UNC Workgroup 0425 Agenda Re-establishment of Supply Meter Points – Shipperless sites Thursday 22 August 2013

ENA, Dean Bradley House, 52 Horseferry Road, London SW1P 2AF

Attendees

Bob Fletcher (Chair)	(BF)	Joint Office
Lorna Dupont (Secretary)	(LD)	Joint Office
Alex Ross-Shaw	(ARS)	Northern Gas Networks
Andrew Margan	(AM)	British Gas
Andy Clasper	(AC)	National Grid Distribution
Chris Hill	(CH)	Cornwall Energy
Chris Warner	(CW)	National Grid Distribution
Colette Baldwin	(CB)	E.ON UK
David Addison	(DA)	Xoserve
David Corby	(DC)	National Grid NTS
David Mitchell	(DM)	Scotia Gas Networks
Edward Hunter	(EH)	RWE npower
Erika Melén	(EM)	Scotia Gas Networks
Gareth Evans	(GE)	Waters Wye
Hilary Chapman	(HCh)	Xoserve
Huw Comerford	(HW)	Utilita
Joel Martin	(JM)	Scotia Gas Networks
Jon Dixon	(JD)	Ofgem
Lorna Lewin	(LL)	DONG Energy
Marie Clark	(MC)	ScottishPower
Mark Jones	(MJ)	SSE
Steve Mulinganie*	(SM)	Gazprom
*via teleconference		

Copies of all papers are available at: www.gasgovernance.co.uk/0425/220813

The Workgroup's Report is due to the UNC Modification Panel by 17 October 2013

1.0 Introduction and Status Review

BF explained the purpose of the meeting.

At the UNC Modification Panel to consider the Final Modification Report, it was reported that the Transporters had received a communication from the Authority raising questions about the content of the legal text, and it had been suggested that it would be beneficial to review the content of the communication and consider if amendments need to be made to either the legal text or the modification, or both, before Panel makes its recommendations on the modification. It was also suggested that any such discussion should not be exclusively between the Proposer, National Grid Distribution and Ofgem, and that any changes be considered by the Workgroup.

The Workgroup has therefore been requested to:

- Consider the points raised by Ofgem;
- Clarify the solution and supporting business rules;
- Identify an implementation path, covering the nature of the systems changes and if the modification is subject to User Pays; and
- Present a further report to the October Panel.

2.0 Final Modification Report

The Workgroup carried out its review as requested by the UNC Modification Panel.

Legal Text

AC presented the restructured legal text and explained that the amendments had been made to add greater clarity and make it easier to follow. AC believed that all of the Authority's comments had been addressed and AM, as Proposer, confirmed that he too was satisfied with the changes made.

It was noted that the Workgroup had been requested to consider the points raised by Ofgem, and clarify the solution and supporting business rules. BF pointed out that this was a difficult task for the Workgroup to accomplish or assess as being satisfactorily addressed, as Ofgem's communication had not been made available to the Workgroup. JD explained the communication had been quite granular, were not of any great magnitude and were generally points relating to clarity. He noted the Workgroup's concerns regarding perceived lack of transparency and being asked to assess something for which it had no supporting information on which to base its judgment, and will make this communication available for publication. **Post meeting note:** *The document has been published at: www.gasgovernance.co.uk/0425/040913*.

BF suggested that an associated commentary on the revisions made might have been a useful tool to assist understanding. The revised text was then reviewed and AC pointed out and commented in greater detail on the changes made in response to the Authority's communication. It was observed that more information had been added in to the text, rather than any being removed.

Business Rule 11 was discussed, and was re-phrased to be less prescriptive.

Implementation

The Workgroup had been requested to identify an implementation path, covering the nature of the systems changes.

Implementation was proposed as 01 December 2013 and therefore only sites withdrawn after this would be covered by this modification.

Shippers were concerned that appropriate and reasonable lead times should be accommodated in the implementation timescales in order to give sufficient time for parties to make the required changes across systems and commercial areas before the implementation date. System change impacts were briefly discussed, and it was noted that Shippers had already raised concerns regarding the implementation of Modification 0424 UK Link changes.

It was recognised that if Panel considered any changes made to be material, it may

choose to issue this modification for further consultation, or if immaterial it may determine its recommendation on whether or not this should be implemented. Either decision will have an effect on the proposal of an appropriate implementation date, which will therefore be earlier if the latter course is determined. Various dates were discussed. It was suggested that a backstop lead time of 60 calendar days would be welcomed, with implementation dates of either 01 February 2014 (if issued for further consultation) or 01 January 2014 (if returned to Ofgem for decision without further consultation).

The text will be amended to reflect the revised implementation dates.

User Pays Status

The Workgroup had been requested to identify if the modification is subject to User Pays. The Proposer, AM, confirmed it was not User Pays. No other comments were made.

Next Steps

The Workgroup had been requested to present a report to the October Panel.

Concluding the discussions BF summarised that the assumption must be made that Ofgem itself was satisfied that its points had been appropriately addressed, as the Workgroup was unable to confirm that it had considered these, not knowing what they were, at this juncture.

The Workgroup was therefore only able to indicate that it was satisfied with the text as it stands, that it met the requirements of the Modification and the Business Rules as drafted, and was capable of being implemented.

A Workgroup response will be drafted for the Workgroup's review/approval at the meeting on 04 September 2013, following which the intention would be to submit it to the September UNC Modification Panel for consideration.

3.0 Any Other Business

None.

4.0 Diary Planning

The next meeting will take place within the business proceedings of the Distribution Workgroup, on Wednesday 04 September 2013, at Consort House, 6 Homer Road, Solihull B91 3QQ.