UNC Workgroup 0472 Minutes Restricting the number of registration attempts by a supplier Monday 10 February 2014

Consort House, 6 Homer Road, Solihull, B91 3QQ

Attendees

Bob Fletcher (Chair)	(BF)	Joint Office
Helen Cuin (Secretary)	(HCu)	Joint Office
Alan Raper	(AR)	National Grid Distribution
Alex Ross-Shaw	(ARS)	Northern Gas Networks
Andrew Margan	(AM)	British Gas
Chris Warner	(CW)	National Grid Distribution
Colette Baldwin	(CB)	E.ON UK
David Addison	(DA)	Xoserve
Ed Hunter	(EH)	RWE npower
Gerald Jago	(GJ)	RWE npower
Kirsten Elliot-Smith	(KES)	Cornwall Energy
Lorna Lewin	(LL)	DONG Energy
Mark Jones	(MJ)	SSE

^{*} via teleconference

Copies of all papers are available at: www.gasgovernance.co.uk/0472/070114

The Workgroup Report is due to be presented at the UNC Modification Panel by 17 April 2014.

1.0 Review of Minutes and Actions

1.1 Minutes

The minutes of the previous meeting were accepted.

1.2 Actions

0101: RWE npower to provide a view/update from SPAA of their views on the most appropriate way to manage the proposals in this modification.

Update: EH confirmed the SPAA expert group have discussed the modification topic. The view was that there is a route through SPAA but there was a preference to have an obligation within the UNC in addition to any SPAA requirements. **Complete.**

2.0 Discussion

Some Workgroup participants felt that this change would be better managed through a SPAA schedule. However, GJ/EH believed a modification was required as not all parties are governed by SPAA.

CB challenged how an obligation in the UNC would be effective without any reporting, validation or sanctions.

GJ highlighted concerns within the industry on the number of attempts to gain customers who were on fixed term contracts with a supplier. In some cases, attempts are made up to 16 times to transfer a customer on a fixed term contract. GJ explained that where the customer has debt or is in a fixed term contract the current Shipper has the right to object to a transfer.

Concern was expressed that the confirmation/objection process flows were being used as a means of 'fishing' for information when contracts are due to end to trigger an attempt to approach the customer. GJ also highlighted that customers are approached by third parties to switch and they sign up to deals without realising they are in a fixed term contract.

CW highlighted concerns around rejecting confirmations, which Transporters are obliged to process under the UNC.

GJ explained the modification would provide Shippers the opportunity to refer to the provisions in the UNC that when a 5th confirmation attempt is made, the registering Shipper must have evidence of a supply contract with the customer. If further attempts to register a site are made beyond 4 attempts the current Shipper can raise concerns with the Authority. GJ believed that there are rules around the reasons for objecting but no rules about confirmation attempts. CW highlighted that UNC TPD Section G2.5.3 already underpins that confirmation attempts warrant a contract is in place.

The Workgroup discussed whether there should be a reset point for the count of confirmations – should this be the life of the current contract?

CW expressed concern about preventing sites transferring and wanted the modifications to be clear about the facilitation of competition.

MJ suggested that the Workgroup may wish to consider why 4 confirmation attempts had been chosen as opposed to an alternative level i.e. 3 or 5. Ofgem may require some statistical justification.

GJ/EH agreed to consider the discussions held with a view to amending the modification for further clarity, particularly considering the relevant objectives and required business rules to assist the provision of legal text.

3.0 Any Other Business

None.

4.0 Diary Planning

Further details of planned meetings are available at: www.gasgovernance.co.uk/Diary

The next meeting will take place within the Distribution Workgroup on:

Tuesday 11 March 2014 at 10:30, 31 Homer Road, Solihull B91 3LT (venue subject to change).

Action Table

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
0101	07/01/14	2.0	RWE npower to provide a view/update from SPAA of their views on the most appropriate way to manage the proposals in this modification	RWE (EH)	Complete