

**DSC Change Proposal**

**Change Reference Number: XRN4621**

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| **Change Title** | Suspension of the Validation between Meter Index and Unconverted Converter Index |
| **Date Raised** | 23/02/2018 |
| **Sponsor Organisation** | Orsted |
| **Sponsor Name** | Lorna Lewin |
| **Sponsor Contact Details** | 02074511974  [LOLEW@orsted.co.uk](mailto:LOLEW@orsted.co.uk) |
| **CDSP Contact Name** | David Addison |
| **CDSP Contact Details** | 0121 623 2752 / 07428559800  [david.addison@xoserve.com](mailto:david.addison@xoserve.com) |
| **Change Status** | Out for consultation (Solution Review) |
| **Section 1: Impacted Parties** | |
| **Customer Class(es)** | Shipper  Distribution Network Operator  iGTs  National Grid Transmission |
| **Section 2: Proposed Change Solution / Final (redlined) Change** | |
| During Nexus Implementation the validation between the meter index and the unconverted converter index was suspended.  Within the approved change pack we stated:  As a result of the change we recognised where meter, converter and AMR devices were present that “the AMR devices may be configured to either record the meter or uncorrected indexes in addition to the corrected index. Whilst it is acknowledged that AMR devices may only return two indexes from site this situation is currently encountered in the existing UK Link solution and User systems provide the relevant reading indexes to satisfy the conditionality.”  Xoserve previously provided the attached issue paper to the industry for discussion and to try to set out the requirements and solution. No solution was agreed and Xoserve indicated that they intended to solicit further industry input.    This change proposal is raised to ensure the industry supports the principal to assess the relevant indexes to be provided and the necessary validations. This change proposal will enable Xoserve to assess the relevant solution options, impacts to file formats and necessary governance changes. | |
| **Proposed Release** | **R4 – June 2019 (by the customer)** |
| **Proposed IA Period** | **15WD** |
| **Section 3: Benefits and Justification** | |
| Where AMR devices are fitted at Supply Meter Points in addition to a converter then Users are required to provide three indexes in the file formats. It is understood that Users are unable to obtain three indexes from site in such a configuration. In order to fulfil these requirements there is a risk that Users will compromise the quality of Meter Readings submitted to UK Link with consequential impacts to downstream processes. This change will ensure the data quality remains. | |
| **Section 4: Delivery Sub-Group (DSG) Recommendations** | |
| See page 4 | |
| **DSG Recommendation** | Option i) – Construction of the Meter Reading to include just meter and converted index is assumed to be valid regardless of the Meter Reading Source (preferred – typically only the converted index drives down stream processing).  DSG did not express a preference for other facets of the solution. |
| **DSG Recommended Release** | June 2019 |
| **Section 5: DSC Consultation** | |
| **Issued** | Yes |
| **Date(s) Issued** | 24/08/2018 / 09/11/2018 |
| **Comms Ref(s)** | 2043.5-RJ-RH / 2141.1 – RJ – ES |
| **Number of Responses** | 0 for 2043.5 / 5 approvals for 2141.1. |
| **Section 6: Funding** | |
| **Funding Classes** | x Shipper 100%  ☐ National Grid Transmission XX%  ☐ Distribution Network Operator XX%  ☐ iGT XX%  TOTAL |
| **Service Line(s)** | Service Area 1 – Manage supply point registration  Candidate change to DSC Service Lines attached, should Users elect to include the reporting option. Changes will not be necessary to the DSC if the report option is deselected. |
| **ROM or funding details** | none |
| **Funding Comments** | none |
| **Section 7: DSC Voting Outcome** | |
| **Solution Voting** | ☐ Shipper Approve  ☐ National Grid Transmission NA  ☐ Distribution Network Operator NA  ☐ iGT NA  Approved to proceed to ICoSS |
| **Meeting Date** | 12/09/2018 |
| **Release Date** | Candidate for November 2019 |
| **Overall Outcome** | Approved to proceed to ICoSS |

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

**C:DSC Change Proposal: DSG Discussion**

**(To be removed if no DSG Discussion is required; Xoserve to collate where DSG discussions occur)**

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| **Section C1: Delivery Sub-Group (DSG) Recommendations** | |
| **DSG Date** | 16th July 2018 / 6th August 2018 / 17th September 2018 |
| **DSG Summary** | |
| Dave Addison presented slides 31 to 46, talking through the summary & recommendation. This has been talked through at DSG many times.  DSG Discussion: Do we need to take account of this (and change UNC)? Some thoughts:  • This will make the Mandatory Meter Reading field optional in UMR / UBR / UDR and responses  • Only had one response that indicated of portfolio of 150, only 1 was calling U+C only.  • Do we build to a UNC compliant solution only?  **06/08/18 –** discussed with regards to the validation only being applied at the annual process e.g. Check read process. DSG agreed that the meter and convertor index validation should not be applied to standard Shipper User to CDSP meter reading files.  **17/09/18 –**  DA presented this section to DSG. This Change was recently included within a Change Pack; however, it did not generate any responses. As this change only impacts I&C Shippers, and DSG largely consists of Small Supply Point Shippers, this change will be taken to ICoSS for consultation. It’s a candidate for the November 2019 Release. | |
| **Capture Document / Requirements** | INSERT |
| **DSG Recommendation** | Defer |
| **DSG Recommended Release** | TBC |

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| **Section C2: Delivery Sub-Group (DSG) Recommendations** | |
| **DSG Date** | 5th November 2018 |
| **DSG Summary** | |
| David Addison (DA) provided a verbal update to DSG. Following the meeting, DA created some slides which are now on the presentation pack on Xoserve.com.  DA explained that XRN4621 has been presented at DSG on numerous occasions. ChMC agreed to refer XRN4621 to ICoSS to solicit views on this change.  At previous DSG meetings, Xoserve’s expectation for the meter reading to be constructed going forward had been agreed. This was consistent with Uniform Network Code (UNC) obligations for meter readings to include converted and unconverted: M+U+C OR M+C i.e. U becomes ‘optional’ and no longer a conditional requirement if a converter is fitted. Meter index remains mandatory in the field.  DA mentioned that a Change Pack was issued to ask further questions of parties, but little interest was received. One of these questions sought to understand in which circumstances Xoserve are expecting the reduced meter reading indexes to be provided. In conjunction with ICOSS, DA agreed in the instances where the standard reading was provided via the U12, U14 or the UO1 record, the instances that would remain unchanged would be RGMA (Job and UPD/SFN).  DA stated that Xoserve do not expect RGMA to change. There was also a question about which read readings would have validation: Xoserve proposed that these validations would be applied to standard read files regardless of whether AMR was recorded as fitted on UK Link Systems. Otherwise, Xoserve would be rejecting reads, which would not be ideal for the affected parties.  About the above validations, DA questioned whether the validation rules would be accepted – whether those validations within UNC are relevant, and if they should be applied on the UK Link Systems; DA stated he expected the validations would be applied by Shipper Users, not in UK Link Systems.  There was some discussion in DSG regarding whether a report could be generated to show where the reading has been accepted, but may indicate drift.  DA questioned if a drift is identified, how this would be corrected; possibly the ‘Check to Check’ process could be amended to resolve this. When this option has been reviewed, DA stated that amending the Check to Check process principles significantly would therefore be complex; DA did mention that there is a process whereby the drift is identified using the consumption adjustment process; therefore, the use of the consumption adjustment process was recommended.  DA asked DSG to direct any questions they may have, after the meeting, to him. LW wanted to understand what was expected from DSG for this agenda item. DA stated that this change has been reviewed by ICOSS, and they were content with the solution DA proposed; this change was presented to DSG to see if they were content as well. DA mentioned that this change is a candidate for the November 2019 Major Release.  DSG did not provide any objections or considerations. | |
| **Capture Document / Requirements** | N/A |
| **DSG Recommendation** | N/A |
| **DSG Recommended Release** | N/A |

**Section D: DSC Change Proposal High Level Solution Options**

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| **Section D1: Solution Options** | |
| **High Level summary options** | |
| Meters record the volume of gas passed through the device. This volume is, in conjunction with a calorific value, used to determine the energy consumed.  Due to the impact of temperature and pressure on gas volume passing through a meter then converters are installed on some Supply Meter Points to ensure that the energy consumed is correctly recorded.  These converter devices typically use ‘pulse’ technology – i.e. an electronic pulse is generated by the meter after a certain volume of gas is recorded, and that this pulse is then recorded by the converter. Pulse technology is notoriously unreliable as pulses may be missed or multiple pulses may be generated or recorded.  Where both a Meter and Convertor are present at the Supply Meter Point three indexes are available to form the Meter Reading – the Meter index, the Unconverted and Converted indexes of the Convertor device.  Where an AMR device is fitted typically only two ports are available to record indexes. UNC (M1.5.2) specifies that a Shipper User provided Meter Reading should be constructed. i.e.  For the purposes of the Code, in relation to a Supply Meter:  (a) a “Meter Reading” is:  (i) the reading of the index of the Supply Meter; and  (ii) … where Remote Meter Reading Equipment and such a convertor are installed, a Meter Reading need not include the unconverted reading of the convertor under paragraph (ii);  DSG (16th July 2018) confirmed that this change can assume that the construction of the Meter Reading will not be amended.  Validation was previously described in the Network Code Validation Rules where the Meter and Unconverted Volume and also the Meter and Converted Volume was validated.  This change seeks to:   * Define how Meter Readings should be constructed and passed by Shipper Users to CDSP, and between CDSP and Users. * Define how validation should be applied to Meter Readings. * Define how any drift identified should be rectified.   The options considered are:  Options were assessed with regards to this, and DSG concluded that the construction of the Meter Reading within UNC did not require amendment. As such where a Convertor and AMR device is present Meter Readings must be sent with either:   * Meter, Unconverted and Converter indexes, or * Meter and Converted indexes   **Representation question – do you agree with proposed construction of Meter Reading proposal?**  This change will not be applied to any Meter Reading files that trigger the Check to Check Reconciliation processes. The proposed solution will be considered in the following Shipper User to CDSP Files:   * UMR (U01 record); * UBR (U14 record) and * UDR (U12 record).   The RD1 file (MRA to CDSP file) will also be amended by this change.  **Representation question – do you agree with proposed Meter Reading files against which to apply this construction proposal?**  **Options are available for how Meter Readings are submitted in the U01; U14 and U12.**   * Option i) – Construction of the Meter Reading to include just meter and converted index is assumed to be valid regardless of the Meter Reading Source (*preferred – typically only the converted index drives down stream processing*). * Option ii) – Construction of the Meter Reading to include just meter and converted index is only valid with a subset of the Meter Reading Source – e.g. Read Source ‘R’ Remote Read Equipment only.   **Representation question – do you agree with the preferred option?**  **Meter Reading Validation Options**  Existing validation as described in the UNCVR– such as Outer Tolerance Validation – would continue to apply.  **Options are available as to the validation between meter and converter indexes applied.**   * Option 0 – Do not apply validation in UK Link systems (*Xoserve* *preferred* – see statement regarding Option X below). * Option 1 – Meter index to unconverted index only. * Option 2 – Meter index to converted index only. * Option 3 – Both tests applied individually - Meter index to unconverted index and Meter to converted index.   **Representation question – do you agree with the Xoserve preferred option?**  **Where Option 1 or 2 is selected, we need determine which parties should apply this validation.**   * Option X – Validation is only applied by Shipper Users. No validation applied by the CDSP. Shipper Users validate prior to submission, Users select whether to submit Meter Readings, or take corrective action where drift is identified *(Xoserve preferred – this allows Shipper Users to identify where corrective action is necessary, but where drift is occurring then they may continue to submit readings whilst remedial action is taken).* * Option Y - All Readings received will be validated by CDSP (and Shipper Users in advance of submission to the CDSP). Any validation failures would be rejected by the CDSP.   **Representation question – do you agree with the Xoserve preferred option?**  **Amendment of Reconciliation Position when Drift Identified Options:**  It is proposed that the Consumption adjustment process be used to correct drift between the Meter and the Converter. Where an AMR device is fitted the User will need to submit a Site Visit Reading in order to prompt the Check to Check Reconciliation process, and a Consumption Adjustment can then be applied to this entire Check to Check period. Where an AMR device is not present, the Consumption Adjustment can be applied to one or more reconciliation periods.  **Representation question – do you agree with the proposed solution? Do you consider an alternative solution option should be considered?** | |
| **Implementation date for this solution option** | Proposed June 2019 |
| **Xoserve preferred option; including rationale** | As referenced in Section D2. |
| **DSG preferred solution option; including rationale** | NA – requested a wider industry view |
| **Consultation close out date** | 24/08/2018 |

**Section E: DSC Change Proposal: Industry Response Solution Options**

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| **User Name** | **N/A** | |
| **User Contact Details** | **N/A** | |
| **Section E1: Organisation’s preferred solution option, including rationale taking into account costs, risks, resource etc.** | | |
|  | | |
| **Implementation date for this option** | | Approve / Reject / Defer |
| **Xoserve preferred solution option** | | Approve / Reject / Defer |
| **DSG preferred solution option** | | Approve / Reject / Defer |
| **Publication of consultation response** | | Publish / Private / None |

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

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| **Note from Xoserve:** | **No response comments were received** |

**Section D2: DSC Change Proposal High Level Solution Options**

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| **Section D2: Solution Options** | |
| **High Level summary options** | |
| In the August Change Pack the CDSP issued communication 2043.6 – RJ- RH - Suspension of the Validation between Meter Index and Unconverted Converter Index - Solution View. In response to this Change Pack, no formal representations were received, but subsequently a number of Industrial and Commercial Shipper Users expressed a preference for some of the solution options outlined within the Change Pack. This was highlighted to the DSC Change Management Committee who agreed to refer this Change Pack to the I&C Shippers and Suppliers Group (ICoSS) as this change particularly affected this market sector (i.e. Class B Shipper Users).  In October 2018, ICoSS agreed with the recommended solution options proposed (described below). These options were highlighted to the 5th November 2018 DSG meeting.  The recommended solution option is:  1. Construction of the Meter Reading – proposed that the existing UNC definition UNC M1.5.2 remains relevant – i.e.  i. Meter index (M) + Unconverted Converter index (U) +Converted Converter index (C) OR  ii. M+C (i.e. U becomes ‘optional’ no longer a conditional requirement if a converter is fitted)]  2. The above change will apply to the means that Readings are loaded onto UKL are as defined above in the file / records. The corresponding response records and notifications will have the corresponding conditionality changes.  3. This liberalised construction of the Meter Reading (as described in bullet 1(ii) will apply to the in scope means that Readings are received (as bullet 2) regardless of an AMR device being recorded in UK Link systems.  4. Meter to Unconverted index and Unconverted to Converted index validation are candidates but assessment will be conducted by the Shipper User rather than within UK Link system. This requirement requires no validation change to UK Link systems.  5. The process to correct drift / consumption inaccuracies will be the existing Consumption Adjustments process, no amendment is required to the existing Check to Check process. This requirement requires no change to UK Link systems.  Consideration is required to a report to highlight potential drift / consumption inaccuracies between Meter and Converter indexes by the CDSP to Shipper User where readings have been accepted on UK Link systems.  **Users are requested to ratify the above solution option.**  Users are asked to note that a High Level Solution Option Assessment is underway on this basis, we will provide a view of costs as soon as we have them.  **Users are asked to provide comments with respect to inclusion in the proposed November 2019 Major UK Link Release.**  Note: It is not expected that the M03 Record (MBR File) conditionality will change but this is being verified. | |
| **Implementation date for this solution option** | November 2019 UK Link Release |
| **Xoserve preferred option; including rationale** | The preferred option is described above. |
| **DSG preferred solution option; including rationale** | This has been discussed at DSG on a number of occasions (August – September 2018), with no preferred solution option identified save for the construction of Meter Reading.  ChMC supported referral to ICoSS. ICoSS supported the solution in D2 described above. |
| **Consultation close out date** | 23/11/2018 |

**Section E2: DSC Change Proposal: Industry Response Solution Options Review**

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| **User Name** | **Graham Wood** | |
| **User Contact Details** | [**Graham.Wood@centrica.com**](mailto:Graham.Wood@centrica.com) | |
| **Section E2 – Response 1: Organisation’s preferred solution option, including rationale taking into account costs, risks, resource etc.** | | |
| We support the proposals. | | |
| **Implementation date for this option** | | Approve |
| **Xoserve preferred solution option** | | Approve |
| **DSG preferred solution option** | | Approve |
| **Publication of consultation response** | | Publish |
| **Section E2 – Response 1: Xoserve’ s Response to Organisations Comments** | | Thank you for your comments |

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| **User Name** | **Alison Neild** | |
| **User Contact Details** | [**Alison.Neild@gazprom-energy.com**](mailto:Alison.Neild@gazprom-energy.com) | |
| **Section E2 – Response 2: Organisation’s preferred solution option, including rationale taking into account costs, risks, resource etc.** | | |
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| **Implementation date for this option** | | Approve |
| **Xoserve preferred solution option** | | Approve |
| **DSG preferred solution option** | | Approve |
| **Publication of consultation response** | | Publish |
| **Section E2 – Response 2: Xoserve’ s Response to Organisations Comments** | | Thank you for your comments |

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| **User Name** | **Npower** | |
| **User Contact Details** | [**Gas.Codes@npower.com**](mailto:Gas.Codes@npower.com) | |
| **Section E2- Response 3: Organisation’s preferred solution option, including rationale taking into account costs, risks, resource etc.** | | |
| We are happy with the solution proposed and support an implementation date of Nov 19. | | |
| **Implementation date for this option** | | Approve |
| **Xoserve preferred solution option** | | n/a |
| **DSG preferred solution option** | | Approve |
| **Publication of consultation response** | | Publish |
| **Section E2 – Response 3: Xoserve’ s Response to Organisations Comments** | | Thank you for your comments |

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| **User Name** | **SSE** | |
| **User Contact Details** | **mark.jones@sse.com** | |
| **Section E2- Response 4: Organisation’s preferred solution option, including rationale taking into account costs, risks, resource etc.** | | |
| In support; no other comments. | | |
| **Implementation date for this option** | | Approve |
| **Xoserve preferred solution option** | | n/a |
| **DSG preferred solution option** | | Approve |
| **Publication of consultation response** | | Publish |
| **Section E2 – Response 4: Xoserve’ s Response to Organisations Comments** | | Thank you for your comments |

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| **User Name** | **EON** | |
| **User Contact Details** | [Kirsty.Dudley@eonenergy.com](mailto:Kirsty.Dudley@eonenergy.com) | |
| **Section E2- Response 5: Organisation’s preferred solution option, including rationale taking into account costs, risks, resource etc.** | | |
| We support the approach of only meter reading and Converted indexes; our preference is the CDSP doesn’t apply rigid validation but to ensure that what they accept is within the obligations set out in the UNC.  Our preference would be for implementation via a major release and due to approval and change process timings would see it being delivered November 2019 or later. | | |
| **Implementation date for this option** | | Approve |
| **Xoserve preferred solution option** | | Approve |
| **DSG preferred solution option** | | Approve |
| **Publication of consultation response** | | Publish |
| **Section E2 – Response 5: Xoserve’ s Response to Organisations Comments** | | Thank you for your comments. The existing reading validations will continue to apply e.g. CIR, ITR. It is proposed that we will engage with the industry to propose correction validations that users would apply. |

**Version History**

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| **Version** | **Date** | **Author(s)** | **Summary of Changes** |
| 1 | 29/03/18 |  |  |
| 1.1 | 25/07/18 |  | DSG updates from 16th July added |
| 2 | 10/08/18 | David Addison | Updates to section D in preparation for industry solution responses |
| 3 | 14/09/18 | David Addison | ChMC updates from 12/09 added to section 7 |
| 4 | 20/09/18 | David Addison | DSG updates from 17th September |
| 5 | 09/11/18 | David Addison | Solution Review Change Pack - November |
| 6 | 15/11/18 | David Addison | DSG Updates from 5th November added |
| 7 | 28/11/18 | David Addison | Representation Matrix Created |

**Reviewers**

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

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