

UNC Final Modification Report	At what stage is this document in the process?
<h1>UNC 0654S:</h1> <h2>Mandating the provision of NDM sample data</h2>	<div style="display: flex; flex-direction: column; gap: 5px;"> <div style="border: 1px solid #ccc; padding: 5px; display: flex; align-items: center; gap: 10px;"> 01 Modification </div> <div style="border: 1px solid #ccc; padding: 5px; display: flex; align-items: center; gap: 10px;"> 02 Workgroup Report </div> <div style="border: 1px solid #ccc; padding: 5px; display: flex; align-items: center; gap: 10px;"> 03 Draft Modification Report </div> <div style="border: 1px solid #ccc; padding: 5px; display: flex; align-items: center; gap: 10px;"> 04 Final Modification Report </div> </div>
<p>Purpose of Modification:</p> <p>This modification is seeking to introduce an obligation into the UNC for the provision of regular NDM sample data from Shippers to the Central Data Services Provider (CDSP).</p>	
	<p>The Panel determined that this self-governance modification be implemented.</p>
	<p>High Impact: None identified.</p>
	<p>Medium Impact: Shippers / CDSP</p>
	<p>Low Impact: Transporters</p>

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Modification timetable:		 07749 983418
Initial consideration by Workgroup	01 May 2018	Systems Provider: Xoserve
Amended Modification considered by Workgroup	31 July 2018	
Workgroup Report presented to Panel	16 August 2018	UKLink@xoserve.com
Draft Modification Report issued for consultation	16 August 2018	Other: Sallyann Blackett
Consultation Close-out for representations	07 September 2018	
Final Modification Report available for Panel	11 September 2018	sallyann.blackett@eoneenergy.com
Modification Panel decision	20 September 2018	 07912 806290

1 Summary

What

Currently NDM Sample Data can be voluntarily provided to the CDSP using the direction in the [Xoserve NDM Document](#) “Third Party Supplied NDM Sample Data Guidance and File Format Document” – it outlines the data required and in which format. There has been a noticeable reduction in the data volumes being submitted and the number of contributing organisations is extremely low. The recent activity as part of Workgroup 0631R has shown that it is possible for organisations to get this information and submit it to the CDSP. It has also proved that the new End User Categories (EUCs) being discussed as part of Workgroup 0644 cannot be supported accurately without this sample data. (Note DESC are considering what can be done with limited data given the UIG urgency but to support the analysis accurately sample data will be required).

Why

This sample data provides insight into the Class 3 and 4 customer behaviours and helps support development of allocation profiles and EUCs by the Demand Estimation Sub-Committee (DESC). Although the current Transporter sample allows viable profiles to be derived by DESC it has proved essential to boost this sample with Shipper/Supplier provided data for the past two years. The low volumes of data don't allow for accurate profiling activity – particularly in the proposed new pre-payment and small Industrial & Commercial (I&C) EUCs being developed by DESC to improve allocation. If the data cannot be provided this will prevent the required improvements to the allocation profiles which could lead to further issues within Unidentified Gas (UIG) and will certainly prevent improvements in this key area.

How

This modification is seeking to introduce an obligation to mandate the provision of NDM Sample Data on a regular basis, and at a minimum twice yearly.

To monitor the provision of the sample data an initial high-level report is to be produced, the evolution of this report would be within the PACs remit and any sanctions they feel are appropriate. Sanctions are not being developed as part of this modification.

2 Governance

Justification for Self-Governance, Authority Direction or Urgency

The Modification Panel determined that this Modification is likely to have a material impact because of impact on UIG, allocation and commercial arrangements for Shippers, therefore this Modification should follow Authority Direction procedures.

Requested Next Steps

This modification should:

- be subject to Self-Governance;
- be issued to consultation.

The Workgroup considered the Panels view on Self-Governance and were not able to identify a material impact on Shippers or other industry parties and would therefore consider the Modification as suitable for

Self-Governance. However, it was noted that some industry parties may not be represented at meetings and that they may not be in a position to provide the data at this time which might have a material impact on them, therefore the Workgroup recommends Panel seek views on Self-Governance during consultation.

3 Why Change?

Currently there is no mandated obligation for parties to share NDM Sample Data with the CDSP and over the last few years the quantity of data and participating organisations has dwindled. The limited data is impacting the development of improved profiling as there is not enough data to support the required granularity of customer types and cannot therefore support the creation of any new EUCs, such as pre-payment or small I&C supplies.

The aim of this modification is to mandate the provision of the dataset in accordance the “Third Party Supplied NDM Sample Data Guidance and File Format Document” so that each Shipper with a Product Class 3 and/or Product Class 4 portfolio provides information to support the creation of future profiles. This will ensure a representative spread across organisations and will ensure profiles represent an unbiased cross section of customers.

This is a Code matter because the current requirements are on a voluntary basis where this modification seeks to make it a mandatory obligation for a minimum data set. This wouldn't however stop parties from providing more data if they felt it would be beneficial.

It is anticipated that there will be no change to the mandated Transporter/CDSP NDM samples as these continue to form the backbone of the profile calculation.

The NDM Sample data is to be in line with the formatting outlined in the “Third Party Supplied NDM Sample Data Guidance and File Format Document”. However, it is not currently proposed to make this a UNC related document as the data provision is key, rather than the format.

The introduction of the Performance Assurance reporting will enable monitoring of the data provision and will allow the Performance Assurance Committee (PAC) to develop any required next steps.

4 Code Specific Matters

Reference Documents

Third Party Supplied NDM Sample Data Guidance and File Format Document – current version 6.1:
<https://www.gasgovernance.co.uk/sites/default/files/ggf/book/2018-05/File%20Format%20%28Third%20Party%20NDM%20Sample%20Data%29%20v6.1.pdf>

Knowledge/Skills

Knowledge of the NDM Demand Estimation processes

5 Solution

It is proposed to add a clause into Section H 1.6 to mandate the provision of data with the following business rules and formatting:

- To introduce an obligation on Shippers with Product Class 3 and/or Product Class 4 Supply Meter Points to provide continuous daily gas consumption data for individual (NDM) Supply Meter Points. Data is required to support the following scheduled activities:
 - Autumn Modelling – By the 5th Business Day (BD) in October each year, the requirement is 12 months consumption data ending with the read date of 1st October.
 - Spring Modelling – By the 5th BD in April each year, the requirement is 12 months consumption data ending with the read date of 1st April (NOTE: 13 months data is required when the Easter holiday period begins in March of the preceding year. Easter holiday period is defined as the Wednesday before Good Friday to the Friday after Good Friday).
- Data cuts are to be provided to the CDSP in line with one of the following submission frequencies:
 - Monthly – By the 5th BD of each month (CDSPs preferred option to support continuous review of algorithm performance).
 - Quarterly – By the 5th BD of January, April, July and October each year.
 - Twice Yearly – By the 5th BD of April and October each year.
- Data cuts are to contain consistent Supply Meter Points where possible, as analysis requires continuous daily data for a 12 or 13 month period. It is not possible to combine two Supply Meter Point histories to create one record – once added to the sample the Supply Meter Point will continue until:
 - it is lost from the Shipper’s portfolio.
 - the meter is exchanged for a non-loggable model.
 - the meter is removed and/or meter point isolated.
- The data will be in line with the formatting outlined in the “Third Party Supplied NDM Sample Data Guidance and File Format Document” with the following format:

RECORD/FIELD NAME	OPT	DOM	LNG	DEC	DESCRIPTION
METER_POINT_REFERENCE_NUMBER	M	N	10	0	A unique numeric reference associated to the supply meter point
LDZ_INDICATOR	M	T	2	0	Identifies the local distribution zone to which the supply point is associated
METER_READ_DATE	M	D	8	0	The date that the meter/converter read relates to in order to derive the volume (i.e. the date of the closing

					5am read). For example, 'Meter_Read_Date' of '02102017' would relate to the Gas Day '01/10/2017'. FORMAT: DDMMYYYY
METER_SERIAL_NUMBER	M	T	14	0	The manufacturers meter serial number from which the meter read/consumption was taken
UNCORRECTED_VOLUME	M	N	12	0	The uncorrected metered volume calculated for the relevant gas day (in Cubic Metres or Cubic Feet)
CORRECTED_VOLUME	O	N	12	0	The corrector (converter) volume calculated for the relevant gas day (in Cubic Metres or Cubic Feet)
VOLUME_UNITS	M	T	2	0	Indicator identifying the unit of measurement of the stated uncorrected / corrected volume. Allowable values: CM = Cubic Metres CF = Cubic Feet
MARKET_SECTOR_FLAG	M	T	1	0	Identifies the type of consumer to enable accurate modelling. Allowable values: D = Domestic N = Non-Domestic

Note 1:

OPT - Optional, Mandatory

DOM - Domain i.e. Text, Numeric, Date

LNG – Number of characters

DEC - Number of decimal places

Note 2:

All text fields should not be enclosed in “double quotes”

Example file:

METER_POINT_REFERENCE_NUMBER,LDZ_INDICATOR,METER_READ_DATE,METER_SERIAL_NUMBER,UNCORRECTED_VOLUME,CORRECTED_VOLUME,VOLUME_UNITS,MARKET_SECTOR_FLAG

12345678,SO,19072014,G67354,55,56,CM,N

567891234,WM,19072014,H12345,25,,CF,D

- The file naming convention is: SM01_SSC_yyyymmddvv.CSV

Value	Description	DOM	LNG	Variables
SM01	Unique file identifier	T	4	'SM01'
SSC	The three letter shipper identifier	T	3	Shipper specific
yyyy	Year (relevant to the file date)	N	4	-
mm	Month (relevant to the file date)	N	2	'01' to '12'
dd	Day of the month (relevant to the file date)	N	2	'01' to '31'
vv	The in-day file version	N	2	Start at '01'
.CSV	File extension	T	4	' .CSV'

- Mirroring the current guidance, the business rules would be:
 - The Supply Meter Point must exist on the Sites and Meters system.
 - The Supply Meter Point status must be Non-Daily Metered (i.e. Product Class 3 or 4).
 - The Supply Meter Point must be Live (LI).
 - They must be randomly selected, covering all consumption bands supplied (excluding Band 09 – sites with AQs greater than 58,600 MWh).
 - A maximum of 100 Supply Meter Points per EUC (End User Category), per LDZ (Local Distribution Zone), per Shipper is suggested and should be proportionally distributed across all EUCs within the Shippers portfolio.
- An additional business rule to the current requirements are to include a minimum submission of 100 Supply Meter Points proportionally distributed across all EUCs so it represents the Shipper Users portfolio
 - This requirement is to ensure that all qualifying Shippers (portfolio >25,000) actively provide some data
 - If all Supply Meter Points are within 1 EUC the minimum of 100 will be expected as it is representative of the Shipper Users portfolio

- Where a Shipper has a portfolio which contains both GT and IGT Supply Meter Point(s) the sample should contain a selection of both
 - The sampling ratio between GT and IGT will be at the discretion of the Shipper but it is recommended to have a minimum of 1 Supply Meter Point per EUC per LDZ
- Shippers with smaller portfolios will be required to participate on a reasonable endeavours basis
 - Threshold of <25,000 Supply Meter Points
 - Supply Meter Points must meet the criteria for submission e.g. have 12 (or 13) months of sample data
 - Shippers can submit data but once the Supply Meter Point count is greater than 25,000 the data must either be submitted monthly, quarterly or twice yearly in accordance with the submission rules
 - Once the threshold of 25,000 has been crossed the requirement to submit data continues regardless if the portfolio dips below 25,000 in the future
- Although the current guidance stipulates a maximum of 100 Supply Meter Points, if parties wish to submit additional data this should not be precluded but by bilateral agreement with the CDSP
- Currently there is not an IX flow to submit this data and until such time this is developed the submission of this data is via password encrypted .CSV file to the designated CDSP mailbox Emails should be titled “SM01: Sample Data” and should be emailed to the following box account: xoserve.demand.estimation@xoserve.com
- Amendments to the sample format post implementation will be via standard DSC Change Management governance

Creation of a PAC report to monitor data submissions

Under Section V 16.5.3 any amendments to the Performance Assuring reporting needs to be delivered via changes to the Performance Assurance Framework - Performance Reports Register document. Below are the requirements Reports Register document as well as low level reporting requirements.

- A PAC report is to be provided to monitor Shipper participation and ensure the data is provided in a timely manner (see appendix 1 for details):
 - The report will be run a minimum of twice a year with the opportunity for PAC to request adhoc reports
 - Reports will be run no later than 1st May and 1st November
 - Where a Shipper as >25,000 and hasn't submitted either a monthly or twice-yearly sample they will be included in the report and will have a 0% shown for their submission
 - Where the Shipper provides a monthly or quarterly sample the report will show the latest submissions information
 - The high-level report will contain the data outlined below – any further information required by PAC will be developed by the PAC

Shipper	Submission Date YYYYMMDD	<25,000 Y/N	% of portfolio Supplied	Contains IGTs Y/N	Monthly, Quarterly or Twice-Yearly submission	Received within 5WD window Y/N
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Shipper A	NA	Y	NA	NA	NA	NA
Shipper B	20190403	N	3%	Y	Monthly	Y
Shipper C	NA	N	0%	NA	NA	N

- Currently there is not an IX flow to submit this data and until such time this is developed the submission of this data is via password encrypted .CSV file to the designated CDSP mailbox. Emails should be titled “SM01: Sample Data” and should be emailed to the following box account: xoserve.demand.estimate@xoserve.com
- Amendments to the sample format post implementation will be via standard DSC Change Management governance

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

No direct consumer impacts have been identified. However, the proposals set out in this modification should support more accurate allocation and cost targeting for Shippers which should have an indirect benefit to consumers by supporting competition.

Consumer Impact Assessment	
Criteria	Extent of Impact
Which Consumer groups are affected?	None identified.
What costs or benefits will pass through to them?	None identified.
When will these costs/benefits impact upon consumers?	None identified.
Are there any other Consumer Impacts?	None identified.

Cross Code Impacts

This Modification would require similar changes to the IGT UNC and an associated IGT UNC Modification IGT110 has been raised by the by E.ON. Modification IGT110 seeks to point at the UNC text rather than have an independent solution.

No impacts identified for the SPAA.

EU Code Impacts

None identified.

Central Systems Impacts

NDM Sample Data is already loaded when provided there are no material impacts anticipated other than an increase in the volume of data received.

A ROM has been requested for the impacts identified on Central Systems.

The creation of the PAC reporting will require CDSP development but can be delivered as part as a minor release.

Workgroup Impact Assessment

The Workgroup has considered the process set out in the solution and has been unable to identify any material impacts on CDSP, Shipper or Transporter processes. However, it was noted that new market entrants and parties with smaller portfolios should not be mandated to take part in the process until they were in a position to be able to provide sufficient and consistent data.

Panel Questions:

Consider the interaction between the AUG Review and the PAC review of meter reading submissions?

The Workgroup notes that the submission of regular and accurate Meter Readings is a significant aspect underpinning Settlement. However, this Modification is encouraging the submission of Meter Reading data to support the accurate profiling of NDM EUC bands and although related, the rules required to meet the process are different. The Process for NDM profiles requires consistency in the choice of specific Supply Meter Point data collated over a defined period of time, which is not always consistent with the meter readings required to support settlement.

Submission of meter reading data to meet the requirements of this proposed NDM sample process would not satisfy Shippers obligations to provide meter reads under TPD Section M.

Rough Order of Magnitude (ROM) Assessment

Extract from the ROM assessment below:

Costs and Timescales
Change Costs (implementation): An enduring solution will cost at least £2,000 , but probably not more than £4,400 to implement.
Change Costs (on-going): An enduring solution will cost per year at least £9,500 , but probably not more than £10,000 to operate.
Timescales: 3 months development and deployment from the change being approved

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.	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 has a positive impact on Relevant Objective f) as the provision of sample data should have a positive impact on the profiling within the demand forecasting process for new and existing EUCs, leading to improved allocation and reduced UIG. The PAC reporting should ensure monitoring and compliance checks are completed on the provision of sample data.

In addition, this Modification may have minor benefits to Relevant Objective d) as the improved allocation should improve cost targeting and therefore further competition between Shippers and Suppliers.

8 Implementation

Although self-governance procedures are proposed, the implementation date will be confirmed by Transporters.

It should be noted that the CDSP would require a minimum of 3 months to develop and deploy these proposals should this modification be implemented. It is likely that industry parties would need a similar deployment period.

9 Legal Text

Draft legal text has been provided by SGN and is published alongside this report. The Workgroup has considered the draft legal text although they note this text has not been formally requested by Panel.

10 Consultation

Panel invited representations from interested parties on 16 August 2018. 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.

Implementation was unanimously supported in the 15 representations received.

Representations were received from the following parties:

Organisation	Response	Relevant Objectives	Key Points
British Gas	Support	d - positive	<ul style="list-style-type: none"> Supports the implementation of this modification and believe the sharing of NDM data by shippers/suppliers will lead to more accurate allocation and future profiles for class 3 & 4 customers. Notes that the timeline to submit the data (5th business day of month) could be impractical to suppliers, and DESC's expectations should be managed accordingly. Some resourcing time would be required to facilitate collating the sample data.
Cadent	Support	d - positive f - positive	<ul style="list-style-type: none"> Agrees that the mandatory provision by Shipper Users of data in support of the NDM sample would be expected to improve NDM allocation profiles and EUC development. The measures proposed including PAC reporting would also be likely to assist in the reduction of Unidentified Gas (UIG). Does not believe this Modification is sufficiently material to require an Authority decision and consequently would recommend that self-governance procedures be applied.
Ecotricity	Support	d - positive f - positive	<ul style="list-style-type: none"> Supports implementation due to the positive impacts it shall have by creating more representative profiles, which should reduce UIG volatility. Believes that this modification should not be subject to self-governance. When considering the potential gaming issues, purposeful gaming could have unfortunate consequences. Should better controls be in place to prevent gaming, then Ecotricity agree that this would be

			<p>subject to self-governance.</p> <ul style="list-style-type: none"> • Feels that a minimum of three months' notice is needed to allow enough time for shippers to scope their internal mechanisms for collating this data in accordance with the proposed business rules. Any shorter time frame will drive shippers away from a monthly submission schedule in order to perform the internal work required to submit this obligated data. • Although the business rules shall mandate that the data be randomly selected, Ecotricity do not believe there are enough controls in place to prevent shippers from gaming the system by selecting which data they provide.
EDF	Support	d - positive f - positive	<ul style="list-style-type: none"> • Supports mandating the provision of Non-Daily Meter (NDM) sample data, as this will aid the development of more accurate allocation profiles and End User Categories (EUCs). • This modification will also have a positive impact on the current level of Unidentified Gas (UIG) across the industry. • The modification is a request for data, therefore EDF Energy agrees that this modification is suitable for self-governance. • Expects a minimum implementation period of three months. However, EDF do have concerns over the use of encrypted emails for the provision of this data. • Preference would be to delay the implementation until an IX flow is available to securely pass the data required. • EDF have assessed the cost for the implementation of this modification and we can provide this information on a confidential basis directly to the Joint Office. • EDF have made comments specific to the legal text, please see the published representation here: http://www.gasgovernance.co.uk/0654 for further detail. • The timelines within the legal text, requesting that data be submitted by the fifth business day, will be problematic if this falls on a weekend or bank holiday.
ENGIE	Support	d - positive f - positive	<ul style="list-style-type: none"> • Agrees that additional sample sites are required to derive robust statistical estimates of the NDM parameters for each EUC. Shippers should be obligated to support this process, by providing sample data representative of their individual portfolios. • Three months would allow shippers the necessary time to

			implement the necessary processes.
E.ON	Support	d - positive f - positive	<ul style="list-style-type: none"> • Supports the mandating of the sample data. • The creation of the PAC reporting acts as a first step to monitor the data delivery, any further steps or sanctions can be developed at a later date, if required. • Supports both the UNC and IGT UNC modifications. • Considers the request for the data as self-governance, although it links with UIG the data doesn't influence the daily position but more ensures accuracy of the modelling. As this modification just enables a report and the monitoring of report submission, E.ON does not feel it is a material change and supports self-governance for the UNC and the IGT UNC modification.
First Utility	Support	d - positive f - positive	<ul style="list-style-type: none"> • The provision of NDM sample data was identified as having a positive effect on the modelling of demand at the Demand Estimation Sub Committee (DESC) and thus having a positive effect on levels of Unidentified Gas. • Supports any such initiatives that can bring more certainty to the NDM algorithm and profile Unidentified Gas accurately. • Believes this proposal can proceed under self-governance. • Believes 3 months is a suitable timeframe for implementation. • There will be minimal costs associated with this change.
Gazprom	Support	d - positive f - positive	<ul style="list-style-type: none"> • Support the introduction of a mandatory NDM sample as this will help improve demand modelling and thus more accurately target the allocation of unidentified gas. • Believe sufficient time should be given to allow parties time to put in place suitable arrangements i.e. developing reports in the agreed format, and would expect a minimum 3 months lead time for development.
NGN	Support	d - positive f - positive	<ul style="list-style-type: none"> • NGN supports this modification as the provision of increased levels of Non-Daily Metered sample data from Shippers to the Central Daily Service Provider should aid the Demand Estimation Sub-Committee in the analysis and activities undertaken to set the annual End User Category profiling. • This modification should be subject to the Self-Governance procedure as its implementation would not directly have a material impact on industry parties or

			<p>processes.</p> <ul style="list-style-type: none"> The implementation date should be set by Transporters, subject to industry discussion and agreement through the Data Services Contract (DSC) Change Management Committee.
npower	Support	d - positive f - positive	<ul style="list-style-type: none"> Supports the mandatory provision of NDM sample data, to increase the amount of data available for demand estimation modelling. Believe this should ultimately have a positive impact on demand estimation. Agrees with the existing modification categorisation. While there is a good argument for self-governance status, given that there could be an eventual material impact on cost allocation, on balance npower believes authority direction procedures should apply. Prefers an implementation lead time of six months to allow parties to make the necessary changes to systems to retrieve and send the relevant data. Agrees with the need to send data in a timely fashion, but notes the requirement for submission of data on the 5th business day could pose some challenges in certain situations (when retrieving data for the last days of the previous month/period).
Opus	Support	d - positive f - positive	<ul style="list-style-type: none"> Having a greater quantity and frequency of gas read data available should, at least in theory, reduce the overall discrepancies between the standard industry profiles and actual consumption, meaning less error in the gas allocation process and a smaller initial UIG pot. It should also allow DESC to more easily analyse introducing additional EUCs such as domestic, non-domestic and prepayment for AQ band 1. Believe this change is likely to have a material impact because of impact on UIG and allocation and commercial arrangements for Shippers. We therefore believe this modification should follow Authority Direction procedures. 3 months, will allow sufficient lead-time to develop reports and put in place processes. The proposed implementation date of 16 business days after a decision to implement would not be sufficient given the changes required.
Orsted	Support	d - positive f - positive	<ul style="list-style-type: none"> Support the mandating of NDM sample data as they believe it will bring benefits to the developments of EUCs and demand modelling. This will lead to improvements in

			<p>the NGM algorithm, which in turn will help to bring improvements to the UIG issues.</p> <ul style="list-style-type: none"> • Support it being self-governance • Sufficient time should be given to allow affected parties to make arrangements for the provision of the data in the format specified. At a minimum we would expect 3 months development time. • The timelines are too tight to submit the data by the 5th business day of the month. Shippers may not have enough time to process reads particularly during bank holidays which may affect timely submission. We would like to see the window for submission extended.
ScottishPower	Support	d - positive f - positive	<ul style="list-style-type: none"> • Supports the obligation into the UNC for the regular provision of NDM sample data as believe it will improve NDM allocation profile and EUC development. This should have a beneficial effect of improving UIG issues across the Market. • Agrees self-governance is appropriate. • 3 months lead time required.
SGN	Support	d - positive f - positive	<ul style="list-style-type: none"> • In mandating the provision of NDM sample data, SGN agree that the proposal would help facilitate greater degrees of accuracy in modelling. This would go some way to tackling the decreasing amount of data which is currently being provided. • The data that is presented in forums to the Industry and to Ofgem may suffer from being less accurate than it could be without the adoption of this Modification. • This modification should support more accuracy in the gas allocation process which in turn should help reduce the size of the UIG pot. No matter how small, anything that can help with the fluctuations in UIG since Project Nexus would be welcome. • Agrees with the Self-Governance Statement. • A minimum lead time of 3 months is recommended for this development
SSE	Support	d - positive f - positive	<ul style="list-style-type: none"> • The provision of more sample data will allow the CDSP to calculate gas demand profiles more accurately, which should then result in improvements in gas settlements including lower and less volatile levels of UIG, a major concern to the industry since the implementation of Project Nexus. • Agree with the Modification's Panel view that this

			<p>modification should follow Authority Direction.</p> <ul style="list-style-type: none"> • Due to IT system development being required, SSE believe that the modification should be implemented 6 months after an Authority decision to approve it. • SSE would incur some IT development costs to provide this data.
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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 considered when the UNC Modification Panel makes its assessment and recommendation.

11 Panel Discussions

Panel Members noted that all respondents were unanimous in their support of this Modification and, they noted the support of respondents in relation to Relevant Objective d) – Competition.

A Panel Member highlighted the views of respondent EDF, noting their concern relating to email file formats and whether they should actually be IX files. The Panel Member asked whether because of the question, should the Modification be returned to Workgroup for discussion, but noted that EDF supported implementation. Other Panel Members noted that this might be considered more of an implementation issue. Some Shipper Panel Members noted that they wished to see an expedited implementation period, whilst others wished to see a reasonable implementation period to allow for the development of their own systems.

A Panel Member requested that the CDSP provide a view on implementation and they confirmed that it is likely to be March 2019.

In relation to the Relevant Objectives, Panel Members agreed that this Modification met Relevant Objective d) – Competition. All Panel Members felt that data accuracy measures and supporting processes, must be good for competition as parties know precisely where they stand. Noting the points raised by the Workgroup, Panel Members felt that Relevant Objective d) – Competition was of greater relevance.

Panel Members also considered Relevant Objective f) – efficiency and administration. A Panel Member noted that greater data accuracy would enable a more efficient Code, resulting in more efficient demand forecasting, NDM allocation and reconciliation.

The matter of Self-Governance was raised. Panel Members noted that some respondents were in favour of Self-Governance, whilst other respondents were not.

Panel Members took a vote on Self-Governance. Ten Panel Members voted in favour of Self - Governance, whilst four did not.

Ofgem did not object that this Modification should be Self-Governance.

12 Recommendations

Panel Recommendation

Members agreed that Modification 0654S meets the Self Governance criteria and should be implemented.

13 Appendix 1 – PAC Reporting

Appendix 1 – PARR Reporting

Report Title	NDM Sample Data
Report Reference	PARR Schedule 2B.11 [Note: reference number subject to change due to other reports being progressed at the same time]
Report Purpose	To monitor the provision of NDM sample data.
Expected Interpretation of the report results	To monitor Shipper participation and ensure the data is provided in a timely manner
Report Structure (actual report headings & description of each heading)	See table set out below.
Data inputs to the report	Where a Shipper has >25,000 Supply Meter Points and hasn't submitted either a monthly or twice-yearly sample they will be included in the report and will have a 0% shown for their submission
Number rounding convention	Whole number
History (e.g. report builds month on month)	A rolling 12 month view, provided monthly.
Rules governing treatment of data inputs (actual formula/specification to prepare the report)	<ul style="list-style-type: none"> The portfolio is measured as at the first day of the relevant month, associated rolling AQs the values that went live for those supply points on the same day. Where the Shipper provides a monthly or quarterly sample the report will show the latest submissions information
Frequency of the report	<ul style="list-style-type: none"> The report will be run a minimum of twice a year with the opportunity for PAC to request adhoc reports. Reports will be run no later than 1st May and 1st November
Sort criteria (alphabetical ascending etc.)	Shipper Short Code Alphabetically

History/background	
Additional comments	Where a Shipper has >25,000 and hasn't submitted either a monthly or twice-yearly sample they will be included in the report and will have a 0% shown for their submission
Estimated development costs	
Estimated on-going costs	

The high-level report will contain the data outlined below – any further information required by PAC will be developed by the PAC.

Shipper	Submission Date YYYYMMDD	<25,000 Y/N	% of portfolio Supplied	Contains IGTs Y/N	Monthly, Quarterly or Twice-Yearly submission	Received within 5WD window Y/N
Shipper A	NA	Y	NA	NA	NA	NA
Shipper B	20190403	N	3%	Y	Monthly	Y
Shipper C	NA	N	0%	NA	NA	N