



Draft - Rewording for the Risk Register

PAC Risk	Risk Title / Description	There is a risk that...
PACR001	<p><u>Theft of Gas:</u> <u>The consumption recorded at and by the meter does not record the actual consumption at the premise because of theft of gas at that premise</u> <u>Theft of Gas will lead to the inaccurate identification of gas consumed from an end user and impact the level of Unidentified Gas across settlement</u></p>	<p><u>Some energy being consumed at a premise is not being recorded due to theft leading to a higher level of unidentified gas in settlements.</u> <u>The energy consumed at a Shipper's site will not be accounted for and be incorporated into unidentified gas</u></p>
PACR002	<p><u>AQ Correction Process:</u> <u>The process to correct AQ's is not used correctly or appropriately thereby applying a bias to the AQ corrections which is not reflective of the AQ corrections needed in any shipper's portfolio</u> <u>Misunderstanding and misuse of the AQ correction process will cause a miscalculation of energy</u></p>	<p><u>Shippers do not apply AQ corrections in a fair and consistent way thereby introducing a bias, ultimately leading to inaccurate levels of unidentified gas in settlements</u> <u>Inaccurately calculated AQs will cause a misallocation of energy and the AQ correction process will not be used in a fair and consistent way.</u></p>
PACR003	<p><u>Use of estimated reads for Daily Metered sites (Product Class 1 and 2) due to an actual daily reading not being loaded onto UKLink</u> <u>The use of estimated reads for Daily Metered sites (Product Class 1 and 2) will lead to inaccurate energy calculation</u></p>	<p><u>The algorithm used to determine the estimated consumption for a DM Site does not reflect the actual consumption at that site leading to inaccurate allocation and settlement</u> <u>Where estimated reads are used in Product Classes 1 and 2 after D+5, Gas is allocated and reconciled incorrectly</u></p>
PACR004	<p><u>Identified LDZ Offtake measurement errors:</u> <u>The gas measured into the network has been identified as being incorrect</u> <u>Identified LDZ Offtake measurement errors lead to incorrectly measured allocated gas within the LDZ</u></p>	<p><u>The gas being measured into the network is incorrect impacting allocation and shrinkage calculations.</u> <u>Offtake meters develop errors and produces inaccurate readings leading to inaccurate allocation of gas in an LDZ</u></p>
PACR005	<p><u>Incorrect or absent meter asset data:</u> <u>Consumptions are inaccurately derived from the meter billing attributes provided.</u> <u>The use of incorrect asset data or missing asset data on the Supply Point Register leads to delays in and/or missing reconciliation</u></p>	<p><u>The billing attributes of a meter are incorrectly recorded or missing leading to incorrect or no consumptions being derived from meter readings, impacting reconciliations and therefore settlement accuracy.</u> <u>The billing attributes of a meter and gas consumption are incorrectly recorded or missing</u></p>



<p>PACR006</p>	<p><u>Site-specific winter annual ratio (WAR) bands:</u> <u>Site-specific WAR bands are not available for End User Category (EUC) 03-08 sites</u> <u>There is a risk to accurate daily settlement of meter points that do not having a site-specific winter annual ratio (WAR) band for End User Category (EUC) 03-08</u></p>	<p><u>For daily settlement sites, a site-specific WAR band is not available from which more accurate profiles can be derived, leading to more accurate allocation and settlement.</u> <u>The daily settlement of meter points that do not have a site-specific WAR will be inaccurate</u></p>
<p>PACR007</p>	<p><u>Undetected LDZ Offtake measurement errors:</u> <u>The gas measured into the network is incorrect and remains undetected</u> <u>Undetected LDZ Offtake measurement errors leading to shrinkage and unidentified gas remain permanently inaccurate</u></p>	<p><u>The gas being measured into the network is incorrect due to a measurement error impacting settlement, the levels of unidentified gas and shrinkage, which remains whilst the error is undetected</u> <u>LDZ offtake meters develop an error and remain undetected and produces undetected inaccurate readings leading to inaccurate allocation of gas in an LDZ</u></p>
<p>PACR008</p>	<p><u>Unregistered Supply Points:</u> <u>The supply point is not registered, but is consuming gas.</u> <u>MPRNs are being created and remain Unregistered by not being registered on the Supply Point Register whilst consuming gas</u></p>	<p><u>No shipper is putting gas into the network or paying for gas off-taken thereby directly impacting unidentified gas</u> <u>An unregistered meter begins consuming gas and adversely impacts the accuracy to Settlement</u></p>
<p>PACR009</p>	<p><u>Shipperless Supply Points:</u> <u>The supply point exists on the Supply Point Register with no registered Shipper whilst consuming gas</u> <u>MPRNs exist within the Supply Point Register with no registered Shipper whilst consuming gas</u></p>	<p><u>No shipper is putting gas into the network or paying for gas off-taken thereby directly impacting unidentified gas</u> <u>The accuracy of settlement where a Shipperless site is either still consuming gas or begins to consume at a future date without the Supply Point being reregistered.</u></p>
<p>PACR010</p>	<p><u>Meter readings fail validation (product classes 3 and 4):</u> <u>Insufficient reads are loading into UKLink eroding the accuracy of the AQ</u> <u>Meter readings in Product Classes 3 and 4 are submitted and fail validation, and subsequent reads fail validation; the AQ will become less accurate impacting the timeliness of reconciliation</u></p>	<p><u>Actual reads are either sent and fail validation or are not sent so that insufficient reads are provided to maintain the AQ accuracy leading to inaccurate allocation and settlement.</u> <u>In Product Classes 3 and 4 where accurate meter reads are rejected and inaccurate reads are accepted due to the mismanagement of the meter read validation process</u></p>
<p>PACR011</p>	<p><u>Derived meter read drift:</u> <u>The consumption derived from automatic reads is not reflective of the actual consumption recorded on the meter and this is not identified</u> <u>Where check reads are not completed, there is a risk that meters are under or over reading for an extended period of time which will impact allocation accuracy</u></p>	<p><u>Consumption drift is not identified because check reads are not obtained to identify the issue, leading to incorrect consumptions being used in settlement.</u> <u>Where check reads are not completed within timescales, sites that derive a read will drift and not be identified</u></p>



<p>PACR012</p>	<p><u>Required meter read frequency for product 4 meters:</u> <u>The differing required frequency in meter read provision between product class 3 and 4 sites</u> <u>Infrequent meter read submission of Product Class 4 meters will impact the frequency with which the AQ is recalculated and the number of times a site is individually reconciled</u></p>	<p><u>The frequency of submission of meter readings for Product Class 4 meter points could adversely impact the accuracy of the derived AQ and consumption along with the frequency of reconciliation</u> <u>The frequency of submission of meter readings for Product Class 4 meter points could adversely impact the accuracy of the derived AQ and consumption</u></p>
<p>PACR013</p>	<p><u>Change of Shipper Reads:</u> <u>Estimated Change of Shipper reads are used and rather than actual reads, creating inaccurate reconciliation to the shippers involved</u> <u>The risk to allocation is created by estimated Change of Shipper reads being used and not replaced by actual reads creating incorrect periods of reconciliation</u></p>	<p><u>The opening and closing periods of reconciliation are not accurately reflected for the two shippers when an actual read is not used impacting reconciliation accuracy</u> <u>Estimated readings provided by the Transporter are used and not replaced with an actual reading are inaccurate and will create incorrect periods of reconciliation</u></p>
<p>PACR014</p>	<p><u>Meter readings not provided within the settlement window:</u> <u>Sites do not have any reads loaded in the settlement window</u> <u>Failure to obtain a meter reading within the settlement window will lead to final allocation not reflecting true consumption</u></p>	<p><u>Reconciliations will be crystallised based on estimated readings due to the failure to provide a meter reading within the settlement window, impacting settlement accuracy and unidentified gas</u> <u>Some meter points do not obtain a read within the settlement window and reconciliation periods will crystallise not reflecting true consumption</u></p>
<p>PACR015</p>	<p><u>Retrospective updates:</u> <u>Application of an inconsistent approach by Shippers and the industry to retrospective updates</u> <u>Inconsistent approach taken by Shippers to retrospective updates increases the risk of inaccurate reconciliation periods</u></p>	<p><u>The application of an inconsistent approach to retrospective updates introduces a bias and therefore impacts settlement accuracy</u> <u>The approach taken by shippers to retrospective updates increases the risk of inaccurate reconciliation periods</u></p>
<p>PACR016D</p>	<p><u>Correction Factors (CF) – incorrect use of standard CF above 732,000kwh:</u> <u>Incorrectly using standard Correction Factor (1.02264) for sites consuming above 732,000kWh</u> <u>Use of standard Correction Factors for a sites consuming above 732,000kWh</u></p>	<p><u>The standard correction factor is used when a site-specific correction factor should be applied, leading to incorrect consumptions and ultimately inaccurate settlement</u> <u>The calculation of gas consumption is incorrect for a site where site specific correction factor (>732,000 kWh) is mandatory under Thermal Regulations</u></p>
<p>PACR017D</p>	<p><u>Correction Factors (CF) – use of a standard CF for sites consuming on or below 73,200kWh</u> <u>The accuracy in use of a standard Correction Factor (1.02264) for sites consuming below 732,000 kWh</u></p>	<p><u>Using a standard correction factor as required in the Thermal Energy Regulations introduces inaccuracy to settlements</u> <u>There is a risk that across the scale, the use of standard correction factor (1.02264) for sites consuming below 732,000 kWh leads to incorrect attribution of energy</u></p>



PACR018D	Correction Factors (CF) – incorrect use of standard CF below 732,000kwh: Incorrectly using standard Correction Factor (1.02264) for sites consuming above 73,200kWh and below 732,000kwh	The standard correction factor is used when a site-specific correction factor should be applied, leading to incorrect consumptions and ultimately inaccurate settlement
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