

UNC Final Modification Report	At what stage is this document in the process?
<h1>UNC 0807FT:</h1> <h2>Minor update to the legal text implemented under Modification 0672S</h2>	<div style="display: flex; flex-direction: column; gap: 5px;"> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 10px;"> 01 Modification </div> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 10px;"> 02 Workgroup Report </div> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 10px;"> 03 Draft Modification Report </div> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 10px;"> 04 Final Modification Report </div> </div>
<p>Purpose of Modification:</p> <p>In order to achieve the intent of Modification 0672S – Target, Measure and Report Product Class 4 Read Performance, a minor update is required to amend TPD Section M 5.9.18 (introduced as part of Modification 0672S) to clarify the rules regarding submission of Valid Meter Readings that would qualify for the Target Read Performance.</p>	
<p>Next Steps:</p> <p>The Panel determined that this Fast-Track Self-Governance Modification should be implemented.</p>	
<p>Impacted Parties:</p> <p>High: None</p> <p>Low: None</p> <p>None: Minor update to UNC text only</p>	
<p>Impacted Codes: n/a</p>	

Contents		
1	Summary	3
2	Governance	3
3	Why Change?	3
4	Code Specific Matters	4
5	Solution	4
6	Impacts & Other Considerations	4
7	Relevant Objectives	6
8	Implementation	7
9	Legal Text	7
10	Recommendations	9
Timetable		
Modification timetable:		
Pre-Modification Discussed	24 March 2022	 0141 614 5930
Date Modification Raised	05 April 2022	Transporter: Guv Dosanjh Cadent
New Modification to be considered by Panel	21 April 2022	 Gurvinder.Dosanjh @cadentgas.com
First Workgroup Meeting	28 April 2022	
Workgroup Report to be presented to Panel	19 May 2022	
Draft Modification Report issued for consultation	23 May 2022	
Consultation Close-out for representations	14 June 2022	
Final Modification Report available for Panel	20 June 2022	
Modification Panel decision	21 April 2022	 07773 151 572
		Systems Provider: Xoserve
		 UKLink@xoserve.c om

 Any questions?

Contact:
Joint Office of Gas Transporters


enquiries@gasgovernance.co.uk

 0121 288 2107

Proposer:
Claire-Louise Roberts
Scottish Power


ClaireLouise.Roberts@ScottishPower.com

 0141 614 5930

Transporter:
Guv Dosanjh
Cadent


Gurvinder.Dosanjh@cadentgas.com

 07773 151 572

Systems Provider:
Xoserve


[UKLink@xoserve.c](mailto:UKLink@xoserve.com)
[om](mailto:UKLink@xoserve.com)

1 Summary

What

A minor change is required to the Uniform Network Code (UNC), in Transportation Principal Document (TPD) Section M to ensure that the Business Rules within Modification 0672S are implemented in accordance with the Modification intent. This change will ensure:

- Amendment to TPD Section M paragraph 5.9.18 (introduced as part of Modification 0672S) to clarify the rules regarding submission of Valid Meter Readings that would qualify for the Target Read Performance.

Why

If this Modification is not implemented, then the UNC will not be consistent with the intent of Modification 0672S.

How

This Modification proposes minor updates to the legal text implemented as part of Modification 0672S.

2 Governance

Justification for Self-Governance

This Modification is unlikely to have a material effect on *(aa) existing or future gas consumers; and (bb) competition in the shipping, transportation or supply of gas conveyed through pipes or any commercial activities connected with the shipping, transportation or supply of gas conveyed through pipes*; because it is a minor change to the UNC to ensure Valid Meter Readings, submitted in the relevant period, are considered in the calculation for the Monthly Read Performance.

During pre-modification discussions the minor nature of the change was discussed along with the suggestion of the Modification being issued to one Workgroup for transparency. Workgroup concluded the proposal did not meet the Fast-Track Self Governance criteria.

Requested Next Steps

This Modification should be sent to a single Workgroup prior to being submitted for Consultation.

The Panel determined that this Modification met the Fast-Track Self Governance Criteria and should be implemented.

3 Why Change?

During the solution development process for Modification 0672S by the CDSP an inconsistency was identified, and the system solution has been developed in line with the **intent** of the original Modification. If this Modification is not implemented the solution will be inconsistent with the intent of the Modification 0672S. (Modification 0672S was implemented in Code on 07 September 2020).

The inconsistency identified was presented to the Distribution Workgroup (DWG) in December 2021 and participants suggested the proposal could be progressed as a minor changes via a Fast-Track Modification, however at Distribution Workgroup in March 2022, the Fast-Track Self Governance criteria were reviewed and the Modification proposal does not appear to meet the criteria. Therefore there was a suggestion that this be discussed in one Workgroup meeting.

4 Code Specific Matters

Reference Documents

None identified.

Knowledge/Skills

None identified.

5 Solution

Minor update required to the UNC, in TPD Section M to ensure that the Business Rule within Modification 0672S is implemented in accordance with the Modification intent. This change will ensure:

1. Amendment to paragraph TPD M 5.9.18 (introduced as part of Modification 0672S) to clarify the rules regarding submission of Valid Meter Readings that would qualify for the Target Read Performance.

UNC TPD Section M Paragraph 5.9.18 needs to be amended such that the definition of ‘MMR’ in TPD M 5.9.18 is updated to state, ‘during calendar month M and M+1’ rather than ‘during calendar month M+1’. If this is not updated, Meter Readings that would otherwise be Valid (in accordance with TPD M 5.9.4), may not be considered in the calculation for the Monthly Read Performance. i.e. the drafting of the 0672S legal text meant that Meter Readings submitted to the CDSP within the same calendar month that they were obtained (month M) would not be considered.

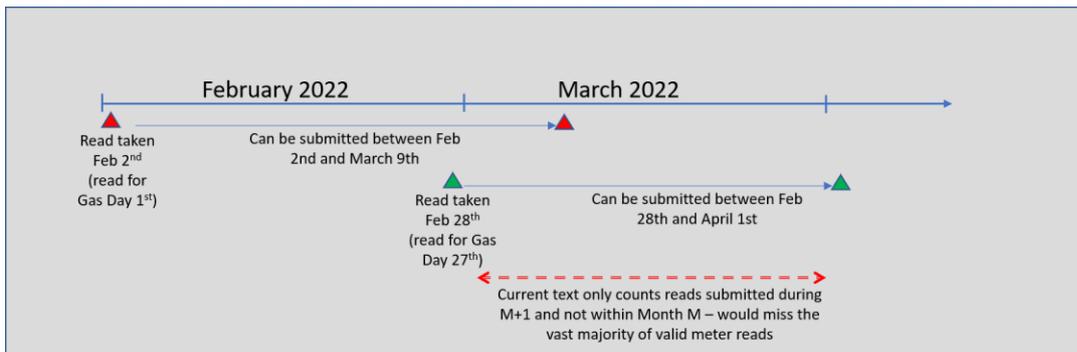
5.9.4 The requirement referred to in paragraph 5.9.3 is that, of the Valid Meter Readings obtained by a User pursuant to paragraphs 5.9.7 to 5.9.12 in respect of Relevant Class 4 Supply Meters on any particular Day:

- (a) not less than 50% are submitted by the 10th Supply Point Systems Business Day after the Read Date;
- (b) not less than 100% are submitted by the 25th Supply Point Systems Business Day after the Read Date

and the CDSP shall notify each User of its performance in such respect.

The current legal text ‘..during calendar month M+1.’ means that the performance reporting for this period could be seen to be ignoring reads received within the month in which they were obtained (example shown below), therefore the amendment to the legal text proposed would rectify this matter.

Figure 1: Example of why reads in months M and M+1 should be included



Note, in order for a Meter Reading to contribute to the performance under Modification 0672S, the Meter Reading must be Valid in accordance with TPD M 5.9.4 AND have been received no later than the end of the subsequent month within which the Meter Reading was obtained.

The following is an extract from the 0672S legal text. The highlighted text is the text that requires amendment:

5.9.18. For the purposes of paragraph 5.9.19:

- (a) "Target Monthly AQ Read Percentage" and "Target Annual AQ Read Percentage" are the percentages expressed as such and set out in the Performance Assurance Report Registers (as updated from time to time);
- (b) a User's "Actual Monthly AQ Read Percentage" in respect of a calendar month (M) is calculated as follows:

$$(MMR / TAQM) * 100$$

where:

MMR is the sum of the Annual Quantity for each relevant monthly Supply Meter Point in respect of which the User submitted a Valid Meter Reading to the CDSP during calendar month M+1;

TAQM is the sum of the Annual Quantity for each Supply Meter Point which for all Days in the calendar month is:

(A)(1) a Monthly Read Meter; and

6 Impacts & Other Considerations

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

This Modification has no impact on any Significant Code Review or any other significant industry change project.

Consumer Impacts

This Modification has no impact on Consumers.

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

The consumer experience will not be changed as this Modification is simply making a minor amendment to the legal text implemented under Modification 0672S to ensure that the UNC reflects the original intention of that Modification.

Impact of the change on Consumer Benefit Areas:

Area	Identified impact
Improved safety and reliability n/a	None
Lower bills than would otherwise be the case n/a	None
Reduced environmental damage n/a	None

Improved quality of service n/a	None
Benefits for society as a whole n/a	None

Cross-Code Impacts

None. Modification 0672S did not require a Modification to the IGT UNC, therefore this Modification will not require a Modification to the IGT UNC.

EU Code Impacts

None

Central Systems Impacts

None. Following guidance from the proposer and the Distribution Workgroup, the solution for Modification 0672S was previously developed in line with the changes described with this Modification.

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.	None

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
--	------

This Modification seeks to ensure that the original intent of Modification 0672S is achieved. Consequently, the justification of the original Modification applies.

Modification 0672S was justified in the following way:

This Modification proposes to introduce a new report to highlight performance to industry participants that by targeting meter read performance across Shippers and customer types that might lead to changes in behaviour that should help to reduce the levels of volatility and unpredictability of UIG, reduce uncertainty in estimation and improve the accuracy of cost targeting and therefore further Relevant Objective d) Securing of effective competition between Shippers and Suppliers.

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.

9 Legal Text

Text

TRANSPORTATION PRINCIPAL DOCUMENT

SECTION M - SUPPLY POINT METERING

Amend paragraph 5.9.18 as denoted by the *red text* to read as follows:

5.9.18 For the purposes of paragraph 5.9.19:

(a) ...

...

where:

MMR is the sum of the Annual Quantity for each relevant monthly Supply Meter Point in respect of which the User submitted a Valid Meter Reading to the CDSP during calendar month *M and M+1*;

10 Panel Discussions

Discussion

The Panel Chair asked the Proposer's representative to summarise the Modification. E Rogers acting as both the Proposer's representative and the CDSP representative, summarised that in order to achieve the intent of previously implemented Modification 0672S – *Target, Measure and Report Product Class 4 Read Performance*, a minor update is required to amend Uniform Network Code (UNC) Transportation Principal Document (TPD) Section M 5.9.18 (introduced as part of Modification 0672S). The change is to clarify the rules regarding submission of Valid Meter Readings that would

qualify for the Target Read Performance. This Modification proposes to update the legal text implemented as part of Modification 0672S in line with both the intent of Modification 0672S and the system change implemented for Modification 0672S.

Panel Members heard that a Pre-modification discussion at Distribution Workgroup on 24 March 2022 had suggested following Self-Governance procedures rather than Fast-Track Self-Governance procedures, as the scope of this new Modification did not immediately appear to fall under the suggested criteria for Fast-Track Self-Governance Modifications. Panel Members noted that the very small amount of Legal Text provided by Cadent Gas within the Modification has been briefly reviewed at Workgroup.

Some Panel Members did not agree with the conclusion drawn by the Distribution Workgroup and suggested that if the Legal Text has already been finalised, the Modification should be approved as a FTSG Modification or issued to consultation. It was confirmed the Legal Text was provided by Cadent and was submitted within the Modification ready for FTSG and therefore imminent implementation if possible.

Panel Members reviewed the FTSG criteria and debated whether the change was an error and if so, the nature of the error, noting that Workgroup has suggested it was not a typographical error.

Fast-Track Self-Governance Criteria

The modification:

- a. *would meet the Self-Governance criteria; and*
- b. *is properly a housekeeping modification required as a result of some error or factual change, including but not limited to:*
 - i. *updating names or addresses listed in the uniform network code;*
 - ii. *correcting minor typographical errors;*
 - iii. *correcting formatting and consistency errors, such as paragraph numbering; or*
 - iv. *updating out of date references to other documents or paragraphs.*

Panel Members debated whether to send the Modification straight out to a short (10 day) consultation. A further debate took place around the fact that the proposed Legal Text has effectively been used in the construction of the systems change for Modification 0672S and therefore this Modification has already effectively been used. This would mean that the change does not constitute a material change, as the industry has likely interpreted the text to include “M and M+1”.

Panel Members agreed that this Modification is correcting a consistency error.

Consideration of the Relevant Objectives

Panel Members accepted the Proposer’s justification for a positive impact on Relevant Objective d) *Securing of effective competition between Shippers and/or Suppliers*, which was taken from that given for Modification 0672S in the Final Modification Report for 0672S. This is reproduced here:

Panel Members agreed that this Modification [0672S] should have a positive impact on Relevant Objective d) Securing of effective competition; because it should increase the granularity of consumption data and therefore help to reduce the levels, volatility and unpredictability of UIG. It is also believed that a volumetric based target, rather than a site-based target, is a much more valuable performance measurement, both in targeting Shippers fairly and contributing to a reduction in UIG. And it was agreed that this will incentivise Shippers

to prioritise their larger supply points ensuring they are submitting regular actual reads which in turn will reduce the risk of UIG

Determinations

Panel Members voted unanimously that Modification 0807 does not have an SCR impact.

Panel Members voted unanimously that Modification 0807 is suitable to follow Self-Governance procedures and that Modification 0807S satisfies the Fast-Track Self-Governance criteria.

Panel Members voted unanimously to implement Modification 0807FTSG.

11 Recommendations

Panel Determination

Panel Members determined that Modification 0807FT should be implemented.