UNC Modification

At what stage is this document in the process?

UNC 0660S:

Amendment to PARR permissions to allow PAC to update with UNCC approval



Purpose of Modification:

To make the Performance Assurance Report Register (PARR) a UNC related document and therefore subject to the provisions under UNC TPD V 12. This will allow the Performance Assurance Committee (PAC) to request updates to the PARR without recourse to the full modification process but instead be able to submit requests for new and amended reports to the UNCC for approval. To allow the Performance Assurance Committee (PAC) to request updates to the Performance Assurance Reports Register (PARR) without recourse to the full UNC modification process, but instead be able to submit requests for new and amended reports to the UNCC for approval.



The Proposer recommends that this modification should be:

- <u>subject to self-governance</u> considered a material change and not subject to self-governance
- proceed to assessed by a Workgroup

This modification will be presented by the Proposer to the Panel on 21 June 2018. The Panel will consider the Proposer's recommendation and determine the appropriate route.



High Impact:



Medium Impact:

Shippers, Transporters



Low Impact:

Any Contents questions? 1 **Summary** 3 Contact: **Joint Office of Gas** 2 Governance 4 **Transporters** 3 Why Change? 4 **Code Specific Matters** 4 enquiries@gasgove rnance.co.uk 5 **Solution** 5 **Impacts & Other Considerations** 5 6 0121 288 2107 **Relevant Objectives** 7 7 Proposer: **Graham Wood Implementation** 8 8 9 **Legal Text** 8 graham.wood@cent 10 Recommendations 8 rica.com 07979 567686 Timetable Transporter: **Chris Warner** Cadent The Proposer recommends the following timetable: 20 Initial consideration by Workgroup 28 June 2018 Chris.Warner@cade Workgroup Report presented to Panel 20 September 2018 ntgas.com Draft Modification Report issued for consultation 20 September 2018 Consultation Close-out for representations 11 October 2018 01926 653541 Final Modification Report available for Panel 15 October 2018 Systems Provider: **Xoserve** Modification Panel decision 18 October 2018 (at short notice) 20 UKLink@xoserve.c <u>om</u>

1 Summary

This proposal has been raised on behalf of the Performance Assurance Committee.

What

The Performance Assurance Report Register (PARR) was created in 2017 with the implementation of UNC520A. The purpose of the PARR was to create a suite of reports which focused on reporting on inputs which have an impact on the accuracy of gas settlement. Amendments to the PARR could only be made by following the UNC modification process. The Performance Assurance Report Register (PARR) was created so that any change to the PARR could only be progressed by raising a UNC modification.

Since implementation a number of reports have been identified for potential inclusion into the PARR, however as a request for each proposed new report or amendment currently has to be progressed through the full UNC modification process, this means that the Performance Assurance Committee (PAC) is not as agile and responsive as it could be.

Why

Since the introduction of Project Nexus, a number of reports have been identified as being required for the PARR by the PAC. A modification proposal has recently been raised to add a proposed new report and following recent discussions at PAC, it is likely that at least one further modification will be needed in the near future to make further additions in relation to meter read performance. Raising a modification every time additional or changed reports are required is a cumbersome and ineffective way to manage the PARR suite of reports.

How

It is proposed that the PARR is added to the list of UNC related documents so that provisions under TPD V 12 will apply. More specifically TPD V12.3 which states:

Should a User or Transporter wish to propose modifications to any of the Documents, such proposed modifications shall be submitted to the Uniform Network Code Committee and considered by the Uniform Network Code committee or any relevant sub-committee where the Uniform Network Code Committee so decide by majority vote.

Changes to the PARR will therefore be submitted to the UNCC for approval, following a period of industry consultation (and not subject to the UNC modification process).

This will ensure that industry oversight will remain in place, to ratify and/or challenge any requests from the PAC and enable the process to be undertaken in a more quick and efficient manner.

It is proposed that the current arrangements are changed so that the modification process does not need to be used every time an amendment to the PARR is identified by the PAC and are replaced by a process that simplifies arrangements by requiring PARR related changes to be submitted to the UNCC for approval. This will ensure that industry oversight will still remain in place, to ratify and/or challenge any requests from the PAC but enable the process to be undertaken in a more quick and efficient manner.

2 Governance

Justification for Self-Governance, Authority Direction or Urgency

Following discussions at panel it is agreed that this proposal should proceed as self-governance as it does not propose a material change to the code. As this proposal changes the nature of one element of the Performance Assurance Framework and would potentially impact the availability of non-anonymised and commercially sensitive data to PAC, it is proposed that this modification is not suitable for Self-Governance as it could impact competition between Shippers and Suppliers, therefore it will need to be sent for Authority Direction.

Requested Next Steps

This modification should:

- subject to self-governance be considered a material change and not subject to self governance
- Proceed to a be assessed by a Workgroup

3 Why Change?

The Performance Assurance Report Register (PARR) was created in 2017 with the implementation of UNC520A. The purpose of the PARR was to create a suite of reports which focused on reporting on inputs which have an impact on the accuracy of gas settlement. Amended to the PARR could only be made by following the UNC modification process.

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It is proposed that the current arrangements are changed so that the modification process does not need to be used every time an amendment to the PARR is identified by the PAC and are replaced by a process that simplifies arrangements by requiring PARR related changes to be submitted to the UNCC for approval. This will ensure that industry oversight will still remain in place, to ratify and/or challenge any requests from the PAC but enable the process to be undertaken in a more quick and efficient manner.

4 Code Specific Matters

Reference Documents

Below is a link to the PARR.

https://www.gasgovernance.co.uk/sites/default/files/ggf/PAC%20Document%201%20Performance%20Assurance%20Framework%20Report%20Register%20v1.0_0.pdf

5 Solution

It is proposed that the PARR is added to the list of UNC related documents so that provisions under TPD V 12 will apply. More specifically TPD V12.3 which states:

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Changes to the PARR will therefore be submitted to the UNCC for approval, following a period of industry consultation (and not subject to the UNC modification process). In this way, further industry oversight will still be in place to add further checks and balances to any PAC requests for regular reports.

The PARR change process is proposed to work as follows:

- 1. PAC agree change to the PARR document
- 2. PAC present change to the industry in the form of consultation with a [4 week] period for comments
- 3. Following closure of consultation period, the PARR change proposal is presented to the UNCC to approve the change by majority vote. A summary of any comments provided during the consultation process will also be provided to the UNCC.
- 4. Should the UNCC not approve the change to the PARR, the PAC have the right to raise a formal proposal via the UNC modification process.

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It is also proposed that the current provisions under UNC Section V 16.1.2 ("Any amendment to the Performance Assurance Report Registers shall be made in accordance with the Modification Rules and for such purposes the Performance Assurance Report Registers shall be deemed to be a part of the Code.") are removed.

Currently, UNC Section V references in 16.1.2 that "Any amendment to the Performance Assurance Report Registers shall be made in accordance with the Modification Rules and for such purposes the Performance Assurance Report Registers shall be deemed to be a part of the Code."

It is proposed that this is amended to allow the PARR to become a UNC related document that can be changed through a request by the PAC, that is subsequently approved by UNCC.

6 Impacts & Other Considerations

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

None identified.

Consumer Impacts

None identified.

Cross Code Impacts

There may be an IGT UNC impact.

EU Code Impacts

None identified.

Central Systems Impacts

None identified.

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	None
(i) the combined pipe-line system, and/ or	
(ii) the pipe-line system of one or more other relevant gas transporters.	
c) Efficient discharge of the licensee's obligations.	None
d) Securing of effective competition:	None
(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.	
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

This modification would enhance Relevant Objective f) – Promotion of efficiency in the implementation and administration of the Code by removing additional administration in the development of PARR reporting arrangements. In addition, by making reporting more responsive, it would support PAC in its investigations of issues and risks and reduce the administrative burden on PAC.

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8 Implementation

No implementation timescales are proposed. However, implementation could take place soon after an authority direction is received.

9 Legal Text

Text

To be provided.

10 Recommendations

Proposer's Recommendation to Panel

Panel is asked to:

- Agree that Authority Direction self-governance procedures should apply
- Refer this proposal to a Workgroup for assessment.