

**UNC Workgroup 0664V Minutes  
Transfer of Sites with Low Valid Meter Reading Submission  
Performance from Classes 2 and 3 into Class 4**

**Thursday 28 January 2021**

**via Teleconference**

<b>Attendees</b>		
Alan Raper (Chair)	(AR)	Joint Office
Helen Bennett (Secretary)	(HB)	Joint Office
Andy Clasper	(AC)	Cadent
Chris Hooper	(CH)	E.ON Energy
David Addison	(DA)	Xoserve
David Mitchell	(DM)	SGN
Ellie Rogers	(ER)	Xoserve
Fiona Cottam	(FC)	Xoserve
Guv Dosanjh	(GD)	Cadent
James Barlow	(JB)	Xoserve
John Welch	(JW)	PAFA
Josh Myers	(JM)	CNG
Kate Lancaster	(KL)	Xoserve
Kirsty Dudley	(KD)	E.ON
Laurie Hayworth	(LH)	Cornwall-Insight
Lorna Lewin	(LL)	Orsted
Mark Jones	(MJ)	SSE
Oorlagh Chapman	(OC)	Centrica (PM only)
Richard Pomroy	(RP)	WWU (0664V and AOB only)
Steve Mulinganie	(SM)	Gazprom Energy
Tracey Saunders	(TS)	Northern Gas Networks

Copies of all papers are available at: [www.gasgovernance.co.uk/0664/280121](http://www.gasgovernance.co.uk/0664/280121)

The Final Modification Report 0664VV is due to be presented at the UNC Modification Panel by April 2021

## 1. Introduction and Status Review

Alan Raper (AR) advised Workgroup that when this was last presented to UNC Panel, a further point was raised which resulted in a further variation proposal being required, which would be 0664VV.

### 1.1. Approval of Minutes (11 December 2020)

The minutes from the previous 0664V Workgroup meeting were approved by attendees of that meeting present at this Workgroup.

### 1.2. Review of outstanding actions

**Action 1201:** Review draft Varied Modification 0664VV - SSE (MJ) to update the draft Modification 0664VV taking into consideration the various points raised by the Workgroup.

**Update:** Not discussed. **Carried Forward**

**Action 1202:** Review draft Varied Modification 0664VV - SSE (MJ), Xoserve (DA) and Cadent (AC) to discuss the legal text implications surrounding the proposed changes to the draft Modification 0664VV and consider the functionality of a staged implementation.

**Update:** Not discussed. **Carried Forward**

## 2. Review draft Varied Modification 0664VV

AR showed onscreen the draft version of 0664VV.

Mark Jones (MJ) advised that a 4-month proposed lock-out does not appear to be something that can be systematised anytime soon. Consequently, in the short to medium term, the Modification is probably going to be limited to one that reports to PAC.

DA advised, with regards to the Supplier entity and market participant ID check, when CSS changes are discussed later in the Distribution Workgroup agenda, it will be highlighted that a Shipper electing to change class is a complex process. While the validation specified in this variation is different, it is similarly complex.

DA raised his concern that the 2-month validation and the lock-out may create a number of different scenarios and will add a lot of complexity, which ultimately would need to be coded, and this needs to be considered in the context of the code freeze associated with the implementation of the CSS.

### Next Steps:

MJ's view is that an automated process would not be deliverable in the near future, and, as such, proposes to keep the foundations of the modification intact but provide compliance assurance by creating reports that go to the PAC.

Workgroup discussed if this would be better approached now as a fresh modification, noting that both the legal text and the Solution would need to change, however, the fundamentals of the modification would remain.

Richard Pomroy (RP) advised that a modification could be withdrawn up until it is submitted to Panel, noting that this modification already being varied once, and was of the view it could still be withdrawn.

DA advised he is not overly-concerned about reclassifying a site, the complexity arises as a result of the lock-out period: one option could be that the Shipper could simply be prohibited from reclassify within the 3-month lock-out period, but without the systematised block. If the modification goes through largely as a reporting solution, a Shipper would still be forced out of class 3 and into class 4, which is the essence of the proposal.

Workgroup agreed that the way forward for this modification could be to have a part A in 0664V and an optional part B which could address the problem with transgressions and reclassifying sites.

It was suggested that this is a matter for the DSC Change Management Committee, as the CDSP could be put in a position where an action is prohibited in the UNC, but there is no validation to prevent the action in the system.

ER clarified that, as things stood, the systematised element of Modification 0664V would be subject to the code-freeze associated with the implementation of the CSS.

AR suggested to take the modification forward as a reporting modification and introduce the lock-out element at a later date. In effect to split the modification into a part A and B.

Steve Mulinganie (SM) confirmed he would be satisfied with that approach as long as it addresses the point made in Gazprom Energy's consultation response in terms of measuring shippers fairly across their entire portfolio.

**New Action 0101:** MJ, DA & AR to consider today's and previous discussion and consider options for making all or parts the modification deliverable.

It was agreed that MJ will provide an update on progress at the next Workgroup in February 2021.

**3. Consideration of Revised Legal Text for 0664VV**

This will be considered at a future Workgroup once the direction of this modification is better understood.

**4. Completion of Variation Request for February 2021 Panel Submission**

This will be considered at a future Workgroup once the direction of this modification is better understood.

**5. Next Steps**

AR confirmed the next steps to be:

- MJ, DA & AR to consider today's and previous discussion and consider options for making all or parts the modification deliverable.

**6. Any Other Business**

None

**7. Diary Planning**

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

Time / Date	Paper Publication Deadline	Venue	Workgroup Programme
10:00 – 16:00 Thursday 25 February 2021	5pm Tuesday 16 February 2021	Teleconference	Standard Items

**Action Table (as of 28 January 2021)**

<b>Action Ref</b>	<b>Meeting Date</b>	<b>Minute Ref</b>	<b>Action</b>	<b>Owner</b>	<b>Status Update</b>
1201	11/12/20	3.0	<i>Review draft Varied Modification 0664VV - SSE (MJ) to update the draft Modification 0664VV taking into consideration the various points raised by the Workgroup.</i>	SSE (MJ) & Xoserve (DA)	<b>Carried Forward</b>
1202	11/12/20	3.0	<i>Review draft Varied Modification 0664VV - SSE (MJ), Xoserve (DA) and Cadent (AC) to discuss the legal text implications surrounding the proposed changes to the draft Modification 0664VV and consider the functionality of a staged implementation.</i>	Cadent (AC), SSE (MJ) & Xoserve (DA)	<b>Carried Forward</b>
0101	28/01/21	2.0	MJ, DA & AR to consider today's and previous discussion and consider options for making all or parts the modification deliverable.	SSE (MJ), Xoserve (DA) & Joint Office (AR)	<b>Pending</b>