

UNC Draft Workgroup Report	At what stage is this document in the process?
<h1>UNC 0651:</h1> <h2>Changes to the Retrospective Data Update provisions</h2>	<div style="display: flex; flex-direction: column; gap: 10px;"> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 10px;"> <span style="border: 1px solid #ccc; border-radius: 50%; padding: 2px 8px;">01</span> Modification         </div> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 10px;"> <span style="border: 1px solid #ccc; border-radius: 50%; padding: 2px 8px;">02</span> Workgroup Report         </div> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 10px;"> <span style="border: 1px solid #ccc; border-radius: 50%; padding: 2px 8px;">03</span> Draft Modification Report         </div> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 10px;"> <span style="border: 1px solid #ccc; border-radius: 50%; padding: 2px 8px;">04</span> Final Modification Report         </div> </div>
<p><b>Purpose of Modification:</b></p> <p>This UNC Modification is seeking to amend those changes to the UNC identified within UNC Modification 0434 <i>Project Nexus – Retrospective Adjustment</i> specifically relating to Retrospective Data Updates, to incorporate the requirements of Option 4 as identified within the Request 0624R <i>Review of arrangements for Retrospective Adjustment of Meter Information, Meter Point/Supply Point and Address Data Workgroup</i>.</p>	
	<p>This Draft Modification Report is issued for consultation responses at the request of the Panel. All parties are invited to consider whether they wish to submit views regarding this modification.</p> <p>The close-out date for responses is <b>09 August 2018</b>, which should be sent to <a href="mailto:enquiries@gasgovernance.co.uk">enquiries@gasgovernance.co.uk</a>. A response template, which you may wish to use, is at <a href="http://www.gasgovernance.co.uk/0651">www.gasgovernance.co.uk/0651</a></p> <p>The Panel will consider the responses and agree whether or not this modification should be made.</p>
	<p>High Impact: None</p>
	<p>Medium Impact: Shipper Users</p>
	<p>Low Impact: None</p>

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<b>Modification timetable:</b>	
Initial consideration by Workgroup	22 March 2018
Amended Modification considered by Workgroup	25 May 2018
Workgroup Report presented to Panel	18 July 2018
Draft Modification Report issued for consultation	18 July 2018
Consultation Close-out for representations	09 August 2018
Final Modification Report available for Panel	11 August 2018
Modification Panel decision	16 August 2019

 Any questions?

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## 1 Summary

### What

The purpose of this UNC Modification is to change the Retrospective Data Update elements of Modification 0434 (as amended by Modification 0610S *Project Nexus - Miscellaneous Requirements*) to incorporate the requirements set out within Option 4 (simplified version of Option 1 plus a data cleanse exercise) as identified within the Workgroup 0624R.

### Why

Some consider that in their current form, the Retrospective Data Update elements of Modification 0434 give rise to a number of impacts and risks which have the potential to have an adverse impact on customers. These are as follows:

- Reduces the incentive on Shipper Users to ensure data quality is 'right first time' and subsequently maintained.
- Due to the expected development effort and delivery timelines, the changes necessary to implement the Retrospective Data Update solution within UK Link may adversely impact the implementation timelines of other expected major industry change; specifically, that associated with the Ofgem Faster Switching Program (OSP) and Central Switching Service (CSS).
- The full systematised Retrospective Data Update solution (Option 3 as identified by Request 0624R) provides for an 'over engineered', costly to implement and maintain measure for which the benefits are not proven and at best has a limited life span given the advent of Smart and Advance Metering technologies.

Some consider the Request 0624R Cost Benefit Analysis (CBA) was incomplete as a consequence of ambiguous data provided by some industry parties and consequently did not provide the required evidence or sufficient justification for the high cost of a fully systematised Retrospective Data Update solution. Therefore, this should be replaced with a more appropriate and cost-effective approach to the benefit of customers.

### How

UNC would be modified to:

- Change the Retrospective Data Update elements of Modification 0434 (as amended by Modification 0610S) to incorporate the Retrospective Data Update mechanism identified as Option 4 within Request 0624R.
- Require Shipper Users to provide relevant Meter Information as required by the Central Data Services Provider (CDSP) to enable a one-off industry 'data cleanse' exercise to be conducted.

## 2 Governance

### Justification for Self-Governance, Authority Direction or Urgency

This Modification requires Authority Direction as the changes necessary are likely to have a material impact on customers as it amends some of the proposals that were to be implemented as part of

Modification 0434 'Project Nexus – Retrospective Adjustment' which was previously considered to be a material change and was directed for implementation.

## Requested Next Steps

This modification should:

- be considered a material change and not subject to self-governance
- proceed to Consultation

The Workgroup consider the Modification is sufficiently developed to be issued to consultation. In addition, the Workgroup agrees with the Panels determination on Authority Direction procedures for the reasons set out above and that respondents may wish to provide commercially sensitive supporting information for consideration by the Authority.

## 3 Why Change?

### Introduction

Modification 0434 'Project Nexus – Retrospective Adjustment' was approved by Ofgem on 21 February 2014. The Modification provided the ability for Shipper Users to replace Meter Readings and to retrospectively correct data errors associated with Meter Information, Address and Supply Points. This latter function is identified within the UNC as Retrospective Data Updates and is commonly identified by the informal acronym, RAASP.

On 08 January 2016 the now defunct Project Nexus Steering Group (PNSG) determined that implementation of the Retrospective Data Update elements of Modification 0434 should be deferred and not implemented along with the 'core Project Nexus changes on the Project Nexus Implementation Date (PNID). It should be noted that the arrangements within Modification 0434 pertaining to the amendment of periodic Meter Readings and the subsequent automatic reconciliation were implemented at PNID. PNSG deemed that inclusion of Retrospective Data Update functionality was a risk to the timely implementation of Project Nexus as a whole and deferral would also allow for extended testing of the 'core' UK-Link system changes<sup>1</sup>.

Modification 0573 *Project Nexus – deferral of implementation of elements of Retrospective Adjustment arrangements* was raised by National Grid Distribution (now known as Cadent) on 09 February 2016 and approved by Ofgem on 26 February 2016. The Modification deferred implementation of the Retrospective Data Update elements of Modification 0434 to 01 October 2017.

The Address and Supply Point elements of RAASP were subsequently removed as being superfluous by UNC Modification 0610S 'Project Nexus - Miscellaneous Requirements', which was approved by the UNC Modification Panel under self-governance procedures on 20 April 2017 and implemented on PNID.

Subsequent to this, Cadent raised GT Licence 'Consent to Modify' C057, to further defer the implementation date for the remaining Retrospective Data Update elements of Modification 0434 to "a Day no earlier than 01 November 2018".

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<sup>1</sup>[Project Nexus Steering Group Minutes - 08/01/2016](#)

On 10 July 2017 Cadent raised UNC Request 0624R – ‘Review of arrangements for Retrospective Adjustment of Meter Information, Meter Point/Supply Point and Address Data’ to afford the industry the opportunity to review the Retrospective Data Update components of UNC Modification 0434 (as amended by UNC Modification 0610S) with the aim of assessing, through a cost benefit analysis(CBA), the merits of progressing with the solution identified within UNC Modification 0434 or an alternative option if identified within the Workgroup. The primary driver for Cadent raising the Request was that a considerable period of time (4 years) had elapsed since development of Modification 0434 and therefore its currency and on-going relevance should be reviewed.

At its February 2018 meeting, the UNC Modification Panel approved closure of the 0624R Workgroup following publication of the Workgroup report<sup>2</sup>.

## UNC Request 0624R

As described above, Request 0624R was raised as a worthwhile exercise, given the considerable passing of time and the changing commercial landscape since Modification 0434 was approved by the Authority. Of particular importance was the need to re-examine the business case for implementing the Retrospective Data Update elements of Modification 0434.

To support the development of Request 0624R, the Central Data Services Provider (CDSP), Xoserve carried out an impact assessment on the Retrospective Data Update requirements and identified a series of alternative options<sup>3</sup> all of which provided a solution to varying degrees of automation, complexity and requirement for manual intervention.

In order to inform a CBA for the varying options, including the current fully automated solution (Option 3), the Workgroup initiated a Request for Information (RFI) exercise. Xoserve supported this exercise by co-ordinating, receiving and collating responses and produced an anonymised summary of the RFI consultation responses.<sup>4</sup>

In total 16 organisations responded to the RFI consultation, comprising of 11 Shipper Users, 4 Transporters and 1 iGT. The views expressed within the representations received were polarised in nature between Shipper User and Transporter respondents.

Shipper Users unanimously favoured the fully automated systematised solution identified as Option 3. This option would deliver the full functionality to reflect the remaining unimplemented parts of Modification 0434 (as amended by Modification 0610S) and would provide to Shipper Users, in their opinion, the most cost-effective solution due to minimal operational resource overhead requirements.

However, Transporters responded that Option 4 (which comprises of a data cleanse activity and a simplified version of the Option 1 solution) was, overall, a more effective remedy given that it could be implemented more rapidly and at less cost than Option 3 and could offer substantial near-term benefits.

During analysis of the RFI Xoserve identified that a number of respondents had interpreted the questions differently and wrote out to a number of parties in an effort to seek clarity. However, the final published tables in the view of the Workgroup remained ambiguous, containing incomplete data given that only a minority of Shipper Users responded to the RFI.

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<sup>2</sup> [Modification Request 0624R Workgroup Report](#)

<sup>3</sup> [Solution options scenario comparison](#)

<sup>4</sup> [Summary of consultation responses to UNC 0624R Request for Information exercise](#)

Generally, a CBA would compare the implementation/operational costs of each option along with the benefits case, which for the purposes of the 0624R CBA would be Shipper User costs along with overall Shipper User avoided costs for each option.

Xoserve advised Workgroup 0624R that only one Shipper User provided financial data pertaining to their perceived benefits case for each option and this can be seen in Table 4 of the summary of consultation responses document, 'Expected Constant Materiality of Errors' which Xoserve identify as *'the cost incurred by their respective organisations to manage identified errors under each solution option'*.

The particular Shipper User identified cost savings to them of between £3m and £6m per year for each option. The veracity of this data must though be in some doubt given that Option 5 (a 'Business as Usual' (BAU) or for the purposes of RAASP option comparisons, effectively a 'no change to present' scenario) was also given a cost saving figure of £3m.

In view of the limited number of responses and the variations in how parties interpreted the RFI questions, the Workgroup were unable to provide a meaningful or complete CBA for inclusion within the Workgroup 0624R Report.

Given that the Workgroup were unable to provide a conclusion from the CBA, Cadent analysed the data provided and have postulated that the benefit to Shipper Users can be inferred from the Shipper User operational resource costs of each option within Table 2 of the summary of consultation responses document. In this way Option 3 can be viewed as having an enduring benefit of approximately £1m per year in reduced Shipper User operational resource costs in comparison to Option 4 (noting that Option 3 would be likely to cost at least £1.1m more than Option 4 to design, build and implement).

Therefore, some consider that the conclusion is that the benefits case for implementing the fully systematised Option 3 solution as contained within UNC Modification 0434 has not been made.

### UNC Modification 0434 (option 3) solution – concerns

The content of Modification 0434 was predicated on the requirements identified within the 'Retrospective Updates' Business Requirements Definition (BRD)<sup>5</sup>. The Business Requirements Document (BRD) featured the following change drivers and business objectives:

- To improve the accuracy and quality of the data held on the Supply Point Register.
- To provide accurate data to an Enquiring, Proposing Shipper or a new Shipper on transfer of ownership.
- To enable the processing and receipt of any financial adjustments as a result of a data update.
- Accurate energy allocation and transportation charging.
- To develop a robust regime to allow historical data to be accurately corrected on the Supply Point Register to ensure the data held by the GTs reflects the actual position of a Supply Meter Point at any point in time.

Noting the above, Cadent is concerned that in its present form, the fully systematised (Option 3) Retrospective Data Update solution is inconsistent with the above and has several drawbacks:

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<sup>5</sup> [Business Requirements Definition document](#)

- It removes the incentive on Shipper Users to ensure that ALL data submitted to the CDSP is accurate and 'right first time'. Cadent acknowledges that occasionally mistakes and oversights may occur but these should be regarded as the exception not the rule and all efforts should be taken by industry parties to prevent their occurrence at source. In particular it is imperative in the run up to implementation of the CSS under Ofgem's 'Faster Switching programme that industry data is of the highest quality. Providing Shipper Users with a mechanism to retrospectively amend poor data could suggest that data quality/accuracy is of secondary importance as it can simply be 'fixed' at a later date.

Of interest it will be noted Shippers/Suppliers have previously remarked on the importance of ensuring data is 'right first time'.

- In its representation to Modification 0434 a Shipper User respondent noted:
  - *.... concerns that a modification such as this, which introduces a retrospective element, may not promote or encourage the correct behaviours in terms of provision of timely and accurate data in the first instance".*
- In their comments on Supply Point Administration Agreement (SPAA) CP 421 a Supplier noted:
  - *"We are minded to reject the proposal to allow suppliers to make wholesale changes to the data they have already submitted as part of the GTDIS programme. Such a step would set a damaging precedent, suggesting to parties that striving for data accuracy is not important as it can just be changed later on. Accurate data provision is utterly critical for the healthy function of the incentive scheme. Mixed messages about the importance of providing the right data at the right time will not help parties to participate meaningfully in the scheme".*
- The solution provides for a simple way of retrospectively rectifying data errors. However, remedies are already available such that anomalies can be resolved without recourse to retrospection and for which obligations already exist within UNC. Retrospective actions impact adversely on other Shipper Users (through resultant settlement volatility) who may well have invested in ensuring their data is correct first time. In its representation to Modification 0434 one Shipper User noted:
  - *"Shippers who operate to ensure that the highest standards of data accuracy are maintained both within their individual portfolio updates and billing processes may continue to be adversely impacted by parties who do not perform the same level of scrutiny and audit to their data".*
- The time and effort required to build, test and implement (through a DSC Change Committee sanctioned CSDP release) a fully systematised and over engineered solution could seriously compromise delivery of other industry change programmes of arguably greater priority.
- It is likely that a 'fully automated' Retrospective Data Update solution could become largely redundant either before it is implemented or shortly afterwards. Within the work undertaken by the 0624R Workgroup it was noted that the overall view expressed by Shipper Users was that the volumes of corrective updates required would potentially *'increase as a result of discrepancies encountered during the ramp up of Smart Meter roll out through to 2020'*. It is reasonable to infer from this that as it is the accelerated rate of Smart and Advanced Meter installations which Shipper Users identify as being a key reason for data error creation then completion of the Smart Meter roll out program should lead to a significant reduction in the quantity of 'new' data errors being created thereafter.
- Shipper Users presently have obligations to procure Meter Readings on a monthly basis for Smart and Advance Meters. Should an RGMA systems read rejection be received it will be noted that Shipper Users have an obligation to rectify the data immediately and by definition not seek to

utilise retrospective measures. Modification 0477 ‘Supply Point Registration - Facilitation of Faster Switching’ implemented in 07 November 2014, requires relevant data to be provided by the CDSP to Shipper Users earlier in the Shipper User transfer process to enable validation to occur to ensure data is correct when submitted. In this respect Cadent would challenge Shipper Users assertions that there would be a ramp up of cases for retrospective update due to Smart Metering roll out.

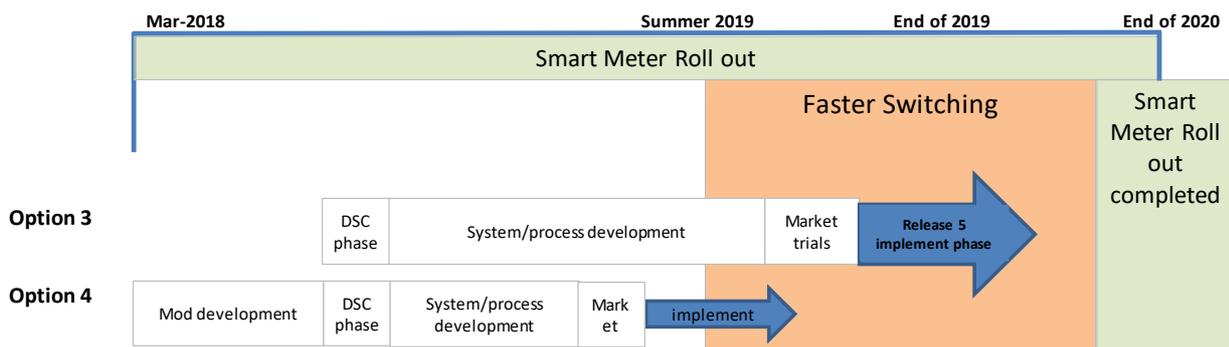
- Every Retrospective Data Update which is undertaken would be likely to result in an Individual Meter Point Reconciliation and therefore create potential for unpredictable and ongoing volatility relating to Energy settlement impacting on all Shipper Users and ultimately to customers. Providing a fully automated Retrospective Data Update solution would be likely to substantially increase uncertainty indefinitely.
- As indicated within table 4 of the consultation summary document, the expected rate of data error both in year 1 and on an enduring basis is expected to be relatively low, ranging from an average of 1.3% to 1.9% of total Supply Meter Points. It is therefore questionable whether a fully automated and systematised solution can be justified for a relatively low percentage of such errors.

### Indicative implementation timeline

The ‘glide’ path below outlines potential comparative timelines for implementation of an Option 3 and Option 4 solution. The timings are indicative only as DSC Change Committee discussion/prioritisation requirements and Xoserve release schedules along with Shipper User market trial requirements are presently uncertain.

The illustration below suggests that it is possible that Option 3 implementation may not occur sufficiently in advance of completion of the currently scheduled Smart Meter roll out timetable and also that there is a much greater risk of conflict with all aspects of the Faster Switching/CSS programme than Option 4.

#### Indicative implementation timeline



### Preferred solution

Some consider Option 4 as identified by Request 0624R represents an optimal solution and is likely to deliver the following customer benefits:

- Meets all of the drivers and business goals as documented within the Retrospective Updates BRD.

- Identifies a sensible compromise which delivers an early solution with a focus on ‘up front cleaning’ of key industry data while providing a mechanism by which incorrect data can be readily rectified by exception.
- The ‘added value’ data cleanse exercise would be likely to rectify a large majority of existing data errors (85%+) as a one off managed activity. Early benefits to the industry of the data cleanse activity are:
  - Feed into CSS for better data quality
  - Provides for a mechanism to spot ‘polluters’ at an early stage to prevent ongoing occurrences.
- The Performance Assurance Committee (PAC) may also have an interest in this.
- Can be implemented in a reasonable timescale and at reduced cost which will mitigate the risk to other industry change of a greater priority.
- Will not degrade the incentive on Shipper Users to ensure that data is provided ‘right first time’.
- Incentivises parties to ensure processes/resources are in place to proactively monitor and remedy data anomalies.
- Reduces the likelihood of energy settlement volatility through excessive retrospective reconciliation volumes.

Option 3/Option 4 – option overview

<b>Option 3 – as per 0434 Solution</b>
<ul style="list-style-type: none"> <li>• Initial Design – as per Retrospective Updates BRD</li> <li>• Asset data corrected via automated process (i.e. file submission)</li> <li>• Scenarios relating to retrospective updates to Meter Removal, Meter Exchanges, Meter Installations and meter details are being assessed to ensure these are still appropriate</li> <li>• Retro update submitted with an effective date, are updated in the system reflecting the actual activity date in the relevant fields</li> <li>• All the reads recorded in the system during the retrospective update period will be marked inactive and no reconciliation variance will be created for these dates</li> <li>• Current shipper is expected to provide the new transfer read (if there is a shipper transfer) and a latest read along with retrospective update</li> <li>• Any amendment invoice position will be reversed and negative charge position will be created whilst applying the retrospective update</li> </ul>

<b>Option 4 – Timestamp Asset data + Data Cleansing Exercise</b>
<ul style="list-style-type: none"> <li>• Asset data corrected via automated process (i.e. file submission)</li> <li>• Applicable to current Asset only</li> <li>• Data will be ‘timestamped’ - notifying the date retrospective update was applied to system</li> <li>• Data will be presented with correct Effective Dates to relevant organisations e.g. file flows, Data Enquiry etc</li> <li>• Start &amp; End Reads to be provided by Shipper</li> </ul>

- Shipper provides Metered Volume as part of file submission for whole period
- Xoserve process Consumption Adjustment
- Financial Adjustments based on volume provided

**Data Cleansing Exercise**

- Shippers to provide asset data as maintained within their systems in an agreed format
- Xoserve to compare the data contained in both sources (Shipper dataset and UK Link)
- Highlight any anomalies and cleanse, applying the same process as was undertaken for data validation during Project Nexus
- Shipper able to provide Metered Volume within agreed format for relevant retrospective update period
- Xoserve process Consumption Adjustment and apply calculate charges

**Option 3/Option 4 – option comparison**

**Retrospective Data Update Candidate Data**

The following Retrospective Data Update Candidate Data Items to be provided by the relevant Shipper User for the data cleansing exercise (as per ‘Solution’ business rules 3, 4, 5).

Meter Point Reference Number \*\*

Shipper Short Code\*\*

Meter Point Conversion Factor

Effective Date of Asset Installation (Meter and Converter)

Transaction Type Code

**METER DETAILS:**

Meter Serial Number

Model Code

Manufacturer Code

Year of Manufacture

Meter Type Code

Meter Mechanism Code

Measuring Capacity

Collar Status Code

Number of Dials/Digits

Multiplication Factor

Pulse Value Meter Asset Status Code

**CONVERTER DETAILS:**

Converter Serial Number

Model Code

Manufacturer Code

Year of Manufacture

Number of Dials/Digits

Multiplication Factor

Convertor Conversion Factor

Conversion Basis Code

Converter Asset Status Code

READING DETAIL:

Reading Index (Meter)

Round the Clock (RTC) (Meter)

Reading Index (Converted Converter)

Round the Clock (RTC) (Converted)

Reading Index (Unconverted Converter)

Round the Clock (RTC) (Unconverted)

Current Non-Opening Reading (Cyclic)

CONSUMPTION ADJUSTMENT DETAILS

Metered Volume / Value

Adjustment From Date

Adjustment to Date

Adjustment Reason Code

Adjustment Type

Data Item Change

## 4 Code Specific Matters

### Reference Documents

[Modification 0434](#)

[Modification 0573](#)

[Modification 0610S](#)

[Consent to Modify C057](#)

[Modification Request 0624R](#)

[Summary of consultation responses received to UNC 0624R](#)

## Knowledge/Skills

An understanding of the relevant Project Nexus 'retrospective' Modification and Business Requirements Definition documents would be advantageous.

## 5 Solution

Modification of the UNC is required to amend existing terms concerned with Retrospective Data Updates within TPD E6.7 and TPD M4.3 (inserted following approval of Modification 0434) to clarify that where a Shipper User carries out a Retrospective Data Update that an 'automatic' Reconciliation will no longer occur and to clarify the requirement on Shipper Users who carry out such Retrospective Data Updates to provide Reconciliation Metered Volumes and Reconciliation Metered Periods where they so wish for a Reconciliation to occur.

Shipper Users will also be required to provide Meter Point Reference Number (MPRN) information from their business systems to permit the CDSP to carry out a Retrospective Data Update cleansing exercise against the information held in the Supply Point Register.

The following activities will form the basis of the exercise:

1. The CDSP to provide pre-notification of the Retrospective Update Data cleansing exercise 60 Business Days prior to the agreed data extract date.
2. The CDSP will provide to each Shipper User an extract of their Supply Point portfolio as held on the Supply Point Register on the agreed data extract date.
3. Shipper Users to take an extract (asset portfolio extract) of the data held within their respective systems.
4. The asset portfolio extract will include, but not limited to, the data items outlined within the Retrospective Data Update Candidate Data Items table in Section 3 'Why Change'.
  - o The data items required within the asset portfolio extract will form part of the UK Link Manual and will be determined by the DSC Change Management Committee.
5. Shipper Users to submit their asset portfolio extract to the CDSP within 20 Business Days of the agreed extract date.
6. The CDSP will complete a portfolio comparison exercise within 20 Business Days of the receipt of the asset portfolio extract.
7. The CDSP will identify, and report, any data misalignment, discussing these with the individual Shipper User and following agreement, will apply the relevant updates to the Supply Point Register.
8. Where deemed necessary by the Shipper User, a Consumption Adjustment may also be requested in conjunction with the relevant asset portfolio data.
9. Any Consumption Adjustment request will be subject to the existing conditions and validations in place as part of the Request for Adjustments (RFA) process.

## 6 Impacts & Other Considerations

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

This Modification does not directly impact an SCR. However, if this Modification were not implemented and the Retrospective Data Update solution as identified within Modification 0434 (as amended by Modification 0610S) is required to proceed to implementation, then there is a risk that design, build and testing of the required UK-Link systems functionality will impact on a number of major industry change projects associated with CDSP systems and processes.

### Consumer Impacts

This Modification, if implemented, would provide a more effective remedy to issues associated with energy settlement data quality which would ultimately benefit customers at reduced cost.

#### Consumer Impact Assessment

Criteria	Extent of Impact
Which Consumer groups are affected?	<ul style="list-style-type: none"> <li>• Domestic Consumers</li> <li>• Small non-domestic Consumers</li> <li>• Large non-domestic Consumers</li> <li>• Very Large Consumers</li> </ul>
What costs or benefits will pass through to them?	<ul style="list-style-type: none"> <li>• No direct benefits will pass through to consumers. However, some consider the proposed reduction in costs to allow retrospective adjustments in the proposed option would flow through to the general operating costs for the industry.</li> <li>• The proposed Retrospective Data Update solution combined with a data cleaning exercise would ensure consumer information is updated when errors are identified.</li> </ul>
When will these costs/benefits impact upon consumers?	No direct impact identified.
Are there any other Consumer Impacts?	None identified.

### Cross Code Impacts

A comparable IGT UNC change is likely to be required should this Modification be implemented. The IGT UNC Code Administrator is keeping progress of this Modification under review.

### EU Code Impacts

None identified.

## Central Systems Impacts

If this Modification is directed for implementation it would reduce the scale of change to central systems at a time of significant industry change, as these proposals are less complex than those currently approved for Modification 0434.

## Workgroup Impact Assessment

Should this Modification be implemented, some consider the redistribution in costs identified in consumer impacts would borne more greatly by Shipper Users, as individually they would need to stand up processes to support the data cleanse activity and the activities not implemented by the descoping of RASSP.

Some consider the data cleanse would be more involved and complex than described in this Modification. This would in part be due to the large number of domestic meter exchanges due to the SMART roll out which would be after the data cleanse exercise was undertaken. Some noted that this might be a similar impact for micro business consumers.

Some consider this Modification aims to encourage a more proactive approach to controlling data.

## Rough Order of Magnitude (ROM) Assessment

For further details see the impacts identified in [Workgroup Report 0624](#).

### Workgroup 0624R High Level Impact Assessment

Cost estimate from CDSP	£460,000 to 515,000
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## 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 <ul style="list-style-type: none"> <li>(i) the combined pipe-line system, and/ or</li> <li>(ii) the pipe-line system of one or more other relevant gas transporters.</li> </ul>	None
c) Efficient discharge of the licensee's obligations.	None
d) Securing of effective competition: <ul style="list-style-type: none"> <li>(i) between relevant shippers;</li> <li>(ii) between relevant suppliers; and/or</li> <li>(iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.</li> </ul>	Impacted

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

Some participants consider the measures identified within this Modification Proposal can be expected to facilitate GT Licence relevant objective d). This is because a new and proportionate Retrospective Data Update solution, combined with a data cleaning exercise would replace the existing, albeit unimplemented, solution identified in excess of 4 years ago which can be considered no longer appropriate in the present commercial environment. The new solution represents a more efficient and economic way forward which, while providing a means whereby data can be retrospectively corrected would encourage Shipper Users to proactively monitor and maintain accuracy of data relevant to energy settlement to the benefit of customers.

## 8 Implementation

No implementation timescales are proposed. However, it is recommended that following an Authority decision that appropriate consideration to implementation priority is given by the DSC Change Management Committee.

## 9 Legal Text

Suggested Legal Text has been provided by Cadent and is included below. The Workgroup has considered the Suggested Legal Text and is satisfied that it meets the intent of the Solution.

### Suggested Text Commentary

<b>TRANSPORTATION PRINCIPAL DOCUMENT</b>	<b>Topic</b>	<b>Explanation</b>
<b>SECTION E – DAILY QUANTITIES, IMBALANCES AND RECONCILIATION</b>		
Amendment to	Retrospective Dara	The proposed amendments to this paragraph

paragraph 6.7.4	Update: Offtake Reconciliation	mean that the CDSP will not undertake a reconciliation exercise unless the shipper has provided them with the Reconciliation Metered Volume and Reconciliation Metered Period data.
<b>SECTION M – SUPPLY POINT METERING</b>	<b>Topic</b>	<b>Explanation</b>
Amendment to paragraph 4.3.2(a)	Meter Information: Retrospective Data Update	The proposed amendments to this paragraph require the shipper to provide Reconciliation Metered Volume and Reconciliation Metered Period data to the CDSP if they require an Affected Offtake Reconciliation.
Amendment to paragraph 4.3.7	Meter Information: Retrospective Data Update	The proposed amendments to this paragraph re-iterate that an Affected Offtake Reconciliation will not take place unless the shipper has provided Reconciliation Metered Volume and Reconciliation Metered Period data.
<b>UNC TRANSITION DOCUMENT</b>  <b>PART 11C – TRANSITIONAL RULES</b>  <b>1.UNIFORM NETWORK CODE</b>	<b>Topic</b>	<b>Explanation</b>
New paragraphs 23.2 – 23.7	Retrospective Data Updates	The proposed paragraphs put in place a process for a one off data reconciliation exercise to be undertaken.

## Suggested Text

### UNIFORM NETWORK CODE – TRANSPORTATION PRINCIPAL DOCUMENT

#### SECTION E – DAILY QUANTITIES, IMBALANCES AND RECONCILIATION

##### 6.7 Retrospective Data Update: Offtake Reconciliation

Amend paragraph E6.7.4 as follows:

6.7.4 Where a Retrospective Data Update is carried out and the necessary information has been provided under Section M4.3.2(b) to undertake an Affected Offtake Reconciliation, subject to paragraph 6.7.5:

(a) the CDSP will:

(i) in a case within paragraph 6.7.1(b)(i), re-determine the Reconciliation Values, on the basis of the Updated Data, for each Affected Offtake Reconciliation;

(ii) in a case within paragraph 6.7.1(b)(ii), determine Reconciliation Values, by reference to the Updated Data, on the basis of two Offtake Reconciliations for which the Reconciliation Metered Periods are the Reconciliation Metered Period for the Affected Offtake Reconciliation divided into two periods ending and starting respectively with the Read Date of the Meter Read comprised in the Updated Data;

(b) the Reconciliation Values under the Affected Offtake Reconciliation(s) shall be replaced by the Reconciliation Values determined under paragraph (a)(i) or (a)(ii);

(c) the CDSP will determine and invoice such adjustments in respect of the Reconciliation Values determined under the Affected Offtake Reconciliation(s) as are necessary to give effect to paragraph (b).

#### SECTION M – SUPPLY POINT METERING

##### 4.3 Meter Information: Retrospective Data Update

Amend paragraph M 4.3.2 (a) as follows:

4.3.2 A Retrospective Data Update Notification shall:

(a) in addition to the other requirements set out in the UK Link Manual, specify:

(i) the Supply Meter, Supply Meter Installation or Supply Meter Point in respect of which the notification is submitted;

(ii) the Updated Data;

- (iii) the effective Date, being a date on or after the Code Cut Off Date and which is earlier than the Read Date for the last Valid Meter Reading obtained for the Supply Meter comprised in the Supply Meter Point;
- (iv) a Valid Meter Reading for which the Read Date is the Update Effective Date; and
- (v) Reconciliation Metered Volumes and Reconciliation Metered Periods if an Affected Offtake Reconciliation is required in accordance with Section E6.7.

Amend paragraph M 4.3.7 as follows:

- 4.3.7 Where the CDSP carries out a Retrospective Data Update it may give rise to an adjustment to an Affected Offtake Reconciliation in accordance with Section E6.7. An Affected Offtake Reconciliation will not be undertaken unless the information required under Section M 4.3.2(a) (v) has been provided.

## **UNIFORM NETWORK CODE – TRANSITIONAL DOCUMENT**

### **PART 11C – TRANSITIONAL RULES**

#### **1. UNIFORM NETWORK CODE**

#### **23 RETROSPECTIVE DATA UPDATES**

Insert new paragraphs 23.2 – 23.7 as follows:

- 23.2 The CDSP shall provide 60 Business Days' notice to the Relevant Users of its intention to conduct a one-off Retrospective Data Update data cleansing exercise.
- 23.3 On a date specified by the CDSP (not less than 60 Business Days' from the initial notification referred to in 23.2 above) (the "Data Extraction Date"), the CDSP shall provide to the Relevant Users the Registered User Portfolio Report (as defined in the DSC Agreement) as it relates to each individual Relevant User;
- 23.4 On the Data Extraction Date, the Relevant Users shall take an extract of their asset portfolio in such format and containing such information as requested by the CDSP. This extract shall be provided to the CDSP within 20 Business Days' of the Data Extraction Date.
- 23.5 Within 20 Business Days following receipt of the extract of the asset portfolio from the Relevant Users, the CDSP shall conduct a portfolio comparison exercise and notify the Relevant Users of any data misalignment between information contained on the Registered User Portfolio Report and the asset records of the individual Relevant Users.
- 23.6 The CDSP shall only make changes to the Supply Point Register as a result of this data cleanse exercise where such a change has been agreed with the Relevant User.

- 23.7 A Relevant User may request a Consumption Adjustment following any amendments to the Supply Point Register in accordance with TPD Section M 1.9.

## 10 Recommendations

### Panel's Recommendation to Interested Parties

The Panel have recommended that this report is issued to consultation and all parties should consider whether they wish to submit views regarding this modification.