

UNC Workgroup 0479S Minutes
Inclusion of email as a valid UNC communication
Monday 07 July 2014
at 31 Homer Road, Solihull B91 3LT

Attendees

Bob Fletcher (Chair)	(BF)	Joint Office
Helen Cuin (Secretary)	(HC)	Joint Office
Alex Ross-Shaw	(ARS)	Northern Gas Networks
Chris Warner	(CW)	National Grid Distribution
Colette Baldwin	(CB)	E.ON UK
Dave Addison	(DA)	Xoserve
Dave Mitchell	(DM)	Scotia Gas Networks
Jeremy Guard	(JG)	First Utility
Kirsten Elliott-Smith	(KES)	Cornwall Energy
Kirandeep Samra	(KS)	RWE npower
Ian Hollington	(IH)	Joint Office
Mark Jones	(MJ)	SSE
Martin Connor	(MC)	National Grid NTS

* via teleconference

Copies of all papers are available at: <http://www.gasgovernance.co.uk/0479/070714>

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

1.0 Review of Minutes and Actions

1.1 Minutes

The minutes of the previous meeting were accepted.

1.2 Actions

0402: All to review the amended appendix 5B prior to the next meeting.

Update: MC confirmed further analysis is being undertaken and hoped this will be completed by the end of this week. **Complete.**

0403: EON UK (CB) to seek legal view on deemed receipt and the transmission of emails when used in a contractual process.

Update: CB explained that meetings have been held to seek a view but a formal response was not available at this time. CB explained that these are some concerns about the deemed receipt approach and the balance of risk and responsibility when communications take place. The assumption of the communication being received was weighted far too heavily in favour of the networks. The Workgroup discussed scenarios where email may not be received resulting in the sender believing the intended recipient has received the email. CB was concerned that where the communication creates or amends an obligation the use of email was far too risky based on guaranteed receipt. She stressed that the importance of the communication needs to be considered. KS enquired if delivery and read receipts could be used. JG suggested that replies to an email provides an audit trail that active communication has undertaken, where this does not exist the sender may wish to consider failed delivery. ARS explained the principal of modification including email as a valid form of communication. He highlighted that email is already being used by the

industry but not recognised a valid form of communication and the modification would bridge this gap. BF explained that this is an enabling modification to allow email to be used as a recognised form of communication. However, he anticipated this was a two-stage process whereby further consideration needs to be given on what parts of the UK Link manual could use email as a valid form of communication under the UNC. DA confirmed that the UK Link Committee would need to assess the scope of communications. However, some concern was expressed that an assessment of whether systems could be adapted to accept email may not consider the commercial or critical impacts of the change. The Workgroup considered further whether the UK Link Committee would be best placed to consider commercial impacts. **Complete.**

2.0 Discussion

The Workgroup considered further the non-receipt of emails and the obligations associated with the non-receipt of emails. ARS was keen for the Workgroup to assess which processes they are concerned with. He explained that where processes use batch processing via the IX this would continue. He reiterated that some communications are already made via email without any governance and this modification would recognise that email can be used.

DA believed there would be some areas where there would be concerns for using email and others not and whether the Workgroup should consider the appendix line by line.

ARS was concerned with constraining parties from using email in certain areas by stipulating what parties can/cannot use.

ARS explained that Xoserve have reviewed section 5B of the UK link manual and reviewed whether email is already used or would have no objection to using email instead of existing communication forms. He provided examples where letters/emails are utilised now.

ARS considered amending the solution of the modification to stipulate where the UK Link committee changes an existing UK Link communication this would be considered by the UK Link committee who would then make a recommendation for approval to the UNCC. Where a new communication is to be added this would be governed by the UNC Modification process. The Workgroup also considered UNCC approval for all new and changed forms of communication within the UK Link Manual.

DA highlighted a presentation available at: <http://www.gasgovernance.co.uk/uklc/081211> regarding [UKLink Notice Periods](#) and explained the typical notice periods provided for new records / amendments to existing processes. DA confirmed if a modification effectively stipulates how information will be provided to the industry, for example a new charge type for an existing process, a months notice would be provided to advise parties of the change.

MC expressed concern about the security and obligations that may be impacted in certain areas should email be used. Direct communication with parties should only be via email where this is agreed by both parties. CB explicitly asked where customer information is exchanged to ensure there are appropriate security and data protection provisions in place.

MC expressed concerns about consistency where some parties agree email is valid and others do not – how would this be governed to ensure all are treated equitably?

The Workgroup agreed to consider the Workgroup Report on 24 July to allow the Workgroup report to the August UNC Panel.

It was agreed as part of the proceedings on 24 July the Workgroup would reconsider and report to panel whether this modification is a self-governance modification or not.

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:

Thursday 24 July 2014 at 10:30, 31 Homer Road, Solihull B91 3LT

Action Table

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
0402	11/04/14	2.0	All to review the amended appendix 5B prior to the next meeting.	All	Complete
0403	11/04/14	2.0	EON UK (CB) to seek legal view on deemed receipt and the transmission of emails when used in a contractual process.	EON UK (CB)	Complete