

**UNC Workgroup 0851R
Extending the Annually Read PC4 Supply Meter Point (SMP) read
submission Window**

Thursday 25 January 2024

via Microsoft Teams

Attendees		
Rebecca Hailes (Chair)	(RHa)	Joint Office
Nikita Bagga (Secretary)	(NB)	Joint Office
Aidan Lo	(AL)	Joint Office
Andy Clasper	(AC)	Cadent Gas
Catriona Ballard	(CB)	Brookgreen Supply
Charlotte Gilbert	(CG)	BU-UK
Colin Wainwright	(CW)	SGN
Dan Simons	(DS)	Joint Office
Dave Addison	(DA)	CDSP
David Mitchell	(DMi)	SGN
David Morley	(DMo)	Ovo Energy
Edward Allard	(EA)	Cadent Gas
Ellie Rogers	(ER)	CDSP
Fiona Cottam	(FC)	CDSP
James Lomax	(JLo)	Cornwall Insight
Julie Chou	(JC)	Wales & West Utilities
Josie Lewis	(JL)	CDSP
Lee Greenwood	(LG)	Centrica
Louise Hellyer	(LH)	TotalEnergies Gas & Power
Mark Cockayne	(MC)	Joint Office
Matt Marshall	(MM)	Cadent Gas
Paige Leigh-Wilkes	(PW)	Cadent Gas
Steve Mulinganie	(SM)	SEFE Energy Limited
Susan Helders	(SH)	NGN
Tom Stuart	(TSu)	Wales & West Utilities
Tracey Saunders	(TS)	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/0851R/250124>.

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

1. Introduction and Status Review

Rebecca Hailes (RHa) welcomed all parties to the meeting. David Morley (DMo) provided a recap on what the Modification involves. DMo explained that there is currently a 25 SPSBD (Supply Point System Business Days) limit to submit meter reads and there are issues relating to missing this window and the reads therefore becoming unusable. In response to this, the

Proposer is looking to raise a Modification to expand the 25 SPSBD window to align with electricity market-wide half hourly.

1.1 Approval of Minutes (11 December 2023)

RHa raised the amendments made by CDSP to the minutes following the last meeting. The Workgroup confirmed they were happy with the proposed amendments and the changes were approved.

RHa confirmed a clean set of minutes would be published for Workgroup 0815R 11 December 2023.

1.2 Approval of Late Papers

There was 1 set of late papers that the Workgroup Participants approved for this meeting. This was the PAC response provided by Anne Jackson (AJ).

1.3 Review of Outstanding Actions

1101: PAFA (AJ) to obtain PAC views on possible actions related to this Review group and on what they would wish to contribute.

Update: AJ provided an update, advising that PAC do wish to contribute. The presentation discussed the outcomes and feedback from PAC following the questions put to them. PAC would like to contribute due to the potential impact of valid readings not getting into settlement and the effect this would have on the overall accuracy.

When discussing the proposed questions for a new PAC-led RFI to gather information for 0851R, AJ raised that there are UNC requirements around validation and some concerns that parties answering the questions would be indicating whether or not they are meeting the validation requirements as specified in the UNC. A caveat has therefore been included at the top of the questionnaire regarding confidentiality.

DMo raised that he had a further question he would like to include – *“If we extend the window beyond 25 SPSBDs, will your processes continue to pass through the majority of your reads within 25 SPSBDs?”*. Steve Mulinganie (SM) raised that the concern is not people sitting on their reads, the concern is people could be deciding to not submit until the last minute. In response, AJ questioned whether the wording of the additional question should be amended to state *“Do you wait until the threshold or do you send them [the reads] as soon as they are dealt with?”*. Furthermore, it was discussed that a question relating to batched reads could also be considered and what triggers someone to submit their reads. If people are withholding their reads, this is something that needs to be considered further and the need to investigate why this might be happening, but the hope is that the staggered timescales will prevent withholding.

SM raised that the key thing is to understand the benefit of having additional days in the window to submit reads in and to understand how many more valid reads will be obtained if the window is extended. AJ advised she would revisit the questions to ensure they capture this rationale.

SM raised a question relating to the different levels (specified in UNC TPD M 5.9.4) however, AJ advised this is tricky. There are levels in the Code currently but the understanding is that those levels don't impact accuracy. They can be checked only after 100% of reads have been submitted.

The intention is to distinguish between those reads which are valid and the valid reads which are being lost. RHa advised it would be worth noting on the questionnaire the rationale behind requesting the information, it is being collected to help validate the hypothesis that “more reads could be captured into settlement if the submission window was made longer”. The response to the questions will act as evidence to confirm the length of the extended window.

RFI Feedback to UNC0851R Workgroup PC3 & PC4 Meter Reading Submissions

AJ presented slides 1-4. AJ advised that PAC had conducted an RFI previously in which they obtained feedback. DMO questioned whether there were reasons for why reads could not be obtained or in the event they were obtained, why they could not be submitted however, AJ advised that the questions were not that specific.

SM highlighted that a good level of responses had been obtained previously.

The remainder of the slides were not deemed relevant for 0851R.

RHa summarised that the 25 SPSBDs is felt to potentially be too short and extending the window should lead to further reads being obtained and getting into settlement. The evidence obtained from the information provided should assist with deciding by how much to extend the window.

ER drew reference to the mention of Product Class 3 (PC3) and questioned the relevancy of including this data as DMO is focusing on PC4 so there is an assumption that the Modification would be based on PC4. DMO advised PC3 may not be required but he will take it away and ask his team if 7 days is too tight.

New Action 0101: DMO to ascertain whether the data from Product Class 3 needs to be considered.

Post Meeting Update:

DMO confirmed that given that sites in PC3 should be retrieving reads regularly for meters which are communicating regularly and as expected, expanding the PC3 read window at this point in time is not something that he wanted to pursue as part of Review 0851R. Therefore there was no need to include PC3 in the forthcoming RFI.

RHa asked and DMO confirmed that the rule being amended is in respect of PC4 (both annual and monthly); it will apply to both. RHa raised the idea discussed by DMO in that the window could be extended to 80 days. DMO advised this is a minded to position currently, it mirrors what is being done in the electricity space.

- 5. Of the actual meter readings your organisation obtains (whether valid or not, but not estimates), what percentage of these reads are successfully loaded into Settlement and /or Customer billing (where known).

Area	Settlement Only	Settlement & Customer Billing	Customer Billing Only	Not used	Total
For each category above: Percentage of Reads obtained (no estimates)	X%	Y%	Z%	AA%	100%

Lee Greenwood (LG) referred to question 5 (see above) and asked whether the Workgroup wants to be specific regarding the time frames; different people might interpret differently which could cause skewed results. AJ advised that it is likely to skew the results because you are considering data from Summer and Winter. 12 months is the best option but whether this is easy for everyone to track is unknown. The different times of the year may also have an impact on the rejected reads. RHa suggested the wording “*ideally look at over 12 months if you can*” or where data is provided, asking the person to indicate the period for which the data relates. If data has been obtained for 6 months this is still better than no data being provided at all. This is why a preamble would be important. **Closed.**

1102: (Shippers) To confirm if they hold back meter reads that they anticipate won't meet the valid read criteria.

Update: RHa advised that the JO had not received any feedback specifically relating to this

action; DMO had also not received anything. As this action was superseded by the RFI, it was agreed this action would be closed. **Closed.**

1103: PAFA (AJ) to review PAC RFI data and ascertain if sufficient detail for Review purposes. If not, ask of PAC would issue an RFI on behalf of the Review Group.

Update: The Workgroup agreed to close this action. See update relating to Action 1101 above. **Closed.**

1201: PAC to consider whether they want staggered benchmarks and if so, does the suggestion on slide 5 work for PAC? If not, can PAC suggest anything else? Consideration of wording in TPD Section M 5.9.4.

Update: DMO provided an overview of the presentation slides, explaining that 80 days allows for time to visit the site. The intention is not to promote invalid reads as a way of not considering the rejected reads option. RHa raised concerns surrounding the presentation in that anyone who gets an RFI from PAC will see what is being looked for, but this needs to tie into the narrative. There will also need to be consideration in the drafting of the Modification.

In terms of the sweet spot, SM suggested starting with 25 and moving up incrementally as a pragmatic approach, this will allow the impact on billing to be observed. DMO highlighted that continuing with 25 SPSBDs is arbitrary.

Louise Hellyer (LH) stated that the current benchmark is the baseline, whatever is currently being obtained is the first line and anything further is a bonus. The data obtained can help to promote the Modification.

SM highlighted that it is unlikely to create a detrimental impact, it can only improve the position. The first level/benchmark should be the current arrangement as we can measure historical data as a minimum.

ER advised that CDSP have a presentation on what the sweet spot may be. In relation to the different levels, there will be a need to ensure consideration of whether the wording relates (as is currently) to “obtained reads” for both CDSP and PAFA to consider, this will need to be done based on portfolio size. CDSP will need to wait until the end of the process to see what has been obtained. Another option is to have the wording relate to portfolio size so that performance could be calculated before 100% of reads are obtained. Fiona Cottam (FC) raised that PAFA is concerned about the data latency. The way the Code is currently drafted (“obtained reads”) means you need to know the final position to understand how much was obtained at the start. RHa reviewed the point of the staggered benchmarks and their use - the idea is to encourage everyone to submit their reads as opposed to sitting on them. FC raised that there are 2 different things at play – the system capability and the window. There may be something for PAC to look at and consider if there is a concern regarding a lack of compliance. FC further raised that there is not a report for every UNC obligation being submitted to PAC.

SM raised that PAC has limitations in terms of what they can do in the event of not meeting absolute requirements in the UNC. It is a pragmatic approach versus the system capabilities position. The Code is not absolute as it stands. This is about enhancing and improving settlement without there being an adverse effect elsewhere. ER raised that even if PAC do not wish to have a report at this stage, it would be beneficial in the future to see how people are performing at each of these levels rather than waiting until after the event to see how things are working.

A pragmatic starting point would be to go through file reports and provide statistics. The intention is to not imply the process is being made less robust.

RHa noted AJ’s comment “*This will not help settlement*”. AJ explained that the earlier reads are submitted does help settlement, but the deadline for how long after a read date is submitted is not going to change the settlement accuracy.

The intention for the Modification is to obtain more reads into settlement but this could affect reconciliation, making reconciliation take longer. These discussions are a way of trying to mitigate this effect, keep a good pace of submissions and ensure that a good chunk of reconciliations occur without destroying the current process.

RHa suggested 80-90% of submissions by 25 SPSBD.

The Workgroup discussed the possibility of not submitting reads by the first threshold and the impact this may have on the remainder of the readings obtained. SM advised that his view is that this doesn't restrict the ability to submit meter reads later on. ER confirmed that if someone doesn't submit by the threshold, the system will not reject further reads being submitted if the first threshold is not met. Meeting the first threshold is an aim.

RHa asked the Proposer to discuss this offline with PAFA and CDSP and report back to the next Workgroup meeting with an update.

New Action 0102: DMO to arrange a meeting with PAFA and CDSP to discuss any proposed change to UNC Section M 5.9.4.

Please refer to the presentation slides published for further details and information. **Carried Forward.**

1202: CDSP to consider what the optimal supply point business days is such that the impact is to only extend by one month's cycle. What is the sweet spot?

Update: RHa suggested Workgroup re-look at the material provided last month by the CDSP. FC confirmed CDSP was trying to discover what the optimum level of business days would be. 60 days would move to the 4th following month so what could be done to move only by 1 month. At this point, CDSP are unable to confirm how many extra reads would be obtained if the window was changed from 25 to 45 days.

CDSP conclusion was caveated by the following: business day counts depend on the fall of weekends and bank holidays: eg April 2023 was an 18-business day month due to starting on a Saturday and having 2 Easter Bank holidays. The conclusion is that based on 2023 to 2025 calendar years, a figure of **45 to 47 days** seems to be the minimum to ensure that no AQ or reconciliation transactions would be delayed until the 4th following month (except for existing Reconciliation exceptions).

FC noted that analysis of current read rejections would not give the full picture of read submission volumes or patterns – several Shippers report that they do not submit reads that have “timed out” . If the window were extended, it is not known what the submission profile of reads would

Please refer to the presentation slides published for further details and information. The Workgroup agreed to close this action **Closed.**

2. Review Discussion

2.1 Consider options presented in light of CDSP feedback

Please refer to section 1.3 for the discussion on the outstanding Actions.

2.2 Assessment of any data available and any further data required

Please refer to section 1.3 for the discussion on the outstanding Actions.

2.3 Workgroup assessment of options for a Modification

Please refer to section 1.3 for the discussion on the outstanding Actions.

3. Next Steps

Discussions next month will depend on the results of actions taken by PAC and by the Proposer.

4. Any Other Business

No other business was raised.

5. Diary Planning

0851R Meetings are listed at: <https://www.gasgovernance.co.uk/0851R>

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

Time / Date	Paper Publication Deadline	Venue	Workgroup Programme
10:00 Thursday 22 February 2024	5 pm Wednesday 14 February 2024	Microsoft Teams	<ul style="list-style-type: none"> Review Action updates Development of Workgroup Report
10:00 Thursday 28 March 2024	5 pm Wednesday 20 March 2024	Microsoft Teams	<ul style="list-style-type: none"> Completion of Workgroup Report

Workgroup 0851R Action Table						
Action Ref	Meeting Date	Minute Ref	Action	Reporting Month	Owner	Status Update
1101	23/11/2023	1	PAFA (AJ) to obtain PAC views on possible actions related to this Review group and on what they would wish to contribute.	January 24	PAFA (AJ)	Closed
1102	23/11/2023	1	(Shippers) To confirm if they hold back meter reads that they anticipate won't meet the valid read criteria.	December 23	Shippers	Closed
1103	23/11/2023	1	PAFA (AJ) to review PAC RFI data and ascertain if sufficient detail for Review purposes. If not, ask of PAC would issue an RFI on behalf of the Review Group.	January 24	PAFA (AJ)	Closed
1201	11/12/2023	2	PAC to consider whether they want staggered benchmarks and if so, does the suggestion on slide 5 work for PAC? If not, can PAC suggest anything else. Consideration of wording in TPD Section M 5.9.4.	December 23	PAC	Carried Forward
1202	11/12/2023	3	CDSP to consider what the optimal supply point business days is such that the impact is to only extend by one month's cycle. What is the sweet spot?	December 23	CDSP	Closed

Workgroup 0851R Action Table						
Action Ref	Meeting Date	Minute Ref	Action	Reporting Month	Owner	Status Update
0101	25/01/2024	1.3	DMo to ascertain whether the data from Product Class 3 needs to be considered.	January 24	DMo	Pending
0102	25/01/2024	1.3	DMo to arrange a meeting with PAFA and CDSP to discuss any proposed change to UNC Section M 5.9.4.	January 24	DMo	Pending