













UNC Final Modification Report	At what stage is this document in the process?
<h1>UNC 0600S:</h1> <h2>Amend obligation for the acceptance of EPDQD revisions made after D+5</h2>	<div>01 Modification</div> <div>02 Workgroup Report</div> <div>03 Draft Modification Report</div> <div>04 Final Modification Report</div>
<p><b>Purpose of Modification:</b></p> <p>This proposal seeks to amend the requirement in UNC that no revisions can be made to the Entry Point Daily Quantity Delivered (EPDQD) after D+5. The amended text will allow revisions to be made after this date, but any revisions submitted after D+5 will be accepted at National Grid's discretion.</p>	
	<p>Panel consideration is due on 16 March 2017 <i>(at short notice by prior agreement)</i></p>
	<p>High Impact: None</p>
	<p>Medium Impact: None</p>
	<p>Low Impact: All parties</p>

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Timetable		 Any questions? Contact: <b>Joint Office of Gas Transporters</b>  <a href="mailto:enquiries@gasgovernance.co.uk">enquiries@gasgovernance.co.uk</a>  0121 288 2107 Proposer: <b>Angharad Williams</b>  <a href="mailto:angharad.williams@nationalgrid.com">angharad.williams@nationalgrid.com</a>  01926 653149 Other: <b>Justin Goonesinghe</b>  <a href="mailto:Justin.goonesinghe@nationalgrid.com">Justin.goonesinghe@nationalgrid.com</a>  01926 653278
<b>Modification timetable:</b>		
Initial consideration by Workgroup	03 November 2016	
Workgroup Report presented to Panel	16 February 2017	
Draft Modification Report issued for consultation	16 February 2017	
Consultation Close-out for representations	09 March 2017	
Final Modification Report available for Panel	10 March 2017	
Modification Panel decision	16 March 2017	

# 1 Summary

## What

UNC TPD Section E 1.4.2 states that no revisions to the Entry Point Daily Quantity Delivered (EPDQD) will be made after the 5<sup>th</sup> day after the gas flow day. National Grid NTS proposes the revision of this obligation, so that EPDQD amendments can be accepted after this timescale, but at the discretion of National Grid.

## Why

National Grid NTS has been accepting late revisions to the EPDQD to ensure shippers are accurately allocated. If National Grid NTS continues to accept these late revisions without amending code, we risk enforcement action from the regulator. If National Grid no longer accepts these late revisions and enforces the D+5 timescale, this will have an adverse impact on the market because shippers will not receive accurate allocations. National Grid believes it is in the best interest of the market to continue accepting these late revisions; therefore UNC needs to be aligned to reflect current practice.

## How

This modification proposes to amend paragraph E 1.4.2 of UNC, so the obligation in code for amendments after D+5 to not be accepted will be revised, and will be modified with a requirement for amendments submitted after this timescale to be subject to National Grid's discretion.

# 2 Governance

## Justification for Self-Governance

This modification is proposed as self-governance as it is unlikely to have a material effect on competition in the shipping, transportation or supply of gas conveyed through pipes because it is likely to formally enable only a small subset of the overall EPDQD revisions received.

Workgroup participants considered the matter further and the workgroups assessment confirmed there was only a small number of EPDQD revisions received post D+5 (1.5%) and therefore the impact would not be material.

## Requested Next Steps

This modification should:

- be subject to self-governance procedures
- proceed to consultation

Workgroup participants agreed that the report was suitable for consultation.

### 3 Why Change?

UNC TPD Section E 1.4.2 states that the EPDQD shall not be revised after the 5<sup>th</sup> Day after the Gas Flow Day. Through National Grid's involvement in the DECC Gas Day Industry Workgroup, the entry allocation process was scrutinised which uncovered that National Grid have been making revisions to the EPDQD after D+5.

National Grid NTS has been making these late revisions for the benefit of the wider shipping community, to ensure shippers are allocated accurately at entry points by the CVA. Initial investigations indicated that the majority of the changes occur due to late amendments sent to National Grid by sub-terminals. Therefore, the UNC is not consistent with current industry practice.

Feedback on this issue has been received from a number of sub-terminals and entry points, their feedback supports the D+5 timescale and the acceptance of late revisions. Shippers have provided feedback through Transmission Workgroup that they do not want to be exposed to inaccurate EPDQD data. Currently the wording of UNC exposes shippers to this inaccurate data, and by extension also exposes consumers to inaccurate costs, if National Grid were to implement the process of accepting these revisions as set out in code. Therefore we recognise that we should codify current industry practice to ensure National Grid NTS could continue to provide this service that is valued by industry participants.

### 4 Code Specific Matters

#### Reference Documents

None.

#### Knowledge/Skills

None.

### 5 Solution

The following changes are proposed to UNC TPD Section E 1.4.2:

- Retain the D+5 deadline for EPDQD amendments
- Amendments submitted after D+5 will now be permitted up to 10:00 on M+15, prior to month end close out
- However, any amendments submitted between D+5 and 10:00 on M+15 will only be accepted at the discretion of National Grid, and this discretion will be exercised in a way, which avoids any undue preference or undue discrimination.
- National Grid may also investigate or enquire as to why any revision is submitted after D+5, and may use the results of this investigation to propose improvements to the timely and accurate revision for EPDQD amendments in future

The main parties impacted by this code change are sub-terminals, and other system entry points, which are not signatories to UNC. For this reason we are also making changes beyond UNC to ensure the ambitions outlined in this modification are successful.

National Grid NTS holds 'Network Entry Agreements' (NEAs) with these parties, so we will be taking the following steps to support this modification:

- Updating the generic NEA template to ensure any new system entry point contract includes the D+5 timescale,
- When existing contracts are opened for amendments, we will endeavour to include the D+5 timescale
- We will write to all system entry points to inform them of the change to code and the future NEA changes.

## 6 Impacts & Other Considerations

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

There is no impact on any other industry change.

### Workgroup Impact Assessment

The Workgroup sought clarification of several matters closely associated with this change. These can be summarised below:

#### 1. Understanding the scale of the problem

Data collated from 1st January 2016 to September 2016, showed 74 late revisions had been made and the same site made 42 of these. The average number of late revisions was 8.2 per month and this equated to 1.5% of all revisions made. This data highlighted the number of late revisions was not significant and therefore it was thought appropriate to align the UNC to the operational reality.

#### 2. Bringing forward the final deadline for late revisions to 10:00 on M+15

After discussion, it was proposed that the final deadline for late revisions is 10:00 hours on M+15, to prevent unnecessary reworking of the Entry Allocation Statement submitted by the CVA and align it with National Grid Gemini processes.

#### 3. Information provision requirement on sub-terminals and rejection of late amendments

Originally it was proposed that a reporting obligation be placed on those making the late amendments as this would incentivise earlier amendments but this was thought not to be feasible. Some participants suggested reducing the incentive on system entry points to submit data by D+5 and not have late revisions rejected. This suggestion was dismissed due to concerns about potential increases in the number of late amendments and/or the accuracy of such amendments.

The proposal was changed to allow late revisions to be accepted at National Grid's discretion. In order to address concerns over the use of this discretion NTS confirmed that the operational teams currently contact the site to query the revision, rather than reject it. The legal Text was also amended to clarify that the "Transporter shall avoid any undue preference, or undue discrimination" in deciding whether to accept a revision. The Workgroup supported this amendment.

### Consumer Impacts

Accurate data submission will enable accurate shipper allocations, which will ensure accurate costs, and this will ultimately lead to a more competitive environment to the benefit of consumers.

### Cross Code Impacts

There is no impact on any other energy code.

## EU Code Impacts

There is no impact on any EU energy code.

## Central Systems Impacts

There is no impact on any central systems because the functionality to implement this process is already available.

## User Pays

User Pays	
Classification of the modification as User Pays, or not, and the justification for such classification.	No User Pays service would be created or amended by implementation of this modification and it is not, therefore, classified as a User Pays Modification.
Identification of Users of the service, the proposed split of the recovery between Gas Transporters and Users for User Pays costs and the justification for such view.	n/a
Proposed charge(s) for application of User Pays charges to Shippers.	n/a
Proposed charge for inclusion in the Agency Charging Statement (ACS) – to be completed upon receipt of a cost estimate from Xoserve.	n/a

## 7 Relevant Objectives

Impact of the modification on the Relevant Objectives:	
Relevant Objective	Identified impact
a) Efficient and economic operation of the pipe-line system.	None
b) Coordinated, efficient and economic operation of (i) the combined pipe-line system, and/ or (ii) the pipe-line system of one or more other relevant gas transporters.	None
c) Efficient discharge of the licensee's obligations.	None
d) Securing of effective competition: (i) between relevant shippers; (ii) between relevant suppliers; and/or (iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.	Positive
e) Provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards... are satisfied as respects the availability of gas to their domestic customers.	None
f) Promotion of efficiency in the implementation and administration of the Code.	None
g) Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	None

### d) Securing of effective competition:

This objective is furthered by the modification because it will enable the provision of accurate data that will ensure accurate cost allocations, which will lead to more effective competition.

This modification also recognises and addresses the operational reality that not all system entry points are meeting the D+5 requirement. Aligning code to this reality will give shippers greater confidence that they will receive accurate allocations.

## 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 National Grid NTS and is included below. The Workgroup has considered the Legal Text and is satisfied that it meets the intent of the Solution.

### Text Commentary

Paragraph of UNC TDP Section E	Commentary
Existing 1.4.2 and new 1.4.2(a)	This requires that any revision of the aggregate quantity of gas delivered at a System Entry Point is made before D+5. The principle is retained in new 1.4.2(a)
New 1.4.2(b)	National Grid now has discretion to allow revision of the aggregate quantity delivered to be made after D+5 but before M+15
New 1.4.2(c)	This requires that National Grid rejects submissions made after M+15
New 1.4.3	National Grid will avoid any preference or discrimination in the way it exercises its discretion in new 1.4.2(b)
New 1.4.4	National Grid may propose improvements to the process to facilitate timely submissions of data

### Text

#### UNC TPD Section E

#### 1.4 System Daily Quantities: Entry

*Amend paragraph 1.4.2 to read as follows:*

1.4.2 The ~~amount determined~~ Transporter shall:

- (a) accept any revision to ~~be~~ the Entry Point Daily Quantity Delivered ~~in respect of any System Entry Point~~ for ~~the a~~ Gas Flow Day ~~may be revised~~ which is received by it at any time up to and including the 5th Day following a Gas Flow Day ~~Day, but no;~~
- (b) have discretion as whether it accepts any revision ~~will be made~~ to ~~such quantity~~ the Entry Point Daily Quantity Delivered for a Gas Flow Day which is received by it after the 5th Day ~~after following~~ the Gas Flow Day and before 10:00 hours on the 15th Business Day of the calendar month following the month in which the Gas Flow Day occurs; and
- (c) reject any revision to an Entry Point Daily Quantity Delivered which it does not accept in accordance with (a) or (b) above.

*Insert new paragraphs 1.4.3 and 1.4.4, as follows:*

1.4.3 The Transporter shall avoid any undue preference, or undue discrimination, in the way in which it exercises its discretion under paragraph 1.4.2(b).



1.4.4 The Transporter may make enquiries as to why any revision to an Entry Point Daily Quantity Delivered is made in accordance with paragraph 1.4.2 (b) (and not paragraph 1.4.2 (a)) and may use the results of its enquiries to propose improvements to the timely and accurate revision of any Entry Point Daily Quantity Delivered in future.

Renumber existing paragraph 1.4.3 as 1.4.5, as follows:

1.4.5~~1.4.3~~ In respect of the Total System the “**Total System Daily Quantity Delivered**” is the aggregate quantity of gas delivered to the Total System on a Day, determined as the aggregate of the Entry Point Daily Quantities Delivered for all System Entry Points.

## 10 Consultation

Panel invited representations from interested parties on 16 February 2017. The summaries in the following table are provided for reference on a reasonable endeavours basis only. We recommend that all representations are read in full when considering this Report. Representations are published alongside this Final Modification Report.

Of the 6 representations received 5 supported implementation and 1 provided comments.

Representations were received from the following parties:

Organisation	Response	Relevant Objectives	Key Points
British Gas	Support	d- positive	<ul style="list-style-type: none"> <li>• Modification provides a pragmatic solution for the provision of accurate entry point daily quantities. Without such a solution gas shippers are exposed to potential failures or mistakes by terminal operators and National Grid.</li> <li>• Implementation will provide gas shippers with more confidence that their efforts to balance will be successful and therefore support the intentions behind the daily balancing regime.</li> <li>• Agree with the self-governance status of this proposal.</li> <li>• Would have preferred the text to refer to a form of reasonable endeavours obligation on National Grid to permit accurate late revisions. This would have provided shippers with even greater confidence that, contractually, the late revisions to the daily quantities would be allowed and that they will be allocated the correct delivery quantities.</li> </ul>
CVSL	Support	d - positive	<ul style="list-style-type: none"> <li>• Retaining the ability to amend DQs after D+5 is essential to support the timely and accurate provision of Entry Allocation Statements (EAS) to National Grid. Flexibility enables many over-sold sub-terminal positions to be eradicated. This has been effectively used since 1996 and there would be significant cost</li> </ul>

			<p>implications for shippers if the status quo is not maintained.</p> <ul style="list-style-type: none"> <li>• Much of the information used to derive the EAS comes from processes that are not part of the UNC and allocations may change at any time up until M+15. Additionally, noted that the Option A solution to the Gas Flow Day is dependent upon changes being able to be made after the current D+5 DQ deadline. This process would be undermined by not having as much flexibility as possible before actual close-out on M+15.</li> <li>• In favour of the 10:00 M+15 cut-off for DQ changes. This will remove the risk of the DQ being changed on M+15 after CVSL has closed out and submitted the monthly Entry Allocation Statement to Gemini. Where this happens the EAS will not exactly match the DQ and per UNC the EAS for any affected sub-terminal day is ignored by Gemini and the default position of nominations applies. This is therefore a worthwhile constraint in the process.</li> <li>• Highlight that if M+12 is used as the cut-off for DQ changes, CVSL would lose its capacity to solve over-sold conditions where the DQ needs to be changed as part of the solution. CVSL needs the M+12 to M+15 window to be able to make changes and ensure high quality EASs are delivered to NG.</li> <li>• Indicates likelihood of significant costs being borne by shippers if the D+5 DQ deadline was enforced.</li> </ul>
National Grid NTS	Support	d - positive	<ul style="list-style-type: none"> <li>• Highlights that if National Grid NTS continues to accept late revisions without amending code, they risk enforcement action from the regulator, but if they no longer accept these late revisions and enforce the D+5 timescale, this will have an adverse impact on the market because shippers will not receive accurate allocations.</li> <li>• Therefore, it is in the best interest of the market to continue accepting late revisions and the UNC needs to be aligned to reflect current practice.</li> <li>• Accurate data submission will enable accurate shipper allocations, which will ensure accurate costs, and this will ultimately lead to a more competitive environment to the benefit of consumers.</li> <li>• Highlights modification is proposed as self-governance and that Workgroup participants considered the matter further and confirmed there was only a small number</li> </ul>

			of EPDQD revisions received post D+5 (1.5%) and therefore the impact would not be material.
RWE Supply & Trading GmbH	Support	d - positive	<ul style="list-style-type: none"> <li>• Pragmatic solution that will amend the UNC to codify current arrangements and ensure National Grid NTS is not in breach of the UNC. Modification will not disrupt established CVA processes and will enable accurate shipper allocations to continue to be produced.</li> <li>• Supports some proposed actions in relation to Network Entry Agreements that go beyond the vires of the UNC.</li> <li>• Agree that this modification proposal should be subject to self-governance.</li> <li>• Would have preferred the legal text 1.4.2(b) to not include National Grid discretion over acceptance of revisions made after D+5 but before M+15.</li> </ul>
ScottishPower Energy Management Limited	Support	d - positive	<ul style="list-style-type: none"> <li>• EPDQD allocations that are as accurate as possible are crucial to a robust balancing regime that shippers can have confidence in, and welcome National Grid's pragmatic practice to this point of making revisions to EPDQD submissions beyond the code prescribed D+5 deadline. Believe that it is appropriate to formalise and codify the practice.</li> <li>• Agree with the view expressed in the Workgroup Report that this Modification Proposal is suitable to be progressed via self-governance, as it is unlikely to have a material effect on competition between shippers.</li> <li>• Satisfied that the legal text will deliver the intent of the solution.</li> </ul>
Statoil UK Ltd	Comments	d - positive	<ul style="list-style-type: none"> <li>• Believe the proposed deadline of 10:00 M+15 for submitting revisions may have unintended consequences around late and inaccurate submission of data.</li> <li>• Believe CVSL had a preference for a revision deadline of M+12 (current deadline for submitting data to CVSL) and feel this would better deliver the overall intent of the solution.</li> <li>• Notes that CVSL currently accept revisions providing individual shippers aren't left worse off and feels the existing CVSL process works efficiently.</li> <li>• Questions if the proposed legal text overrides the existing process rather than just codifying it.</li> </ul>

			<ul style="list-style-type: none"><li>• Agree this is self-governance modification.</li></ul>
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Please note that late submitted representations will 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

Members agreed that Modification 0xxx should [not] be implemented

## 13 Appendix 1: Analysis Undertaken by National Grid NTS

Previous analysis of EPDQD submissions received by National Grid after D+5 highlighted that late revisions are largely submitted by sub-terminals.

We gathered feedback from sub-terminals to understand whether they felt the D+5 timescale was challenging, and the reasons that they may need to submit a late revision.

### Process

All sites that had submitted a revision after D+5 from 1<sup>st</sup> January 2016 to 31<sup>st</sup> March 2016 were contacted to inform them of a potential change to the EPDQD data submission process, and asked if they would be willing to provide feedback on the timescale and the reasons that they had made late revisions. For those sites which responded to this request, we organised a number of telephone interviews, and a few sites also provided feedback by email.

At the request of Transmission Workgroup we then contacted all other sub-terminals for their feedback, but we also included all other NTS entry points (i.e. storage, interconnectors). We provided them with a survey so they could give feedback on the D+5 timescale, and any hypothetical reason they may need to make a late revision.

### Feedback

11 sites in total provided feedback on the EPDQD D+5 timescale, of these sites:

- 7 felt that D+5 is not a challenging timescale
- 1 was undecided
- 3 felt that it was challenging

The sites stated the following reasons a revision may be made after D+5:

- Human Error
  - One of the most common reasons for amendments
  - Related mostly to manual transposition issues
  - Also one error caused by individuals being on leave
- Complex mis-measurements
  - Could be due to something like an orifice plate being the wrong way round
- Meter errors
  - Sometimes not identified until a few weeks after the fact
  - Could result in many days or weeks of data being incorrect
  - Difficult to foresee or mitigate against
- System errors
  - Some sites had invested in software and systems to manage the calculation and submission of this data
  - There were rare occasions where there had been errors with these systems
- National Grid NTS error
  - Related to manual transposition
  - National Grid NTS have proposed system changes to be implemented in 2017 – these changes will ensure our processes are more robust

We also received further feedback from the Claims Validation Agent (CVA) regarding any proposed changes to the D+5 timescale.

They choose to accept all late EPDQD revisions up to M+15 to ensure that shippers are allocated accurately. However, they run their first shipper allocation process at D+7, so they must have the EPDQD data by this timescale. If data was not submitted before D+7, shipper allocations would be zero.

The CVA also stated that if any changes were made to the timescales in their process, they would need to invest in a new system to manage their data processes, and this new system would inflict a significant cost upon industry participants.

## Conclusions

Based upon the feedback received from sites and the CVA we arrived at the following conclusions:

- With no clear opposition to the D+5 timescale, this should endure.
- Sub-terminals need to be incentivised to submit their EPDQD data by D+5 to ensure the first shipper allocation process is accurate
- Amendments submitted after D+5 should still be accepted to ensure shippers are not unnecessarily exposed to inaccurate allocations

## Analysis of Options

We have applied the feedback received and our subsequent conclusions to clarify how we reached our final proposal.

### 1. Amending the D+5 timescale

We initially considered an extension to the D+5 timescale to one which might be more achievable for sub-terminals and other entry points.

However, this would have impacted the CVAs processes and was not supported by the majority of sub-terminals. During engagement with Ofgem, they also stated that they would not support a change to the timescale for EPDQD submissions in UNC, unless there was clear evidence to show that it was required.

Analysis of the late amendments has shown that in some instances revisions are not submitted until a few weeks after the original gas flow day. These appear to be rare occurrences caused by unforeseeable circumstances, but it is important to accept them to ensure shippers are allocated accurately.

For these reasons we concluded that there was not adequate support for amending the D+5 timescale.

### 2. Enforcing the D+5 timescale

Due to feedback from sub-terminals and other entry points that the majority do not find the D+5 timescale challenging, we assessed the option to no longer accept amendments submitted after D+5.

This option is not appropriate because a number of late amendments would be very difficult to mitigate against, and not accepting these revisions would impact the accuracy of shipper allocations, which would go on to impact the accuracy of costs for consumers.

We therefore concluded that enforcing the D+5 timescale would be unfair on shippers and consumers.

### 3. Retain D+5, but allow revisions after this timescale

Due to the CVA milestone at D+7 for the first shipper allocation process, we need to incentivise sub-terminals and other entry points to submit data which is as accurate as possible by D+5. However, as already described, we also need to allow revisions after this timescale.

We therefore considered options for how we could incentivise sub-terminals and other entry points to submit their data by D+5, and discussed the following sub-options:

*a) Retain D+5, but add a secondary deadline for revisions up until M+15*

This would reflect current practices, but would provide no incentive to submit EPDQD data by D+5. Therefore it is likely that the data submitted by D+5 would become increasingly inaccurate. This would impact shipper allocations and costs for consumers.

*b) Retain D+5, but add a financial incentive for revisions submitted after this timescale*

We felt that this option was not proportionate to the issue, because it would require changes to neutrality. We would also need to include this financial incentive in our contracts with sub-terminals, and the process of negotiating this change would be likely be protracted and costly.

*c) Retain D+5, but add a reporting obligation for revisions submitted after this timescale*

Although this option was deemed to be proportionate to the issue, investigation highlighted that there are differences between the data for late revisions recorded by the CVA and National Grid. Feedback from sub-terminals also showed that some sites did not recognise the post-D+5 amendments, and would therefore be unable to provide a reason to report upon.

Based upon this new information we determined that it was more important to carry out ongoing investigation into the post-D+5 revisions to ensure the quality of National Grid's data going forwards.

We also received feedback from a number of sub-terminals that they would be unwilling to provide the information required for the report without us making immediate changes to their NEAs.

*d) Retain D+5, but revisions will be accepted at National Grid's discretion after this timescale*

National Grid is already accepting post-D+5 revisions at its discretion, so this would accurately reflect current practice.

For this reason, we are proposing this as our solution.

This incentive is proportionate to the issue, and will allow current practice to continue with minimal changes to processes.