

**DSC Change Proposal**

**Change Reference Number: XRN4658**

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| **Change Title** | Read validation – increasing outer tolerance value for specific AQ bands for Class 3 & 4 Meter Points |
| **Date Raised** | 23rd April 2018 |
| **Sponsor Organisation** | Gazprom |
| **Sponsor Name** | Steve Mulinganie |
| **Sponsor Contact Details** | 0799 097 2568 |
| **CDSP Contact Name** | David Addison |
| **CDSP Contact Details** | 0748 559800 |
| **Change Status** | Proposal / With DSG / **Out for Consultation** / Voting / Approved or Rejected |
| **Section 1: Impacted Parties** | |
| **Customer Class(es)** | **X** Shipper  ☐ National Grid Transmission  ☐ Distribution Network Operator  ☐ iGT |
| **Section 2: Proposed Change Solution / Final (redlined) Change** | |
| Nexus was implemented nearly 12 months ago and the industry now has significant operational experience of the current market breaker tolerances. Gazprom have undertaken some analysis on the number of reads failing the market breaker (Outer Tolerance Range (OTR)) tolerance, and how many of these readings that have failed the OTR are ‘valid’ reads. This analysis has been combined with analysis undertaken by other Suppliers and Xoserve to establish a more appropriate set of market breaker tolerances. Recognising that the initial tolerances were a best guess they were set as parameterized values allowing them to be easily amended. iIf the current Market Breaker tolerance were amended a greater number of ‘valid’ meter reads would be accepted. By allowing more valid reads to be accepted it will reduce the amount energy being misallocated to unidentified gas.  Requirement to increase the number of valid reads being accepted that are currently failing the outer market breaker tolerance, increasing the market breaker tolerance will require an increase to the upper inner tolerance value also. The change is proposed for Class 3 and 4 meter reads only.  Attached it table shows the existing Market Breaker Tolerance value and the new proposed values, also captures some alternative values that have been suggested by Gazprom as alternative values. | |
| **Proposed Release** | **R - Minor 06/2018** |
| **Proposed IA Period** | **10WD** / 30WD /5 WD |
| **Section 3: Benefits and Justification** | |
| To enable Shippers opportunity to provide readings that they have assessed as valid.  This will be achieved by increasing the inner upper tolerance value and the Market breaker outer tolerance. A number of reads which are valid readings are failing the market breaker tolerance and therefore are rejected and not recorded on the register. Increasing the Market Breaker tolerance will see these reads being accepted provided that the Shipper flags that they have failed the upper inner tolerance.  .  As this is considered to be a change to configurable values and gain benefit from the change as early as possible, the proposer would like to see this change delivered via a minor release or included within release 3. This implementation approach will be ratified with DSC Change Management Committee.  It is recognised the Shipper Community will be the main beneficiary of the this change. | |
| **Section 4: Delivery Sub-Group (DSG) Recommendations** | |
| **23/04 – preliminary discussion at DSG, members to report back on initial views at 1st May DSG meeting**  **01/05 –DSG members requested some further analysis from Xoserve. It was also requested that DSG members come to next DSG meeting with a view on ‘if they need to make system changes’ and ‘the earliest the changes could made in own systems’** | |
| **DSG Recommendation** | Approve / Reject / Defer |
| **DSG Recommended Release** | Release X: Feb / Jun / Nov XX or Adhoc DD/MM/YYYY |
| **Section 5: DSC Consultation** | |
| **Issued** | **Yes** / No |
| **Date(s) Issued** | 11th May 2018 |
| **Comms Ref(s)** |  |
| **Number of Responses** |  |
| **Section 6: Funding** | |
| **Funding Classes** | Shipper 33 % = £XXXX.XX  ☐ National Grid Transmission XX% = £XXXX.XX  Distribution Network Operator 67 % = £XXXX.XX  ☐ iGT XX% = £XXXX.XX  TOTAL = £XXXX.XX |
| **Service Line(s)** | 5 |
| **ROM or funding details** | Charging methodology splits service line 5 as per above |
| **Funding Comments** |  |
| **Section 7: DSC Voting Outcome** | |
| **Solution Voting** | ☐ Shipper Approve / Reject / NA / Abstain  ☐ National Grid Transmission Approve / Reject / NA / Abstain  ☐ Distribution Network Operator Approve / Reject / NA / Abstain  ☐ iGT Approve / Reject / NA / Abstain |
| **Meeting Date** | XX/XX/XXXX |
| **Release Date** | Release X: Feb / Jun / Nov XX or Adhoc DD/MM/YYYY or NA |
| **Overall Outcome** | Approved for Release X / Rejected |

**Please send the completed forms to:** [**.box.xoserve.portfoliooffice@xoserve.com**](mailto:.box.xoserve.portfoliooffice@xoserve.com)

**Consultation Responses**

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| **Change Representation (to be completed by User and returned for response)** | |
| **User Name** | Eleanor Laurence |
| **User Contact** | Eleanor.Laurence@edfenergy.com / 07875 117771 |
| **Representation Status** | Accept |
| **Representation Publication** | Publish |
| **Representation** | We also feel lower tolerances could be improved. However, as they only determine need to include an override flag or not we are fine with change as currently defined. We would though ask if any data can be collected within CDSP to validate our views of minimal risk to market post implementation and potentially to use that on-going to determine if any further amendments to these limits should be considered by parties. This could require data from AQ correction process when used to update due to market breaker reads to enable such a review to be undertaken on a regular basis. |
| **Do you think the change proposed poses a material risk/cost to your organisation?  Please can you provide the rationale for your response**  No, although changes in AQ could be more volatile we feel that numbers involved are minor in relation to total portfolio. Therefore these changes should not have any material impact on overall values as most significant change is for low AQ bands. We do recognise that this might not be true for all parties. | |
| **Do you think the change proposed poses a material market risk? Please can you provide the rationale for your response**  Our evidence does not suggest that this change poses and material market risk. We are aware that AQ changes could be slightly more volatile but feel that parties have processes in place to deal with that possibility and over national portfolio impact should be minor. | |
| **Do you think your organisation will benefit from the change proposed? Please provide any quantifiable outputs as well as any assumptions**  Yes, we will see a reduction in number of reads that are held back for review as market breakers. Given that AQ correction process for resolving these is not currently effective and leads to excessive manual work this will reduce resources needed. These savings are not significant but we also feel that change will ensure data is available with respect to reads and therefore AQ updated more quickly and that will aid in other gas processes, such as settlement. | |
| **Do you think the market will benefit from the change proposed? Please provide any quantifiable outputs as well as any assumptions.**  Yes, as this change should increase number of reads accepted it should lead to improved AQ values which would improve settlement of gas market. However, overall we feel that this will be a small amendment for market as a whole, but this is based on our view of market breaker reads that we believe to be accurate. | |
| **Considering any functional changes as a result of this change, would your organisation support this to be implemented within a minor release as proposed? Based on your answer how long a lead time would your organisation require to implement this change (for example minimum of 4 months, minimum of 6 months)**  We could support a 2 month lead time but our preference would be to include with one of currently agreed scheduled releases as this would be more cost effective for us. | |
| **As currently drafted the Change Proposal impacts on service area 5. The funding for this area is 33% Shipper funding, 67% DNs. Do you agree with the principles of this funding?**  We have no strong views on charging for this change. | |
| **Target Release Date** | Our preference would be to include this change in a regular release and not look to deal with this outside of those timeframes. We do feel that this could be implemented with November 2018 release. |

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| **Change Representation (to be completed by User and returned for response)** | |
| **User Name** | SSE Supply |
| **User Contact** | Mark Jones  mark.jones@sse.com  01443 827473 |
| **Representation Status** | Reject |
| **Representation Publication** | Publish |
| **Representation** | SSE does not support the implementation of this change as it would allow too many erroneously high reads to be loaded which would have a detrimental effect on the accuracy and quality of gas settlement data. |
| **Do you think the change proposed poses a material risk/cost to your organisation?  Please can you provide the rationale for your response**  We do consider that the change proposed poses a material risk to our organisation. Whilst we accept that the proposal would allow more reads to be loaded, it would allow reads to be loaded that were far too high, especially in the lower AQ values, and whilst these may be fine for I&C sites with low AQ values, it would allow very high AQ values to be loaded for domestic customers, the number of which across the industry could be significant. | |
| **Do you think the change proposed poses a material market risk? Please can you provide the rationale for your response**  We do consider that the change proposed does cause a material market risk as it would allow AQs to be loaded that are more than 100,000kWh for domestic sites and these could occur in sufficient numbers to have a significant effect on the market. | |
| **Do you think your organisation will benefit from the change proposed? Please provide any quantifiable outputs as well as any assumptions**  We do not think, overall, that out organisation would benefit from the change proposed, as we believe that the benefits of additional reads being loaded would be more than outweighed by the dis-benefit of erroneously high reads being loaded | |
| **Do you think the market will benefit from the change proposed? Please provide any quantifiable outputs as well as any assumptions.**  We do not believe that the market would benefit from the change proposed as the benefits of more reads being loaded would be more than offset by the increased errors and misallocation created in settlement by the loading of erroneously high reads, principally for domestic customers. | |
| **Considering any functional changes as a result of this change, would your organisation support this to be implemented within a minor release as proposed? Based on your answer how long a lead time would your organisation require to implement this change (for example minimum of 4 months, minimum of 6 months)**  We would not support this being implemented within a minor release and we would require the usual minimum of six months to implement this change as it would involve IT changes. | |
| **As currently drafted the Change Proposal impacts on service area 5. The funding for this area is 33% Shipper funding, 67% DNs. Do you agree with the principles of this funding?**  A higher percentage of the change should be funded by shippers. | |
| **Target Release Date** | Confirmation of release date or comments for an alternate release date |

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| **Change Representation (to be completed by User and returned for response)** | |
| **User Name** | *Kirsty Dudley* |
| **User Contact** | [Kirsty.Dudley@eonenergy.com](mailto:Kirsty.Dudley@eonenergy.com) |
| **Representation Status** | Defer |
| **Representation Publication** | Publish |
| **Representation** | Overall, we support in principle what this change is trying to achieve, the amendments of parameters to accept more good readings with the current UIG issues is something we would like to support (we supported a localised parameter change as part of R3).  We however do not support the radical changes which are being proposed in one minor delivery. The widening of the parameters is so vast that it is guaranteed that good readings will be accepted, however, there is an extreme likelihood that bad readings will also be accepted rendering the proposal counterproductive or potentially negatively impacting.  We would prefer smaller, closely monitored parameter changes which would allow the solution to be rolled back if there was a detrimental impact on UIG or any other process.  Although in principle we support this we don’t believe this solution as it is currently drafted will just allow acceptance of good reads but will also vastly increase bad reads which with the current UIG situation we prefer not to do. |
| **Do you think the change proposed poses a material risk/cost to your organisation?  Please can you provide the rationale for your response**  Our initial analysis indicates that the risk isn’t necessarily just organisational but could also be at an industry level, the drastic changes in parameters will allow for increased volumes of good reads to be accepted but there is also the acceptance of previously suppressed/rejected bad reads which will go through and could have an overall negative impact on what could be a positive proposal. | |
| **Do you think the change proposed poses a material market risk? Please can you provide the rationale for your response**  There is a material risk that the number of bad reads accepted because of the changes have a counterproductive impact. Although we have been unable to fully quantify this risk during the IA window we believe that smaller parameter changes would be the right way to go rather than one big shift which this change proposers. | |
| **Do you think your organisation will benefit from the change proposed? Please provide any quantifiable outputs as well as any assumptions**  We currently mirror the validation rules and don’t send readings which will fail, we have conducted some analysis which shows that some good reads are suppressed because of this approach and would benefit but also that bad readings which we know should be rejected would be accepted which is why we think there is a risk. | |
| **Do you think the market will benefit from the change proposed? Please provide any quantifiable outputs as well as any assumptions.**  There is a benefit but could also be counteracted based on our analysis in both the residential and commercial portfolios. Our preference is small parameter changes are completed and the UIG impact assessed with each bitesize change. If the benefit is removed then the changes are rolled back to the old validation. | |
| **Considering any functional changes as a result of this change, would your organisation support this to be implemented within a minor release as proposed? Based on your answer how long a lead time would your organisation require to implement this change (for example minimum of 4 months, minimum of 6 months)**  We would not support this as a minor change, our validation is set to mirror this and would require functional amendments to change the parameters, we would prefer it is linked to a major release preferably with 6 months implementation time. | |
| **As currently drafted the Change Proposal impacts on service area 5. The funding for this area is 33% Shipper funding, 67% DNs. Do you agree with the principles of this funding?**  We would support the service level as drafted. | |
| **Target Release Date** | Feb 2019 at the earliest |

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| **Change Representation (to be completed by User and returned for response)** | |
| **User Name** | Maitrayee Bhowmick-Jewkes |
| **User Contact** | Maitrayee.Bhowmick-Jewkes@npower.com |
| **Representation Status** | Approve |
| **Representation Publication** | Publish |
| **Representation** | Though this proposed widening of OTR poses some potential issues (erroneously high AQs), we support the change given that we believe the benefits (more accurate allocation of UiG) outweigh the risks. We think this change works best as an interim measure (to last until at least after winter 18/19) and that a more detailed review of read tolerance processes should be undertaken to address seasonality and what actually constitutes a market breaking read (now we have sufficient post Nexus data) simultaneously. Where this proposed review best sits (PAC/DESC/Weekly UiG call et al? ) should be discussed at Panel as a first step in that process.  Should this change be approved, we would like to see specific periodic reporting produced which tracks how many more reads are entering settlement, what is happening to total allocated / UiG volumes as a result of the change, and the correlation (if any) to the number of MPRNs in ‘bucket’ WAR bands. This will inform the wider discussion about how the tolerance bands should evolve, if at all. |
| **Do you think the change proposed poses a material risk/cost to your organisation?  Please can you provide the rationale for your response**  There is a risk that annually read MPRNs might see very large increases in AQ between 2 reads. With the new OTR being proposed, a ‘normal’ Domestic AQ could change from 20,000 KWh to 300,000 KWh if shippers send a read with an override flag. This risk is lessened for monthly read MPRNs as AQs change more incrementally. If shippers have robust read submission processes and systems, this risk is mitigated. We also welcome that the change sponsor is not proposing any change to the current override flag range, which further reduces the implied risk. | |
| **Do you think the change proposed poses a material market risk? Please can you provide the rationale for your response**  If shippers do not have robust read submission processes and systems in place, total LDZ allocation may be less accurate. This is not just a material risk to the incumbent shipper, but also a future risk to a prospective shipper when MPRNs would have erroneous AQs upon registration. Erroneous AQs also impact the accuracy of UiG levels in D+5 allocation. We believe these market risks are outweighed by the benefits. | |
| **Do you think your organisation will benefit from the change proposed? Please provide any quantifiable outputs as well as any assumptions**  It will lead to fewer valid reads being rejected and also reduce the need to submit AQ Corrections in order to get valid ‘market breaker’ reads into settlement. It could also reduce the requirement for ‘must reads’ being undertaken by transporters, thus reducing unnecessary costs. | |
| **Do you think the market will benefit from the change proposed? Please provide any quantifiable outputs as well as any assumptions.**  Npower recognises the benefits of more valid reads entering settlement in the winter months. More valid readings during winter will lead to less MPRNs in bucket WAR bands, which we believe will improve the accuracy of UiG allocation at D+5. We also recognise the impact erroneous AQs have on UiG, and more valid reads entering settlement will improve the current situation. | |
| **Considering any functional changes as a result of this change, would your organisation support this to be implemented within a minor release as proposed? Based on your answer how long a lead time would your organisation require to implement this change (for example minimum of 4 months, minimum of 6 months)**  Given that this is primarily a ‘winter risk’, we would like to see delivery of this change to timescales that maximise its intent, with implementation ideally before November 2018. | |
| **As currently drafted the Change Proposal impacts on service area 5. The funding for this area is 33% Shipper funding, 67% DNs. Do you agree with the principles of this funding?**  Yes. | |
| **Target Release Date** | Confirmation of release date or comments for an alternate release date |

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| **Change Representation (to be completed by User and returned for response)** | |
| **User Name** | Claire Louise Roberts |
| **User Contact** | Claire Louise Roberts  [Clairelouise.Roberts@Scottishpower.com](mailto:Clairelouise.Roberts@Scottishpower.com)  01416145930 |
| **Representation Status** | Reject |
| **Representation Publication** | Publish |
| **Representation** | Free text response |
| **Do you think the change proposed poses a material risk/cost to your organisation?  Please can you provide the rationale for your response**  Yes, Market breaker tolerances are currently preventing erroneous energy entering settlements | |
| **Do you think the change proposed poses a material market risk? Please can you provide the rationale for your response**  Yes, Market breaker tolerances are currently preventing erroneous energy entering settlements | |
| **Do you think your organisation will benefit from the change proposed? Please provide any quantifiable outputs as well as any assumptions**  No | |
| **Do you think the market will benefit from the change proposed? Please provide any quantifiable outputs as well as any assumptions.**  No, there will need to be improvements in the performance of read rejections relating to over-ride flag read rejections (MRE01029 - c1.2m per month) | |
| **Considering any functional changes as a result of this change, would your organisation support this to be implemented within a minor release as proposed? Based on your answer how long a lead time would your organisation require to implement this change (for example minimum of 4 months, minimum of 6 months)**  Minimum 6 months | |
| **As currently drafted the Change Proposal impacts on service area 5. The funding for this area is 33% Shipper funding, 67% DNs. Do you agree with the principles of this funding?** | |
| **Target Release Date** | Confirmation of release date or comments for an alternate release date |

**Document Control**

**Details**

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| **Title** | **Version** | **Owner** | **Review Frequency** | **Next Review Date** |
| XRN Template |  | Emma Smith |  |  |

**Version History**

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| --- | --- | --- | --- | --- |
| **Version** | **Status** | **Date** | **Author(s)** | **Summary of Changes** |
| 1 | For Approval | 25/04/18 |  |  |
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**Reviewers**

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| **Version** | **Name** | **Role** | **Business Area** | **Date** |
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**Approvers**

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