

Action Update: PAC to review COVID-19 problems, solutions, what interventions required before going into Winter 20/21.

Report to August 2020 Panel

1. Background

Several Urgent Modifications¹ triggered by the Covid-19 pandemic have been received since beginning April 2020 and processed through the UNC. These have been requested and been granted Urgency by the Authority and as such have proceeded through a very expedited process with generally no workgroup assessment.

2. Context

There may be a second wave of lockdown restrictions in Autumn 2020 and Panel wished to seek views from several sources on ways forward including lessons learnt and suggestions for further action.

3. Discussions

At PAC on 11 August 2020, the Committee briefly discussed lessons learnt from the several Urgent Covid-19 related Modifications received so far.

The overwhelming response from PAC Members was that regular and accurate meter read submission is the highest priority. Read submission drives accurate settlement. Parties should ensure their portfolios are as accurately recorded as possible in order to minimise erroneous and unnecessary charges.

Current Covid-19 related Modifications should be reviewed to ensure they can be made to work better in terms of traceability and auditability, if it is thought that they may be used again. PAC is not the ideal place to do this as it is not a development Workgroup. Other Workgroups such as Distribution would be better placed to do this.

Modifications 0722 and 0723 are linked to the UK government's (and devolved governments') emergency COVID restrictions, so will be available to Shippers if a second wave of COVID-19 infections

¹ All implemented except where indicated - for more information see:

<https://www.gasgovernance.co.uk/mods>

- Modification 0726: COVID-19 Liquidity Relief Scheme for Shippers
- Modification 0725: Ability to Reflect the Correct Customer Network Use and System Offtake Quantity (SOQ) During COVID-19 19 (Authority decision no-implementation)
- Modification 0724: Amendment to Ratchet charges during COVID-19 period
- Modification 0723: Use of the Isolation Flag to identify sites with abnormal load reduction during COVID-19 period
- Modification 0722: Allow Users to submit Estimated Meter Reading during COVID-19
- Modification 0721: Shipper submitted AQ Corrections during COVID-19 (Authority decision no-implementation)

triggers further mandated lockdowns or closure, without further amendments. They are only available to sites which have been ordered to close by the restrictions. Modification 0726 only applies to the June, July and August 2020 Billing Periods, so would need a further Modification to extend it to cover additional Billing Periods.

There has been a strong assumption by Industry that PAC could pick up information to monitor the effect of these Modifications, especially 0722 and 0723. This is not true. Both Modifications granted permissions for new uses of an existing industry function/flow without making any system changes to identify those transactions. The CDSP is unable to differentiate the usage of Modifications 0722 and 0723 from normal “business as usual” submissions of cyclic meter readings and Supply Meter Point Isolations.

PAC and PAFA access to industry-wide data is currently proscribed by the PARR reports in the main and is limited in scope. Parties should not assume that the data will be available unless it is specifically called out.

Any further Covid-19 Modification must include some detailed provision for any required reporting facility/tools PAC will need to monitor consequences of a Modification. This could include but is not limited to uptake, effect on settlement and/or AQ and any effects on UIG.

Systems Impact of a Modification must include monitoring of the effect of a Modification. This is not currently straightforward. PAC would need access to be made available to the correct and suitably framed data items and would potentially need specific analysis for each particular Modification to enable them to draw conclusions as to whether a specific Modification has been successful in its aim (if needed) and to monitor any effects.

3. Next Steps / Recommendation

- Discussion at DWG on future use of current Covid-19 Modifications and any potential for improvement.
- Panel to review the issues discussed and bear in mind for future Covid-19 related modifications.