Review of Network Operator Credit Arrangements Review Group (UNC0252) Minutes Monday 19 October 2009 Holiday Inn, Solihull

Attendees

Bob Fletcher (Chair) BF Joint Office of Gas Transporters Helen Cuin (Secretary) HC Joint Office of Gas Transporters

Beverley Viney

Carl Wilkes

CW RWE npower

Chris Shanley

Mandip Grewal

Phil Lucas

BV National Grid NTS

CW RWE npower

CS National Grid NTS

MG Northern Gas Networks

PL National Grid Distribution

Rawinder Basra RB Scotia Gas Networks

Richard Fairholme RF E.ON UK

Simon Trivella ST Wales & West Utilities

Stefan Leedham SL EDF Energy

Sue Davies SD Wales & West Utilities

Vickey King VK National Grid Shared Services

1. 1. Introduction and Status Review

1.1. Minutes from previous Review Group Meeting

The minutes of the previous meeting were approved.

1.2. Review of actions from previous Review Group Meetings

Action RG0252 0005: Ofgem (PD) to consider the annual cost reporting mechanism which should be established for the Gas and Electricity markets if the RAV is available on an annual basis.

Action Update: Ofgem had previously confirmed by email that the updated RAV value is published in the Gas Distribution Annual Report during the Spring following the end of the regulatory year concerned. SD confirmed that the Spring reports are available the following year. **Complete.**

Action RG0252 0007: Ofgem (PD) to provide an extract of the equivalent Gas and Electricity Licences.

Action Update: PD had previously provided extracts by email of Condition 40 and Condition 46. It was agreed to carry this item forward to the next meeting for clarification, as members were unsure if these were the correct licence extracts. **Carried Forward.**

Action RG0252 0008: Review Group to consider the introduction of additional Agencies into the UNC and consider recommendations for the **Review Group report**.

Action Update: JF had previously confirmed the intention to raise a modification.

Carried Forward.

Closed Action RG0252 0009: National Grid (PL) to establish what the reference to National Grid NTS and National Grid PLC being construed as a single Transporters is designed for.

Action Update: Although PL confirmed at the September meeting that National Grid Gas plc is a single signatory to the UNC, ST questioned this as the licenses are separate. CS explained that National Grid is a single entity. SL explained that EDF Energy also have two licenses but EDF Energy has a parent entity which has signed. ST wished to challenge the single signatures to the UNC. ST wished to understand why National Grid is signed as one single signatory to the UNC.

New Action RG0252 0009a: National Grid to clarify their position with regards to being a single signatory to the UNC despite having two separate licenses for Distribution and Transmission. **Pending.**

Action RG0252 0010: Review Group to consider if the "an approved credit" rating can be removed from section V3.

Action Update: It was previously agreed at the September meeting to consider this either within the **Review Group Report** or as a modification. **Carried Forward.**

Action RG0252 0011: National Grid Distribution to establish if the reference to V3.1.7 within V3.1.4 relates to a previous UNC Modification which should have been removed or if it should refer to an alternative paragraph.

Action Update: It was previously agreed that any change would need a modification and that the **Review Group Report** should reflect that the term needs to be removed. **Carried Forward.**

Action RG0252 0012: Review Group to consider the reference to a 12 month period for credit limits which build up measured as a 60th per month over 5 years.

Action Update: PD had previously provided an email update from Ofgem that the equivalent section in the DCUSA was clearer. It was agreed this needed to be changed for clarity. **Carried Forward.**

Action RG0252 0013: Review Group to compare the differences between missed/late payments in the Gas and Electricity markets and whether there should be a soft landing for administration errors.

Action Update: A discussion had previously taken place on whether to remove the option to use payment history until 12 months history is available. It was agreed that a soft landing needs to be considered along with the view of small suppliers. CS explained that National Grid NTS have some views and will bring a strawman along to the next meeting. **Carried Forward.**

Action RG0252 0013a: Joint Office to ask Ofgem if a small supplier can be approached for a view. Action updated to Ofgem to seek views from a small Supplier. **Action Update:** BF confirmed that the Joint Office have been approached and that Paul Darby is progressing this request. **Carried Forward.**

Action RG0252 0014: WWU (ST) to establish if the DCP034 document is available publicly and can be made available to the Review Group for further consideration. **Action Update:** ST confirmed that the documentation has been made available to the Review Group members. However, he has established that the report cannot be published. **Complete.**

Action RG0252 0014a: Review Group to consider the circulated DCP034 documents. **Action Update:** Any aspects to be included in the Review Group Report. **Closed.**

Action RG0252 0014b: Transporters to consider the impact of applying the DCUSA table introduced in DCP034.

Action Update: It was confirmed that Joanna Ferguson has raised a draft modification and that National Grid have provided a paper for further discussion. See item 2.1. **Complete.**

Action RG0252 0014c: Ofgem to provide a view on introducing the DCUSA table to the gas industry.

Action Update: Paul Darby provided some comments on the introduction of a credit assessment score table for use in conjunction with recognised agency trade credit scores, similar to those used in DCUSA. As an overall caveat, any comments at this stage are without prejudice to the full review of any modification proposals submitted to the ICL team:

- PD thinks it is likely that the introduction of a score table, similar to DCUSA and consistent with 3.21 to 3.26 of the best practice guide (BPG) would be agreed
- With respect to the Strawman paper by National Grid, a couple of points were fed back:
 - Option B: para 3.24 of the BPG, PD read this differently from NG NTS and doesn't think it envisages a 'second guess' against the credit allowance generated by the score table to Credit Rating read across rather it provides a comment that the assessment score embodies a view on what the user is 'good for'
 - * Option C: there could be some reticence in respect of a proposal which envisaged a possible reduction of the credit allowance available to holders of Issuer Credit Ratings where a secondary reference agency assessed a trade credit limit lower than the percentage driven level presently defined.

As a general comment, PD wouldn't see trade credit level assessments (£) taking priority over the established percentage scales associated with formal Credit Ratings – rather, the trade credit assessments provide an alternative 'route' into that regime. That said, he don't think proposals have to be hidebound by the 2005 BPG and so a revised approach to the credit assessment/Credit Rating read across could be appropriate. **Complete.**

Action RG0252 0016a: Modification to be raised to remove incorrect reference within Section V3 and V4.

Action Update: It was agreed to consider this when producing the Review Group Report. **Carried Forward.**

Action RG0252 0018: Review Group to consider whether a provision needs to be included relating to 30 days within V3.2.4 (d).

Action Update: It was agreed to consider this when producing the Review Group Report. **Carried Forward.**

Action RG0252 0019: Ofgem to clarify the approval rationale for <u>UNC0145</u>, given that Section V3.2.11 appears to open up a three month window that the VAR is potentially not covered by an increase in security.

Action Update: BF provided an action update from Ofgem: Section V 3.3.4 (NTS exit capacity charges included in the Value at Risk figure but only after a 'transgression' has occurred giving rise to notices. Having checked with the Ofgem gas policy team and ICL, PD has been unable to identify any Ofgem imperative for this mechanism – feedback is that specifics like this would have been 'industry response to the overall

requirement for robust arrangements'. The Review Group questioned if this was the correct update for this particular action, it was agreed to ask Ofgem to clarify the update as it was believed that this was an update to Action 0028.

The VAR level was discussed and the intention of the Best Practice Guidelines Section 3.4.7. Two months notice has to be provided for a change in charges. **Carried Forward.**

Action RG0252 0020: Review Group to consider if the whole of 3.2.5 should be referenced in 3.2.10.

Action Update: It was previously agreed that V3.2.9 needs amending and should be included in the **Review Group report**. **Carried Forward**.

Action 0021a: Review Group to consider if the management of contact details could be done centrally.

Action Update: ST would like to replicate the requirements for UNC emergency contacts. He explained that a change is being considered to maintain emergency contacts centrally and consideration is being given on whether to expand this for other contacts details. The aspiration is that there should be a requirement to supply and hold contact details centrally. The group discussed that currently the contact details only have to be supplied initially there is nothing in code to ensure maintenance. VK suggested the use of mailbox accounts rather than individual contacts. SL asked for any request for invoicing contact details is made clear to avoid any confusion with the provision of emergency. The Review Group agreed a central list ought to be maintained through a central point and this recommendation needs to be recorded in the Review Group Report. Carried Forward.

Action 0022a: Review Group to consider the use of email in addition to posted/faxed notices.

Action Update: The Review Group agreed that the use of email is supplementary to the formal communication routes due to the legal issues with email. The UNC provides a minimum and parties can choose to send email as a supplement to legal notices served by post or fax. **Complete.**

Action RG0252 0023: The Review Group is to consider the process and timeline for serving notices.

Action Update: The Review Group agreed to carry this item forward. Carried Forward.

Action RG0252 0024: Review Group National Grid NTS to consider if the current drafting should be amended to reflect one test at 80%.

Action Update: It was agreed that further consideration is required and that a legal view ought to be sought prior to making a recommendation. **Carried Forward.**

Action RG0252 0025: 3.3.2 - drafting error to be corrected – delete superfluous "V" in reference.

Action Update: See New Action 0016a. Carried Forward.

Action RG0252 0026: Review Group to consider if clause 3.3.2 (c) should be redrafted in line with discussions.

Action Update: Phil Lucas had previously clarified that there are different sanctions with different timescales. It was recognised some sanctions can be applied straight way and others only after 5 days it was questioned if sanctions should be consistent. VK confirmed that she would review the sanction in detail before obtaining a view from Ofgem as to whether the drafting should change. Paul Darby to provide a view on applying consistent sanctions for portfolio capacity increases. **Carried Forward.**

Action RG0252 0027: WWU (ST) to provide a view on whether a DNO can be terminated (V3) or discontinued (V4). If a DNO lost its licence, would it become a

discontinuing user?

Action Update: ST provided a view that DNO's should not be discontinued. The Review Group agreed it needs to understand who is party to which agreement and how the term for User applies in this instance to a DNO. SL asked about the booking of exit capacity, ST explained DNOs are classed as a User for that part of the UNC, the contractual relationship is the UNC itself, but the Transporter sale agreements need to be examined to understand the contractual relationship as he believed the DNO's are not party to each other's individual codes. SL understood that a party cannot be terminated for something that has not been signed and questioned which code would a breach be under, would this only be under the own DNO code, not all the other Transporters? Would effect be the same? CS believed a DNO could be terminated but the risk is very low. It was agreed to obtain a legal view. Carried Forward.

Action RG0252 0028: Ofgem agreed to consider the provisions in 3.3.4 to identify if there are any regulatory reasons for these provisions.

Action Update: See the action update provided by Ofgem for Action 0019. It was recognised that there was no objection provided by Ofgem. It was suggested that the collective DNO clause could be removed or if there was a justification for shipper users it maybe more appropriate to remove DN as users in V3 and V4. It was confirmed that the DNOs would like to see change but wanted to understand UKTs views on the justification of the provisions in 3.3.4. CS expressed some sympathy for DNs as they are very low risk. SL questioned the process for Shippers and DNOs with the use of Shipper of last resort and DNO of last resort, and the risks for new projects. ST highlighted that there is a user commitment in exit reform (ARCA process), adequate cover already for that capacity, but not in line with VAR, exit capacity singled out, inconsistent and no real basis for it. Want to progress removing this as part of this review group, is it consistent with best practise guidelines or credit arrangements? ST confirmed that he was happy to raise a modification but questioned if it should just be for DNOs, or everybody. SL highlighted that new and incremental projects need to considered and does it justify the cost. It was suggested that this is discussed as a Topic and a modification is developed. Complete.

New Action RG0252 0028a: Topic V3.3.4 exit capacity/VAR credit arrangements to be tabled at next Review Group for further discussion. **Pending.**

Action RG0252 0030: Review Group Ofgem to consider relevance and use of bi-lateral insurance provisions used in section 3.4.

Action Update: It was suggested that a view from Ofgem is obtained to determine what the meaning of this section is and whether it is relevant. **Carried Forward.**

Action RG0252 0031: Typo "an policy" to be corrected.

Action Update: To be corrected. See Action 0016a. Carried Forward.

Action RG0252 0032: Definition Enforceable contains a typo in the last sentence change "provides" to "provide".

Action Update: To be completed. See Action 0016a. Carried Forward.

RG0252 0033: National Grid (PL) to confirm the background to the £10,000 limit in

4.3.1(a) and if possible what this was equivalent to.

Action Update: No update available. Carried Forward.

Action RG0252 0034: Review group to consider the appropriateness of the 4.3.1(a) £10,000 limit.

Action Update: To be considered. Carried Forward.

Action RG0252 0035: Review Group to consider amending TPDV 3.2.5 to include specially commissioned ratings and qualifying companies whose credit rating is reduced below A.

Action Update: It was questioned if consideration is needed for a qualifying company going below A as they are usually cut out elsewhere if they fail to qualify. SD explained that they are no longer a qualifying company if the rating drops below A. However it was questioned what this actually meant as mathematically, A- is less than A. It was agreed that this statement needs to be clear to ensure no ambiguity. It was questioned if there is a need to define what is meant by A and if this included other relationships with A, ie, AAA-. It was suggested that a table might be needed to illustrate this with references to row numbers. A view on EBCC rules and Fitch modification to be obtained. Carried Forward.

Action RG0252 0036: Transporters (PL/SD) to seek a Legal view on what is Surety and Security.

Action Update: SD explained surety is commitment or intention and security is something tangible such as cash or other asset. For credit purposes there are grey areas such as a letter of credit, which is security as its cashable, but it is only valuable if the bank pay so could be considered surety. A promise to pay is only surety. It was agreed that a defined term may be required, it needs something that makes more sense and to check if there is any reason why one term can't be used. In certain parts of the section it only refers to surety and there may be consequences if this was changed to security. **Complete.**

2. Review Group Discussion

2.1. Topic Review

MG asked if there were any questions that need to be fed back into the Northern Gas Networks draft proposal.

It was suggested that the Modification needs to look at interim credit availability.

RF questioned what is the relevant information that could change the credit rating.

It was recognised that you can force a review at present but at cost to the Transporter. 'Off the shelf' agency credit ratings are considered more cost effective than a bespoke annual review. RF asked if rating by switching from one agency to another may lead to higher ratings.

VK highlighted the cost of a Dun and Bradstreet report at approximately £40. She suggested that the proposal should stipulate which three agencies could be used and that the lowest of the ratings will be used, the cost of this would be £120 (3x£40). SD highlighted the possibility of each Transporter requesting a rating resulting in multiple costs. SD asked what if a Shipper asked for a report, as this is free to them. However, it was not clear if the Shipper report could be shared with other parties. CS offered a suggestion that the Shipper could choose which three from table of five.

It was debated that if the Transporters specify the panel of three agencies and select any one, does the table need to only provide three agencies or all five.

VK explained that the Shipper could challenge the agency if there appears to be a discrepancy.

It was questioned if the table lifted from DCUSA should be published in the UNC how governance would be managed going forward. If it published elsewhere should it just be referred to rather than inserted into the UNC. BV asked if it should be added as an annex.

The group agreed the need to understand where the table originated from to monitor changes.

ST pointed out that any recognised credit rating agency could be appointed it is up to the Transporters to make an assessment of the rating.

Action RG0252 0037: Northern Gas Network to confirm origin of table and verify if this is a published document controlled by a third party.

BV introduced the strawman, with three options considering the NGN draft proposal.

Option B was considered and the reasonable test. It was recognised that the DUCSA table only gives a score not the value/size of a company. It was questioned if the table is the right way forward, should commercial judgement be used to indicate the level of credit based on credit score and company value.

VK explained the Score is the credit worthiness that value is what it should be capped at to prevent a small company obtaining a £10m credit rating say for example when only £2m should have been provided.

It was questioned if within the legal text of the DUCSA table did suggest use of commercial judgement?

SL suggested the DNOs may wish to consider the value of the contract against the credit rating and company size/value.

It was suggested that payment history may offer more value in addition to the credit report.

SD suggested that the UNC payment history is not a true reflection of a companies credit worthiness. If a Shipper is not paying other bills it may suggest trading issues. She believed that the payment history to Transporters on its own is of little relevance. It was challenged how lack of payment of other credit arrangements should affect credit arrangements under the UNC, if the UNC payments are always made. SL suggested companies are likely to delay payments to other creditors as much as possible in the current economic conditions, he challenged how customers could be challenged to reduce their credit worthiness when their UNC payments are always paid and on time. VK explained that independent assessment does not indicate what bills are not being paid, simply the percentage of payments reduced.

SL confirmed that credit rating agencies look at a suite of payments and days beyond term, but could still be paying gas charges on time and customers should not be penalised for other bills not being paid.

VK expressed that the score is an assessment of ability to pay and any reduction suggests that the company is becoming more of a risk and indicates a requirement to review credit.

Following the discussions on the strawman the Review Group agreed the preferred option from the strawman was option B and it was agreed that the draft proposal should be amended to include this option.

CS agreed to look at the wording of DCUSA model for commercial judgement.

Action RG0252 0038: National Grid NTS to examine the DCUSA model wording for commercial judgement.

Action RG0252 0038 a: National Grid NTS to work with NGN to capture the elements of the strawman agreed by the RG within the drafted proposal.

SD expressed she is not comfortable Option C.

RF suggested rewording commercial judgement as it implies Transporters may be making a judgement, SD explained that this is the credit agencies judgement, CS explained that this agency will recommend a maximum credit rating.

Action RG0252 0039: Shippers and Ofgem consider options detailed in the independent assessment strawman and provide a view at the next meeting.

VK highlighted how the UNC provides a higher unsecured credit limit. CS illustrated that more credit is being given than is needed under the UNC despite Ofgem concerns with option C. SL highlighted the possibility of supplier of last resort being utilised and that the unsecured credit limit gives some head room because it can take a while to obtain large increases in credit. VK asked if there was any appetite for Option C.

It was suggested that Option B has benefits and uses recommended limits not commercial judgements. It was questioned what would be the best payment history to go along with it, there are four or five options for credit payment history. Double counting was also mentioned. Consideration of the best practise guidelines was considered. CW highlighted these may have been best at the time but the market has changed and they need to reconsidered.

VK questioned the treatment of new customers, do you allow unsecured payment history at a reduced level until history is obtained, to balance the risk.

It was agreed a Strawman should be produced on three options.

Action RG0252 0040: National Grid NTS (CS) to provide a payment history strawman based on the three options.

It was agreed to obtain a view form Ofgem whether the draft modification should list all five credit agencies or the three agencies the Transporters will use. ST highlighted DUCSA does not preclude any agencies, CW questioned the exclusion of other market participants. VK asked what is fit for purpose.

Action RG0252 0041: Ofgem to provide a view of the extent of listed credit agencies and if this should be the same as DCUSA are limited to three agencies.

3. AOB

BF highlighted the need for extension to February 2010.

4. Diary Planning for Review Group

10:00 Monday, 16 November 2009, Holiday Inn, Solihull

10:00 Tuesday, 15 December 2009, London venue to be confirmed

10:00 25/26 January 2010, London or Solihull

APPENDIX A.

ACTION LOG - Review Group 0252

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
RG0252 0005	18/08/2009	2.1	Ofgem (PD) to consider the annual cost reporting mechanism which should be established for the Gas and Electricity markets if the RAV is available on an annual basis.	Ofgem (PD)	Complete
RG0252 0007	18/08/2009	2.1	Ofgem (PD) to provide an extract of the equivalent Gas and Electricity Licences.	Ofgem (PD)	Carried Forward
RG0252 0008	18/08/2009	2.1	Review Group to consider the introduction of another Agency into the UNC and consider recommendations for the Review Group report.	Review Group	Carried Forward
RG0252 0009a	19/10/2009	1.2	National Grid to clarify their position with regards to having one single signature to the UNC despite having two separate licenses for Distribution and Transmission.	National Grid (PL/CS)	Pending
RG0252 0010	18/08/2009	2.1	Review Group to consider if the "an approved credit" rating can be removed from section V3.	Review Group	Carried Forward
RG0252 0011	18/08/2009	2.1	National Grid Distribution to establish if the reference to V3.1.7 within V3.1.4 relates to a previous UNC Modification which should have been removed or if it should refer to an alternative paragraph.	National Grid Distribution (PL)	Carried Forward
RG0252 0012	18/08/2009	2.1	Review Group to consider the reference to a 12 month period for credit limits which build up measured as a 60 th per month over 5 years.	Review Group	Carried Forward

Action **Minute** Meeting Action Owner **Status Update** Ref **Date** Ref RG0252 18/08/2009 2.1 Review Group to compare the Review Carried Forward 0013 differences between Group missed/late payments in the Gas and Electricity markets and whether there should be a soft landing for administration errors RG0252 22/09/2009 1.2 Ofgem to seek views from a Ofgem Carried Forward 0013a small Supplier. RG0252 18/08/2009 2.1 WWU (ST) to establish if the WWU (ST) Complete 0014 DCP034 document is available publicly and can be made available to the Review Group for further consideration. RG0252 22/09/2009 1.2 Review Closed Review Group to consider the 0014a circulated DCP034 Group documents. RG0252 22/09/2009 1.2 Transporters to consider the **Transporters** Complete 0014b impact of applying the DCUSA table introduced in DCP034. 1.2 RG0252 22/09/2009 Ofgem to provide a view on Ofgem (PD) Complete introducing the DCUSA table 0014c to the gas industry. RG0252 22/09/2009 1.2 Carried Forward Modification to be raised to Review 0016a remove incorrect reference Group within Section V3 and V4. RG0252 18/08/2009 2.1 Carried Forward Review Group to consider Review 0018 whether a provision needs to Group be included relating to 30 days within V3.2.4 (d). RG0252 18/08/2009 2.1 Ofgem (PD) Carried Forward Ofgem to clarify the approval 0019 rationale for UNC0145, given that Section V3.2.11 appears to open up a three month window that the VAR is potentially not covered by an increase in security.

Minute Action Meeting Action Owner Status Update Ref **Date** Ref RG0252 18/08/2009 2.1 Review Group to consider if Review Carried Forward the whole of 3.2.5 should be 0020 Group referenced in 3.2.10. RG0252 22/09/2009 1.2 Review Group to consider if Review Carried Forward 0021a the management of contact Group details could be done centrally. 1.2 Rg0252 22/09/2009 Review Group to consider the Review Complete 0022a use of email in addition to Group posted/faxed notices. Carried Forward RG0252 18/08/2009 2.1 The Review Group is to Review consider the process and 0023 Group timeline for serving notices. RG0252 18/08/2009 2.1 Review Group to consider if Review Carried Forward 0024 the current drafting should be Group amended to reflect one test at 80% RG0252 18/08/2009 2.1 3.3.2 drafting error to be Review Carried Forward 0025 corrected – delete superfluous Group "V" in reference. Review 2.1 Carried Forward RG0252 18/08/2009 Review Group to consider if 0026 clause 3.3.2 (c) should be Group redrafted in line with discussions. WWU RG0252 18/08/2009 2.1 Carried Forward WWU (ST) to provide a view 0027 on whether a DNO can be (ST) terminated. RG0252 18/08/2009 2.1 Ofgem agreed to consider the Ofgem Complete provisions in 3.3.4 to identify if 0028 (PD) there are any regulatory reasons for these provisions. RG0252 20/10/2009 1.2 Topic V3.3.4 exit Review Pending 0028a capacity/VAR credit Group arrangements to be tabled at next Review Group for further discussion. Further views to be provided at the next meeting before raising a modification. ST wished to understand what the risks are

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
			if it wasn't there.		
RG0252 0030	18/08/2009	2.1	Review Group to consider relevance and use of bi-lateral insurance provisions used in section 3.4.	Review Group	Carried Forward
RG0252 0031	18/08/2009	2.1	Typo "an policy" to be corrected	Review Group	Carried Forward
RG0252 0032	18/08/2009	2.1	Definition Enforceable contains a typo in the last sentence change "provides" to "provide".	Review Group	Carried Forward
RG0252 0033	22/09/2009	2.1	National Grid (PL) to confirm the background to the £10,000 limit in 4.3.1(a) and if possible what this was equivalent to.	National Grid (PL)	Carried Forward
RG0252 0034	22/09/2009	2.1	Review group to consider the appropriateness of the 4.3.1(a) £10,000 limit.	Review Group	Carried Forward
RG0252 0035	22/09/2009	2.2	Review Group to consider amending TPDV 3.2.5 to include specially commissioned ratings and qualifying companies whose credit rating is reduced to A or below.	Review Group	Carried Forward
RG0252 0036	22/09/2009	2.2	Transporters (PL/SD) to seek a Legal view on what is Surety and Security.	Transporters (PL/SD)	Complete
RG0252 0037	19/10/2009	2.1	Northern Gas Network to confirm origin of table and verify if this is a published document controlled by a third party.	Northern Gas Networks (JF)	Pending
RG0252 0038	19/10/2009	2.1	National Grid NTS to examine the DCUSA model wording for commercial judgement.	National Grid NTS (CS)	Pending

Meeting Action Minute Action Owner Status Update Ref Ref **Date** RG0252 19/10/2009 National Grid NTS to work with National Grid 2.1 Pending NGN to capture the elements NTS (CS) 0038a of the strawman agreed by the RG within the drafted proposal. RG0252 19/10/2009 2.1 Pending Shippers and Ofgem consider Shippers options detailed in the 0039 and Ofgem independent assessment (PD) strawman and provide a view at the next meeting. RG0252 19/10/2009 2.1 National Grid NTS (CS) to National Grid Pending 0040 provide a payment history NTS (CS) strawman based on the three options. 2.1 RG0252 19/10/2009 Ofgem to provide a view of Ofgem (PD) Pending 0041 the extent of listed credit agencies and if this should be the same as DCUSA are limited to three agencies.