN4958 is still valid from a content and costings perspective.

## 6. Confirmation of whether an equivalent IGT Modification is required (January)

RK said he would confirm if an IGT Modification would be required once the formal Legal Text had been submitted.

**New Action 0106:** British Gas (RK) to supply a statement confirming if an IGT Modification will be required and this statement to be encompassed within the Workgroup Report.

### 7. Finalise Workgroup Report (January/February)

RH overviewed the Workgroup Report and drew attention to areas as required, for clarification. A brief general discussion took place concerning the Relevant Objectives and it was agreed that

Relevant Objective b) Coordinated, efficient and economic operation of

- (i) the combined pipe-line system, and/ or
- (ii) the pipe-line system of one or more other relevant gas transporters.

should be removed as it was much less important than the other two relevant objectives identified by the Proposer; RK agreed to amend the Relevant Objectives, as outlined.

#### 8. Review of Outstanding Actions

**Action 0901**: Xoserve and British Gas to consider XRN4958 and raise a Change Proposal to provide the specification for the required PARR Report for Modification 0691S.

Update: FC confirmed this action could now be closed. Closed.

Action 1001: RK to submit an amended Modification v6.0

**Update:** RK confirmed the amended Modification had been submitted in December 2019 and so the action could now be closed. **Closed** 

Action 1002: Legal Text to be provided for Modification 0691S based on v6.0

**Update:** DM confirmed the draft Legal Text had been supplied, for which Workgroup thanked him. He stated the formal Legal Text had not been requested from Panel and then confirmed this action could now be closed. **Closed** 

Action 1003: Proposer (RK) to raise a Change Proposal for Modification 0691S.

**Update:** RK confirmed XRN5038 had now been raised and so this action could now be closed. **Closed** 

**Action 1101:** Xoserve (JR) and British Gas (RK) to specify what detail needed to be included in the PARR Report (A and B versions) in relation to the implementation and the DSC Service Line.

**Update:** RK confirmed this action could now be closed as the required information had now been included within the Modification. **Closed** 

# 9. Next Steps

RH outlined the next steps for the February meeting as follows:

- Review Amended Modification v7.0 (February)
- Confirmation of Legal Text (February)
- Clarification and confirmation of the ROM
- Confirmation of whether an equivalent IGT Modification is required (February)
- Confirmation as to whether there is an overlap with Modification 0710 (Action: 0103).
- Finalisation of Workgroup Report (February/March)

# 10. Any Other Business

# 11. Diary Planning

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

Workgroup meetings will take place as follows:

Time / Date	Venue	Workgroup Programme
10:30 Tuesday 25 February 2020	Radcliffe House, Blenheim Court, Warwick Road, Solihull B91 2AA	<ul> <li>Review Amended Modification v7.0 (February)</li> </ul>
,		<ul> <li>Confirmation of Legal Text (February)</li> </ul>
		<ul> <li>Clarification and confirmation of the ROM</li> </ul>
		<ul> <li>Confirmation of whether an equivalent IGT Modification is required (February)</li> </ul>
		<ul> <li>Confirmation as to whether there is an overlap with Modification 0710 (Action 0103).</li> </ul>
		<ul> <li>Finalisation of Workgroup Report (February/March)</li> </ul>

# Action Table (as at 21 January 2020)

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
0901	23/09/19	2.0	Xoserve and British Gas to consider XRN4958 and raise a Change Proposal to provide the specification for the required PARR Report for Modification 0691S.	Xoserve /British Gas (FC/RK)	Closed
1001	22/10/19	2.0	RK to submit an amended Modification v6.0	British Gas (RK)	Closed
1002	22/10/19	2.0	Legal Text to be provided for Modification 0691S based on v6.0	SGN (DM)	Closed
1003	22/10/19	2.0	Proposer (RK) to raise a Change Proposal for Modification 0691S.	British Gas (RK)	Closed
1101	26/11/19	2.0	Xoserve (JR) and British Gas (RK) to specify what detail needs to be included in the PARR Report (A and B versions) in relation to the implementation and the DSC Service Line.	Xoserve (JR)/ British Gas (RK)	Closed
0101	21/01/20	2.0	British Gas (RK), SGN (DM) and Xoserve (FC) to investigate and explain if and how the nomination referral process operates and ensure this process is not bypassed.	British Gas (RK), SGN (DM) & Xoserve (FC)	Pending
0102	21/01/20	4.0	Joint Office (RH) to request the Legal Text at the February 2020 Panel.	Joint Office (RH)	Pending
0103	21/01/20	4.0	Joint Office (RH) to contact the Proposer (Richard Pomroy) of Modification 0710 - CDSP provision of Class 1 read service, to confirm if there would be an overlap in relation to the Transporter Daily Read equipment and Modification 0691S - CDSP to convert Class 2, 3 or 4 meter points to Class 1 when G1.6.15 criteria are met.	Joint Office (RH)	Pending
0104	21/01/20	4.0	British Gas (RK) to amend the wording within Business Rule 1, to say the CDSP 'should' notify the Shipper and relevant Transporter immediately upon a site meeting the Class 1 qualifying conditions under G1.6.15 – however this is not proposed to be codified.	British Gas (RK)	Pending

# Joint Office of Gas Transporters

0105	21/01/20	5.0	Joint Office (RH) to contact Xoserve to clarify if the ROM XRN4958 is still valid from a content and costings perspective.	Joint Office (RH)	Pending
0106	21/01/20	6.0	British Gas (RK) to supply a statement confirming if an IGT Modification will be required and this statement to be encompassed within the Workgroup Report.	British Gas (RK)	Pending