Interim Panel Update (Draft):

Modification 778R - Gas Vacant Sites Process Review

Primary purpose: To Establish whether Vacant Site Status should be introduced into the UNC Discussion areas:

Previously rejected Modification 282 - Positives & Negatives in Ofgem Decision Letter

The Authority has concluded that:

- implementation of the modification proposal may better facilitate the achievement of the relevant objectives of the UNC¹⁵; but that
- directing that the modification be made would not be consistent with the Authority's principal objective and statutory duties.

How the process work now:

Site properties (AQ / SOQ / EUC) remain static: no read means no periodic revision

No temporary cessation to allocation: any over allocation resolved when Meter eventually read / reconciled

Mitigations available now:

Access via Landlord

Access via Warrant, where theft or debt suspected

Discussions around 2-yearly meter inspections

Use of Isolation: Suspends energy allocation

Use of Isolation and Withdrawal: Suspends energy & transportation charges

Provisions introduced to mitigate COVID effect

(Noted that temporary closures that may become permanent & other associated uncertainty factors)

Meter clamping / Meter removal & GS(M)R cut-off process

Acknowledgement of BSC P196 Process & agreement to deep dive

Discussion of BSC P196 Process:

Process Trigger: 2 failed attempts to read meter, (at least three months apart)

Supplier must endeavour to read meters, may include:

Check gas situation is comparable

Track down possible key holders – Estate agents etc

Must attempt access at least every 7 months and re-evaluate status

Audit trail must be maintained

Audit rights available to PAB

Change of Supplier wipes Vacant status

Noted that:

Product Class (PC) coverage: largely agreed Vacant provisions should be available to all PC

AMR should provide reads and should reduce Rolling AQ

Even empty premises can still consume: e.g. Frost protection Thermostat

Vacant status would have to be periodically validated

Solution options may be cross-code and impact REC

CDSP may be able to offer a validation service, (outwith UNC)

Points of note:

AMR meters should be able to identify "no usage" and AQ roll accordingly Vacant sites may relate principally to dumb metered sites, (exceptions will occur) However, view was that site characteristics should be main driver, not meter characteristics

Information from MRA key to establishment of Vacant status
Agreed that a process flow chart would be beneficial
Lessons need to learnt to avoid a Mod 282 outcome
Care needs to be taken to avoid misappropriation of status: e.g. on holiday rather than empty scenarios

High level agreement of categorisation based on:

Unoccupied

Non-consuming

No access

(Although exceptions could also form part of definition)

Agreement that process would probably require a guidance / "Related" Document

Points of note: