

**UNC Workgroup 0479S/0479A Minutes
Inclusion of email as a valid UNC communication
Wednesday 05 November 2014
31 Homer Road, Solihull B91 3LT**

Attendees

Les Jenkins (Chair)	(LJ)	Joint Office
Helen Cuin (Secretary)	(HC)	Joint Office
Abid Sheikh*	(AS)	Ofgem
Alex Ross-Shaw	(ARS)	Northern Gas Networks
Azeem Khan	(AK)	RWE npower
Chris Warner	(CW)	National Grid Distribution
Colette Baldwin*	(CB)	E.ON UK
David Addison	(DA)	Xoserve
Hilary Chapman	(HCh)	Xoserve
Lorna Lewin	(LL)	DONG Energy
Martin Connor	(MC)	National Grid
Richard Pomroy*	(RP)	Wales & West Utilities
Sean McGoldrick	(SM)	National Grid NTS
Steve Nunnington	(SN)	Xoserve

* via teleconference

Copies of all papers are available at: <http://www.gasgovernance.co.uk/0479/051114>

The Workgroup Report is due to be presented at the UNC Modification Panel by 20 December 2014.

1.0 Review of Minutes and Actions

1.1. Minutes

The minutes of the previous meeting were accepted.

1.2. Actions

0801: CB to amend the business rules to exclude UK Link Communications from email.

Update: See item 2.2. **Complete**

0802: CB to amend the modification to allow for the use of a nominated primary user.

Update: See item 2.1. **Complete**

2.0 Workgroup Report

2.1. Amended Modification(s)

The Workgroup considered the amended modification.

CB summarised the recent changes to Modification 0479A's draft Business Rules, amended in line with Workgoup discussions and feedback from British Gas.

DA highlighted an inadvertant removal of business rule 2 which confrimed UK Link Communications will be excluded. It was clarified that the business rule 2 would be reinstated.

2.2. Consideration of Business Rules

The Workgroup considered the Questions and Answers between E.ON and Northern Gas Networks whilst considering the differences between the alternates.

LJ suggested it would be helpful for the consultation process, for those not involved in the assessment of the modifications, for it to be made clear what the differences are between the two modifications. The request was noted by both proposers.

The Workgroup considered the suggested requirement within Modification 0479A for the Transporter Agent to maintain the UK Link manual and the reference to Section 5b. CB believed a provision ought to be within the UNC to maintain the UK Link manual. DA explained that the UK Link manual is subject to its own governance arrangements. He explained that Xoserve are working on updating the UK Link manual to ensure it is up to date and summarised some of the changes recently released. It was understood that within Section U there is a generic obligation to keep the UK Link manual up to date. DA asked for clarification if E.ON expected Section 5b to be explicitly referenced in the UNC. The Workgroup envisaged that the lawyers providing the legal text would have a view on whether Section 5b should be referenced or not.

It was suggested as a general rule, when there is an option for the use of email placed alongside post or fax, the test will be whether the form of communication is appropriate, if not appropriate, it should not be enforced.

ARS explained the difference between the two modifications in relation to the governance process. The Workgroup considered the reporting requirements to the UNC Committee (UNCC) when the UK Link committee proposed changes.

CB expressed concern that the UK Link Committee could change the UK Link manual through the UK Link governance process which could pose a commercial risk. Under Modification 0479A the UK Link Committee will be obliged to send a report to the UNCC for notification of proposed changes while under Modification 0479S the UK Link Committee will be obliged to send a report to the UNCC for notification of changes made at the last meeting. It was debated if business rule 3 within Modification 0479A was sufficiently clear or whether it was open to interpretation.

It was clarified that there is a delegated authority from UNCC to the UK Link committee, for general UK Link manual changes. Matters from the UK Link committee are only referred to the UNCC by exception, where consensus to change cannot be reached. However it was believed this provision would be explicitly different for Section 5b.

It was clarified that the intent of 0479A Business Rule 3 is that the UK link Committee retains the governance change to section 5b but must pass a notification to the UNCC of any proposed change, the proposed change will then go back to the UK Link Committee before the UK Link Committee can approve and implement the change.

MC highlighted that Modification 0479A first business rule creates optionality and bi-lateral agreements for the use of email. However within Modification 0479 the first business rule does not have this option. ARS clarified that NGN were satisfied with existing governance to avoid any disparity with communication methods.

The Workgroup considered the security of email and assurance of communications being received by the intended recipient. CB thought it would be helpful to have a business rule which considered nondelivery in addition to the one hour deeming rule already present in the original Modification, namely that where there is a non

delivery notification the sender should within the next hour contact and resolve the issue of non delivery.

The Workgroup considered the reference to PDF or equivalent forms and whether this needed to be specific. It was agreed to take this element out of the Business Rules.

The Workgroup considered the reference to Business Days in relation to managing nondelivery of email. It was agreed the reference needed to be reconsidered to ensure email communications received outside office working hours ie after 17:00 hrs are managed within normal office hours ie. 09:00 – 17:00hrs.

Action 1101: NGN to consider the use of term Business Days for deeming receipt of emails which roll over into the next working day (ie. received after 16:01 hrs)

The Workgroup considered how to manage email addresses for communications. DA was concerned about obligations with maintaining a register. Concern was expressed that some organisations may want to allocate a box account or individual email address for each communication and the extent of such register.

AS requested if there is any significant costs involved with keeping a register. AS believed as email is an option if parties do not wish to use email the cost would be nil.

The Workgroup discussed the requirement to maintain a register. It was recognised a contact list already exists for communication within Xoserve which email addresses could be added to. Creating and maintaining a new register would have more costs associated. AS was keen to understand the costs of maintaining such a register. DA explained Xoserve would need to consider the availability of a register, who sees it, who can update it, how updates will be managed etc. DA agreed to liaise with the proposers to understand the requirements to maintain a register.

Action 1102: Xoserve to assess the requirements of a register and provide a view on the management of such a register including a view of potential costs.

CW enquired about the scope of the modification and impact to code communications (other than UK Link Communications which are excluded), particularly the potential impact to iGTs. AS also requested clarity on the scope.

It was clarified that communications referred to communications issued under the UNC, this included general notices. ARS clarified that the scope covers only changes to existing communications where communications may be sent via fax or letter.

CB believed email communication required more diligence over and above letters and faxes. She explained emails may not be received because there can be complications with email gateways and incorrect email addresses. Creating an obligation to maintain a register with a valid email address ensures all parties are responsible for providing updates.

Following Workgroup discussions it was anticipated there would be some further amendments required to the Business Rules.

2.3. Consider use of email in other Codes

The Workgroup considered there may be codes other than those already referenced within the modification.

2.4. Reconsideration of Self-Governance Status

The Workgroup considered the status of the two modifications. It was agreed that the self-governance status will need to be reconsidered once the modifications have been developed further.

2.5. Legal Text Update

The Workgroup considered if the modifications were clearly defined to allow the preparation (0479A)/update (0479) of Legal Text. It was agreed that the modifications at this stage are not sufficiently finalised to allow the preparation of final text.

3.0 Next Steps

The Modifications will be considered further, within the Distribution Workgroup meeting, on Friday 12 December 2014.

An extension will be requested with a suggested Panel report date in April 2015.

4.0 Any Other Business

4.1. SSMPs and Unique sites – email communications

SN highlighted a potential issue identified within a recent Project Nexus Workgroup regarding about email communications for Shared Supply Peter Points (SSMPs) and Unique Site. SN provided a copy of the presentation provided to the Project Nexus Workgroup on 4 November 2014. Due to complexities the 117 Unique sites and 13 Shared supply meter points will be operated outside of UK Link. SN explained code communications are currently issued via email with the additional use of fax as a back up. He suggested the industry consider formalising the use of email for SSMP and Unique sites. He also highlighted as a result of this concern being raised Xoserve are considering other communications such as invoicing back up information and how this may need to be addressed.

The Workgroup discussed the ability to amend individual processes and having emails added as an additional method to the conventional communication method within the UNC to codify practises that are currently being used

The Transporters wished to consider the suggestion further. CW confirmed the issue will be discussed at the joint Transporter/Xoserve CMSG forum to agree a way forward. A report will be provided to the 0479 Workgroup.

Action 1103: Transporters to provide a view on individual modifications to insert email as a form of communication for processes within the UNC.

5.0 Diary Planning

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

Workgroup meetings will take place as follows:

Time / Date	Venue	Workgroup Programme
Friday 12 December 2014	31 Homer Road, Solihull, B91 3LT (to be accommodated within the Distribution	<ul style="list-style-type: none"> • Amended Modification (Business Rules) • Consideration of User Pays • Review of Impacts and Costs • Review of Relevant Objectives

	Workgroup Meeting)	<ul style="list-style-type: none"> • Consideration of Wider Industry Impacts • Development of Workgroup Report
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Action Table

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
0801	28/0814	2.1	CB to amend the business rules to exclude UK Link Communications from email	EON.UK (CB)	Complete
0802	2/08/14	2.1	CB to amend the modification to allow for the use of a nominated primary user	EON.UK (CB)	Complete
1101	05/11/14	2.2	NGN to consider the use of term Business Days for deeming receipt of emails which roll over into the next working day (ie. received after 16:01 hrs)	NGN (ARS)	Pending
1102	05/11/14	2.2	Xoserve to assess the requirements of a register and provide a view on the management of such a register including a view of potential costs.	Xoserve (DA)	Pending
1103	05/11/14	4.1	Transporters to provide a view on individual modifications to insert email as a form of communication for processes within the UNC.	All Transporters (CW)	Pending