UNC Workgroup Report

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.

The Workgroup recommends that this modification should be:



- subject to self-governance
- be issued to consultation

The Panel will consider this Workgroup Report on 20 September 2018. The Panel will consider the recommendations and determine the appropriate next steps.



High Impact:

None



Medium Impact:

Shippers, Transporters and CDSP



Low Impact:

None

Contents		Any questions?
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		Transporter: Chris Warner Cadent
Modification timetable:		(D)
Initial consideration by Workgroup	28 June 2018	Chris.Warner@caden
Amended Modification considered by Workgroup	23 August 2018	tgas.com
Workgroup Report presented to Panel	20 September 2018	01926 653541
Draft Modification Report issued for consultation	20 September 2018	
Consultation Close-out for representations	11 October 2018	Systems Provider: Xoserve
Final Modification Report available for Panel	15 October 2018	
Modification Panel decision	18 October 2018 (at short notice)	UKLink@xoserve.co

1 Summary

What

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

The Performance Assurance Report Register (PARR) was created in 2017 with the implementation of UNC Modification 0520A - Performance Assurance Reporting. 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 can only be made by following the UNC modification process.

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, the 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 UNC TPD V12 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.

2 Governance

Justification for Self-Governance, Authority Direction or Urgency

Panel determined the Modification is unlikely to have a material effect on competition between relevant Shippers and Suppliers or the administration of Code because the Modification is proposing an administrative change to the governance of PAC reports

Modification 0660S will therefore follow self-governance procedures.

Requested Next Steps

This Modification should:

- be considered a non-material change and subject to self-governance
- proceed to Consultation

The Workgroup agree with the Panels view on self-governance for the reasons set out above. The Workgroup consider the Modification is suitably developed to proceed to consultation.

3 Why Change?

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4 Code Specific Matters

Reference Documents

UNC TPD Section V

https://www.gasgovernance.co.uk/TPD

Knowledge/Skills

Below is a link to the PARR.

https://www.gasgovernance.co.uk/tpddocs

5 Solution

It is proposed that the PARR is added to the list of UNC related documents so that provisions under TPD V12 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
- 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.

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.

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.

Consumer Impact Assessment		
(Workgroup assessment of proposer initial view or subsequent information)		
Criteria	Extent of Impact	
Which Consumer groups are affected?	None identified	

Joint Office of Gas Transporters

What costs or benefits will pass through to them?	Not applicable.
When will these costs/benefits impact upon consumers?	Not applicable.
Are there any other Consumer Impacts?	This Modification proposes a change to the governance arrangements for the PARR and therefore there should be any direct or indirect impacts on consumers.

Cross Code Impacts

None identified.

EU Code Impacts

None identified.

Central Systems Impacts

None identified.

Workgroup Impact Assessment

The Workgroup notes that the proposal in this Modification should not have a material impact on the provisions and process in Code. However, it is noted that PAC should be able to manage the process of relevant and timely reporting or changes to reporting by submission of justified requests to the UNCC.

The Workgroup notes that the UNCC may choose to issue a proposed amendment to the PARR to consultation to seek wider industry views should the circumstances warrant such a view.

Rough Order of Magnitude (ROM) Assessment

None identified.

OR

Rough Order of Magnitude (ROM) Assessment (Workgroup assessment of costs)		
Cost estimate from CDSP	Insert text here	
Insert Subheading here	Insert text here	

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. c) Efficient discharge of the licensee's obligations. None

Joint Office of Gas Transporters

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.

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

Insert Proposers Suggested Legal Text where provided and not superseded by Transporters Text.

Legal text will be drawn up by the relevant Transporter at a time when the modification is sufficiently developed in line with the <u>Legal Text Guidance Document</u>.

Legal Text has been provided by [name] and is [included below/published alongside this report]. The Workgroup has considered the Legal Text and is satisfied that it meets the intent of the Solution.

Text Commentary

Insert text here

Text

Insert text here

10 Recommendations

Workgroup's Recommendation to Panel

The Workgroup asks Panel to agree that:

• This self-governance Modification should proceed to consultation.