














UNC Modification	At what stage is this document in the process?
<h1>UNC 0722 (Urgent):</h1> <h2>Allow Users to submit Estimated Meter Reading during COVID-19</h2>	<div>01 Modification</div> <div>02 Workgroup Report</div> <div>03 Draft Modification Report</div> <div>04 Final Modification Report</div>
<p>Purpose of Modification:</p> <p>Allow Users to submit Estimated Meter Readings as Actual Meter Readings for Non-Daily Meter sites during COVID-19 “lock-down”.</p>	
	<p>The Proposer recommends that this modification should be:</p> <ul style="list-style-type: none"> treated as urgent and should proceed under a timetable approved by the Authority.
	<p>High Impact:</p> <p>Shippers</p>
	<p>Medium Impact:</p>
	<p>Low Impact:</p> <p>CDSP</p>

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Timetable			Systems Provider: Xoserve
The Proposer recommends the following timetable:			 UKLink@xoserve.com
Modification sent to Ofgem	21 April 2020		Other: Gareth Evans (WWA)
Ofgem Decision on Urgency	22 April 2020		 gareth@waterswye.co.uk
Consultation commences (<i>3 Business Day consultation</i>)	22 April 2020		 01473 822503
Consultation Close-out for representations	27 April 2020		
Final Modification Report available for Panel	28 April 2020		
Modification Panel recommendation	30 April 2020		
Ofgem Decision	01 May 2020		

1 Summary

What

Currently Users are unable to submit estimated Meter Readings other than estimated Proposing User Estimate Opening Meter Readings (M 1.5.2 (c) (iv) refers), on the assumption that shippers will either be able to obtain meter readings through site visits, or from customers. Where such readings are not available, then the UNC requires that meter reads are obtained by the transporters under the must-read process.

As a result of the COVID-19 pandemic, routine site visit activity has ceased. In addition, many sites are unoccupied as the premises are closed, and their customers are unable to obtain meter readings. Indeed, they may be potentially breaking the law if they attempt to do so.

Though many sites are known to be not consuming gas, it is not possible under the terms of the UNC to provide estimated meter readings. These means that these sites are not being reconciled to their true consumption.

Why

Since the COVID-19 Lockdown has been enforced there have been impacts on gas usage at individual sites, including actual usage deviating significantly from the AQ. Because of the lockdown there is also increased likelihood of a failure to procure accurate reads due to unavailability of meter readers, restricted access due to closed premises, and limited opportunity to take corrective measures with respect to faulty AMR.

Shippers therefore require a mechanism to ensure that sites that are currently inaccessible can register an estimate reading that is more representative of actual consumption to avoid the material impacts of incorrect allocation based on AQ that are no longer representative of consumption,

How

This Modification proposes that Users are permitted to submit estimated Meter Readings for Non-Daily Metered Supply Meter Points during the COVID-19 pandemic.

2 Governance

Justification for Urgency

This Modification recognises that there is a need to allow shippers to provide estimated meter readings as it is not possible to rely on existing meter readings processes.

Many properties are currently lying vacant as a result of the COVID-19 pandemic and it is potentially illegal for these sites to be visited by customers to retrieve meter readings. Also, any sites with remote meter reading capability cannot be visited to fix any read issue. Without a mechanism to allow estimated meter readings to be provided as a result of the COVID-19 pandemic, many sites will not be reconciled for a considerable period and AQs will not be recalculated. Shippers are therefore not being cashed out of positions, tying up significant amounts of collateral at a time where cashflows are being negatively affected by the unexpected reduction in gas demand. This therefore needs to be addressed urgently to allow these organisations to survive through the duration of the COVID-19 pandemic.

Requested Next Steps

This modification should:

- be treated as urgent and should proceed as such under a timetable agreed with the Authority

3 Why Change?

Since the COVID-19 Lockdown has been enforced there have been unexpected impacts on gas usage at individual sites, including actual usage deviating significantly from the AQ. Because of the lockdown there is also an increased likelihood of a failure to procure accurate reads due to unavailability of meter readers, restricted access due to closed premises, and limited opportunity to take corrective measures with respect to faulty AMR or Smart Metering. Shippers, therefore, require a mechanism to ensure that sites that are impacted from the COVID-19 pandemic can register an estimated reading that is more representative of actual consumption and promptly generate a reconciliation of the allocated energy.

Without implementation, many sites will not be reconciled for a considerable period of time.

4 Code Specific Matters

Reference Documents

None

Knowledge/Skills

None

5 Solution

This Modification proposes that Users should be permitted to submit estimated Meter Readings for Non-Daily Metered Supply Meter Points where justified in doing so as a result of the COVID-19 Pandemic.

Business Rules

1. Users may submit an Estimated Meter Reading as an Actual Meter Reading where in the User's reasonable estimate, no Actual Meter Reading can be obtained as a result of coronavirus (as defined in the Coronavirus Act 2020).
2. An Estimated Meter Reading must reflect as closely as possible the site's estimated consumption for the period covered by the meter reading, in the User's reasonable opinion.
3. User must keep records of how any Estimated Meter Readings were derived for a period of 2 years.

6 Impacts & Other Considerations

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

None

Consumer Impacts

Though customer consumption is not being truly represented in the system, we expect that customer billing will continue on estimated readings, so no direct impact on customers.

Cross Code Impacts

None.

EU Code Impacts

None.

Central Systems Impacts

This modification does not implement changes to systems or processes, but rather utilises an existing process for extenuating reasons. Xoserve has provided the following notes:

- *It is not proposed to amend UK Link systems in so far that Shipper Generated Estimate would still not be acceptable for Non-Opening, and Replacement Meter Readings. The solution proposed is that Users should submit their estimated Readings as Actual Meter Readings.*
- *Note, there would be no way of identifying that such Meter Readings were not Actual Meter Readings.*

7 Relevant Objectives

Impact of the modification on the Relevant Objectives:

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

Allowing Shippers to provide Estimated Meter Readings during the COVID-19 pandemic will allow sites to be reconciled and AQs to be recalculated. This will improve the accuracy of gas allocations and hence cost targeting and so further competition.

8 Implementation

As urgency status is being requested, implementation could be as soon as authority approval is given.

9 Legal Text

Text Commentary

Legal text has been published alongside this Modification.

Text

Legal text has been published alongside this Modification.

10 Recommendations

Proposer's Recommendation to Panel

The Authority is asked to:

- Agree that this Modification should be treated as urgent and should proceed under a timetable approved by the Authority