UNC Distribution Workgroup Minutes Thursday 27 October 2022 via Microsoft Teams

Attendees		
Eric Fowler (Chair)	(AR)	Joint Office
Helen Bennett (Secretary)	(HB)	Joint Office
Vera Li	(VL)	Joint Office
Aleksandra Cebo	(ACe)	EDF (0825 only)
Andy Clasper	(AC)	Cadent
Ashley Adams	(AA)	National Grid
Anne Jackson	(AJ)	Gemserv (0812R only)
Ben Mulcahy	(BM)	Northern Gas Networks
Claire Louise Roberts	(CLR)	ScottishPower
Clare Manning	(CM)	E.ON
Daniel Wilkinson	(DW)	EDF Energy
David Mitchell	(DMi)	SGN
David Morley	(DMo)	OVO Energy (agenda 1.5.1 only)
Ellie Rogers	(ER)	Xoserve
Emma Buckton	(EB)	Northern Gas Networks
Fiona Cottam	(FC)	Xoserve
John Baldwin	(JB)	CNG Services Ltd (0808 only)
Kate Lancaster	(KL)	Xoserve
Kathryn Adeseye	(KA)	Xoserve
Kundai Matiringe	(KM)	BU-UK
Lee Greenwood	(LG)	British Gas
Louise Hellyer	(LH)	TotalEnergies Gas & Power
Mark Jones	(MJ)	SSE
Nick King	(NK)	CNG Services
Nicky Kingham	(NKi)	Xoserve
Paul Bedford	(PB)	Opus Energy
Richard Pomroy	(RP)	Wales & West Utilities
Steve Mulinganie	(SM)	SEFE Energy Limited
Tom Stuart	(TSt)	Wales & West Utilities
Tracey Saunders	(TS)	Northern Gas Networks

Copies of all papers are available at: https://www.gasgovernance.co.uk/dist/271022

Please note these minutes do not replicate/include detailed content provided within the presentation slides, therefore it is recommended that the published presentation material is reviewed in conjunction with these minutes. Copies of all papers are available at: www.gasgovernance.co.uk/dist/271022

1. Introduction and Status Review

Eric Fowler (EF) welcomed everyone to the meeting and gave a brief overview of the scheduled items for discussion.

1.1. Approval of Minutes (22 September 2022)

The minutes from the previous Distribution Workgroup were approved.

1.2. Approval of late papers

EF advised there were no late papers for the main meeting but there are late papers for some of the workgroups.

1.3. Review Outstanding Actions

0108: Industry Update from Ofgem - Joint Office (EF) to advise Ofgem of the request for an excel version of the Code Modification / Modification Proposals with Ofgem for decision - Expected publication dates timetable to be published.

Update: No progress to report. Carried Forward

0109: Current energy prices and AQ amendments - Xoserve (ER) to discuss with Mark Perry, (Demand Estimation Team Manager), to request that he provide an update to the next DESC meeting on 05 October 2022).

Update: Ellie Rogers (ER) advised that the discussion has taken place and noted that DESC have no authority over individual site AQ's. The uplifting or reducing of factors to reflect gas year for day in day volatility of UIG was discussed in the last DESC meeting, the decision was taken to not action anything at this time. **Closed**

1.4. Industry Update from Ofgem

EF confirmed publication of the "Code Modification / Modification Proposals with Ofgem for decision - Expected publication dates timetable", last published 14 October 2022: https://www.ofgem.gov.uk/publications/code-modificationmodification-proposals-ofgem-decision-expected-publication-dates-timetable.

1.5. Pre-Modification discussions

1.5.1. Introduction of an Independent Shrinkage Expert

David Morely (DMo) introduced a pre-modification to introduce an Independent Shrinkage Expert (ISE).

Purpose of Modification: A recent independent study notes that, from early 2018 onwards, gas leaks above cities are 30-35% higher than is reported by Gas Distribution Networks. To lower greenhouse gas emissions, increase the robustness of RIIO-GD2 incentivisation, and reduce end-consumer costs, this Modification proposes to introduce a new role to the UNC: The Independent Shrinkage Expert (ISE). The ISE will be responsible for the production of the Shrinkage and Leakage Model (SLM), including updating or replacing the National Leakage Tests (NLT) through innovation, and will be led by principles of impartiality, environmentalism, and best outcomes for end-consumers.

When Louise Hellyer (LH) asked how the analysis is carried out at the moment in order to calculate Shrinkage, Mark Jones (MJ) advised the current model was designed some years ago and assumes that everything works perfectly, e.g no adhoc leaks, therefore this Modification is very welcome.

When David Mitchell (DMi) asked if the Proposer is planning to raise an equivalent IGT Modification, DMo advised that will be decided as an outcome of Panel discussions.

LH noted that her overall initial feedback is this Modification is a great idea, her only reservation is that there have been challenges with the AUGE in the AUG Framework and it would be advantageous if the scope of the ISE is defined as much as possible going forward.

When asked, DMo confirmed the ISE will be an enduring role.

MJ asked the Proposer to bear in mind that the governance that sits around shrinkage is quite complex.

DMo concluded his presentation by confirming the intention is to present the proposal to the November 2022 Modification Panel meeting and recommend that it is referred to Workgroup for a period of 6-months development and that Authority Direction procedures are followed.

End of discussion.

1.5.2. Amending the Unsecured Credit Table in TPD V3 to reflect the removal of Graydons and insertion of Creditsafe

Andy Clasper (AC) provided an overview of the proposal and referred to the Independent Assessment Score table located at UNC TPD Section V – General 3.1.7, he explained the table is utilised to allocate an unsecured credit limit to requesting Shippers.

AC also noted that, once an independent credit rating agency has been selected and an unsecured credit limit allocated, Transporters can monitor this as part of any required mid-year reviews

UNC TPD Section V - General 3.1.7

Independent Assessment Score	Equivalent of the Independent Ass	% of Transporter's Maximum Unsecured Credit Limit		
	Dunn & Bradstreet/ N2 Check Comprehensive Report	Experian Bronze, Silver or Gold Report	Graydon Level 1, Level 2 or Level 3	

AC explained that Creditsafe have taken over Graydons portfolio and that Transporter access to Graydons portal will be removed imminently which will effectively mean Transporters will not be able to allocate any new unsecured credit limits or review any ongoing limits set under Graydons.

All Transporters are currently in discussion with Creditsafe to extend their access to Graydons portal for as long as possible (to fit in with expected timescales of the modification) but it is expected that removal of the portal for some transporters could be imminent. In addition to ongoing discussions, Creditsafe have advised the absolute cut-off date for removal of the Graydons portal will be no later than Feb 2023. AC advised that due to the imminent removal of the portal, time is of the essence with this modification.

The purpose of the Modification will be to remove Graydons and insert Creditsafe within the table in V3.1.7. It is also to move any Shippers who, at the time of implementation, are utilising a Graydons unsecured credit limit onto a Creditsafe unsecured credit rating unless the affected Shipper requests the use of Dunn & Bradshaw or Experian prior to implementation.

AC advised that only a handful of Shippers are affected and that all relevant Transporters are currently in talks with all affected parties (it was noted some Transporters don't currently have any Shippers who utilise Graydons).

AC concluded his overview by confirming the intention is to present the proposal to the November 2022 UNC Panel with the suggested governance of Self-Governance with one Workgroup meeting.

End of discussion.

2. CSS REC Consequential Changes Update

Dave Addison (DA) provided a verbal overview of the latest update regarding Late Gate Closure and Missing Messages issued between the Central Switching Service and the Gas Retail Data Agent (GRDA) and explained the GRDA role is performed by the CDSP.

and noted the grey text in the material provided refers to information already provided in previous updates with the black front was itemising the new status.

For the detailed update, please refer to the published slides (the grey text in the material provided refers to information already provided in previous updates with the black front itemising the new status):

DA reported that there were still instances of missing messages being reported – the latest being on 13 October 2022, total to date was 155 missing messages.

(Note: subsequent to the meeting a further missing message instance was identified for 17 October 2022).

It was indicated that the Switching Operator had conducted an investigation that highlighted, of the 122 messages missing on 02 August 2022, 119 related to rejections that the GRDA had initiated. Upon investigation, DA advised that they had identified that the GRDA had rejected the message as it considered the message issued by CSS was for a future date or time.

DA indicated that this was caused by the GRDA instance of the Microsoft Azure Virtual Server Clock drifting by as little as half a second, as the CSS and GRDA systems have been exchanging messages in times less than this period. Upon investigation, Microsoft indicate that drift can occur by up to 2 seconds. DA indicated that a fix was being progressed to allow for future drift events.

DA apologised that this matter had been incorrectly attributed to the CSS Missing Message issue.

DA advised that Xoserve were still requesting the final reconciliation from DCC of the Missing Messages, but they understood that 9 messages related to a cancelled Registration. DA indicated that all Supply Meter Points had been issued to the impacted Shippers, and this was their current understanding of the situation for each Supply Meter Point and clarified that they expected confirmation that the remaining Registrations should have gone Live.

DA indicated that they were proposing to undertake prospective fixes, so if the Registration should be live in CSS from a point in the past, this would be applied to UK Link with the next available future Registration Effective Date. DA said that evaluation and analysis of the impacts were still ongoing under XRN5535 - Processing of CSS Switch Requests Received in 'Time Period 5' and confirmed that the CDSP were investigating options for adjustments.

Next Steps

CDSP have requested a reconciliation position and are informed that are 9 pending Switches that were cancelled, which leaves 146 Registrations that potentially need to be applied to UK Link.

Proposed Solution

CDSP plan to progress the changes as once they have developed and tested the functionality and have got to a point of 99% accuracy with regards to the adjustment. DA noted that traditionally adjustments can get complicated and that CDSP are looking at the best route for that adjustment so that it does not materially impact anybody's position.

REC update

DA advised that the Switching Operator has indicated that they cannot generate the Secured Active Message for Missing Messages and that UNC envisages that CDSP will get formal Secured Active Synch messages, and references 'Notifications' as a term from the REC. However, the Code does state that CDSP are not required to accept messages other than those specified in the REC.

With the suggestion that CDSP are allowed discretion to accept messages other than those specified in the REC, DA requested views from Workgroup.

DA further noted the suggestion that this is validated or approved by UNCC so that it is not set as a precedent.

Update concluded.

3. Workgroups

3.1. 0808 - Reverse Compression - deferred to October 2022

(Report to Panel 15 September 2022) https://www.gasgovernance.co.uk/0808

3.2. 0811S- Shipper Agreed Read (SAR) exceptions process

(Due to Report to Panel 20 October 2022)

https://www.gasgovernance.co.uk/0811

3.3. 0812R- Review of Alternatives to "Must Read" Arrangements

(Due to Report to Panel 20 April 2023)

https://www.gasgovernance.co.uk/0812

3.4. 0816S - Update to AQ Correction Processes - deferred to October 2022

(Report to Panel 17 November 2022)

https://www.gasgovernance.co.uk/0816

3.5. 0818 - Releasing of unused capacity under a specific set of circumstances

(Report to Panel 19 January 2023)

https://www.gasgovernance.co.uk/0818/

3.6. 0819 - Establishing/Amending a Gas Vacant Site Process – deferred to 02 November 2022

(Report to Panel 19 January 2023)

https://www.gasgovernance.co.uk/0819

3.7. 0825 - Removal of the remaining Retrospective Asset, Address and Supply Point (RAASP) elements of the Retrospective Adjustment arrangements put in place under Modification 0434 - deferred to 02 November 2022

(Report to Panel 20 April 2023)

https://www.gasgovernance.co.uk/0825

4. Distribution Workgroup Change Horizon

ER provided a view of the Dashboard Report highlighting Modifications that are Distribution Workgroup specific and where they are in the delivery process for Central Systems.

5. Issues

None raised.

6. Any Other Business

6.1. Priority Customers – definitions change

SM noted that clarification of when the process will be finalised and what the process will be is required.

ER provided an update and advised that CDSP manage the process on behalf of Gas Transporters and that since the notification from BEIS on the updated categories was received, CDSP are raising a change proposal. ER advised that, following discussions with Gas Transporters, an updated Request Form will be communicated in the form of an extraordinary Change Pack which will also provide confirmation of the process.

SM requested that the communication also confirms the arrangements for existing customers as it has been suggested that existing customers would be retained for this winter, but this is unconfirmed.

6.2. New Modification following on from Request 0718R - Review of the Unidentified Gas process

Mark Jones (MJ) provided an update and advised the proposal will be to allocate UIG based on a straight throughput allocation model. It is envisaged that Dan Fittock will be raising the Modification and for Workgroup to expect a pre-Modification discussion at the November Distribution Workgroup.

6.3. Implications of the Energy Bill

DA provided an update and advised that the management of Modification 0824 (Urgent) - Appointment of CDSP as the Scheme Administrator for the Energy Price Guarantee (EPG) for Domestic Gas Consumers (Gas) will be via the DSC Contract Management Committee but there may be aspects that might need to be viewed at Distribution Workgroup.

Workgroup considered this and agreed that a placeholder agenda item should be added to the Distribution Workgroup until further notice.

7. Diary Planning

Time / Date	Paper Publication Deadline	Venue	Programme
Tuesday 10:00-13:00 02 November 2022		Microsoft Teams	Workgroup 0819 and Workgroup 0825
Thursday 10:00 24 November 2022	5pm 15 November 2022	Microsoft Teams	Standard Agenda
Monday 10:00 12 December 2022	5pm 01 December 2022	Microsoft Teams	Standard Agenda

	Action Table (as of 26 October 2022)						
Action Ref	Meeting Date	Minute Ref	Action	Reporting Month	Owner	Status Update	
0108	25/08/22	1.5	Industry Update from Ofgem Joint Office (EF) to advise Ofgem of the request for an excel version of the Code Modification / Modification Proposals with Ofgem for decision - Expected publication dates timetable to be published.	September- 2022 October 2022	Joint Office (EF)	Carried Forward	
0109	22/09/22	4.1	Current energy prices and AQ amendments Xoserve (ER) to discuss with Mark Perry, (Demand Estimation Team Manager), to request that he provide an update to the next DESC meeting on 05 October 2022).	October 2022	CDSP (ER)	Closed	

UNC Workgroup 0808 Minutes Reverse Compression

Thursday 27 October 2022

via Microsoft Teams

Attendees		
Eric Fowler (Chair)	(AR)	Joint Office
Helen Bennett (Secretary)	(HB)	Joint Office
Vera Li	(VL)	Joint Office
Andy Clasper	(AC)	Cadent
Ashley Adams	(AA)	National Grid
Ben Mulcahy	(BM)	Northern Gas Networks
Claire Louise Roberts	(CLR)	ScottishPower
Clare Manning	(CM)	E.ON
Daniel Wilkinson	(DW)	EDF Energy
David Mitchell	(DMi)	SGN
Ellie Rogers	(ER)	Xoserve
Emma Buckton	(EB)	Northern Gas Networks
Fiona Cottam	(FC)	Xoserve
John Baldwin	(JB)	CNG Services Ltd
Kate Lancaster	(KL)	Xoserve
Kathryn Adeseye	(KA)	Xoserve
Kundai Matiringe	(KM)	BU-UK
Lee Greenwood	(LG)	British Gas
Louise Hellyer	(LH)	TotalEnergies Gas & Power
Mark Jones	(MJ)	SSE
Nick King	(NK)	CNG Services
Paul Bedford	(PB)	Opus Energy
Richard Pomroy	(RP)	Wales & West Utilities
Steve Mulinganie	(SM)	SEFE Energy Limited
Tom Stuart	(TSt)	Wales & West Utilities
Tracey Saunders	(TS)	Northern Gas Networks

Copies of all papers are available at: https://www.gasgovernance.co.uk/0808/271022

The Workgroup Report is due to be presented at the UNC Modification Panel by 17 November 2022.

1.0 Introduction and Status Review

1.1. Approval of Minutes (25 August 2022)

The minutes from the previous Workgroup were approved.

1.2. Approval of Late Papers

There were no late papers to consider.

1.3. Review of Outstanding Actions

0105: DNs to provide justification for an Authority Direction Governance route based on v1.0 of the Modification.

Update: As per Workgroup discussions on 27 October 2022, this action no longer applies. **Closed**

0106: DNOs to supply list of <u>mandatory</u> items for ancillary agreements and items which that <u>may</u> be required in an ancillary agreement.

Update: Deferred to November 2022 meeting when a strawman ancillary agreement will be reviewed. **Carried Forward**

2.0 Amended Modification

John Baldwin (JB) provided an update from the GDN discussions.

For a detailed update, please refer to the published slides on the meeting page.

JB noted he has had very little feedback from GDNs as yet and he believes there are three options for Workgroup to consider as a viable way forward for this proposal:

- 1. GDN Provided RC as per Cadent Doncaster which will provide capacity in a very large area that has a common 7 bar pipeline
- 2. GDN provided RC but with the RC adopted under a self-transmission pipelines)
- 3. An iGT owns and operates the RC

SGN have provided feedback on the three options and David Mitchell (DM) confirmed that their preferred option is 3 where the IGT owns and operates. DM suggested that a ancillary agreement should be developed that sits alongside it.

DM advised that Joel Martin has offered to draft a strawman ancillary agreement in time for the November 2022 Distribution Workgroup which will be shared with DNs in advance of that Workgroup.

JB noted that the draft scope as outlined on slide 5 of the presentation can be used as part of the development of the ancillary agreement.

Richard Pomroy (RP), Wales & West Utilities offered his feedback and advised that the development of an agreement is premature as there are still active trials and reverse compression is only one of the options to provide extra capacity. He added that there could be significant interaction issues, therefore there needs to be system controls put in to make sure it operates efficiently.

RP clarified that Wales & West Utilities oppose any of the options while there are still active trials.

Andy Clasper (AC), Cadent, advised Cadent are comfortable with option 3 at the moment and would like to see a transitional period included in any ancillary agreement.

JB noted that this approach is established throughout Europe, and that nobody has ever written down what the issues are within the UK Industry, he added there is no risk to consumers and there would be no stopping of flows from one grid to another.

Workgroup considered if a Modification is required at all and DM advised that if Workgroup agreed the option 3 route, this would create a situation where the IGT is taking gas off one network then flowing through to another network, this may need to be carved out in Code. That is why a Modification would be required.

DM received feedback as to what the ancillary agreement should include, such as:

- Who decides when the compressor operates (RP)
- Who is operating what?
- How the system is going to be operated in certain scenarios as the HSE would be interested if there is an impact to the Safety Case.

Workgroup agreed that the proposed changes are not material therefore the Modification can continue as intended. JB noted his preference is to amend Modification 0808 which received support from the DNs present at Workgroup. As it will be an enabling Modification it can move forward quite quickly as most of the agreements/rules will be in the ancillary agreement.

New Action 0110: Proposer to make appropriate amendments to the Modification based on Workgroup discussions held 27 October 2022.

New Action 0210: Networks to work collaboratively on the business rules for the ancillary agreement and the Code update.

3.0 Next Steps

EF confirmed the next step will be to:

- Review the content for the ancillary agreement (SGN, DM/JM)
- Provision of an amended Modification (Proposer)
- Extension to February 2023 to be requested at the November 2022 UNC Panel (Joint Office)

4.0 Any Other Business

4.1. NTS Meters Accuracy

JB advised that CNG Services Ltd (CSL) believes that reduction in gas flow through NTS Exit Metering (caused by lower gas demand and potentially reduced NTS exit flows into parts of the LDZ with additional biomethane injection) is adversely impacting the development of biomethane projects.

Workgroup agreed that an agenda item can be put on the main Distribution Workgroup agenda for discussion at the January 2023 meeting.

5.0 Diary Planning

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

Workgroup meetings will take place as follows:

Time / Date	Paper Publication Deadline	Venue	Workgroup Programme
Thursday 10:00	5pm	Microsoft	Standard Agenda
24 November 2022	16 November 2022	Teams	
Monday 10:00	5pm	Microsoft	Standard Agenda
12 December 2022	01 December 2022	Teams	
Thursday 10:00	5pm	Microsoft	Standard Agenda
26 January 2023	18 January 2023	Teams	

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
0105	26/05/22	3.0	DNOs to provide justification for an Authority Direction Governance route based on v1.0 of the Modification.	DNOs	Closed
0106	23/06/22	3.0	DNOs to supply list of mandatory items for ancillary agreements and items which that may be in an ancillary agreement.	DNOs	Carried Forward
0110	27/10/22	2.0	Proposer to make appropriate amendments to the Modification based on Workgroup discussions held 27 October 2022	Proposer	Pending
0210	27/10/22	2.0	Networks to work collaboratively on the business rules for the ancillary agreement and the Code update.	Networks	Pending

UNC Workgroup 0811S Minutes Shipper Agreed Read (SAR) exceptions process

Thursday 27 October 2022

via Microsoft Teams

Attendees		
Eric Fowler (Chair)	(AR)	Joint Office
Helen Bennett (Secretary)	(HB)	Joint Office
Vera Li (Secretary)	(VL)	Joint Office
Andy Clasper	(ACI)	Cadent Gas
Ashley Adam	(AA)	National Grid
Ben Mulcahy	(BM)	Northern Gas Networks
Claire Louise Robert	(CLR)	ScottishPower
Clare Manning	(CM)	E.ON Next
Daniel Wilkinson	(DW)	EDF Energy
David Addison	(DA)	Xoserve
David Mitchell	(DM)	SGN
Elena Dranceanu	(ED)	Gazprom Energy
Ellie Rogers	(ER)	Xoserve
Fiona Cottam	(FC)	Correla on behalf of Xoserve
John Baldwin	(JB)	CNG Services Ltd
Kate Lancaster	(KL)	Xoserve
Kathryn Adeseye	(KA)	Xoserve
Kundai Matiringe	(KM)	BU-UK
Lee Greenwood	(LG)	British Gas
Louise Hellyer	(LH)	TotalEnergies Gas & Power
Mark Jones	(MJ)	SSE
Nick King	(NK)	CNG Services
Nicky Kingham	(NKi)	Xoserve
Paul Bedford	(PB)	Opus Energy
Richard Pomroy	(RP)	Wales & West Utilities
Steve Mulinganie	(SM)	SEFE Energy Limited
Tom Stuart	(TSt)	Wales & West Utilities
Tracey Saunders	(TS)	Northern Gas Networks

Copies of all papers are available at: https://www.gasgovernance.co.uk/0811/271022

The Workgroup Report is due to be presented at the UNC Modification Panel by 2022.

Please note these minutes do not replicate/include detailed content provided within the presentation slides, therefore it is recommended that the published presentation material is reviewed in conjunction with these minutes. Copies of all papers are available at: https://www.gasgovernance.co.uk/dist/271022

1.0 Introduction and Status Review

Steve Mulinganie (SM) stated that the Legal Text is not yet available and suggested to postpone discussion. Eric Fowler (EF) advised that the ROM Response and Draft PARR report provided by Ellie Rogers (ER) have now been published and recommended Workgroup to have a brief discussion on these.

1.1. Approval of Minutes (22 September 2022)

The minutes from the meeting held on 22 September 2022 were approved.

1.2. Approval of Late Papers

EF advised that the ROM Response and Draft PARR Report were received late, Workgroup agreed to review them.

1.3. Review of Outstanding Actions

Action 0108: All Shippers to review the amended Business Rules within the Modification and provide comments/concern to JO for further discussion in October 2022 Workgroup meeting. **Update:** Joint Office confirmed that no further response has been received. SM) and EF suggested the action is closed. **Closed**

Action 0208: All Shippers (where possible), to share with the CDSP typical volumes for their organisation where a SAR has been agreed between Shippers, whereas the Proposing User has failed to submit it.

Update: Ellie Rogers (ER) confirmed only one response received.

ER confirmed that in order not to delay the progress, she has drafted and provided the ROM Response. **Closed**

2.0 Amended Modification

No progress on the Amended Modification. EF reminded SM on the missing information on Section 4 Code Specific Matters is still required (The Workgroup Report shows in draft the expected text as previously agreed by the Workgroup).

SM advised he will provide an amended Modification once the Legal Text has been finalised.

New Action 1001: SM to finalise and submit the Amended Modification to JO for publication.

3.0 Development of Workgroup Report

EF reviewed and updated the current version of the Workgroup Report with the two pieces of information ER provided in the draft PARR Report and ROM Response, both can be found on Modification 0811 Meeting webpage https://www.gasgovernance.co.uk/0811/271022

SM stated that the Draft PARR Report has raised some interesting questions and that Xoserve have set out some performance parameters, however, SM noted that, as the Proposer, it is not the role of Xoserve to guess and define what performance issues the PAC may need to monitor.

ER advised it was an action in the recent PAC meeting when this Modification was being discussed and this is a first draft and is an assumption of what might be useful.

SM raised his concern that this may set a precedent that the Proposer is responsible for defining what reporting the PAC might get to see, this would seem rather like 'marking one's own homework' and not be appropriate. SM requested that the PARR should be included in the Workgroup Report as an illustration only.

Clare Manning (CM) agreed that the Modification should be developed independently of the requirements for reporting to PAC. SM clarified that if PAC is interested in the Modification and think there should be some associated reporting, then it is their task to develop the reporting.

SM suggested that this PARR report is to be noted in the Workgroup Report. EF proposed to add the PARR report as an appendix and make it clear this is supporting information but is not intrinsically part of this Modification.

ER explained that it is at the request of the PAC that the draft PARR report was created.

Louise Hellyer (LH) stated that the reason for raising the Modification with PAC is for them to check if this has any impact on other reporting. It should be PAC to determine how it should work and not for Proposer to define what PAC expect.

EF then asked the Workgroup to comment on the wording to be entered on the Workgroup Report regarding the PARR Draft Report and all agreement was reached to add it as an Appendix.

ER presented the ROM Response and provided a brief overview of the impacts, assumptions and summary table. She advised there will be an implementation cost of between £70-130K however, but it is not possible to confirm if there would be any ongoing costs. Timescales for inclusion in the next available release, which is November 2022, however, with the process gaining final approval, the DSC Change Management Committee approval procedures may mean it cannot be delivered in the November 2022, release. The next release is May 2023.

Paul Bedford (PB) queried if there is corresponding Xoserve changes and ER confirmed there is an impact on Xoserve system processes. SM also reinstated that there are only UK Link changes and no impact in relations to Shippers. When PB asked ER confirmed that there will be no changes in the file format, and no intention to create a new file format and therefore, is not anticipating any Shipper impact.

4.0 Next Steps

EF confirmed the next steps to be:

- SM to follow up with Richard Pomroy on Legal Text and finalise the Amended Modification.
- Workgroup Report to be reported to the December 2022 Panel Meeting

5.0 Any Other Business

None

6.0 Diary Planning

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

Workgroup meetings will take place as follows:

Time / Date	Paper Publication Deadline	Venue	Programme
Thursday 10:00 24 November 2022	5pm 15 November 2022	Microsoft Teams	Standard Agenda

Action Ref	Meeting Date	Minute Ref	Action	Owner	Reporting Month	Status Update
0108	25/08/22	2.0	All Shippers to review the amended Business Rules within the Modification and provide comments/concern to JO for further	All Shippers	October 2022	Closed

Action Ref	Meeting Date	Minute Ref	Action	Owner	Reporting Month	Status Update
			discussion in October 2022 Workgroup meeting.			
0208	25/08/22	2.0	All Shippers (where possible), to share with the CDSP typical volumes for their organisation where a SAR has been agreed between Shippers, whereas the Proposing User has failed to submit it.	All Shippers	October 2022	Closed
0110	27/10/22		SM to finalise and submit the Amended Modification to JO for publication	Proposer, SM	November 2022	Pending

UNC Workgroup 0812R Minutes Review of Alternative to "Must Read" Arrangements Thursday 27 October 2022 via Microsoft Teams

Attendees		
Eric Fowler (Chair)	(AR)	Joint Office
Helen Bennett (Secretary)	(HB)	Joint Office
Vera Li	(VL)	Joint Office
Andy Clasper	(AC)	Cadent
Ashley Adams	(AA)	National Grid
Anne Jackson	(AJ)	Gemserv
Ben Mulcahy	(BM)	Northern Gas Networks
Claire Louise Roberts	(CLR)	ScottishPower
Clare Manning	(CM)	E.ON
Daniel Wilkinson	(DW)	EDF Energy
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Emma Buckton	(EB)	Northern Gas Networks
Fiona Cottam	(FC)	Xoserve
Kate Lancaster	(KL)	Xoserve
Kathryn Adeseye	(KA)	Xoserve
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Lee Greenwood	(LG)	British Gas
Louise Hellyer	(LH)	TotalEnergies Gas & Power
Mark Jones	(MJ)	SSE
Nick King	(NK)	CNG Services
Paul Bedford	(PB)	Opus Energy
Richard Pomroy	(RP)	Wales & West Utilities
Steve Mulinganie	(SM)	SEFE Energy Limited
Tom Stuart	(TSt)	Wales & West Utilities
Tracey Saunders	(TS)	Northern Gas Networks

The Workgroup Report is due to be presented at the UNC Modification Panel by 20 April 2023.

Please note these minutes do not replicate/include detailed content provided within the presentation slides, therefore it is recommended that the published presentation material is reviewed in conjunction with these minutes. Copies of all papers are available at: www.gasgovernance.co.uk/dist/271022

1.0 Introduction and Status Review

1.1. Approval of Minutes (22 September 2022)

The minutes from the meeting held on 22 September 2022 were approved.

1.2. Approval of Late Papers

There were no late papers.

1.3. Review of Outstanding Actions

Action 0109: Workgroup participants to review the proposed solution options to take this Review forward:

- 1) (Preferred solution) Remove obligation on Transporters and let PAC manage any settlement risk which gives them the freedom to address the issue as they see fit;
- 2) Remove obligation on Transporters and put in place specific obligations on Shippers should they breach their meter reading obligation;
- 3) Replace the Transporter obligation in Code by arrangements for central provision of the service.

Feedback to be provided to Joint Office enquiries@gasgovernance.co.uk and/or Richard Pomroy Richard.pomroy@wwutilities.co.uk.

Update: Richard Pomroy (RP) confirmed Lee Greenwood (LG), British Gas, has provided feedback.

LG advised he does not think this Review is required for the following reasons:

- 1. This process does not exist in electricity, there is nothing to capture a read that is not being procured, this obligation sits with the Supplier and is measured via Error Fault Resolution plans which are in place if the Supplier does not meet their targets.
- 2. A Modification was raised recently which moved everything into monthly read meters
- 3. The rollout of Smart Meters will remove the risk of meters not getting read

AJ noted, as the PAFA, meter reading performance in the Gas industry is not exceptional and is very different to Electricity.

AJ confirmed this Review has not yet been discussed by PAC and noted that PAC do not currently have any responsibilities for any roles within UNC, their role is quality performance.

RP shared his view that there may need to be something done to improve meter reading performance, but that is separate to whether Transporters should provide this service.

Paul Bedford (PB) noted that Opus Energy is both a Supplier and a Shipper therefore would be impacted by any outcome from this Review.

RP clarified that Shippers have the obligation in Uniform Network Code but rely on Suppliers to provide the readings. This Review would remove the provision that if the Shipper does not provide a reading, then the Transporter does.

PB advised that, in the case of Opus Energy who utilises the Must Read Service, new commercial arrangements would be required if the service were to move to PAC.

When asked RP provided clarification of *Option 3 - Replace the Transporter obligation in Code* by arrangements for central provision of the service and advised this would be a centrally provided service rather than each DN providing their own, there would be a central body that provides the must read service.

When AJ mentioned that meter readings are required for settlement accuracy, RP clarified that Transporters revenue is now driven almost entirely by capacity, the meter readings for non-daily metered sites have a less direct reliance.

AJ added it is expected for Transporters to be interested in their billing as they are incentivised to be as accurate as possible.

It was suggested that, considering PAC did not have sufficient time to consider the questions, the actions should be deferred to the November 2022 Workgroup.

Discussion concluded.

Action 0209: Workgroup participants to consider if it is still appropriate for Transporters to provide the Must Read service:

If yes, please provide your reasoning.

• If no, then who should provide it?

Update: Deferred to November 2022. Carried Forward

Action 0309: Workgroup Chair (RH/EF) to ask PAC for evidence on the effectiveness of must reads and the effectiveness on settlement accuracy: (Is there a benefit or value in the must read service)

- If must reads are successfully used, to what extent do they mitigate settlement risk?
- Are Transporters the appropriate party to provide the service?
- If they are not, who should provide the service

Update: Deferred to November 2022. Carried Forward

2.0 Amended Modification

The Request had not been amended.

3.0 Issues and Questions from Panel

3.1. Does the process utilised in the IGT UNC work as an alternative arrangement?

This will be considered at a future Workgroup meeting.

4.0 Development of Workgroup Report

This will commence at a future Workgroup meeting.

5.0 Next Steps

EF confirmed that the November Workgroup meeting will consider any additional views from the outstanding actions taken and then will consider what a Modification might look like.

6.0 Any Other Business

None.

7.0 Diary Planning

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

Workgroup meetings will take place as follows:

Time / Date	Paper Publication Deadline	Venue	Programme
Thursday 10:00 24 November 2022	5pm 15 November 2022	Microsoft Teams	Standard Agenda
Monday 10:00 12 December 2022	5pm 01 December 2022	Microsoft Teams	Standard Agenda

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
0109	22/09/22	2.0	Workgroup participants to review the proposed solution options to take this Review forward: 1) (Preferred solution) - Remove obligation on Transporters and let PAC manage any settlement risk which gives them the freedom to address the issue as they see fit; 2) Remove obligation on Transporters and put in place specific obligations on Shippers should they breach their meter reading obligation; 3) Replace the Transporter obligation in Code by arrangements for central provision of the service. Feedback to be provided to Joint Office enquiries@gasgovernance.co.uk and/or Richard Pomroy Richard.pomroy@wwutilities.co.uk.	Workgroup participants	Carried Forward
0209	22/09/22	2.0	Workgroup participants to consider if it is still appropriate for Transporters to provide the Must Read service: If yes, please provide your reasoning. If no, then who should provide it?	Workgroup participants	Carried Forward
0309	22/09/22	2.0	Workgroup Chair (RH/EF) to ask PAC for evidence on the effectiveness of must reads and the effectiveness on settlement accuracy: (Is there a benefit or value in the must read service) If must reads are successfully used, to what extent do they mitigate settlement risk? Are Transporters the appropriate party to provide the service? If they are not, who should provide the service?	Workgroup Chair (RH/EF)	Carried Forward

UNC Workgroup 0816S Minutes Update to AQ Correction Processes 10:00 Thursday 27 October 2022 via Microsoft Teams

Attendees		
Eric Fowler (Chair)	(AR)	Joint Office
Helen Bennett (Secretary)	(HB)	Joint Office
Vera Li (Secretary)	(VL)	Joint Office
Andy Clasper	(ACI)	Cadent Gas
Ashley Adam	(AA)	National Grid
Ben Mulcahy	(BM)	Northern Gas Networks
Claire Louise Robert	(CLR)	ScottishPower
Clare Manning	(CM)	E.ON Next
Daniel Wilkinson	(DW)	EDF Energy
David Addison	(DA)	Xoserve
David Mitchell	(DM)	SGN
Elena Dranceanu	(ED)	Gazprom Energy
Ellie Rogers	(ER)	Xoserve
Fiona Cottam	(FC)	Correla on behalf of Xoserve
John Baldwin	(JB)	CNG Services Ltd
Kate Lancaster	(KL)	Xoserve
Kathryn Adeseye	(KA)	Xoserve
Kundai Matiringe	(KM)	BU-UK
Lee Greenwood	(LG)	British Gas
Louise Hellyer	(LH)	TotalEnergies Gas & Power
Mark Jones	(MJ)	SSE
Nick King	(NK)	CNG Services
Nicky Kingham	(NKi)	Xoserve
Paul Bedford	(PB)	Opus Energy
Richard Pomroy	(RP)	Wales & West Utilities
Steve Mulinganie	(SM)	SEFE Energy Limited
Tom Stuart	(TSt)	Wales & West Utilities
Tracey Saunders	(TS)	Northern Gas Networks

Copies of all papers are available at: https://www.gasgovernance.co.uk/0816/271022

The Workgroup Report is due to be presented at the UNC Modification Panel by 17 November 2022

Please note these minutes do not replicate/include detailed content provided within the presentation slides, therefore it is recommended that the published presentation material is reviewed in conjunction with these minutes. Copies of all papers are available at: https://www.gasgovernance.co.uk/dist/271022

1.0 Introduction and Status Review

1.1. Approval of Minutes (25 August 2022)

The minutes from the meeting held on 25 August 2022 were approved.

1.2. Approval of Late Papers

EF advised the update report for outstanding Action 0208 was submitted late and Workgroup agreed to accept it.

1.3. Review of Outstanding Actions

Action 0108: E.ON Next (CM) to review Business Rules (BR) and update the Workgroup at the September meeting.

Update: Clare Manning (CM) confirmed there is no amendment on the Modification. There are suggestions on amending some Business Rules and would like to discuss with Workgroup today. **Carried Forward**

Action 0208: Correla (FC) to provide a view of the AQ Corrections PAC Report for the September meeting.

Update: Report provided. Ellie Rogers (ER) provided an overview of the PARR Reports using the presentation published. **Closed**

2.0 Amended Modification

No Amended Modification.

3.0 Issues and Questions from Panel

3.1. Consider materiality relating to billing impacts and whether the Modification continues to meet the Self-Governance criteria

CM addressed the question from Panel whether the Modification meet the Self-Governance criteria by firstly providing an overview of the Modification to recapture the essence.

CM stated that these AQ Amendments are currently being requested, however, under the wrong reason code. The intention is that by introducing these new reason codes it will give Users a better way to request amendments and put some Business Rules in place for the specific reasons to use the new codes. CM also reiterated that there are concerns about the influx of AQ amendments and the impacts on billing.

CM noted that there are two new eligible clauses proposed. Some of the business justification might change and CM was seeking Workgroup comments on the mechanisms for validation of the reason codes and what a Shipper would have to prove to demonstrate it is not violating the Code.

CM then briefed on the proposed changes on the Business Rules:

BR2 a): As a mandatory requirement of submitting an [erroneous AQ based on read history] AQ correction, the User must submit Supporting Information highlighting the erroneous read(s) and date(s) within the SMP read history which is outside of the Registered User's ownership.

Guidance note: The erroneous read(s) highlighted within the Supporting Information will be preventing an accurate rolling AQ being calculated.

CM proposed, in terms of validation of Users submitting supporting information, it should be changed to the Suppliers' read for the site. If a reading has been rejected in the past for the site using the Last Resort process, that is an exception process and not the normal BAU process. CM suggested adding the Rejected Change Requirement as shows the Shipper has exhausted alternative means before raising the AQ amendment.

The second proposal on validation is to add a time limit so the reading can only to be submitted up to 12 months after a change of Supplier or Shipper which then aligns with the process. CM proposed that the AQ being corrected cannot be lower that the lowest AQ of the site historically or last accepted AQ prior to any change. Altogether this change on the Business Rules should mitigate issues, as a stronger validation process is being put in place.

EF asked the Workgroup to comment on the proposed amendment on Business Rules. No comments received, and EF suggested CM to make amendment and redraft on the Modification Business Rule 2 (a):

 Time limit of 12 Months for the validation to go through and also validation on AQ cannot be corrected – no lower than any previously "Lowest AQ" or lower than the last accepted AQ prior to the previous read

When Tracey Saunders (TS) asked, CM confirmed that the validation will be carried out by the CDSP.

When asked Ellie Rogers (ER) advised that adding the AQ correction code in theory should not be huge, however, the extra validation processes will be more complicated and would incur extra costs, however, at the moment, Xoserve does not has any figures.

CM advised she will look into the validation around the reading not being lower than the previous lowest read, and not lower than the last read AQ. CM mentioned again that if a Shipper submits an erroneous lower AQ the subsequent read would not be accepted by UK Link, and therefore would fall into the PAC Performance management. CM anticipates that the combination of both is enough mitigate concerns and maintain the justification for Self-Governance.

The second reason code proposed is for changed operation and conversation had been had about what supporting evidence or validation may be available. CM suggested there could be a "disclaimer" when Users submit amendment requests to state that has been a change in the site operation and as Shipper attempts have been made to provide evidence of the changed operation. It was noted that this is different from reason code 3 as the justification is there is some to opening hours or manufacturing process rather than any change to the equipment on site.

There followed some discussions raised by Lee Greenwood (LG) as to whether this could make his Modification (0819) redundant to some degree, as Shippers might use the easy way to amend the AQ under 0816 instead of using the other code as his proposal on Vacant Sites.

Ben Mulgahy (BM) queried that as there is no physical change in equipment, just change in use and for instance, seasonal operation sites could be changing strategy over a period of time within year falling within the AQ review period could this ability to amend the AQ up and down create a loophole. It has been agreed that this Modification is the change of AQ on annual review, and these are occupied sites and not Vacant Sites and to avoid being used as loophole, CM might need to reconsider the change of use time limit, process decision etc.

The final element of the proposals is a Business Rule set to reject any AQ amendment when AQ has not changed. There followed some discussion on whether the AQ amendment sought should be validated to the exact number or whether a tolerance (5-10%) should be accepted on the "lowest" read. It was suggested that erroneous requests were typically an exact match however, ER would investigate whether setting a tolerance could be beneficial. This would be clarified in the business rules.

4.0 Development of Workgroup Report

EF confirmed the next steps to be:

 CM to continue reviewing Business Rules and submit Amended Modification to JO for preparation of Workgroup Report to be submitted to January 2023 Panel Meeting.

5.0 Next Steps

CM to Amended Modification to Joint Office and further discussion in November Meeting.

6.0 Any Other Business

None.

7.0 Diary Planning

Further details of planned meetings are available at: www.gasgovernance.co.uk/events-calendar/month Workgroup meetings will take place as follows:

Time / Date	Paper Publication Deadline	Venue	Programme
Thursday 10:00 24 November 2022	5pm 15 November 2022	Microsoft Teams	Standard Agenda

Action Ref	Meeting Date	Minute Ref	Action	Owner	Reporting Month	Status Update
0801	25/08/22	2.1.1	E.On Next (CM) to review Business Rules (BR) and update on Modification for discussion in October meeting.	E.On Next	September 2022	Carried Forward
0802	25/08/22	2.1.1	Correla (FC) to provide a view of the AQ Corrections PAC Report for the September meeting.	Correla (FC)	September 2022	Closed

UNC Workgroup 0818 Minutes

Releasing of unused capacity under a specific set of circumstances Thursday 27 October 2022

via Microsoft Teams

Attendees		
Eric Fowler (Chair)	(AR)	Joint Office
Helen Bennett (Secretary)	(HB)	Joint Office
Vera Li	(VL)	Joint Office
Andy Clasper	(AC)	Cadent
Ashley Adams	(AA)	National Grid
Ben Mulcahy	(BM)	Northern Gas Networks
Claire Louise Roberts	(CLR)	ScottishPower
Clare Manning	(CM)	E.ON
Daniel Wilkinson	(DW)	EDF Energy
David Mitchell	(DMi)	SGN
Ellie Rogers	(ER)	Xoserve
Emma Buckton	(EB)	Northern Gas Networks
Fiona Cottam	(FC)	Xoserve
Kate Lancaster	(KL)	Xoserve
Kathryn Adeseye	(KA)	Xoserve
Kundai Matiringe	(KM)	BU-UK
Lee Greenwood	(LG)	British Gas
Louise Hellyer	(LH)	TotalEnergies Gas & Power
Mark Jones	(MJ)	SSE
Nick King	(NK)	CNG Services
Paul Bedford	(PB)	Opus Energy
Richard Pomroy	(RP)	Wales & West Utilities
Steve Mulinganie	(SM)	SEFE Energy Limited
Tom Stuart	(TSt)	Wales & West Utilities
Tracey Saunders	(TS)	Northern Gas Networks

Copies of all papers are available at: https://www.gasgovernance.co.uk/0818/271022

Please note these minutes do not replicate/include detailed content provided within the presentation slides, therefore it is recommended that the published presentation material is reviewed in conjunction with these minutes. Copies of all papers are available at: www.gasqovernance.co.uk/0818/271022

1.0 Introduction and Status Review

1.1. Approval of Minutes (22 September 2022)

The minutes were approved.

1.2. Approval of Late Papers

No late papers to consider.

1.3. Review of Outstanding Actions

Action 0109: Proposer (TS) to liaise with NGN's internal processing team and consider an amendment to the Modification to include the Mod390 process.

Update: Tracey Saunders (TS) confirmed the new draft of the Modification includes the Mod390 process as part of the specific criteria.

TS provided some data regarding the number of sites that were in the Mod390 process during 2020 and 2021 which highlights that the Mod390 process needs extra support, such as, this proposal:

2020

- 53 challenges only half engaged.
- 1 shipper agreed to make a reduction, but no reduction made.

2021

- 58 sites
- 1 shipper responded
- Agreed a number of sites to reduce their capacity, and again, no reduction was made.

Action 0109 Closed.

Action 0209: Proposer (TS) to provide a response to each of the UNC Panel questions. **Update:** EF advised Northern Gas Networks response has been provided, this is now published on the meeting page here: https://www.gasgovernance.co.uk/0818/271022.

It was requested that Workgroup participants acknowledge and review the initial representations and Northern Gas Networks response and provide feedback or any questions at the next Workgroup meeting in November 2022. **Closed**

New Action 0110: Workgroup to review Northern Gas Networks response to the Initial Representations made.

Action 0309: Distribution Networks to provide analysis to show how many times this Modification could likely be used.

Update: TS advised that the number of sites the Modification *could* capture, currently, is less than 10 and the number of sites it would be used for, in reality, is less than 5, and that is across all networks. **Closed**

2.0 Amended Modification

Tracey Saunders (TS) provided a view of a draft Modification – Draft v2.0 and explained the proposed amendments and confirmed this is the drafting that is currently with the Lawyers for consideration of Legal Text.

TS noted that Lawyers have been instructed to commence Legal Text drafting.

TS advised she said she would look at who has been involved in the Supply Point Offtake Review (SPOR) process in the previous year and advised there are currently 62 sites in the current Mod309 process and asked Workgroup participants to advise who the information should be sent to. The Shipper Workgroup participants requested the information to be sent to them.

New Action 0210: All Shippers: Any Shippers that wish to know if they have any sites in the SPOR process are to request it from Tracey Saunders direct: trsaunders@northerngas.co.uk

3.0 Development of Workgroup Report

Deferred to next meeting.

4.0 Next Steps

Workgroup to review Northern Gas Networks response to the Initial Representations made.

5.0 Any Other Business

None.

6.0 Diary Planning

Further details of planned meetings are available at: www.gasgovernance.co.uk/events-calendar/month Workgroup meetings will take place as follows:

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Monday 10:00 12 December 2022	5pm 01 December 2022	Microsoft Teams	Standard Agenda

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
0109	22/09/22	2.0	Proposer (TS) to liaise with NGN's internal processing team and consider an amendment to the Modification to include the Mod390 process.	Proposer (TS)	Closed
0209	22/09/22	2.0	Proposer (TS) to provide a response to each of the UNC Panel questions	Proposer (TS)	Closed
0309	22/09/22	2.0	Distribution Networks to provide analysis to show how many times this Modification would likely be used.	Distribution Networks	Closed
0110	27/10/22	1.3	Workgroup to review Northern Gas Networks response to the Initial Representations made.	Workgroup	Pending
0210	27/10/22	1.3	All Shippers: Any Shippers that wish to know if they have any sites in the SPOR process are to request it from Tracey Saunders direct: trsaunders@northerngas.co.uk	All Shippers	Pending