










UNC Final Modification Report	At what stage is this document in the process?
<h1 data-bbox="132 322 727 416">UNC 0836S:</h1> <h2 data-bbox="132 450 1182 734">Resolution of Missing Messages following Central Switching Service implementation and integration with REC Change R0067</h2>	<div data-bbox="1212 318 1479 640"> <div>01 Modification</div> <div>02 Workgroup Report</div> <div>03 Draft Modification Report</div> <div>04 Final Modification Report</div> </div>
<p><b>Purpose of Modification:</b></p> <p>Since the introduction of Faster Switching Arrangements in July 2022, there have been incidents whereby systems that interface with the Central Switching Service (CSS) have not received expected messages because they have not been generated, or because of issues in transmission or receipt of the messages. This Modification clarifies treatment and activities necessary when the CSS Registration Effective from Date does not align to that recorded in the UK Link system due to this issue.</p>	
<p><b>Next Steps:</b></p> <p>Panel consideration is due on <b>21 September 2023</b> <i>(at short notice by prior agreement)</i></p>	
<p><b>Impacted Parties:</b></p> <p>Low: Suppliers; Shippers; Consumers</p> <p>None: National Gas Transmission, Distribution Network Operators and Independent Gas Transporters</p>	
<p><b>Impacted Codes:</b></p> <p>Other impacted Codes are Retail Energy Code (REC) (REC Change Proposal R0067 has been raised to consider some of the issues defined in this Modification) and some components of this Modification may need to be reflected in IGT UNC (depending on the solution).</p>	

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Timetable		 0121 288 2107
<b>Modification timetable:</b>		Contact: <b>Joint Office of Gas Transporters</b>
Pre-Modification Discussed	26 January 2023	 <a href="mailto:enquiries@gasgovernance.co.uk">enquiries@gasgovernance.co.uk</a>
Date Modification Raised	06 February 2023	 0121 288 2107
New Modification to be considered by Panel	16 February 2023	Proposer: <b>Guv Dosanjh</b> <b>Cadent</b>
First Workgroup Meeting	23 February 2023	 <a href="mailto:gurvinder.dosanjh@cadentgas.com">gurvinder.dosanjh@cadentgas.com</a>
Workgroup Report to be presented to Panel	17 August 2023	 07773 151572
Draft Modification Report issued for consultation	18 August 2023	Transporter: <b>Guv Dosanjh</b> <b>Cadent</b>
Consultation Close-out for representations	11 September 2023	Systems Provider: <b>Xoserve</b>
Final Modification Report available for Panel	12 September 2023	 <a href="mailto:UKLink@xoserve.com">UKLink@xoserve.com</a>
Modification Panel decision	21 September 2023	Other: <b>David Addison</b>
		 <a href="mailto:david.addison@xoserve.com">david.addison@xoserve.com</a>
		 0121 229 2138

## 1 Summary

### What

This Modification proposes that in the event that the Central Data Service Provider (CDSP) becomes aware that Registration details in the UK Link system are not aligned to Central Switching Service (CSS), then the CDSP is able to update the details prospectively in the UK Link system as soon as is practicable. It further proposes that the Uniform Network Code (UNC) acknowledges that - in the event of this misalignment - the Shipper recorded in CSS is responsible for the Supply Meter Point for the purposes of invoicing, despite not being recorded as such within the Supply Point Register. To assist in Settlement processes this Modification also proposes that the CDSP adds a valid Meter Reading on the CSS Registration Effective Date, and the treatment of such a Meter Reading by Users.

This modification further proposes that any Settlement is subject to a materiality test, and where any adjustments are below this threshold the adjustments will not be issued to the relevant Shipper Users.

### Why

This Modification is intended to minimise the risk of exceptions occurring in the Registration process, but to clarify responsibility for invoicing should they occur.

Significant changes were made to the UNC as part of the Faster Switching Significant Code Review to support implementation of the CSS. As a result of a number of issues identified since implementation, there are instances where CSS and the UK Link system is misaligned. These issues are where the relevant messages have not been generated or because of issues in transmission or receipt of the messages have occurred. Misalignment between CSS and the UK Link system was never envisaged in the drafting of the UNC as part of the SCR. These changes are necessary to ensure that:

- The CDSP has the authority to act upon an instruction to update the Supply Point Registration details that is received in a form that is not currently envisaged within the UNC; and
- There is clarity in the UNC as to which party is responsible for Settlement in the event that CSS and the UK Link system are misaligned; and
- The CDSP may load a Meter Reading on the CSS Registration Date, who may replace such Meter Reading and the purpose for which this Meter Reading is loaded; and
- There is clarity about the circumstances that the CDSP shall generate and issue invoice adjustments.

### How

This Modification proposes changes to the UNC to acknowledge that in the event of misalignment between the CSS and UK Link systems that the CDSP can act to remedy this inconsistency and confirm the responsibility for the Supply Point, so that it is clear to whom the CDSP should issue invoices. It also proposes that the CDSP generate a Meter Reading on the CSS Registration Effective Date.

## 2 Governance

### Justification for Self-Governance

This Modification is proposed as Self-Governance because the Modification:

- (i) is unlikely to have a material **negative** 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; and
  - (cc) the operation of one or more pipe-line system(s); and
  - (dd) matters relating to sustainable development, safety or security of supply, or the management of market or network emergencies; and
  - (ee) the uniform network code governance procedures or the network code modification procedures; and
- (ii) is unlikely to discriminate between different classes of parties to the uniform network code/relevant gas transporters, gas shippers or DN operators.

This Modification is not expected to have a material negative effect on existing or future gas consumers in that it doesn't increase timing or costs of switching – rather it seeks to clarify the relevant treatment when integration issues between the CSS and the UK Link system because the necessary messages have not been generated or because of issues in transmission or receipt of the messages have occurred. In this regard it is expected to have a positive effect for consumers ensuring that the CDSP may act in the event that it becomes aware of a discrepancy.

### Requested Next Steps

This Modification should be considered a non-material change and subject to Self-Governance.

The technical solution for REC Change R0067 is expected to be implemented no earlier than December 2023. This change will implement an exception process in the REC for Registration messages from CSS that is different the Supply Point Registration process that is envisaged by the UNC. It is therefore proposed that this be considered by Workgroup to ensure that the Modification is fully developed prior to Consultation.

## 3 Why Change?

Significant changes were made to the UNC as part of the Faster Switching Significant Code Review to support implementation of the CSS. As a result of a number of issues identified since implementation, there are instances where CSS and the UK Link system is misaligned. These issues are where the relevant messages have not been generated or because of issues in transmission or receipt of the messages have occurred. Misalignment between CSS and the UK Link system was never envisaged in the drafting of the UNC as part of the SCR. These changes are necessary to ensure that:

- The CDSP has the authority to act upon an instruction to update Supply Point Registration details that is received in a form that is not currently envisaged within the UNC; and
- There is clarity in the UNC as to which party is responsible for Settlement in the event that CSS and the UK Link system are misaligned; and
- The CDSP may load a Meter Reading on the CSS Registration Date, who may replace such Meter Reading and the purpose for which this Meter Reading is loaded; and
- There is clarity about the circumstances that the CDSP shall generate and issue invoice adjustments.

### Ability for the CDSP to update Registration details

If the changes proposed within the Modification are not made then the CSS and UK Link systems will not be aligned on an on-going basis, as the CDSP will not be able to act to remedy such inconsistency once it becomes aware of it.

This Modification seeks to clarify the party responsible for Settlement in the event that this situation occurs.

REC Change Proposal R0067 - Introduction of CSS Refresh Functionality – will introduce the capability for the Gas Retail Data Agent (GRDA – a role that the CDSP performs in REC) to request a **Resend** of a missing message or request a **Refresh** of an individual Supply Meter Point's Registration data from CSS in instances where we suspect that UK Link and CSS data are misaligned.

UNC only envisages the CDSP being in receipt of a 'Secured Active Notification' from CSS in order to affect a Supply Point Registration. The Resend functionality will enable the CDSP to request the Secured Active Notification (or the cancellation notice) to be sent, this component of R0067 does not require a Code Modification.

The Refresh functionality does not result in the generation of a Secured Active Notification – therefore at present the CDSP cannot act upon the Registration Event Synchronisation (which is the message that the CDSP will receive from the CSS following a Refresh request being issued).

### **Responsibility for a Supply Point**

The changes for the Faster Switching SCR, amongst other things, defined the basis on which a User became the Registered User of a CSS Supply Point in the Supply Point Register. The UNC changes did not consider the circumstances where the CSS and UK Link systems were misaligned. This is not a failure of the SCR as this was a scenario that was not envisaged by the Ofgem Switching Programme, and indeed any changes to remedy such instances were deferred from the Programme.

This Modification seeks to clarify the responsibility for the Supply Point in the exceptional event that CSS and UK Link systems are misaligned.

### **Insertion of a Meter Reading for the CSS Registration Effective Date**

Where a Supply Point is created an Opening Meter Reading should be obtained for the Supply Point Registration Date in accordance with TPD Section M 5.13. Where this is not provided the CDSP will estimate a Meter Reading. This Meter Reading is used in Settlement to define the gas used between the previous and the new Registered User, the Suppliers and potentially end consumer billing.

The CDSP has proposed to insert a Meter Reading on the date that the Supply Point Registration of the CSS Supply Point would have become effective in the Supply Point Register had all messages been generated and received successfully. This Meter Reading will only be inserted where a Meter Reading does not otherwise exist in UK Link systems on the CSS Registration Effective Date. This Meter Reading will be a Valid Meter Reading – i.e. it would be used for reconciliation (i.e. a Reconciliation Meter Reading), and could be used for AQ – but since it is proposed that this is added once the Opening Meter Reading has been loaded then it is unlikely to be utilised as the AQ Closing Reading (TPD M 2.3.7 (a) refers). This will enable Users to continue to use this Meter Reading as if the CSS and UK Link systems were aligned. Treatment of this Meter Reading will be different from a standard Opening Meter Reading in that only the User who is recorded on UK Link systems (i.e. the party that will become the Outgoing User with UK Link systems are updated with the Supply Point Registration) will be able to replace this, as opposed to the incoming User. It is required that both Shippers will co-operate with one another and ensure that any alternative Meter Reading that is agreed must be replaced by the User able to do so. For the avoidance of doubt, there may be some instances where the CSS Registration Effective Date Meter Reading cannot be loaded into the UK Link system – in such instances the Meter Reading will be derived and provided to the Users but any Replacement of such Meter Readings will need to be provided via manual processes.

### **Materiality Test, and Assessment by the CDSP**

The Modification Panel posed a question to the workgroup to 'consider the materiality for the invoicing arrangements and consequential impacts on stakeholders'. During the Modification development, the impact to Transportation charges and gas allocation were described (see table below). In light of this, the Modification was developed to include a materiality test to determine whether an adjustment is required to apply the invoicing

to the Shipper defined in the CSS Registration from the CSS Registration Effective Date (i.e. the incoming User). Where the materiality test indicates that the energy quantity does not exceed the defined threshold the adjustment will not be processed and therefore will remain the responsibility of the outgoing User for the period between the CSS Registration and the UKL Registration Effective Dates.

	Typical Domestic Property	Average sized Industrial/ Commercial Property	Very large Daily Metered site
Assumed AQ (kWh)	16,258	564,000	139,500,00
Peak Day Consumption (SOQ – kWh)	149	3,528	687,032
Typical Transportation Charges per Day	£0.70	£7.35	£535.85
Average gas allocation per day kWh/cost	45 kWh £1.76	1,545 kWh £60	382,252 kWh £14,907
Peak day gas allocation per day kWh/cost (i.e. worst case scenario)	149 kWh £11.18	3,528 kWh £265	687,032 kWh £51,527

• Switch not processed – old Shipper continues to be billed, new Shipper not billed

This Modification proposes that the CDSP will assess the materiality of the adjustment required once the Registration has taken effect in UK Link systems and the Opening Meter Reading and the CSS Registration Effective Date Meter Reading has been recorded.

Following the implementation of Resend and Refresh functionality it is expected that both the volumes of missed messages and the period of any adjustments will be reduced. The proposed materiality test is intended to avoid small adjustments being generated which will impose costs upon all impacted parties to manage and which may exceed the value of the adjustment itself.

This Modification proposes that the materiality test utilises the value defined in REC Schedule 30 Resolution of Consumer Facing Switching and Billing Issues, paragraph 9.4 which determines whether a Supplier Agreed Reading process must be undertaken. The REC process is triggered where “the difference between the Energy Supplier’s view of consumption and that derived from the Switch Meter Reading is more than 1,200 kWh for a gas RMP” (Retail Energy Code; Schedule 30 para 9.4(b)).

Modification 0836S proposes that the CDSP shall perform the one-off assessment against the ‘materiality test defined in REC Schedule 30, paragraph 9.4(b)’. Based on the current values defined in REC Schedule 30, this will mean that where the energy value derived is 1,200kWh or less then the adjustment shall not be undertaken.

### Timeline for Assessment of the Materiality Test

This Modification proposes that the CDSP will perform the Materiality Test at the end of the third month following the UKL Registration Effective Date (e.g. if the Registration takes effect on UK Link systems in February, then the CDSP will perform the Materiality Test no earlier than the final Working Day of the Month 3 months after the Registration was effective in UK Link systems – e.g. 31<sup>st</sup> May 2023). For the avoidance of doubt Meter Readings may be replaced following the Materiality Test being conducted, but any such Replacement Readings will not be factored into the Materiality Test nor amend the result of a previous Materiality Test, nor amend any Adjustment undertaken for this reason. This means that any Replacement Readings must be accepted by the CDSP prior to this point in order to be considered for the Materiality Test and Adjustment.

## 4 Code Specific Matters

### Reference Documents

[REC Change R0067](#) (NB: this will require a REC Portal access). For parties without REC Portal access this document has been reproduced in the Appendix (Section 11).

### Knowledge/Skills

No specific knowledge or skills are expected to be required.

## 5 Solution

### Ability for the CDSP to update Supply Point Registration details

This Modification proposes that in the event that the CDSP becomes aware that Supply Point Registration details in the UK Link system are not aligned to CSS, then the CDSP is able to update the details prospectively in the UK Link system as soon as is practicable.

### Responsibility for a Supply Point

This Modification seeks to clarify the responsibility for the Supply Point in the exceptional event that CSS and UK Link systems are misaligned. In these exceptional circumstances the CSS Recorded Shipper (i.e. a Shipper who is recorded on the Central Switching Service as the registered Shipper, but as a result of the 'missing message' issue is not recorded as the Registered User (i.e. Portfolio Shipper) in the UK Link system)) will be responsible for the Transportation invoicing – which the CDSP will invoice as an adjustment. This is intended to be an exception statement in the event that CSS and UK Link are misaligned only.

### Insertion of a Meter Reading for the CSS Registration Effective Date

This Modification proposes that the CDSP inserts a Meter Reading on the date that the Supply Point Registration of the CSS Supply Point would have become effective. Such Meter Reading will be notified to both Registered User (i.e. the Portfolio Shipper) and the CSS Recorded Shipper. This will enable Users to continue to use this Meter Reading as if the CSS and UK Link systems were aligned. Only the User who is recorded on UK Link systems (i.e. the party that will become the Outgoing User when UK Link systems are updated with the Supply Point Registration) will be able to replace this, as opposed to the incoming User. It is expected that both Shippers will co-operate with one another and ensure that any alternative Meter Reading that is agreed must be replaced by the User able to do so.

The methodology for Meter Reading estimation will be determined by the **prevailing** Class at the time of the CSS Registration Effective Date and in accordance with UNC TPD 5.4.1 and 5.4.2 for Classes 1 and 2, and for 3 and 4, respectively. It is not expected that Meter Readings will be required for Class 1 and 2 Supply Meter Points it would be expected that other daily read processes would have already inserted a Meter Reading, but the ability to insert such Readings should not be prevented if required. For Class 3 and 4 Supply Meter Points (i.e. use the NDM Supply Meter Point Demand in accordance with TPD M5.4.2, and for the avoidance of doubt if there is a later Meter Reading than the CSS Registration Effective Date Meter Reading, then the consumption will be profiled using this methodology between the Meter Readings preceding and following the CSS Effective Date).



## **Materiality Test, and Assessment by the CDSP**

This Modification proposes that the CDSP will assess the materiality of the adjustment required once the Registration has taken effect and the Opening Meter Reading and the CSS Registration Effective Date Meter Reading has been recorded in UK Link systems.

Modification 0836S proposes that the CDSP shall perform the one-off assessment against the Materiality Test defined in REC Schedule 30, paragraph 9.4(b)'. For the avoidance of doubt, this is not intended to include a consumer test whether they are willing to accept 'an accommodation' – which is also included in the above paragraph in the REC. This will mean that where the energy value derived between the energy determined between the Readings on the CSS Registration Effective Date and UK Link Registration Effective Date is less than or equal to the value defined in the REC Schedule (currently 1,200kWh or less) then the adjustment shall not be undertaken, nor shall any future adjustment for this reason for the period for this Supply Meter Point.

## **Timeline for Assessment of the Materiality Test**

This Modification proposes that the CDSP will perform the Materiality Test at the end of the third month following the UKL Registration Effective Date (e.g. if the Registration takes effect on UK Link systems in February, then the CDSP will perform the Materiality Test no earlier than the final Working Day of the Month 3 months after the Registration was effective in UK Link systems – e.g. 31<sup>st</sup> May 2023). This means that the latest recorded Meter Readings for the CSS Registration Effective Date and the Opening Meter Readings, including where such Readings have been Replaced, shall be used for the Materiality Test.

For the avoidance of doubt, where this assessment establishes an adjustment is required in accordance with the test defined in REC Schedule 30, such adjustments will be issued to the relevant Shipper Users within M+2 of the adjustment being identified (in the example above it would be expected to be issued in an Amendment Invoice in July).

For the avoidance of doubt Meter Readings may be replaced following the Materiality Test being conducted, but any such Replacement Readings will not be factored into the Materiality Test nor amend the result of a previous Materiality Test, nor amend any Adjustment undertaken for this reason.

## **6 Impacts & Other Considerations**

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

This Modification does not affect a current live SCR.

### **Consumer Impacts**

This Modification should offer positive benefits to consumers that have been impacted by these Registration exceptions. The Faster Switching SCR moved the responsibility for mastering Registration from the UK Link system to CSS. There have been a small number of exceptions where the consumer switch has not completed successfully and therefore the Registration and Settlement systems are misaligned. For these impacted consumers this misalignment may mean that they are prevented from Switching or may lead to confusion by Suppliers regarding responsibility for the Supply Point which may lead to issues with consumer billing.

This Modification should enable industry processes to minimise the period of misalignment thus reducing the impact to the consumer.

Workgroup Participants did not have anything to add to the proposer's view.



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

This issue has impacted circa 200 end consumers. This Modification should enable the CDSP to manage an exception process to either: reduce the risk of missing messages; or minimise the period that this discrepancy exists.

This Modification should mean that the consumer will receive any benefits stated in the Ofgem business case for Faster Switching regarding reliable switching at reduced timescales.

### Impact of the change on Consumer Benefit Areas:

Area	Identified impact
<p><b>Improved safety and reliability</b></p> <p>Misalignment between Registration and Settlement could lead to a number of industry processes being adversely impacted. To date the impacted sites have primarily been Smaller Supply Points – but were it to impact a Class 1 Supply Meter Point, there could be material impacts to balancing activities – potentially requiring intervention by National Gas Transmission on the OCM.</p> <p>Further impacts could be identified should an emergency situation arise if the Shipper has been prevented from updating consumer contact details as they were not recorded as the Registered User.</p>	Positive
<p><b>Lower bills than would otherwise be the case</b></p> <p>Ofgem have previously argued that the consumer's ability to switch with reduced timescales offers a cost saving but as the number of instances impacted by this exception is small this is not considered to offer a 'lower bills' case.</p>	None
<p><b>Reduced environmental damage</b></p> <p>None identified.</p>	None
<p><b>Improved quality of service</b></p> <p>This process should reduce the risk of exceptions in the switching process, and should they be encountered should reduce the period for which the exception instance exists.</p>	Positive
<p><b>Benefits for society as a whole</b></p> <p>None identified.</p>	None

## Cross-Code Impacts

Other impacted Codes are REC; REC Change Proposal R0067 has been raised to consider some of the issues defined in this Modification and some components of this Modification may need to be reflected in IGT UNC (depending on the solution).

Meter reading Supply Point components of IGT UNC will be impacted and a Modification is required. This should not impact the development of this Modification, although implementation may need to be coordinated.

## EU Code Impacts

None identified.

## Central Systems Impacts

Changes are required to the interfaces between the GRDA (a role that the CDSP fulfils in the REC) and CSS. This has been accounted for in [XRN5567 - Implementation of Resend Functionality for Messages from CSS to GRDA \(REC CP R0067\)](#) and the costs approved by the DSC Change Management Committee for delivery of that change.

Another Change Proposal, [XRN5535A - Processing of CSS Switch Requests Received in 'Time Period 5'](#) has been raised to consider the circumstances where the GRDA receives messages after 02:59:59. XRN5535A will include a new DSC Service Line where the CDSP is made aware that the Registration details in UK Link are not aligned to the Central Switching Service, that it shall initiate prospective Registration in UK Link. This will rely on the UNCC acceptance of the CDSP using 'proxy Secured Active Notifications' until this Modification establishes this in the UNC. *Please note, acceptance of the 'proxy Secured Active Notifications' was obtained at the November 2022 UNCC meeting.*

Change Proposal *XRN5535B - Modification 0836S - Resolution of Missing Messages following Central Switching Service implementation and integration with REC Change R0067* has been raised to assess the necessary operational and system costs for this Modification and any changes to the DSC Service Lines.

### Rough Order of Magnitude (ROM) Assessment *(Workgroup assessment of costs & lead times)*

Cost estimate from CDSP	£28k to 34k Implementation costs
Insert Subheading here	£5k to 8k annual costs

The ROM is published alongside this Workgroup Report.

## Performance Assurance Considerations

Workgroup Participants did not believe that the impact of this Modification would be material enough to impact settlement and therefore concluded that there was unlikely to be a Performance Assurance Consideration.

The PAFA has raised a risk to monitor any potential impacts of this Modification should it be implemented.

## Initial Representations

None Received.

## Panel Questions

- Please consider the materiality for the invoicing arrangement and consequential impacts on stakeholders
- During the Modification development, the impact to Transportation charges and gas allocation were described (see table below). In light of this, the Modification was developed to include a materiality test to determine whether an adjustment is required to apply the invoicing to the Shipper defined in the CSS Registration from the CSS Registration Effective Date (i.e. the incoming User). Where the materiality test indicates that the energy quantity does not exceed the defined threshold the adjustment will not be processed and therefore will remain the responsibility of the outgoing User for the period between the CSS Registration and the UKL Registration Effective Dates.

	Typical Domestic Property	Average sized Industrial/ Commercial Property	Very large Daily Metered site
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Peak day gas allocation per day kWh/cost (i.e. worst case scenario)	149 kWh £11.18	3,528 kWh £265	687,032 kWh £51,527

- Switch not processed – old Shipper continues to be billed, new Shipper not billed

## Workgroup Impact Assessment

- Workgroup met to assess this Modification on the following dates:
  - [Workgroup 0836S 27 July 2023](#)
  - [Workgroup 0836S 22 June 2023](#)
  - [Workgroup 0836S 25 May 2023](#)
  - [Workgroup 0836S 27 April 2023](#)
  - [Workgroup 0836S 23 March 2023](#)
  - [Workgroup 0836S 23 February 2023](#)

The Workgroup agrees this Modification clarifies treatment and activities necessary when the CSS Registration Effective from Date does not align to that recorded in the UK Link system due to the described issue and that no material impacts were identified should this Modification be implemented.

## 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 <ul style="list-style-type: none"> <li>(i) the combined pipe-line system, and/ or</li> <li>(ii) the pipe-line system of one or more other relevant gas transporters.</li> </ul>	None
c) Efficient discharge of the licensee's obligations.	None
d) Securing of effective competition: <ul style="list-style-type: none"> <li>(i) between relevant shippers;</li> <li>(ii) between relevant suppliers; and/or</li> <li>(iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.</li> </ul>	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

It is considered that the Modification furthers Relevant Objective d). This Modification will reduce exceptions to the Registration process. An effective Registration process is essential for securing effective competition. This Modification furthers Relevant Objective f) as it allows the CDSP to undertake actions to ensure UK Link systems are aligned with CSS systems and therefore furthers promotion of efficiency in the implementation and administration of the Code. The application of the materiality test defined within this Modification avoids the creation of small adjustments that will be more costly to produce and manage by industry participants therefore this further promotes the efficiency of industry processes.

### Workgroup Assessment of Relevant Objectives

Workgroup Participants agreed with the Proposer's points above for Relevant Objectives d) and f). Noting that the Materiality test promotes efficiency in the application of the proposed process.

## 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

Legal Text has been provided by Cadent and is published alongside this report.

### Workgroup Assessment

The Workgroup has considered the Legal Text and is satisfied that it meets the intent of the Solution.

### Text Commentary

Legal Text Commentary is published alongside this report.

### Text

Legal Text is published alongside this report.

Recommendations

## 10 Consultation

Representations were invited from interested parties on 18 August 2023. All representations are encompassed within the Appended Representations section, including any initial representations.

Implementation was unanimously supported in the 3 representations received.

Representations were received from the following parties:		
Organisation	Response	Relevant Objectives
Cadent	Support	d) positive f) positive
Scotland Gas Networks Ltd and Southern Gas Networks Ltd	Support	d) positive f) positive
Wales & West Utilities	Support	d) positive f) positive

Please note that late submitted representations may not be included or referred to in this Final Modification Report. However, all representations received in response to this consultation (including late submissions) are published in full alongside this Report and will be taken into account when the UNC Modification Panel makes its assessment and recommendation.

11 Panel Discussions

12 Recommendations

Panel Determination

Panel Members agreed that Modification 0836S [should [not] be implemented.

13 Appended Representations

- Initial Representation - None
- Representation - Cadent
- Representation - Scotland Gas Networks Ltd and Southern Gas Networks Ltd
- Representation - Wales & West Utilities

14 Appendices

Retail Energy Code Change R0067

The following change request has been raised within the Retail Energy Code. This document has been reproduced here should a party not have the relevant portal access. Portal access can be requested at the following link:

<https://recportal.co.uk/recportal>.



R0067 - Change Proposal Form.pdf



This document is classified as WHITE.  
Information is for public, unrestricted dissemination and publication.

CHANGE PROPOSAL FORM (COPY)

1 PERSONAL DETAILS

PROPOSER NAME (Mandatory)	Michael Taylor
COMPANY (Optional)	REC Code Manager
COMPANY TYPE (Optional)	
TELEPHONE NUMBER (Optional)	
EMAIL ADDRESS (Mandatory)	

2 CHANGE PROPOSAL SUMMARY

CHANGE PROPOSAL TITLE (Mandatory)	Introduction of CSS refresh functionality
WHAT IS THE ISSUE YOU ARE SEEKING TO SOLVE? (Mandatory)	<p>Since the switching arrangements went live in July 2022, there have been a number of observed incidents whereby systems that interface with CSS have not received expected messages, or they have been received after gate closure or have been received out of sync.</p> <p>These issues can result in processing errors and intensive manual error resolution activities.</p>
WHAT IMPACT IS THIS HAVING? (Mandatory)	<p>Systems which interface with the CSS can receive out of sync messages which can be difficult to detect and result in significant manual effort when resolving.</p> <p>The impact is significantly higher when messages are received after gate closure for gas allocation and settlement services.</p>



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8<sup>th</sup> September 2023  
Your Reference: UNC Modification Proposal 0836S

UNC Modification Proposal 0836S - Resolution of Missing Messages following Central Switching Service implementation and integration with REC Change R0067

Dear Bob,

Thank you for your invitation seeking representations with respect to the above Modification Proposal to which Cadent supports.

## **Do you support or oppose implementation?**

Support

### **Relevant Objective:**

- d) positive
- f) positive

### **Reason for support/opposition:**

Cadent are supportive as it will put in place an enduring process for resolving the consequences of the CDSP not receiving registration 'messages' from the CSS, furthering Relevant Objective f).

The process will also ensure that the correct Shipper (subject to a materiality test) will be correctly invoiced for relevant charges which furthers Relevant Objective d)

### **Implementation**

We agree that implementation could be sixteen business days after a Modification Panel decision to implement, subject to no appeal being raised.

## **Impacts and Costs**

Nothing identified.

## **Legal Text**

As Legal Text provider we are satisfied that it meets the intent of the Solution.

## **Are there any errors or omissions in this Modification Report that you think should be taken into account?**

No such errors or omissions identified.

## **Please provide below any additional analysis or information to support your representation**

Nothing further to add.

We trust that this information will assist in the compilation of the Final Modification Report. Please contact me on 07884 113385 ([andy.clasper@cadentgas.com](mailto:andy.clasper@cadentgas.com)) should you require any further information.

Yours sincerely,

Andy Clasper

## Representation - Draft Modification Report UNC 0836S

### Resolution of Missing Messages following Central Switching Service implementation and integration with REC Change R0067

Responses invited by: **5pm on 11 September 2023**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

*Please note submission of your representation confirms your consent for publication/circulation.*

<b>Representative:</b>	Sally Hardman
<b>Organisation:</b>	Scotland Gas Networks Ltd and Southern Gas Networks Ltd
<b>Date of Representation:</b>	8 <sup>th</sup> September 2023
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	d) Positive f) Positive
<b>Relevant Charging Methodology Objective:</b>	Not Applicable

#### Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

SGN supports this modification as it facilitates an enduring process to resolve the incidents where Central Switching Service (CCS) and the Central Data Service Provider (CDSP) are misaligned due to interface 'messages' not being received as expected.

In light of the recent CSS incident we believe this modification will also support Modification 855 - Settlement Adjustments for Supply Meter Points impacted by the Central Switching System P1 Incident.

#### Self-Governance Statement: *Please provide your views on the self-governance statement*

We agree that this modification meets the self-governance criteria.

#### Implementation: *What lead-time do you wish to see prior to implementation and why?*

Implementation could be sixteen days after a Modification Panel decision to implement, subject to any appeal being raised.

#### Impacts and Costs: *What analysis, development and ongoing costs would you face?*

None.

**Legal Text:** *Are you satisfied that the legal text will deliver the intent of the Solution?*

SGN are satisfied that the legal text will facilitate the intent of the solution.

**Are there any errors or omissions in this Modification Report that you think should be taken into account?** *Include details of any impacts/costs to your organisation that are directly related to this.*

None that we have identified.

**Please provide below any additional analysis or information to support your representation**

None.

## Representation - Draft Modification Report UNC 0836S

### Resolution of Missing Messages following Central Switching Service implementation and integration with REC Change R0067

Responses invited by: **5pm on 11 September 2023**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

*Please note submission of your representation confirms your consent for publication/circulation.*

<b>Representative:</b>	Tom Stuart
<b>Organisation:</b>	Wales & West Utilities
<b>Date of Representation:</b>	22.8.23
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	d) Positive f) Positive
<b>Relevant Charging Methodology Objective:</b>	Not Applicable

#### Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

WWU Supports this modification as we think it is essential, particularly in light of the recent P1 incident, to reduce the risk associated with the faster switching service and the resolution of missing messages. This will provide assurance to consumers and the associated follow on processes. We believe this modification furthers relevant objective 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, and relevant objective f) Promotion of efficiency in the implementation and administration of the Code.

#### Self-Governance Statement: *Please provide your views on the self-governance statement*

We agree that this modification should be self-governance.

#### Implementation: *What lead-time do you wish to see prior to implementation and why?*

Implementation should be as soon as possible.

**Impacts and Costs:** *What analysis, development and ongoing costs would you face?*

None

**Legal Text:** *Are you satisfied that the legal text will deliver the intent of the Solution?*

Yes

**Are there any errors or omissions in this Modification Report that you think should be taken into account?** *Include details of any impacts/costs to your organisation that are directly related to this.*

No

**Please provide below any additional analysis or information to support your representation**

None