UNC Workgroup 0642 (Urgent) 0642A Minutes Changes to settlement regime to address Unidentified Gas issues Thursday 04 January 2018

at Xoserve, Lansdowne Gate, 65 New Road, Solihull. B91 3DL

Attendees

| Bob Fletcher (Chair) | (BF) | Joint Office |
|-----------------------------|-------|------------------------------|
| Mike Berrisford (Secretary) | (MiB) | Joint Office |
| Andrew Green* | (AG) | Total |
| Andrew Margan | (AM) | Centrica |
| Beverley Viney | (BV) | National Grid NTS |
| Chris Warner | (CW) | Cadent |
| Dave Addison | (DA) | Xoserve |
| David Tennent* | (DT) | Dentons |
| Eddie Proffitt | (EP) | MEUC |
| Fiona Cottam | (FC) | Xoserve |
| Gareth Evans | (GE) | Waters Wye Associates |
| George MacGregor | (GM) | utilita |
| Jeremy Guard | (JG) | First Utility |
| Jon Dixon | (JD) | Ofgem |
| John Welch | (JW) | npower |
| Justin Price | (JP) | Corona Energy |
| Kirsty Dudley | (KD) | E.ON |
| Linda Whitcroft | (LW) | Xoserve |
| Lorna Lewin | (LL) | Orsted |
| Louise Hellyer | (LH) | Total Gas & Power |
| Luke Reeves* | (LR) | EDF Energy |
| Mark Bellman | (MB) | ScottishPower (Dataserve UK) |
| Mark Jones | (MJ) | SSE |
| Rachel Hinsley | (RH) | Xoserve |
| Rhys Kealley | (RK) | Centrica |
| Richard Pomroy | (RP) | Wales & West Utilities |
| Robert Cameron-Higgs* | (RCh) | Flow Energy |
| Sallyann Blackett | (SB) | E.ON |
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^{*} via teleconference

Copies of all papers are available at: http://www.gasgovernance.co.uk/0642/040118

The Workgroup / Final Modification Report is due to be presented at the UNC Modification Panel by 15 February 2018.

1.0 Outline of Modification(s)

1.1. Modification 0642 (Urgent) (inc. elements of 0643 (Urgent))

GE introduced the modification and provided a brief summary of the rationale behind raising it.

In introducing 'UNC Modifications 0642/0643' presentation, GE explained that in essence there are two UNC modifications that share a common route to their subsequent solutions, which have previously been discussed with the industry. Under normal circumstances these would have been considered as alternates but due to the compressed timescales they had been raised as spate modifications.

Whilst recognising that it is highly likely that parties will have opposing views on these two modifications, GE pointed out that they build upon the previous 2017 discussions in UIG meetings hosted by Xoserve and in short align most closely to option 2A.

The following key points are extracted from the discussions on the various presentation slides (by exception), as follows:

Summary slide

When asked how reconciliation 'squares up' to Ofgem's views on retrospection in relation to Modification 0643, GE accepted that the proposer would need to make a case as to why it is appropriate, but also pointed out that the industry has the opportunity to provide views on the matter when submitting their respective consultation responses. GE suggested that a line in the sand provision might be required.

GE pointed out that Modification 0642 looks to take into account Xoserve system technical constraints, which is the main difference between it and Modification 0643, other than the retrospective aspects.

When some parties questioned how the industry could potentially make any meaningful decisions when the potential impacts remain unclear, GE pointed out that what that this is a 'zero sum gain' with the simple movement of monies around the industry landscape – in short, the same is true of any retrospective based modification.

GE also accepted that parties' allocations may go up or down, depending upon where they sit in the LDZ in terms of allocation, which ultimately could have a bearing on the extent to which they are actually impacted. This might be difficult to accurately access.

Allocation and forecasting changes

In discussing the proposed reinstatement of the pre-Nexus regime, GE accepted that DESC might wish to consider how best to re-create the regime (i.e. DAFs etc.). FC felt that DESC might prefer to look to build these into the 2018 Demand models, and as such, with DESC approval, Xoserve could look to provide old and new world DAFs if needed.

When asked whether this is simply reintroducing the old scaling factors, GE suggested that it is far more complex than that, as it is NOT the new formula with scaling factors added at the end because this could potentially result in instability and volatility. It was noted that the Weather Correction Factor (WCF), also needs to revert to the old formula in order to ensure that the scaling factor does not become the new source of volatility.

NDM review

When it was suggested that the modification (as drafted) does not address UIG levels within the NDM pot (i.e. allocating to different customer types etc.), GE responded by suggesting that this is something that should / would be captured

within the Workgroup Report. However, for the avoidance of doubt, Modifications 0642/0643 are not looking to address the underlying data sets etc.

In noting that the WCF was previously based on demand and is also related to AQs, SB suggested that these proposals appear to highlight potential issues around seasonal normal demand values, and as a consequence, did not necessarily agree with the proposed approach. Responding, GE explained that the proposed monthly review of seasonal normal NDM demand values would only 'kick in' in instances where the rolling AQ has issues – however, this matter could be reconsidered during the Workgroup Report development.

When JP advised that this is why Corona Energy (as Proposer of 0642) are proposing a monthly based review of Seasonal Normal NDM Demand in order to better manage any potential 'drift', FC explained how the (LDZ) AQ would be monitored going forwards (i.e. back to previous baseline + or - 1%).

Focus then switched to a brief review of the legal text impacts before returning to the presentation. (*Please refer to item 1.2 below for more details*)

UIG

GE explained that in future under the Modification 0642 proposals, the AUGE will be required to perform a new task to determine the percentage of throughput which is permanent UIG for each LDZ for each Gas Year. He went on to indicate that the AUGE Contract might need to be re-tendered, as a consequence of these proposals. FC indicated that Xoserve has considered the matter, and their current view is that the contract would not need to be re-tendered.

Summary – Pre-Nexus regime

When FC and LW pointed out that this pie chart contained incorrect information, GE acknowledged the concern before referring to the following slide.

New Process (UNC Modifications 0642/0643)

Based on the discussions and concerns being voiced, GE accepted that more clarity is needed around the Unidentified Gas estimated by AUGE aspects.

AUGE Process

When asked, GE confirmed that in essence the current 'final' weighting table factors used in Allocation become the 'initial' weighting table factors for both UIG Allocation and Settlement Error Reconciliation under these Modification 0642 proposals. In short, on Day 1 the existing settlement error weighting factor table (for 0642 purposes) would only apply to Product Classes 3 and 4.

FC pointed out that this could potentially involve a change to the scope of the AUGE contract depending upon which modification is approved (or not, as the case may be) and also the impact of the sequence of any modification proposal approvals. In attempting to clarify the requirements, LW suggested that for the avoidance of any doubt, this is how to reconcile at the end of the process and NOT allocation. To try and respond to LW's point, GE explained how the Modification 0642 proposals are anticipated to work (i.e. how settlement error weighting factors would be utilised to smear reconciliation across Shippers).

Reconciliation (UNC Modification 0642)

Opening consideration of this slide, GE explained that he recognises that this matter might prove difficult to understand on first acquaintance.

In accepting that more clarity around the various aspects would prove beneficial, GE pointed out that individual meter point reconciliation is NOT being changed

under the Modification 0642 proposals, as every effort is being made to try to minimise system technical changes.

In trying to better understand the Modification 0642 proposals, LW summarised that any site that has had a reconciliation, in the month is out of scope, whereas any re-reconciliations related aspects need further consideration (only applies for the NDM pot). Responding, GE explained that the Modification 0642 proposals are tailored to ensure timely delivery before confirming that Modification 0642 is NOT proposing any DM reconciliation changes and that the current process stays 'asis'. However, he asked parties to note that the energy would go into the calculations where appropriate.

GE acknowledged that the solution may require a national or LDZ based targeting, although further consideration would be required before finally settling on the most appropriate solution. RP voiced his concern that whilst the aggregate position may well be 'in target', an individual LDZs position may not be. In recognising that the weighting factor could have a potential impact, FC suggested that there may be a need to track the meter read status over a given monthly period, and thereby potentially add another layer of complexity to the solution. Whilst accepting the points being put forwards, GE explained that the current proposals avoid individual sites being significantly impacted.

When asked, GE did not agree that the Modification 0642 proposals would potentially encourage 'gaming' by parties.

When asked for a view on the likelihood of issues in this area being triggered, GE suggested that these range from highly unlikely to likely, although he does recognise that negative reconciliation could occur on a low frequency (i.e. potentially every couple of years).

In acknowledging the various concerns being voiced at the meeting, GE explained that he recognises that the Modification 0642 and 0643 proposals are not a perfect answer, but feels strongly that they would work towards improving the current processes. GE also pointed out that in raising the modification many factors were considered, but it was felt that these proposals provide a better 'safety control' mechanism for the industry as a whole.

LW explained that currently individual meters get reconciled and the equivalent energy goes into the 12 month UIG pot. GE pointed out that the current process 'disconnect' of 3 to 4 years based on line in the sand versus Reconciliation smear 12 months would move to a monthly smear under the Modification 0642 regime proposals – the drive being to resolve UIG volatility by incentivising reads and reconciliation.

LW went on to point out that the proposed process would not necessarily just end up with charges to parties, but could also involve payments back to them as well (i.e. debits and credits).

When asked, GE confirmed that he would be happy to consider the removal of the description of 25 day read frequency provisions as they were restrictive, although it could invoke the need for significant associated system changes. LW commented that by using the 'reconciled' position each month this would go away anyway.

When asked, LW confirmed that the concept of an estimated read, only applies at the point of transfer, and Shippers are not permitted to send estimates under any other circumstances.

Moving on to consider the swim lane diagram, GE confirmed that for the purposes of this example DM sites are processing 'as-now' before going on to explain the difference between this model and the pre-Nexus model. FC then explained the

potential impact that the use of weighting factors could have in influencing how we share out the UIG (i.e. re-share across the LDZ for the month).

When GE explained that the main aim remains a reduction in the + / - swings in allocation, LW pointed out that whilst that is fine in principle, it could have potential impacts on reconciliation. In referring to UNC Modification 0473 principles, GE advised that Modification 0642 is NOT looking to replace these.

When FC then moved on to explain how the current UIG processes work over periods greater than 12 months, GE reiterated the point that Modification 0642 is not proposing to change the individual site UIG provisions. In short, the 1.1% throughput never changes (its just setting out the initial UIG for LDZ purposes) and variability should be far less volatile as a consequence. At this point, FC, LW and GE agreed to discuss the matter in more detail offline after the meeting.

When MJ enquired as to how RAASP impacts are potentially catered for under the Modification 0642 provisions, in terms of priority for implementation. LW provided a brief summary of the process in terms of how the DSC process would work.

In order to try and answer parties concerns and questions, GE provided a visual flipchart example of how Modification 0642 proposals are expected to work during which FC confirmed that based on the example provided, there would be potential file format impacts involved. LW also overlaid an individual site (meter point) reconciliation scenario on to the example that stimulated even more questions around read performance requirements and instances where a shipper does not provide a read (as defined in the example). Responding, GE advised that he would consider how NDM re-reconciliations would be expected to fit in with the Modification 0642 proposals and to thereafter provide worked up examples for consideration at the next Workgroup meeting.

New Action 0101: Waters Wye Associates (GE) to provide a worked example of how NDM reconciliations (inc. some realistic weighting factors) would be expected to fit in with the Modification 0642 proposals for consideration at the next Workgroup meeting.

When asked whether or not the Modification 0642 provisions propose a similar 12 monthly rolling UIG smearing pot, GE agreed to consider whilst also noting that parties would welcome the provision of equal granularity around both settlement and UIG data.

When concerns were voiced around the potential for the Modification 0642 proposals to mask what actual volumes are involved on a monthly basis, especially in respect of invoicing aspects, FC explained that the issue relates the complexity associated with 'read and un-read' reporting before suggesting that this would need to be considered, as the proposed solution is far more complicated than the current arrangements. In short, if parties wish to incentivise reads on the back of these UIG proposals, then it would need to be on a more frequent basis rather than current arrangements. GE explained that all Modification 0642 is seeking to do is to compress the previous 12 month UIG volumes into one month. LW then highlighted that the Modification 0643 proposals are more complicated as they look to go back to a 12 month model.

When asked how Modification 0642 proposals potentially affect nomination forecasting, GE explained that the Proposers of 0642 believe that their modification reduces volatility at the front end of the process. GE also explained how the proposed nomination scaling factor has the potential impact on allocations, before confirming that there would not be a separate pot for settlement. In short, an individual shipper would receive a DM nomination + NDM nomination + UIG volume as a proportion of the 1.1% UIG. JD observed that in essence the UIG pot is being split into two elements – one permanent and one

temporary. When asked, GE explained that the settlement model error gets taken out of the UIG pot and placed into the NDM pot instead.

Reconciliation (UNC Modification 0643)

Focusing attention back to the 'Reconciliation (UNC Mod 0643)' slides in the presentation, GE provided a brief explanation behind the information provided.

Retrospection

GE advised that the proposals represent what is effectively a financial adjustment of wholesale rather than retail positions.

When asked whether the proposals re-open balancing, GE confirmed that potentially they do, although further consideration would be needed. When asked about whether a shipper in the current world that does not balance would also be expected to not balance out to the same proportion in the new world, GE suggested that this would depend on the impact of various factors such as UIG and scaling factors etc. When it was suggested that parties that may well be balanced out in the current world may (inadvertently) find themselves out of balance in the new world, JG intervened by arguing that this is why the industry looks to avoid retrospection.

Summarising, FC suggested that we could consider a commercial correction mechanism rather than a re-opener for balancing corrections, although she asked parties to note that the Gemini system would need to be evaluated to understand what would need to be amended to be able to manage the concept of a re-opener and would therefore require a form of 'workaround' based solution at least for an interim period of time. She explained that how all this would potentially works with reconciliations that have already occurred causes her (and Xoserve) great concern. When GE indicated that he would be willing to discuss the matter in more detail offline with Xoserve, JG indicated that he believes that retrospection goes against the principles of good financial practice.

New Action 0102: Waters Wye Associates (GE) and Xoserve (FC/LW) to look to provide a view on how retrospection (and how allocation is impacted) may or may not work in practice at the 15 January 2018 meeting.

It was pointed out that transitional rules would be required that take into account 'cut over' from the existing to the new world and especially how energy is smeared back which should be considered during development of the legal text for the respective (UIG related) modifications.

CW reminded those in attendance that as there are UK Link system impacts involved, the effective implementation date (of any of the modifications) could be expected to be a fair way off, which in turn impacts on any retrospective elements (i.e. it may impact on parties views around reads and read replacement activities etc.). Whilst suggesting the Modification 0643 would possibly be the preferred solution, GE noted that based on Xoserve's initial views around deliverability, if it involves a more difficult solution to deliver.

When asked about the potential impacts on iGT supply points and whether these are being catered for under the 0642 proposals, GE responded by explaining that he believes these fall under NDM aspects and would therefore be covered, although he happy to accept he may well be wrong. He then pointed out that he is trying not to constrain Xoserve in providing a suitable solution. FC reminded everyone that there are no differences in how CSEPs sites are treated to directly connected.

When asked how Modification 0643 proposals look to cater for the effective implementation date and as a consequence the cut over aspects, GE responded

by explaining that the Proposer's view favours a hard cut over, although he accepts that further consideration around the transitional arrangements (i.e. retrospection across the respective dates etc.) would require further consideration. FC pointed out that her previous reference to reconciliation was related to dealing

with any transitional aspects and associated time periods.

When asked how any cost assessments for these urgent modifications would be provided, BF reminded those parties in attendance that the formal consultation is scheduled to start on 01 February 2018 regardless and that the 'cost v's benefits' analysis should if time allows, be included as part of the supporting documentation for the consultation, whether this takes the form of a Workgroup Report, or not. Whilst recognising the driver behind the timely provision of the cost and benefits analysis information, DA explained that the information itself would be dependent upon the level of understanding of the proposed solutions. DA went on to indicate that he would be discussing the requirement in more detail with his Xoserve colleagues (FC and LW) after the meeting. LW then indicated that there are possibly two distinct pieces of work that Xoserve needs to consider.

CW then suggested that the matter should be highlighted at the forthcoming DSC Change Management Committee meeting (scheduled for 10 January 2018) in order to consider how these urgent modification solutions dovetail in with the prioritisation of Release changes, sooner rather than later. At this point GE advised that he would be concerned should the DSC Change Management (prioritisation of system changes) process potentially delay delivery of the solutions for any of these UIG modifications in favour of other UNC modifications.

When FC confirmed that there are potential Gemini system impacts involved, BV noted that the last cost view on a Gemini test environment provision was circa £500k.

1.2. Modification 0642A

SB and KD introduced the proposed alternate modification and provided a brief summary of the rationale behind raising it and seeking urgent status before focusing attention on the main differences between Modification 0642A and Modification 0642.

SB outlined E.ON's thinking and how the Modification 0642A solution looks to involve minimal Project Nexus related changes and therefore costs.

Section 3 – Why Change?

When asked, SB confirmed that in essence Modification 0642A is similar in concept to 0642 and employs a fixed UIG percentage but utilising a 'bottom up' process accompanied by a balancing factor (+ or -) going into the NDM allocation process with reconciliation unchanged.

FC advised that it would be preferable for a separate volume based solution (i.e. a balancing quantity rather than a balancing factor) where daily balancing quantities are allocated on a throughput market share (AQ) basis, a point acknowledged by KD. When asked whether or not weighting factors would be involved, SB advised that they are not part of the proposed solution for Modification 0642A – in essence, the proposed solution is similar to UNC Modification 0432 balancing rules.

FC noted that in terms of sharing, the fixed UIG elements go to all shippers (DM and NDM) whilst the balancing factor goes to NDMs only. When asked, SB confirmed that reconciliation gets shared in the same manner as NDM allocation.

When GE enquired as to where the 3% figure originated, KD recognised that Modification 0642A may need amending in light of discussions before advising that she would be discussing the various points with Xoserve offline. GE suggested

that all that is needed is the rationale behind the 3% figure – a point that KD acknowledged but a number was needed to start the debate.

Moving on, SB explained that E.ON recognises that parties value transparency around balancing factors on the grounds that this enable them to better manage their respective portfolios. When asked how a new market entrant would be expected to gain access to the relevant information, SB explained that they would still be able to extract the aggregate annual data and the aim is for Modification 0642A provisions is to make the process even easier.

In noting the similarities between Modifications 0642, 0642A (significantly different solution) and 0643, GE enquired how the Workgroup believes these solutions should progress, as he questions whether or not 0642A is a suitable alternative, to which JD replied by pointing out that all three modifications are examining the same issue that is (historically) an acceptable approach. It was acknowledged that only one of the three 'linked' modifications would be implemented in time. Whilst recognising the points being made, GE remained of the opinion that Modification 0642A should be a separate modification (and as a consequence treated as such) in its own right as it might take more time to develop.

Responding, JD advised that Ofgem are very keen that all related/relevant modifications are considered alongside the other UIG related modifications in order that valuable process time is not lost. Furthermore, he asked parties to note that Ofgem would not support any attempts to 'filibuster' and delay progress of any of these 'linked' modifications.

LW voiced her concerns around the pressure being applied on Xoserve to provide appropriate (and meaningful) cost analysis, especially when working to these compressed timescales. BF reminded everyone in attendance that it is up to Panel as to whether or not to formally request a detailed cost estimate although this is unlikely due to the compressed development timescales.

When LW pointed out that it is proposed for Xoserve to commence work on a high-level Rough Order of Magnitude (ROM) without waiting for the DSC Change Management Committee on 10 January 2018.

When asked if Ofgem has any concerns about the compressed timescales for these UIG related modifications, JD felt that provision of a high-level ROM that identifies costs across all the modifications should suffice. JD also remarked that the rollout of Smart and AMRs could potentially reduce UIG over time and therefore this might be considered to be a transitional issue with a limited payback period.

When LW raised a question regarding whether or not an industry testing period ('market trials') should also be built in to the timescales, JD indicated that this might be a good idea especially for any Gemini system testing requirements. It was noted that any costs associated to a testing programme would also need to be taken into account. DA then advised that historically Xoserve have concentrated on deliverability aspects rather than testing environment requirements per se, however they could be included in this instance. GE remained concerned that testing requirements could result in a delay to delivery of a suitable solution.

New Action 0103: Xoserve (FC/LW/DA) to look to provide a high-level view on potential costs and testing environment requirements for consideration at the 15 January 2018 meeting.

Concluding discussions, KD indicated that E.ON would look to provide an amended Modification 0642A prior to the next meeting.

1.3. Modification 0642 (Urgent) and 0642A and 0643 Legal Text Proposals

DT provided a brief overview of the proposed approach for preparation of the legal text for Modification 0642 mainly, although consideration of the requirements for 0642A and 0643 would be included in due course.

Focusing attention on TPD Section H, DT provided a very high-level initial assessment of potential changes, as follows:

- Para 1.5 still under consideration, especially for 0642 (Urgent) purposes;
- Para 2.2.1 scaling factor to be added to the end of the existing formula;
- Para 2.3 to remain 'as-is' for the time being;
- Paras 2.4 and 2.5 will probably remain 'as-are', but might need amending although this could be catered for via Methodology Statement changes instead:
- Para 2.6 existing paragraph will be amended to also take into account LDZ scaling factor requirements including a definition for UIG forecast before becoming 2.7 when new paragraph 2.6 added to cover off scaling factor requirements, and
- Para 1.5 still under consideration, especially for 0642 (Urgent) purposes.

Moving on to focus attention on TPD Section E, DT provided a very high-level initial assessment of potential changes, as follows:

- Para 1.1.6 no changes anticipated;
- Para 1.1.7 question marks over whether or not a negative value could exist in the new regime;
- Para 1.3.6 some changes anticipated, but actual nature unknown at this time;
- Para 7.1.1 likely to be deleted in due course;
- Para 7.1.2 expect to be amended to recognise the new reconciliation rules and associated timescales with a new defined term for "Relevant NDM Supply Points", and
- Para 9.4 some changes anticipated to enable determination of UIG per LDZ aspects.

In noting that there could / would be some potential AUG Table impacts involved, DT also advised that these initial proposals would now be broadened out to include Modifications 0642A and 0643 requirements.

When LW enquired about potentially amending reconciliation (i.e. the 1.1% UIG allocation aspects) for individual sites, GE responded by acknowledging the point before apologising that this was not better highlighted within the current version of the presentation. However, for the avoidance of doubt, the 1.1% UIG is fixed and not moving under the provisions of Modification 0642.

When DT and CW advised that an initial legal text review meeting between Cadent, Dentons, the proposers and Xoserve is scheduled for 09 January 2018, BF enquired whether or not Modification 0642A requirements would also be considered at the meeting, to which CW confirmed that they would be. Some parties questioned whether including consideration of 0642A legal text requirements would be efficient management of the time available, although others felt it would be beneficial. CW then pointed out that the nature of the discussions would be focused purely on a mechanical exercise.

It was also suggested that both initial (temporary) and final (permanent) UIG allocation aspects would need to be considered as part of the on going development of the legal text.

2.0 Initial Discussion

2.1. Issues and Questions from Panel

None raised.

2.2. Initial Representations

None received.

2.3. Terms of Reference

The standard UNC Workgroup Terms of Reference will apply and are available at: http://www.gasgovernance.co.uk/mods

3.0 Next Steps

BF confirmed that work would continue on the Workgroup Report alongside consideration of any amended modifications and assessment of the legal text and cost benefit analysis.

4.0 Any Other Business

None.

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 |
|------------------------------------|--|---|
| 10:30 Monday 15 January 2018 | The St Johns Hotel, 651 Warwick Road, Solihull B91 1AT | Detail planned agenda items. Consideration of Amended Modification(s) Consideration of Legal Text, Costs and Benefits Development / Completion of Workgroup Report |

Action Table (as at 04 January 2018)

| Action Ref | Meeting Date | Minute Ref | Action | Owner | Status Update |
|---------------|-----------------|---------------|--|---|------------------|
| 0101 | 04/01/18 | 1.1 | To provide a worked example of how NDM reconciliations (inc. some realistic weighting factors) would be expected to fit in with the Modification 0642 proposals for consideration at the next Workgroup meeting. | Waters Wye Associates (GE) | Pending |
| 0102 | 04/01/18 | 1.1 | To look to provide a view on how retrospection (and how allocation is impacted) may or may not work in practice at the 15 January 2018 meeting. | Waters Wye Associates (GE) & Xoserve (FC/LW) | Pending |
| 0103 | 04/01/18 | 1.2 | To look to provide a high-level view on potential costs and testing environment requirements for consideration at the 15 January 2018 meeting. | Xoserve (FC/LW/DA) | Pending |