# **UNC Modification**

At what stage is this document in the process?

# **UNC 0XXX:**

(Code Administrator to issue reference)

# Add specific roll-over functionality for the AUG Table 2025/26

01 Modification

02 Workgroup Report

03 Draft Modification Report

04 Final Modification

Purpose of Modification: (Proposer to provide a short description)

The Modification seeks to allow an approved AUG Table to apply for more than one AUG Year specifically for the AUG Table which will go live for AUG Year 25/26.

# **Next Steps:**

The Proposer recommends that this Modification should be:

- considered a material change and not subject to Self-Governance
- · assessed by a Workgroup

This Modification will be presented by the Proposer to the Panel on dd Month 202y (Code Administrator to provide date). The Panel will consider the Proposer's recommendation and determine the appropriate route.

**Commented [ER1]:** Proposed to be presented at April Panel meeting.

# **Impacted Parties:**

High: None

Medium: Shippers, Consumers, Allocation of Unidentified Gas Expert (AUGE)

Low: Central Data Service Provider (CDSP)

None: Distribution Network Operators (DNOs), Independent Gas Transporters (IGTs) and

National Gas Transmission (NGT)

# **Impacted Codes:**

UNC

# Joint Office of Gas Transporters

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Commented [ER2]: Suggestion of 3 WGs.

# 1 Summary

#### What

UNC TPD Section E 9 sets out the obligation for an AUGE to be appointed (by the CDSP), to prepare an AUG Statement and AUG Table in relation to each year (period from 01 October until and including the following 30 September known as an AUG Year).

The Framework for the appointment of the AUGE ('Framework'), sets out the lower-level process including the appointment of an AUGE and the procedures for preparing the AUG Statement and AUG Table.

Previously within the UNC, there was a clause which allowed for the most recent values to be applied if there was a scenario where the AUGE does not produce the required values. This was introduced within Modification 0229 – Mechanism for Correct Apportionment of UIG in May 2010.

The clause to allow this roll over, subsequently fell away under the Project Nexus changes as the whole AUGE section was removed, and reintroduced when Modification 0473 amended the AUGE role.

This Modification seeks to reinstate the ability for an approved AUG Table to be 'rolled over' for a further agreed period. This would be to allow the AUG Table for 2025/26 specifically, to be 'rolled over' for AUG Year 2026/27 and 2027/28.

#### Why

The current AUGE appointed by the CDSP, under the existing contract will produce their last AUG Statement and AUG Table to go live for AUG Year 2025/26.

In order to ensure an AUG Table is produced after this point, the CDSP would be required to start a procurement exercise to appoint an AUGE under a new contract. This exercise would need to commence around May 2024, in order for the contract to be in place by May 2025. This is to ensure the required time for the AUGE to follow the procedure set out in the Framework to produce the AUG Statement and AUG Table for 2026/27.

With Modification 0868 being raised, which seeks to extend the current annual process for the production of the AUG Statement to a [3] [Three] yearly process, this means there could be a [material] change in the requirements for an AUGE compared to the 'as is' scope.

In order to factor in the potential change to the AUGE scope and process, and in light of the current contract expiring in April 2025, we are proposing to 'roll over' the AUG Table to be produced for AUG Year 2025/26 for a limited period of 2 years (26/27 and 27/28). As a result, the AUG Table for 2025/26 will be effective for AUG Years 2026/27 and 2027/28 as well.

This allows for the development and outcome of Modification 0868 to be determined, whilst remaining compliant with the obligation to have an AUG Table without proceeding with a procurement event which has potentially redundant requirements.

#### How

To achieve this, a clause should be added to the UNC (expected to be TPD Section E or transitional text), to allow the AUG Table for 2025/26 to be effective for AUG Year 2026/27 and 2027/28.

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This allows for the development and outcome of Modification 0868 to be determined, whilst remaining compliant with the obligation to have an AUG Table without having to go ahead with procurements with potentially redundant requirements.

# 2 Governance

#### Justification for Self-Governance / Authority Direction

AUG Table sets out the UIG weighting factors. Daily throughput is multiplied by the relevant weighting factors which are used to give a weighted throughput. UIG is the balancing figure in each LDZ and is then shared out based on each User's share of total LDZ weighted throughput. Based on this, any change to the AUG Table or process can have an impact in the redistribution of UIG which is considered material.

That being said, as the proposed roll over is for a limited period, we believe the impact is more limited but should still be considered by the Authority.

# **Requested Next Steps**

This Modification should:

- be considered a material change and not subject to Self-Governance.
- · be assessed by a Workgroup for 3 months.

# 3 Why Change?

The current AUGE appointed by the CDSP in 2020, under the existing contract will produce their last AUG Statement and AUG Table to go live for AUG Year 2025/26.

In order to ensure an AUG Table is produced after this point, the CDSP would be required to start a procurement exercise to appoint an AUGE under a new contract. This exercise would need to commence around May 2024, in order for the contract to be in place by May 2025. This is to ensure the required time to appoint a successful bidder, who can follow the procedure set out in the Framework to produce the AUG Statement and AUG Table for 2026/27.

With Modification 0868 being raised, which seeks to extend the current annual process for the production of the AUG Statement to a [3] [Three] yearly process, this means there could be a [material] change in the requirements for an AUGE compared to the 'as is' scope.

In order to factor in the potential change to the AUGE scope and process, and in light of the current contract expiring in April 2025, we are proposing to 'roll over' the AUG Table to be produced for AUG Year 2025/26 for a limited period of 2 years (26/27 and 27/28). As a result, the AUG Table for 2025/26 will be effective for AUG Years 2026/27 and 2027/28 as well.

This allows for the development and outcome of Modification 0868 to be determined, whilst remaining compliant with the obligation to have an AUG Table without proceeding with a procurement which has potentially redundant requirements.

There have been previous instances where the AUG Table has been rolled over under the pre-Nexus AUGE arrangements (where each Table applied from April to the following March):

The initial AUG Table created for 2012/13 was also utilised for 2013/14 to allow time to implement a
major change of approach which went live for 2014/15 and;

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 The AUG Table for 2016/17 was a rolled over version due to the impending implementation of Project Nexus. In the event the Table was rolled over a second time for a further two months up to the revised Project Nexus implementation date of 1 June 2017.

In both of these scenarios, there was a specific reason that it was deemed appropriate for the AUG Table to be rolled over

Additionally, within the UNC previously, there was a clause which allowed for the most recent values to be applied if there was a scenario where the AUGE does not produce the required values. This was introduced within Modification 0229 – Mechanism for Correct Apportionment of UIG in May 2010.

The clause to allow this roll over, subsequently fell away under the Project Nexus changes as the whole AUGE section was removed, and reintroduced when Modification 0473 amended the AUGE role.

Based on this, we believe there is precedent to allow the roll over of an AUG Table in the right circumstance.

In this particular case, we think allowing the 2025/26 AUG Table to roll over, so it is effective for 2026/27 and 2027/28 is beneficial and required to ensure the obligation to have an AUG Table is maintained, whilst preventing the need for an immediate procurement exercise which may become redundant.

If this Modification was not raised and implemented, the CDSP would need to progress with a procurement event based on the 'as is' requirements. Due to Modification 0868 being in development and therefore potentially making [material] changes to the current requirements, any AUGE procurement issued, is at risk of requiring subsequent change. As the procurement of the AUGE must be undertaken based on regulated procurement rules, which are based on the principles of 'Transparency, Equal Treatment, Non-discrimination, Proportional', any changes to requirements would result in the procurement advert being withdrawn and reissued under a new procurement.

Depending on the timing of this, there is a risk that the CDSP would not be able to procure a successful AUGE to follow the procedure set out within the Framework in time, resulting in a 'gap' to fill from the last AUG Table (25/26), until the new contract is put in place. As well as the timing issue, starting a procurement exercise which subsequently becomes redundant would involve effort from both industry and the CDSP and does not feel an efficient use of time and funds.

We believe that a limited roll over of the AUG Table 2025/26 for 2 years is the most efficient way of managing the potential change in the AUGE process, whilst maintaining compliance with the obligation to provide an AUG Table

We note the view within Ofgem's decision letter for Modifications 0831/A, that having an AUGE and the AUG Table are necessary to ensure the allocation of UIG is allocated in a fair, accurate and independent manner. We also note the urge for UNC Parties to consider how the processes of the AUGE and AUG Table can be improved to ensure the continued equitable allocation of UIG across all classes.

We believe raising Modification 0868 does look at how the processes of the AUGE and AUG Table can be improved. Although this Modification suggests a limited period for the AUG Table to roll-over, this is only for a specific period to allow the development of Modification 0868 which seeks to improve the process, and it also avoids unnecessary procurements which become redundant.

# 4 Code Specific Matters

#### **Reference Documents**

UNC TPD Section E 9

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# Framework for the Appointment of an AUGE

Modification 0868 - Change to the current Allocation of Unidentified Gas Statement frequency

# Knowledge/Skills

Understanding of the current AUGE process.

# 5 Solution

BR1: The AUG Table that is approved by the UNC Committee (UNCC), under TPD E9.4.3 and E9.4.4 for AUG Year 2025/26, to apply for AUG Year 2026/27 and 2027/28.

For the avoidance of doubt – the AUG Table for 2025/26, is expected to be approved by the UNCC in April 2025.

# 6 Impacts & Other Considerations

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

No impacts identified.

#### **Consumer Impacts**

We expect any consumer impacts to be positive as this proposal maintains the existing arrangements whilst giving the flexibility to explore process improvements which could be beneficial to consumers. It retains the role of an independent expert but avoids additional costs on procurements based on potentially changing requirements. It would also give stability of UIG weighting factors for a 3-year period which could be easier for consumers to plan for.

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

No fundamental change to the consumer experience is expected as a result of this change.

Impact of the change on Consumer Benefit Areas:	
Area	Identified impact
Improved safety and reliability	None
Lower bills than would otherwise be the case	None
Reduced environmental damage	None

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

#### **Performance Assurance Considerations**

No anticipated impacts. This Modification does not add any new obligations on Shippers or DNOs therefore we do not believe there is anything additional for PAC to monitor.

# **Cross-Code Impacts**

No Cross-Code impacts anticipated. The AUG Table does apply to IGT Supply Meter Points, but we understand that the IGT UNC points across to UNC for this section therefore any updates would apply with change to IGT UNC. This should be checked and confirmed during Workgroup.

# **EU Code Impacts**

No impacts identified.

# **Central Systems Impacts**

This wouldn't have a central system impact, but it would have a positive impact on the CDSP process to meet the obligation to appoint an AUGE. This Modification ensures the compliance with UNC to have an AUG Table created by the AUGE, whilst avoiding the CDSP proceeding with a procurement with potentially redundant requirements. This reduces both CDSP and industry effort and regret spend.

# 7 Relevant Objectives

# Impact of the Modification on the Transporters' Relevant Objectives:

Releva	nt Objective	Identified impact
a) Effi	icient and economic operation of the pipe-line system.	None
(i)	ordinated, efficient and economic operation of the combined pipe-line system, and/ or the pipe-line system of one or more other relevant gas transporters.	None
c) Effi	icient discharge of the licensee's obligations.	None
d) Sec	curing of effective competition: between relevant shippers;	None
(ii)	between relevant suppliers; and/or	
(iii)	between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.	

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e)	Provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards are satisfied as respects the availability of gas to their domestic customers.	None
f)	Promotion of efficiency in the implementation and administration of the Code.	Positive
g)	Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	None

The Modification furthers Relevant Objective f) Promotion of efficiency in the implementation and administration of the Code.

As it ensures compliance with existing obligations and processes to have an AUG Table to determine UIG weighting factors for the allocation of UIG, whilst allowing the flexibility to consider and development improvements to the existing process. This also avoids regret spend on a procurement exercise based on 'as is' requirements that could subsequently change.

# 8 Implementation

Implementation is requested as soon as possible to provide certainty on the AUG Table to be effective from October 2025/26 and avoid a potentially redundant procurement advert being progressed.

Typically, the procurement exercise to appoint an AUGE is around 12 months. Based on this, the CDSP would start the procurement in around May 2025. This Modification negates the need to commence that procurement exercise until the outcome of Modification 0868 is known and the requirements and scope are confirmed.

Considering the Modification process, we are requesting a decision in **August 2024** (or as close to this as possible), to still provide the CDSP enough time to appoint an AUGE from May 2025 if this Modification is rejected, whilst allowing the flexibility to develop the existing process without regret spend.

# 9 Legal Text

# **Text Commentary**

To be provided.

#### **Text**

To be provided.

# 10 Recommendations

# **Proposer's Recommendation to Panel**

Panel is asked to:

- Agree that Authority Direction should apply.
- Refer this proposal to a Workgroup for assessment for 3 months.

