

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

Thursday 22 February 2024

via Microsoft Teams

Attendees		
Rebecca Hailes (Chair)	(RHa)	Joint Office
Harmandeep Kaur (Secretary)	(HK)	Joint Office
David Morley (Proposer)	(DMo)	Ovo Energy
Andy Clasper	(AC)	Cadent Gas
Anne Jackson	(AJ)	PAFA
Catriona Ballard	(CB)	Brookgreen Supply
Charlotte Gilbert	(CG)	BU-UK
Dan Simons	(DS)	Joint Office
Ellie Rogers	(ER)	CDSP
Fiona Cottam	(FC)	CDSP
James Lomax	(JLo)	Cornwall Insight
Josie Lewis	(JL)	CDSP
Kathryn Adeseye	(KA)	CDSP
Louise Hellyer	(LH)	TotalEnergies Gas & Power
Mark Jones	(MJ)	SSE
Martin Attwood	(MA)	CDSP
Marina Papatoma	(MP)	Wales and West Utilities
Sally Hardman	(SH)	SGN
Steve Mulinganie	(SM)	SEFE Energy Limited
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/Dist/220224>.

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

1. Introduction and Status Review

Rebecca Hailes (RHa) welcomed all parties to the meeting.

1.1 Approval of Minutes (25 January 2024)

The previous minutes from 25 January 2024 were approved.

1.2 Approval of Late Papers

No papers for the meeting had been submitted late.

1.3 Review of Outstanding Actions

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: Anne Jackson (AJ) confirmed that the staggered benchmarks were discussed during the PAC meeting, however, PAC has not provided a conclusion yet. AJ noted that PAC will consider this further.

Action Carried Forward.

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

Update: David Morley (DMO) provided a response to this in a post-meeting note to the previous Workgroup held on 25 January 2024 (<https://www.gasgovernance.co.uk/0851/250124>) confirming that given that PC3 sites should be retrieving reads regularly for meters that are communicating regularly and as expected, he was not looking to expand the PC3 read window.

Action Closed.

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

Update: CDSP and DMO confirmed that they have had offline discussions in relation to this and the outcome is reflected in the slides presented below in item 2.1.

Action Closed.

2. Review Discussion

2.1 Considerations from Actions Feedback

Josie Lewis (JL) presented the Current Class 4 Read performance and TPD M5.9.4 interaction. JL provided an overview of the performance of Class 4 Non-Monthly sites in submitting an accepted read within the 25 Supply Point Systems Business Day (SPSBD) window.

DMO queried the benchmark in relation to the Class 4 Non-Monthly site performance and asked whether the sites are meant to hit 90%. FC clarified that the performance for non-monthly sites is to get one read per annum into Settlement and after 12 months, the site is counted as needing a reading, on a per month basis. The slides do not show the sites that provide the readings in 8 or 9 months as they never hit the trigger.

SM asked whether the slides present the performance relevant to the requirement. FC confirmed that they do as they relate to the obligation to submit X number of reads where the only thing CDSP can measure is whether the sites get one read per annum.

DMO queried the position with multiple readings. FC explained that non-monthly sites can submit another reading after 25 calendar days of the first read in order to not appear on the performance report as it will be compliant with the requirements. ER further elaborated that if the site sends another reading within 25 days of the last reading, CDSP will not be expecting the reading, and it will be rejected as it is too close to the previous reading.

RHa asked DMO whether this is the data he had asked for. DMO confirmed that the data gives them a good indication as to how well people are submitting reads.

JL explained the background of the current arrangements in place and presented a worked example of the same using obtained reads. ER explained that the example shows how the progression of the reads should look rather than the reads being presented on the same day. DMO noted that his understanding is that A (10 Reads by the 10th day) is not measured. ER confirmed that A is currently not measured. If A is obtained, it will only be looked at, at the end of 25 days. ER noted that this is why they suggested including 'required reads' rather than the current text which says 'obtained reads'.

Anne Jackson (AJ) queried whether this Business Rule for the requirement is going to impact Settlement accuracy as if there is no impact, this would be outside of PAC's mandate. SM noted that as the process is currently set out, he cannot see any impact on Settlement and any need for PAC's involvement. RHa agreed that PAC would only be interested in general performance for context. AJ noted that PAC would be interested in knowing whether the readings are rejected or whether they are used to report. DMO noted that the rule is to submit a valid meter read. AJ pointed out the subtlety in the wording as there is a difference in the readings being obtained and what is on the system.

DMo explained that they are proposing extending the read submission window to 80 SPSBDs so that there is additional time to submit the readings. SM queried whether extending the window to 45 days where parties can only submit on day 40, would limit the risk of backloading and whether extending the window to 80 SPSBDs creates risk around backloading, which would be of relevance to PAC. DMO responded stating that it probably will not if the meter reads are passed through at the time of the reading.

JL presented what the worked example would look like according to the proposed changes, if the PC4 read submission were staggered over 80 SPSBDs.

For further information, please refer to the published slides.

2.2 Assessment of any data available and any further data required

AJ confirmed that PAC has reviewed and approved the Request For Information (RFI) to support Review Group UNC0851R. AJ presented the RFI template providing an overview of the questions covered in the RFI. RJ noted that the RFI calls out Class 4 categories only and looks to understand whether any reads are missing and whether the missing reads impact Settlement Accuracy. AJ highlighted that this review will be confidential to PAFA, and the details of parties will not be shared with other parties as organisations may be hesitant to share data otherwise.

AJ stated that RFI results may be presented in the April 2024 Workgroup as it will go out with a 4-week timeline for responses, after which PAFA will review and anonymise the data before sharing the results. AJ noted that the results may be delayed until May 2024 if PAC wishes to review the results first.

2.3 Workgroup assessment of options for a Modification

DMo presented the proposed solution in the Modification which will look to update TPD Section M 5.9.4. DMO explained that the intention is to have levels for the volume that will be submitted by certain points in time ("staggered benchmarks"). DMO noted that the value of reads and the day by which they are submitted are to be determined based on the RFI, however, his Proposal is currently to extend the submission window to 80 SPSBDs.

For further information, please refer to the published slides.

RHa queried where the suggestion from CDSP of 45 SPSBDs fits in, based on data presented to previous 0843 Workgroup meetings. DMO noted that he did not believe this is needed as if they align with electricity, 80 days will be enough time. DMO noted that he may look to change the submission window based on the RFI responses.

SM suggested that the change should be made based on evidence that improves the gas market rather than being reflective of the electricity market. SM noted that if the evidence shows that 45 days is beneficial, SEFE Energy will raise an alternative Modification that is supported by the evidence. SM stated that DMO may change the current window based on the analysis and the analysis may support alignment with electricity, however, the decision should be made based on the evidence.

Given that 0851R is a Review, RHa suggested that DMO start preparing a full Modification in readiness for the next UNC Distribution Workgroup meeting so that it can be discussed in the pre-modification discussions. RHa noted that DMO may wish to close the Review Group and propose the Modification. DMO noted RHa's suggestion.

3. Development of Review Group Report

Deferred to 28 March 2024.

4. Next Steps

The review group will await the result of the RFI and results, after filtering from PAC. The Proposer will endeavour to bring a pre-mod discussion to the March 2024 Workgroup.

5. Any Other Business

The Review Group thanked Anne Jackson for undertaking the large piece of work of collecting the data for the RFI.

6. 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 28 March 2024	5 pm Wednesday 20 March 2024	Microsoft Teams	<ul style="list-style-type: none"> Pre-Modification Discussion
10:00 Thursday 25 April 2024	5 pm Wednesday 17 April 2024	Microsoft Teams	<ul style="list-style-type: none"> Review RFI results

Workgroup 0851R Action Table

Action Ref	Meeting Date	Minute Ref	Action	Reporting Month	Owner	Status Update
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
0101	25/01/2024	1.3	DMo to ascertain whether the data from Product Class 3 needs to be considered.	January 24	DMo	Closed
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	Closed