
UNC Workgroup 0566S Minutes
UNC Modification Stakeholder Engagement and Guidelines
Friday 04 December 2015
31 Homer Road, Solihull B91 3LT

Attendees

Les Jenkins (Chair)	(LJ)	Joint Office
Mike Berrisford (Secretary)	(MB)	Joint Office
Alex Ross Shaw	(ARS)	Northern Gas Networks
Andy Miller	(AM)	Xoserve
Angharad Williams	(AW)	National Grid NTS
Angela Love	(AL)	ScottishPower
Chris Warner	(CW)	National Grid Distribution
Colette Baldwin	(CB)	E.ON UK
Colin Blair*	(CBI)	ScottishPower
David Mitchell	(DM)	Scotia Gas Network
Edd Hunter	(EH)	RWE npower
Erika Melen*	(EM)	Scotia Gas Networks
Hilary Chapman	(HC)	Xoserve
Lorna Lewin	(LL)	DONG Energy
Phil Lucas	(PL)	National Grid NTS
Richard Pomroy	(RP)	Wales & West Utilities
Sue Hilbourne*	(SH)	Scotia Gas Networks
Suketa Hammond*	(SHa)	Ofgem

**via teleconference*

Copies of all papers are available at: www.gasgovernance.co.uk/0566/041215

The Workgroup Report is due to be presented at the UNC Modification Panel by 17 March 2016.

1.0 Outline of Modification

Opening the meeting, LJ provided an explanation to the proposed approach for the modification before handing over to the Proposer, E Melen.

EM introduced the modification and explained that it seeks to propose a three-stage solution, as outlined in more detail within Section 3 Solution.

2.0 Initial Discussion

2.1. Initial Representations

None received.

2.2. Issues and Questions from Panel

None raised.

3.0 Solution

EM provided a brief explanation in support of the proposed solution during which no adverse comments were forthcoming. In short, it is a simple solution that seeks to build upon the existing pre-modification discussions facility to ensure that new modifications are suitably developed before being formally submitted to the UNC Panel for consideration.

4.0 UNC Modification Proposals Guidance Document

During quite a detailed discussion, EM confirmed that the guidance document is, as the title suggests, provided for guidance only, rather than a (legal) requirement.

EM handed over to LJ to provide a brief explanation behind the rationale for 'Guidance for New Modification Proposals – Modification Template' section. LJ explained that this outlines how the Joint Office undertakes their quality checks on any new modifications.

LJ explained that the 'Why Change?' element is often confused with the 'Solution' when a Proposer drafts their initial modification.

Some parties voiced their concerns that the approach infers that a prospective Proposer would be expected to have fully developed modification solutions in place before any modification is formally raised, which they perceive stifles healthy Workgroup debate. Responding, LJ explained that it is not suggesting that a modification has to be 100% fully developed before being raised, although the proposal is looking to avoid poorly developed modifications being created and processed.

AL believed that this could have had a direct adverse impact upon her recently raised UNC Modification 0570 'Obligation on Shippers to provide at least one valid meter reading per meter point into settlement once per annum'. Responding, LJ reiterated that the Workgroup phase for any modification is purely an assessment stage under the auspices of the UNC and the Code Administration Code of Practice (CACoP) and it remains a UNC Panel decision as to whether or not a modification is suitably developed to move forwards through the modifications process. LJ quoted the recent FGO modification (0565) as an example of the type of 'critical friend' review that was already taking place. In some instances, a Request Proposal may be a preferred (governance based) option if a proposer does not know what their preferred Solution is.

AL explained that previous pre-modification discussions that she had been involved with had not been formally minuted/had actions allocated, and as a consequence, she believes that her (draft) modification has been delayed due to background discussions with Scotia still being undertaken. LJ believed that this was a good example of why a modification should not be raised too early since, in this example, it would be unlikely to be much further on yet the 'clock would be ticking'.

When challenged about the support other Code Administrators provide to accelerate modifications, LJ reminded everyone comparison should not be made with Elexon, who have a much larger resource on which to draw upon for progressing modifications – in short, these proposals are NOT changing what we already have and do today.

Moving on, LJ pointed out that Ofgem's 'Urgency Guidelines' include their views around retrospectivity.

AM explained that, whilst supportive of the principles underpinning the modification, Xoserve would prefer to have earlier visibility of, and a better understanding of, any actual system requirements before then looking at identifying appropriate solutions. Responding, LJ pointed out that the proposal is aimed at Code (a commercial contract) and not system specific. In short, the solutions should seek to highlight changes to Code and thereafter, any system changes cascade out from there. AM requested that an avoidance of doubt statement be added to cover off the difference between Code and system change requirements / aspects.

Moving on to briefly consider the ‘Impacts’ aspects of the guidance document, LJ reminded everyone that the industry is now in an SCR phase and therefore Panel has to verify, for each new modification, if there are any impacts on the Switching SCR.

5.0 Legal Text

EM provided a brief overview of the proposed supporting (draft) legal text and explained that it is similar in principle to the previous legal text guidance related modification. During a brief discussion, it was pointed out that new paragraph 7.1.2 should actually be numbered as 7.1.3 to take into account existing (and therefore not overwrite) MR7.1.2. AL wondered if the statement should not be made more flexible, to which LJ advised that the Panel always took a view on late submissions already provides suitable process related flexibility.

It was also noted that the amendment proposed for section 7.2 actually relates to existing paragraph 7.2.3(b).

CW suggested that the legal text should also refer to business days; EM agreed.

6.0 Any Other Business

EM agreed to take into account the points put forward during the discussion and to amend the guidance document to look to improve modification ‘up front’ quality aspects as much as possible.

It was agreed that the Workgroup should look to complete the Workgroup Report at the 14 December 2015 meeting, subject to approval of the amended guidance document and legal text, in order to formally submit its report to the January 2016 Panel meeting.

7.0 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
10:00, Monday 14 December 2015	31 Homer Road, Solihull B91 3LT	<ul style="list-style-type: none"> • <i>Consideration of Amended Guidance Document</i> • <i>Consideration of Amended Legal Text</i> • <i>Completion of Workgroup Report</i>
10:00, Wednesday 13 January 2016	<i>To be confirmed</i>	<ul style="list-style-type: none"> • <i>To be confirmed</i>