

UNC Modification	At what stage is this document in the process?
<h1 data-bbox="132 320 660 412">UNC 0811:</h1> <h2 data-bbox="132 448 941 589">Shipper Agreed Read (SAR) exceptions process</h2>	<div data-bbox="1209 309 1469 629"> <div>01 Modification</div> <div>02 Workgroup Report</div> <div>03 Draft Modification Report</div> <div>04 Final Modification Report</div> </div>
<p>Purpose of Modification: To provide a remedy for SARs that have failed to be progressed (exceptions) within a reasonable period to be proactively managed by the Central Data Services Provider (CDSP)</p>	
<p>Next Steps:</p> <p>The Proposer recommends that this Modification should be:</p> <ul style="list-style-type: none"> subject to Self-Governance assessed by a Workgroup <p>This Modification will be presented by the Proposer to the Panel on 21 July 2022. The Panel will consider the Proposer's recommendation and determine the appropriate route.</p>	
<p>Impacted Parties:</p> <p>High: Shippers and Suppliers</p> <p>Low:</p>	
<p>Impacted Codes: None identified as this is a matter for parties to the UNC</p>	

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Timetable		 0121 288 2107
Modification timetable:		Proposer: Steve Mulinganie Gazprom Energy
Pre-Modification Discussed	23 June 22	 enquiries@gasgovernance.co.uk
Date Modification Raised	23 June 2022	 steve.mulinganie@gazprom-energy.co.uk
New Modification to be considered by Panel	21 July 2022	 0799 097 2568
First Workgroup Meeting	28 July 2022	Transporter: Richard Pomroy Wales & West Utilities
Workgroup Report to be presented to Panel	20 October 2022	 richard.pomroy@wutilities.co.uk
Draft Modification Report issued for consultation	20 October 2022	 0781 297 3337
Consultation Close-out for representations	10 November 2022	Systems Provider: Xoserve
Final Modification Report available for Panel	11 November 2022	 UKLink@xoserve.com
Modification Panel decision	17 November 2022	

1 Summary

What

At present the Central Data Service Provider (CDSP) does not intervene when an estimated transfer read needs to be amended in line with an agreed Shipper Agreed Read (SAR). The incoming Shipper should attempt to replace the estimated transfer read with the agreed SAR. If this fails to be accepted or cannot be replaced, due to incorrect read history, then both parties should raise a Request for Adjustment (RFA) within 4 days of each other.

This Modification will provide a remedy for SARs that have failed to be progressed (exceptions) within a reasonable period, to be managed by the Central Data Services Provider (CDSP).

Why

Some Shippers do not submit replacement reads nor raise RFAs, leading to imbalances for the other Shippers. Also, it may cause future read issues for the incoming Suppliers if the transfer read is not corrected.

How

Both Shippers should attempt to amend the transfer read in line with the SAR within 2 months after it was agreed. If this has not occurred, then the CDSP can be contacted for support to reconcile both sides, in line with the new agreed transfer read.

When the CDSP needs to be contacted for support, the Shipper should provide them with suitable evidence of the new agreed read. The CDSP will then notify the other Shipper of the pending exception and will, in the absence of any relevant objection, action the other Shippers request.

2 Governance

Justification for Self-Governance

This Modification is suitable for Self-Governance as it is unlikely to have a material effect as it simply provides an exception process to ensure agreed reads that have not been actioned in a reasonable period are updated in central systems in a timely fashion.

Requested Next Steps

This Modification should:

- be considered a non-material change and subject to Self-Governance.
- be assessed by a Workgroup.

3 Why Change?

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4 Code Specific Matters

Reference Documents

TBC

Knowledge/Skills

TBC

5 Solution

Both Shippers should attempt to amend the transfer read in line with the SAR within 2 months after it was agreed. If this has not occurred, then the CDSP can be contacted for support to reconcile both sides in line with the new agreed transfer read.

When the CDSP needs to be contacted for support, the Shipper should provide them with suitable evidence of the new agreed read. The CDSP will then notify the other Shipper of the pending exception and will in the absence of any relevant objection action the other Shipper's request in accordance with the following Business Rules

Business Rules (BRs)

BR1: Where the Withdrawing User and the Proposing User agree a revised value of a Meter Reading (Agreed Opening Meter Reading), the Withdrawing Shipper should be allowed to submit a [Proposed Agreed Opening Meter Reading] to the CDSP. The [Proposed Agreed Opening Meter Reading] cannot be submitted ahead of the Opening Meter Reading (including an estimate) being fulfilled and notified to the Withdrawing Shipper as per UNC TPD M 5.13.9 timescales.

Guidance for BR1: Currently only the Proposing User can submit the Agreed Opening Meter Reading (UNC M 5.13.12). This is a change to allow the Withdrawing User to submit a [Proposed Agreed Opening Meter Reading]. If this read isn't appealed by the Proposing Shipper, it will have the same effect as an Agreed Opening Meter Reading (e.g. resulting in an Offtake Reconciliation). There is no agreed window in UNC for the Proposing User to submit the Agreed Opening Meter Reading. Based on this we've suggested the Withdrawing User can submit this once they have been notified of the Opening Meter Read

BR2: The [Proposed Agreed Opening Meter Reading] should not be subject to Inner or Outer Tolerance validation as per the UNC Validation Rules. If it is agreed by both Users, the read should be processed, and the Offtake Reconciliation should occur.

BR3: Where the [Proposed Agreed Opening Meter Reading] will cause a failure of the Outer Tolerance check, upon submission of this read to the CDSP, the submitting User must acknowledge that the [Proposed Agreed Opening Meter Reading] will cause a failure to the Outer Tolerance check but state that the read is agreed and should still be accepted and processed.

BR4: Where the [Proposed Agreed Opening Meter Reading] is submitted, before the reading is accepted by the CDSP and the Offtake Reconciliation in relation to the Withdrawing User is revised (as per UNC TPD M 5.13.13), the CDSP must notify the non-submitting User of the [Proposed Agreed Opening Meter Reading] being submitted.

BR5: The non-submitting User will be given [20] Supply Point System Business Days (SPSBDs) from the point of the CDSP notification to appeal the [Proposed Agreed Opening Meter Read] submitted. For the avoidance of doubt, the only valid reason to appeal the [Proposed Agreed Opening Meter Read] is where the non-submitting User believes they have not previously agreed to the read.

BR6: Following the [20] Supply Point System Business Days (SPSBDs), if a valid appeal has not been raised, the [Proposed Agreed Opening Meter Reading] submitted will progress and conditions within UNC TPD M 5.13.13 in relation to the Agreed Opening Meter Reading should apply.

BR7: Where a valid appeal is raised (the non-submitting User believes they haven't agreed the read previously), within the agreed timescale, the [Proposed Agreed Opening Meter Reading] should not be progressed and the conditions within UNC TPD M 5.13.13 will not be applied.

Guidance for BR7: For the avoidance of doubt, in this circumstance, resolution should be managed outside of UNC between the Withdrawing and Proposing Users.

BR8: If the [Proposed Agreed Opening Meter Reading] is appealed, the existing Opening Meter Reading will persist. For avoidance of doubt this could be an actual or estimate read.

BR9: A new PARR report will be expected to monitor this process. This could include information such as e.g. the Number of Proposed Agreed Opening Meter Readings submitted by Withdrawing or Proposing Users and the Number of appeals submitted.

Supplemental

For the avoidance of doubt, the existing Agreed Opening Meter Reading process will not be changed as a result of this Modification. However, if the Proposing User knows the Agreed Opening Meter Reading will cause a failure to the Outer Tolerance validation check, rather than using the current Opening Meter Reading process, they should submit a [Proposed Agreed Opening Meter Reading] which will follow the process set out above.

6 Impacts & Other Considerations

Does this Modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

No.

Consumer Impacts

The inclusion of an exceptions process will avoid the risk of agreed reads not being actioned in a timely fashion which could have consequential impacts on consumers e.g. consumers being billed by the relevant Shipper for the energy associated with the agreed read.

What is the current consumer experience and what would the new consumer experience be?

If this Modification is not implemented, then in the situations contemplated by the Modification the agreed read will not be updated with central systems which could have consequential impacts on consumers. If implemented this exceptions process, were utilised, would remove the risk of agreed reads not being actioned in a timely fashion.

Impact of the change on Consumer Benefit Areas:

Area	Identified impact
Improved safety and reliability	None
Lower bills than would otherwise be the case	None
Reduced environmental damage	None
Improved quality of service	Positive - The inclusion of an exceptions process will avoid the risk of agreed reads not being actioned in a timely fashion which could have consequential impacts on consumers e.g. consumers being billed by the relevant Shipper for the energy associated with the agreed read
Benefits for society as a whole	None

Cross-Code Impacts

None identified

EU Code Impacts

None identified

Central Systems Impacts

The impact of the Modification Solution on Central Systems will need to be assessed.

7 Relevant Objectives

Impact of the Modification on the Transporters' Relevant Objectives:

Relevant Objective	Identified impact
a) Efficient and economic operation of the pipe-line system.	None
b) Coordinated, efficient and economic operation of (i) the combined pipe-line system, and/ or (ii) the pipe-line system of one or more other relevant gas transporters.	None
c) Efficient discharge of the licensee's obligations.	None
d) Securing of effective competition: (i) between relevant shippers; (ii) between relevant suppliers; and/or (iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.	Positive
e) Provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards... are satisfied as respects the availability of gas to their domestic customers.	None
f) Promotion of efficiency in the implementation and administration of the Code.	Positive
g) Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	None

The Modification furthers relevant objective *d) Securing of effective competition: (i) between relevant shippers and (ii) between relevant suppliers* as it provides an exception process to ensure that energy is correctly reconciled between parties.

The Modification is also positive in relation to relevant objective *f) Promotion of efficiency in the implementation and administration of the Code* as currently some Shipper Agreed Reads are not being actioned in a timely and efficient manner and this proposal will address those situations by providing a suitable remedy.

8 Implementation

As Self-Governance procedures are proposed, implementation could be sixteen business days after a Modification Panel decision to implement, subject to no Appeal being raised and also subject to any Central System changes needed to deliver the solution.

9 Legal Text

Text Commentary

Insert text here.

Text

Insert text here.

10 Recommendations

Proposer's Recommendation to Panel

Panel is asked to:

- Agree that Self-Governance procedures should apply.
- Refer this proposal to a Workgroup for assessment.