UNC Workgroup 0691S Minutes CDSP to convert Class 2, 3 or 4 meter points to Class 1 when G1.6.15 criteria are met

Tuesday 16 June 2020

Via Teleconference

Attendees

| 1111011111000 | | |
|-------------------------------|-------|------------------|
| Loraine O'Shaughnessy (Chair) | (LOS) | Joint Office |
| Karen Visgarda (Secretary) | (KV) | Joint Office |
| Andy Clasper | (AC) | Cadent |
| Carl Whitehouse | (CW) | Shell UK |
| David Mitchell | (DM) | SGN |
| Ellie Rogers | (ER) | Xoserve |
| Fiona Cottam | (FC) | Xoserve |
| Kirsty Dudley | (KD) | E.ON |
| Lorna Lewin | (LL) | Orsted |
| Luke Reeves | (LR) | EDF Energy |
| Mark Jones | (MJ) | SSE |
| Mark Palmer | (MP) | Orsted |
| Phil Lucas | (PL) | National Grid |
| Rhys Kealley | (RK) | British Gas |
| Rose Kimber | (RKi) | CNG |
| Sallyann Blackett | (SB) | E.ON |
| Steven Britton | (SBr) | Cornwall Insight |
| Steve Walker | (SW) | PFP Energy |

Apologies

Louise Hellyer (LH) Total Gas & Power)

Copies of all papers are available at: http://www.gasgovernance.co.uk/0691/160620

The Workgroup Report is due to be presented at the UNC Modification Panel by 16 July 2020.

1. Introduction and Status Review

Loraine O'Shaughnessy (LOS) welcomed everyone to the meeting.

1.1. Approval of Minutes (19 May 2020)

The minutes from the previous meeting were approved.

1.2. Approval of Late Papers

LOS advised the Workgroup that Rhys Kealley (RK) wanted to submit one late paper for discussion at the meeting in relation to an IGT impact on the Legal Text

^{*}via teleconference

RK explained it was regarding an email from Anne Jackson, Gemserv in relation to an IGT impact on the 0691 UNC Legal Text. The Legal Text provided was based on UNC Modification 0708 - Re-ordering of the UNC in advance of Faster Switching and the equivalent IGT UNC 137 Modification. (please see the details of this topic and discussion in point 4. below)

2. Review of Outstanding Actions

Action 0502: Joint Office (LOS) to discuss with AR any associated risks with both the following Modifications going to the June 2020 Panel simultaneously; Modification 0710 - CDSP provision of Class 1 read service and Modification 0691S - CDSP to convert Class 2, 3 or 4 meter points to Class 1 when G1.6.15 criteria are met

Update: LOS advised that this action could now be closed, as Modification 0710 - CDSP provision of Class 1 read service, was now going to be submitted to the September 2020 Panel and so this Modification 0691S, would be submitted prior to that one at the August 2020 Panel. LOS also explained that Modification 0691S would now follow on after Modification 0708 - Reordering of the UNC in advance of Faster Switching. **Closed.**

Action 0503: British Gas (RK) and Xoserve (ER) to provide an 'avoidance of doubt statement' in relation to the removal of 2.2.11 of the Legal Text and amendment or removal of Business Rule 7 to aid clarity.

Update: Both RK and ER said that this action could now be closed as the Business Rule had been updated in the V11 of the Modification and updated in the Workgroup Report. **Closed**

Action 0505: SGN (DM) to re-align the draft Legal Text in-line with the amended Modification 0691S v10.0

Update: DM confirmed that a subsequent amended Modification V11 had been provided and both had been incorporated in the Legal Text so this action could now be closed. **Closed**

Action 0506: Joint Office (LOS) to update the Workgroup Report to align with the amended Modification v10.0.

Update: LOS said the Workgroup Report had now been updated to align with the amended Modification v10.0 and the subsequent V11 Modification so this action could now be closed. **Closed**

3. Review of amended Modification v11.0

David Mitchell (DM) confirmed that the Legal Text had been updated in-line with amended Modification v11.0.

DM added that due to the late paper and the subsequent discussions taking place regarding the mis-match in numbering of the Legal Text between Modification 0691S and IGT UNC Modification 137, clearly more detailed and comprehensive discussions were now needed to resolve this matter, regarding the Cross Code Impacts.

LOS agreed and said that the matter now needed to be addressed in an expedient manner to allow progression of the Modification and submission to Panel. She noted that prior to the Legal Text mismatch being raised the Workgroup Report for 0691S was originally going to be submitted to the July 2020 Panel, however due to this recent Legal Text issue, she asked if an extension until August 2020 might be required. RK said that an extension may be required, but he was hopeful that would not be necessary. LOS agreed to take the discussion offline with RK and DM to fully understand the impact and if required, request an extension at the July UNC Panel Meeting only if required.

New Action 0601: Joint Office (LOS) to seek an extension to August 2020 from the July Panel meeting if required. **Closed;** as per the post meeting update below.

<u>Post Meeting Update</u>: LOS confirmed that Action 0601 could now be closed as the Modification would be submitted to the July 2020 Panel.

4. Review of revised draft Legal Text

RK provided an overview of the content of the email from Anne Jackson (AJ), Gemserv and explained that the she was requesting the UNC Modification 0691S change the ordering of the Legal Text as there was a mismatch between the IGT UNC 137 Modification. RK said that AJ had commented that there would be impacts and that there had been considerable work undertaken by the IGTs previously in relation to having to re-number the Legal Text regarding Modification 0708 - Re-ordering of the UNC in advance of Faster Switching. RK added that AJ had said that this mismatch in numbering had only come to light at this late stage in the process, as the IGTs could only assess the impacts once the Legal Text had been drafted and subsequently published.

Kirsty Dudley (KD) said that as she was on the IGT UNC Panel she was aware of the mismatch and the most straight forward solution was for the Legal Text within Modification 0691S to be amended, as this would avoid the need for another 'mop up' IGT UNC Modification having to be raised to address this issue.

DM disagreed with this suggestion and said that there would then be a disconnect in the process, and he reiterated that if this Cross Code Impact was not captured within the solution presently, then it would not be included in the Legal Text. RK confirmed that presently this was not included in the Modification. KD said that she did not think the re-numbering request was unreasonable to slightly amend the current UNC Legal Text.

DM said that he knew the Lawyer would not look on this proposal favourably at all, as it would create a disconnect in the Legal Text, which should be avoided. He reiterated that the Legal Text was created from the detail in the solution within the amended Modification v11.0 and as such, any additions had to be included to provide transparency and clarity. RK said that he could amend the Modification to add a bullet point in the solution regarding the Cross Code Impact. LOS agreed to discuss the impacts offline and workgroup agreed that this should not further delay Modification 0691.

New Action 0602: SGN (DM) to discuss the re-numbering/re-ordering of the Legal Text contained in Modification 0691S in relation to IGT UNC 137 Modification and the best way to proceed (if appliable/required) **Closed**; as per the post meeting update below.

<u>Post Meeting update:</u> Following an offline discussion with the Proposer, it was identified that in the Legal Text drafting of 0691S where Section 2.2.6 to 2.2.10 had been added, that this had resulted in IGT UNC not pointing to the correct section in UNC Section G3.1 whereby previously it pointed to 2.2.6(c) this should now point to UNC 2.2.11 (c). RK said he would raise an IGT UNC housekeeping Modification to request this change, however this would be pending on the outcome of UNC 0691 being implemented. LOS confirmed that Action 0602 was no longer relevant and was closed.

KD said there had been an enormous amount of work necessary to re-number the Legal Text within Modification 0708 - Re-ordering of the UNC in advance of Faster Switching, and she was keen to avoid a repeat exercise with Modification 0691S. DM said he would broach the subject with the Lawyer in the first instance, but he did caveat this by saying he thought it was very unlikely that the Lawyer would agree to this suggestion, especially as the majority of the Legal Text had already been drafted.

A lengthy and protracted discussion took place and LOS asked RK if he would consider raising a new IGT Modification to address this numbering issue, as she felt this was the most appropriate way forward from an overall governance perspective, and would avoid any 'knock on' delay to the direction of travel for Modification 0691S. She added that any change to the Legal Text with Modification 0691S would set a precedence for all future Modifications and matters relating to changing the governance around the cross code impacts, which would have to be discussed at the Governance Workgroup prior to any changes being implemented, and presently the formal Governance Workgroup Meetings had been suspended until November 2020. RK said that he was not that keen to go down that route, especially as it would not follow the same timeline as Modification 0691S and his preference was for the Legal Text numbering to be amended. LOS said she did appreciate this was not ideal, but she still felt this was the most sensible and expedient resolution at the present time.

DM provided an overview of the Legal Text and Explanatory Table that had been created and amended following the May 2020 meeting and prior to the late paper submitted by RK at the start of this meeting, 16 June 2020. DM said he had been in discussions with Ellie Rogers (ER) and he drew attention to specific areas of interest or amendments. All agreed the Legal Text did meet the intent of the solution as detailed in version 11.0 of the amended Modification.

5. Review/finalise updated Workgroup Report

LOS provided an overview of the current content of the Workgroup Report and drew attention to specific additions or amendments that had been incorporated following the May Workgroup discussions and the amended Modification v11.0, in relation to the Solution and Impacts and Other Considerations sections.

New Action: LOS to update the Cross Code Impact of the Workgroup Report following the offline discussion with RK and DM on the IGT UNC impacts.

6. Next Steps

 LOS said following an offline discussion with RK, DM and the Joint Office, the Workgroup Report would be finalised and published for July Panel, recommending that 0691S should proceed to consultation.

7.

Any Other Business

None.

8. Diary Planning

Further details of planned meetings are available at: www.gasgovernance.co.uk/events-calendar/month

Workgroup meetings will take place as follows:

| Time / Date | Paper Publication Deadline | Venue | Programme |
|-------------------------------|-------------------------------|--------------------|---|
| 10:30 Tuesday 28 July 2020 | 5pm Monday 20 July 2020 | Via Teleconference | Review the amended Modification v12.0 (if applicable/required) |
| | | | • To review the revised draft Legal Text regarding IGT UNC 137 (if applicable/required) |
| | | | Review and finalisation of the updated Workgroup Report |

Action Table (as at 16 June 2020)

| Action Ref | Meeting Date | Minute Ref | Action | Owner | Status Update |
|---------------|-----------------|---------------|---|------------------------------------|------------------|
| 0502 | 19/05/20 | 2.0 | Joint Office (LOS) to discuss with AR any associated risks with both the following Modifications going to the June 2020 Panel simultaneously; Modification 0710 - CDSP provision of Class 1 read service and Modification 0691S - CDSP to convert Class 2, 3 or 4 meter points to Class 1 when G1.6.15 criteria are met | Joint Office (LOS) | Closed |
| 0503 | 19/05/20 | 2.0 | British Gas (RK) and Xoserve (ER) to provide an 'avoidance of doubt statement' in relation to the removal of 2.2.11 of the Legal Text and amendment or removal of Business Rule 7 to aid clarity. | British Gas (RK) & Xoserve (ER) | Closed |
| 0505 | 19/05/20 | 2.0 | SGN (DM) to re-align the draft Legal Text in- line with the amended Modification 0691S v10.0 | SGN (DM) | Closed |

Joint Office of Gas Transporters

| 0506 | 19/05/20 | 3.0 | Joint Office (LOS) to update the Workgroup Report to align with the amended Modification v10.0. | Joint Office (LOS) | Closed |
|------|----------|-----|--|-----------------------|---|
| 0601 | 16/06/20 | 3.0 | Joint Office (LOS) to seek an extension to August 2020 from the July Panel meeting if required. | Joint Office (LOS) | Closed (as per the post meeting update) |
| 0602 | 16/06/20 | 4.0 | SGN (DM) to discuss the re-numbering/re- ordering of the Legal Text contained in Modification 0691S in relation to IGT UNC 137 Modification and the best way to proceed (if applicable/required) | SGN (DM) | Closed (as per the post meeting update) |