# **UNC Workgroup 0565 Minutes**

# Central Data Service Provider: General framework and obligations Tuesday 18 October 2016 Dentons, One Fleet Place, London EC4M 7RA

# **Attendees**

Bob Fletcher (Chair)	(BF)	Joint Office
Chris Shanley (Secretary)	(CS)	Joint Office
Angela Love	(AL)	Scottish Power
Andrew Jones	(AJ)	KPMG
Andrew Margan	(AMa)	British Gas
Andrew Meaden	(AMe)	Dentons
Azeem Khan	(AK)	RWE npower
Carl Whitehouse	(CWh)	First Utility
Caroline Powell	(CP)	British Gas
Charles Ruffell	(CR)	RWE
Chris Warner	(CWa)	National Grid Distribution
Charles Robson*	(CR)	Brookfield Utilities
Charles Wood	(CWo)	Dentons
Clare Cantle-Jones	(CC)	SSE
Colin Blair	(CBI)	Scottish Power
Colette Baldwin	(CBa)	E.ON
Dave Mitchell	(DM)	Scotia Gas Networks
David Tennant	(DTe)	Dentons
Dave Turpin	(DTu)	Xoserve
Diane Bennett	(DB)	National Grid Distribution
Gethyn Howard	(GH)	Brookfield Utilities
Karen Stockdale*	(KS)	PX Ltd
Mark Cockayne	(MC)	Xoserve
Martin Baker	(MB)	Xoserve
Milly Nyeko	(MN)	Ofgem
Michael Walls	(MW)	ES Pipelines
Mike Leonard*	(ML)	Ofgem
Nick Salter	(NS)	Xoserve
Rebecca Anderson	(RA)	Dentons
Richard Pomroy	(RP)	Wales and West Utilities
Sarah Gull	(SG)	Xoserve
Sean McGoldrick	(SMc)	National Grid NTS
Shanna Key	(SK)	Northern Gas Networks

Stuart Kelly (SKe) Scottish Power

Sue Hilbourne\* (SH) Scotia Gas Networks

\*Via teleconference

Copies of all papers are available at: http://www.gasgovernance.co.uk/0565/181016

The Workgroup Report is due to be presented at the UNC Modification Panel on 04 November 2016.

#### 1.0 Introduction

BF welcomed all to the meeting, noting that this had been arranged as the second session of the legal text familiarisation review of the Data Service Contract (DSC) documents.

CWo advised that the documents being presented were the same as those published ahead of the meeting. However, these may include minor corrections and amendments based on comments received prior to the meeting.

# 2.0 Budget and Charging Methodology

CWo provided an overview of the Budget and Charging Methodology (Draft 2.0 7<sup>th</sup> October 2016) and the points of interest were as follows.

Al asked why National Grid NTS was absent from 1.4.1 (j). CWo advised that there was no separate category for NTS charging in this group and therefore it was not considered necessary to identify them as such.

CP asked if this section was subject to transitional arrangements, as it did not appear to make this clear. CWo agreed that clarification was required and that the next version would do so.

SMc asked for further clarity for section 1.5.2 as he did not understand its origins. CWo advised that this was carried over from existing practice in the current Contract Managers meeting process and communications.

SMc challenged that why should all members be able to vote on the budget, which was specifically applicable to an individual customer class. CWo explained that the Committee would vote on the whole budget and not individual aspects or service lines, therefore all members should be eligible to vote. However, he would expect the CDSP and customers in a specific class to be able to support the build up of the budget before it is submitted for approval.

SMc was still concerned that other customer groups could impact the budget for a bespoke service or system where they were not paying for the service. CWo suggested that some aspects would be managed under the change process and this was budgeting setting, so they need to be clearly identified as different tasks in the overall process. CWo highlighted that section 3.2 Cost Allocation Model contained a requirement for the CDSP to establish and keep under review, a Cost Allocation Methodology and a Cost Allocation Model. AMa asked if the Cost Allocation Model would be published. NS highlighted that Xoserve had not intended to publish the model but was open to views. MB indicated that there would be customer engagement over the CDSP budget and the Charging Statement, which provides a lower level of with regards the CDSP charges. CWo highlighted that the model would be subject to audit, the audit report would be published and the Charging Statement may be more useful to assist with invoice validation.

SMc felt that publication of the model would be good from a transparency perspective and AL asked how would Shippers know the model was 'fit for purpose' if it was not made available. A discussion was had on the relative benefits of publishing the model and in the end it was decided that the model should be published although this may need to be located on a customer access only website.

CWo explained that section 3.3 Charging Shares sets out the basis on which different Charging Shares are to be calculated for individual Customers. He highlighted a sharing mechanism was not required for National Grid NTS as they were always 100%. CWo also explained that for IGTs, the share was based on the number of Supply Points in a CSEP and GH confirmed he was comfortable with the approach.

CWo went on to provide an overview of section 4 CDSP Budget and Charging Bases. Under section 4.4 Adjustment Margin, it was explained that a margin was applied to ensure CDSP has sufficient working capital to cover any deficits but that this may not be required every year. AMa asked if the section needed to be better defined with lower and upper limits. CWo explained that no limits applied and that the margin could be 1% or 10% for example. MB explained that the margin would depend on the forecast issues for that year and will form part of the budget consultation. NS welcomed any further feedback on this point.

CWo provided an overview of section 4.7 Budget appeal, explaining that a Customer may appeal the CDSP Budget for the Charging Year on the grounds that the CDSP Budget is not fit for purpose for the CDSP to fulfill the obligations of the DSC/UNC.

AMa indicated that he had issues with the wording 'fit for purpose' and felt that a material impact on customers and/or consumers would be a better test. CWo recognised that the wording may not be perfect but indicated that it was from the Licence Condition applicable to the CDSP. A discussion was had on whether a better definition could be placed in the UNC and whether it could help or hinder an appeal. In the end it was decided to leave the wording as drafted. CWo highlighted that an appeal would need to contain extra justification and that any future appeal may give guidance on how best to make an appeal.

CWo indicated that a party must bring their issues to the attention of the CDSP in the first instance. CP asked if an appeal could be raised with regards to the original budget as set out in section 4.6 or an amended budget (section 4.8). MB clarified that it was only the original budget was within scope as the budget amendment should be minimal/justified and should have been subject to a separate consultation and approval process.

With regards to section 4.7.4, which says the Customer may not give notice of appeal more than 20 Business Days after the final CDSP Budget was sent to Customers, AM asked whether 20 Business Days was too long. A discussion was had on the merits of a shorter and longer period, with MB highlighting that a long appeal window would cause uncertainty around the budget/charges people would get. It was felt that the 20 Business Days would be left as is, in order to assist smaller parties with identifying issues and considering whether to appeal. It was also recognised that the 1<sup>st</sup> April was possibly the earliest an appeal would be decided upon.

Similarly section 4.7.7 provides for up to 20 Business Days (after the notice of appeal was received), for the CDSP to send to the Authority its opinion. The 20 Business Days allows for a view to be obtained from the Committee. After some discussion it was agreed that the timescale be reduced to 10 Business Days.

CWo explained that section 4.7.13 indicates that when the Authority decides on the appeal, the Transporters shall notify the CDSP/Committee and the CDSP shall notify each Customer. CWo indicated that this would need to be looked at to assess how it would work in practice and the timescales involved.

CWo explained that section 4.7.14 covers what could happen where the Authority directs a change in the CSDP Budget is required. An option is "with the approval of the Transporters", for the CDSP to seek the Committee's views on any revision of its planned activities. CBa questioned why the Transporters needed to be involved and CWo felt it was to ensure that there were no undue delays in meeting the Transporters licence compliance requirements but agreed to look at this clause again.

CWo highlighted the triggers in section 4.8 Budget Amendment, for the CDSP to revise the budget and that the revised budget goes through the same steps as the original but only faster. CWo explained that in a situation where there was now a budget over amount, there

was an option to accelerate spends from later years in order to keep the budget the same.

CWo explained that where the CDSP amends the CDSP Budget, section 4.9 Revision of Annual Charging Statement, would apply. SK asked for clarity with regards to the timescales for revisions to the Annual Charging Statement in section 4.9.3b and CWo clarified that in some cases this could mean that less than 1 month's notice is provided. CWo reminded participants that delays are not helpful in recovering charges.

CWo explained that when calculating the Annual Customer Class Infrastructure Charge Base (ACCICB), National Grid NTS (Gemini costs) are excluded to ensure no double charging. AL asked whether this exclusion should be based on the first calculation of the ACCICB (7.2.1) or the adjusted ACCICB (7.2.2).

New Action 0565/1018: National Grid Distribution (CWa) to clarify if the National Grid NTS Annual Customer Class Infrastructure Charge Base, as determined in 7.2.3, is based on the first calculation of the ACCICB or the adjusted ACCICB.

CWo provided an overview of section 10 Payment and Invoices and went through what each Customer is to pay to the CDSP. A discussion was had on the timing of the invoices and MB highlighted that an Xoserve invoicing schedule would be published showing how the CDSP invoice would be issued based on the current month. The current intention was to invoice within the service period and therefore the invoice would be issued by the end of the month. Flexibility was to be employed and section 10.2.1 allowed for Xoserve to agree with customers to invoice in advance where charges would be small if required.

With regards to section 10.2.2 SH asked for clarity on the square brackets contained. CWo confirmed that the Customer would have 20 Business Days from date of the invoice issue to challenge the invoice and highlighted that the 20 Business Days was from the Terms of Reference document.

CWo highlighted that section 10.2.4 currently contained square brackets and the proposal was to replace these, to clarify that invoices would be sent by email or post. DT clarified that the intention was not to issue the invoices via the IX but this could be accommodated if the UNC was changed by a Modification.

Finally CWo highlighted that Xoserve published the populated Charge Base Apportionment Table yesterday.

#### 3.0 Transitional Arrangements

CWo provided an overview of the DSC Transitional Arrangements Document (Draft 5.0 11<sup>th</sup> October 2016) that covered both UNC and DSC arrangements and the points of interest were as follows.

CP asked if the drafting in sections 3.2.4 and 3.5.2 was too short hand and would they benefit from additional detail, as there were sections of boilerplate for example, which would usually be located in this section. With regards to 3.5.2 she asked how Transporter rights or obligations with regards to TPD Section U would be novated to CDSP in practical terms and similarly with regards to 3.2.4, how would Transporters be liable for anything done by Xoserve before the implementation date. A discussion was had on how Transporters compliance may be applied in a number of scenarios, where the issue may have arose pre and post Nexus implementation.

New Action 0565/1019: National Grid Distribution (CWa/CWo) to discuss with SG/CP suitable wording for sections 3.2.4 and 3.5.2 of the DSC Transitional Arrangements Document.

With regards to section 3.6.4 the Change Management Committee may establish the Credit Committee before the Implementation Date, AL asked if this was correct and CWo confirmed that it should be the Contract Management Committee and not the Change Management Committee.

CWo provided an overview of section 4 Execution of the DSC, etc. and highlighted that Xoserve were defining the signing/accession process but this process would not be in the DSC. CWo highlighted that the rules for failure to execute the DSC were different for Transporters (licence breach) and Shipper or Traders (User Default).

CWo went through the new text in Section 5 Transition to and Commencement of the DSC and the new text covering what Customers needed to comply with. MC highlighted that bank details needed to be added to the list.

Under section 5.3 Transitional Service Changes, CWo highlighted that any ASA changes not concluded by the implementation date, would become DSC changes. CBa asked if there were any User Pays developments in flight and NS believed that there were non outstanding at this time.

Under section 5.6 Pre-DSC Agreements to remain in force, CP asked if the wording "for the avoidance of doubt" in 5.6.2 could actually cause doubt and whether it would be better to state the ASA clauses that survive post Nexus implementation. CWo stated that some clauses would stay operational where necessary, to ensure activities can be completed after the implementation date, such as invoicing and close out. A discussion was had about what issues this approach may cause.

New Action 0565/1020: National Grid Distribution (CWa) to clarify ASA termination provisions that would survive and what DSC arrangements/termination agreements will take their place.

With regards to section 5.7 Other DSC service documents, CWo highlighted that here were a number of Xoseve policies under the ASA that would get added or amended from time to time, that would (subject to review) be adopted by the CDSP. MC highlighted that a new set of credit rules were being drafted for the DSC.

CWo explained how the costs of a third party liability claim would be paid for by the CDSP if the conditions in 6.1.5 were satisfied and recovered by the Transporter if they were not. CP asked everything was covered. CWo felt this section was a balanced approach to the topic and highlighted that if an issue was known pre implementation it would be accrued for by the Transporters. A discussion was had about the likelihood of a third party liability claim, cross over scenarios and the 2<sup>nd</sup> anniversary liability cut off.

New Action 0565/1021: National Grid Distribution (CWa) to consider if any changes need to be made to section 6.1.5 of the DSC Transitional Arrangements document, when taking into account any incidental costs from any third party liability claims.

CWo explained that section 6.2 covered how the CDSP first year budget would be set and that two periods (pre/post Nexus) would be dealt with. SH asked if the budget to be discussed at a Contract Managers meeting on Wednesday 19<sup>th</sup> October took this into consideration. MB said yes but there was no monthly breakdown. He also highlighted that the meeting was to start the consultation on the budget and not to ratify.

With regards to section 6.3 Investment Costs and section 7.2 Transporters to bear relevant Nexus Costs, AMa asked how any post implementation Nexus costs are ring-fenced to Transporters.

New Action 0565/1022: National Grid Distribution (CWa) to clarify how any post implementation Nexus costs are ring-fenced to Transporters.

CWo explained that section 7.4 covered Nexus defects, which could be any Code/BRD items not delivered or errors with them. He highlighted that any disputes would be resolved by expert determination. SH asked if this section should be more descriptive as Transporters should not be on the hook for additional unforeseen changes/additions. A discussion was had on the priority of defects. DT highlighted that so far the defects were housekeeping changes – small and low cost to fix.

# 4.0 Change Management

CWo provided an overview of the DSC Change Management Procedures (Draft 4.0 9<sup>th</sup> October 2016) and the points of interest were as follows.

CWo highlighted that new text had been included in section 1.4.1e with regards to customer confidential information and that references to this definition are used in a number of places. SG highlighted that she needed to check consistency with the DCS terms and conditions. CWo pointed out that all data was confidential in the terms and conditions but that this was not the case here.

CWo provided an overview of section 3 Amendment of DSC Service Documents, and highlighted that parties should aim to follow the DSC procedures before aiming to make an amendment via the Code route. CR asked how this section linked to decisions made by the Committee in accordance with rules later in the document. For simplicity, CWo said he would add wording to clarify that the amendment could only be made if all other rules had been complied with.

Under section 4.5 Priority Principles, CWo highlighted that the list of principles was a non-exhaustive list and not a hierarchy. In some cases he expected that the CDSP and Committee may not reach a conclusion when judging against the principles and the DSC objectives may need to be considered.

New Action 0565/1023: National Grid Distribution (CWa) to update wording to clarify that the Priority Principles in section 4.5 of the Change Management Procedures are not a hierarchy.

Whilst reviewing section 4.1.16 CR asked at what stage would legal drafting be included in the Business Evaluation Report (BER) and CWo indicated that sometimes it may be provided at the outset for simple changes, after business rules were firm or at implementation stage (4.9.3b).

CWo highlighted that under section 4.8.8 the CDSP are required to deliver approved UNC Modification changes in a timey manner, even if the Committee fails to make a decision.

CWo explained section 5 UK Link Modifications, highlighting that only the CDSP can make a UK Link Modification as long as one of the cases in section 5.2.5 are satisfied. GH asked if a small user could challenge a change if it had an adverse impact upon them and CWo confirmed that a dispute could be raised with the Committee. If there is any doubt about whether the cases are satisfied the CDSP can consult the Committee (5.2.7).

CWo highlighted that in section 5.3 Procedures for UK Link Modifications, a number of notices could be made by the CDSP but no specific periods are made for.

New Action 0565/1024: Xoserve (DTu) to determine the notice periods to be provided in section 5.3 of the DSC Change Management Procedures.

#### 5.0 UK Link Manual

CWo provided an overview of the UK Link Manual (Draft 3.0 13<sup>th</sup> October 2016) explaining that the rules are essentially those from UNC Section U and may be revisited later. The points of interest were as follows:

CWo explained that prior to the Project Nexus Implementation Date, a revision of the UK Link Manual would be published as it was required for Nexus implementation, this would take into account any FGO required changes. CBa asked whether a revised version would be ready on time. CWo advised that temporary rules had been set out in the Transition document to allow time for the UK Link manual to be updated in time for Nexus and FGO post Nexus.

CW explained that the UK Link Manual proposed comprises:

- this UK Link Manual Framework Document;
- · the UK Link Terms and Conditions;

- · the Existing UK Link Manual;
- · ASA-related Provisions; and
- Additional Systems Provisions.

CWo highlighted that new text had been added to section 2.4 with regards to the additional systems, and this included Data Enquiry. CWo also explained section 2.5 covered some arrangements that were not recorded in the existing manual such as use of the internet portal and they were also assessing if any other supporting documents need to be referenced.

## 6.0 UK Link Manual - Annex

RA provided an overview of the UK Link Manual Annex (Terms and Conditions) (Draft 1.0 7<sup>th</sup> October 2016). As with the UK Link Manual the rules in the Annex are essentially those from UNC Section U. SG recognised that some sections would benefit from improvements/updates.

CBa asked how non UK Link Users would access Supply Point Enquiries and DT confirmed that access would continue to be provided.

# 7.0 Third Party Services

This item was not covered in the meeting.

### 8.0 Next Steps

BF explained that the next meeting on the 26<sup>th</sup> October will cover updates on the documents discussed today, Modification 0565A (differences to 0565) and further development of the draft Workgroup Report. Comments were welcomed on any of the documents provided for/discussed at this meeting and the draft Workgroup Report and should be sent to the Joint Office in the first instance. The intention is to submit the Workgroup Report for discussion by the Panel on 4<sup>th</sup> November 2016.

# 9.0 Diary Planning

It was agreed that a further meeting should be arranged for the 14<sup>th</sup> November 2016 to allow interested parties to ask questions on the documents being implemented as part of Modification 0565/0565A.

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

Time/Date	Venue	Workgroup Programme
10:00 Wednesday 26 October 2016	Elexon, 4 <sup>th</sup> Floor, 350 Euston Road, London NW1 3AW	FGO Workgroup and Workgroup 0565  Review draft Workgroup Report
10:00 Tuesday 01 November 2016	Elexon, 4 <sup>th</sup> Floor, 350 Euston Road, London NW1 3AW	FGO Workgroup and Workgroup 0565  • Finalise Workgroup Report

# Workgroup 0565 (as at 18 October 2016)

Action Ref	Meeting Date	Minute Ref	Action	Owner	Status Update
0565/0908	29/09/16	2.0	CWa National Grid Distribution to investigate whether the CDSP would act as an agent for Transporter when receiving an update to the C&D Store from a meter installer.	National Grid Distribution (CWa)	Carried forward (Due 26 Oct 16)
0565/0909	29/09/16	2.0	CWa National Grid Distribution to reflect on the process regarding data flows and meter reading in reference to Modification 0455.	National Grid Distribution (CWa)	Carried forward (Due 26 Oct 16)
0565/0910	29/09/16	2.0	CWa National Grid Distribution to look at the UK Link User Agreement in relation to what it requires existing Trader Users to sign up to.	National Grid Distribution (CWa)	Carried forward (Due 26 Oct 16)
0565/0911	29/09/16	2.0	CWa to arrange for a draft UK Link User Agreement to be made available for review.	National Grid Distribution (CWa)	Carried forward (Due 26 Oct 16)
0565/0912	29/09/16	2.0	Shippers to provide feedback regarding if they want this retained as a Transporter function	All Shippers	Carried forward (Due 26 Oct 16)
0565/1001	03/10/16	2.0	Xoserve (MC) to publish the DSC Credit Rules by close of play on Friday 14 October 2016.	Xoserve (MC)	Carried forward (Due 26 Oct 16)
0565/1002	03/10/16	2.0	Xoserve (MC) to review the Credit Policy process, to provide clarity in respect of issuing the notice to the Transporters regarding a default.	Xoserve (MC)	Carried forward (Due 26 Oct 16)
0565/1003	03/10/16	2.0	National Grid Distribution (CWa) to discuss with MB the area of indebtedness and how this would be linked to the Charging Methodology in relation to contractual exposure.	National Grid Distribution (CWa)	Carried forward (Due 26 Oct 16)
0565/1004	11/10/16	3.0	National Grid Distribution (CWa) to provide clarity regarding Service Lines and Agency Functions to ensure there clear identification of responsibility.	National Grid Distribution (CWa)	Carried forward (Due 26 Oct 16)
0565/1005	11/10/16	3.0	National Grid Distribution (CWa) to add to the Issues Log that the UNC related or referenced documents need to be	National Grid Distribution	Carried forward (Due 26

			reviewed and updated based on the FGO regime.	(CWa)	Oct 16)
0565/1006	11/10/16	3.0	National Grid Distribution (CWa) to confirm the procedure if a User obtained and published confidential or sensitive information that was provided to it in error.	National Grid Distribution (CWa)	Carried forward (Due 26 Oct 16)
0565/1007	11/10/16	3.0	Xoserve (AMi) to confirm if in the context of Performance Assurance if point 16.1.1 is a Direct Function and Agency Services.	Xoserve (AMi)	Carried forward (Due 26 Oct 16)
0565/1008	14/10/16	2.0	National Grid Distribution (CWa) to clarify relationship between UNCC and DESC and how their budget is set.	National Grid Distribution (CWa)	Carried forward (Due 26 Oct 16)
0565/1009	17/10/16	3.0	Xoserve (MC) and (SG) to review the fee of £500.00 for the late invoice payment administration fee, with the view to reducing this figure.	Xoserve (MC) & (SG)	Carried forward (Due 26 Oct 16)
0565/1010	17/10/16	3.0	Xoserve (MC) and (SG) to clarify the period of time allowed for an invoice dispute to be raised and whether the proposed 7 days could be extended.	Xoserve (MC) & (SG)	Carried forward (Due 26 Oct 16)
0565/1011	17/10/16	3.0	National Grid Distribution (CWa) and Xoserve (SG) to look at the categories of data and clarify the position of IPR and licencing.	National Grid Distribution (CWa) & Xoserve (SG)	Carried forward (Due 26 Oct 16)
0565/1012	17/10/16	3.0	National Grid Distribution (CWa) and Xoserve (SG) to confirm the wording regarding <i>Data Security and Protection</i> was 'future proofed' where possible.	National Grid Distribution (CWa) & Xoserve (SG)	Carried forward (Due 26 Oct 16)
0565/1013	17/10/16	3.0	National Grid Distribution (CWa) to investigate including an injunction clause into the Data Security and Protection section of the DSC Terms and Conditions.	National Grid Distribution (CWa)	Carried forward (Due 26 Oct 16)
0565/1014	17/10/16	3.0	National Grid Distribution (CWa) to confirm the rights and obligations against the DSC and how data quality issues should be reported to the PAC.	National Grid Distribution (CWa)	Carried forward (Due 26 Oct 16)

0565/1015	17/10/16	3.0	National Grid Distribution (CWa) to investigate the indemnity issue, and the default reference in point DSC 12.5 (a) (ii) together with the liability under a contract under the CDSP and amend the wording to provide clarity.	National Grid Distribution (CWa)	Carried forward (Due 26 Oct 16)
0565/1016	17/10/16	5.0	Xoserve (SG) to investigate what is the current reporting and frequency of reports presently produced for Business Continuity exercises.	Xoserve (SG)	Carried forward (Due 26 Oct 16)
0565/1017	17/10/16	5.0	Xoserve (SG) to amend the wording DSC Contract Management Point 4.1.5. within the Contract Management Committee section, to read 'as soon as practicable' when considering the provision of audit reports.	Xoserve (SG)	Carried forward (Due 26 Oct 16)
0565/1018	18/10/16	2.0	National Grid Distribution (CWa) to clarify if the National Grid NTS Annual Customer Class Infrastructure Charge Base, as determined in 7.2.3, is based on the first calculation of the ACCICB or the adjusted ACCICB.	National Grid Distribution (CWa)	Carried forward (Due 26 Oct 16)
0565/1019	18/10/16	3.0	National Grid Distribution (CWa/CWo) to meet with SG/CP discuss suitable wording for sections 3.2.4 and 3.5.2 of the DSC Transitional Arrangements Document.	National Grid Distribution (CWa/CWo)	Carried forward (Due 26 Oct 16)
0565/1020	18/10/16	3.0	National Grid Distribution (CWa) to clarify ASA termination provisions that would survive and what DSC arrangements/termination agreements will take their place.	National Grid Distribution (CWa)	Carried forward (Due 26 Oct 16)
0565/1021	18/10/16	3.0	National Grid Distribution (CWa/CWo) to consider if any changes need to be made to section 6.1.5 of the DSC Transitional Arrangements document, when taking into account any incidental costs from any third party liability claims.	National Grid Distribution (CWa/CWo)	Carried forward (Due 26 Oct 16)
0565/1022	18/10/16	3.0	National Grid Distribution (CWa) to clarify how any post implementation Nexus costs are ring-fenced to Transporters.	National Grid Distribution (CWa)	Carried forward (Due 26 Oct 16)
0565/1023	18/10/16	4.0	National Grid Distribution (CWa) to update wording to clarify that the Priority Principles in section 4.5 of the Change Management Procedures are not a	National Grid Distribution (CWa)	Carried forward (Due 26 Oct 16)

			hierarchy.		
0565/1024	18/10/16	4.0	Xoserve (DTu) to determine the notice periods to be provided in section 5.3 of the DSC Change Management Procedures.	Xoserve (DTu)	Carried forward (Due 26 Oct 16)