

UNC Request Workgroup Report	At what stage is this document in the process?
<h1 data-bbox="124 322 724 416">UNC 0851R:</h1> <h2 data-bbox="132 450 1102 658">Extending the Annually Read PC4 Supply Meter Point (SMP) read submission window</h2>	<div data-bbox="1187 315 1455 555"> <div data-bbox="1187 315 1455 389">01 Request</div> <div data-bbox="1187 398 1455 472">02 Workgroup Report</div> <div data-bbox="1187 481 1455 555">03 Final Modification Report</div> </div>
<p>Purpose of Request:</p> <p>Under UNC TPD, M, 5.9.4, Shippers have 25 Supply Point Systems Business Days (SPSBD) after the read date to submit a read for settlement. Where there's an issue preventing the read from being validated, and that issue is not resolvable within the 25 SPSBD timeframe, the read becomes unusable. This is highly problematic for meter reads that are hard to retrieve. It needs addressing because enabling valid reads to be entered into settlement decreases settlement imbalance, unbilled, Unidentified Gas (No reads at Line in the Sand is a UIG contributor), manual AQ fixes, repeated costs for additional site visits, and time and money spent on must-reads.</p>	
<p>Next Steps:</p> <p>The Workgroup recommends that this Request should be closed.</p> <p>The Panel will consider this Workgroup Report on 20 June 2024. The Panel will consider the recommendations and determine the appropriate next steps.</p>	
<p>Impacted Parties:</p> <p>High: Suppliers, Shippers, Consumers</p> <p>Low: Distribution Network Operators, Independent Gas Transporters</p>	
<p>Impacted Codes: IGT UNC, REC</p>	

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About this document:

This report will be presented to the panel on 20 June 2024.

The Panel will consider the recommendations and determine the appropriate next steps.

 **Any questions?**

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1 Request Summary

Why is the Request being made?

Under UNC TPD, M, 5.9.4, Shippers have 25 Supply Point System Business Days after the read date to submit a read for settlement. Where there is an issue preventing the read from being validated, and that issue is not resolvable within the 25 Day timeframe, the read becomes unusable. This is highly problematic for meter reads that are hard to retrieve from the meter.

Enabling valid reads to be entered into settlement would decrease settlement imbalance, unbilled, Unidentified Gas (No reads at Line in the Sand is a UIG contributor), manual AQ fixes, repeated costs for additional site visits, and time and money spent on must-reads.

Options on the table are:

- A) Extending the PC4 read submission window from 25 SPSBDs to [60] SPSBDs. Electricity settlement, by comparison, enables 14 months for NHH read submission, moving to 4 months with MHHS; or
- B) Creating a mechanism via which failed valid reads can be resubmitted and entered into Settlement; or
- C) A combination of A) and B): extending the window to [60] SPSBDs and creating a mechanism for failed valid reads to be re-entered into Settlement.

Impacts & Costs

This request would aim to address settlement imbalance, unbilled, Unidentified Gas (No reads at Line in the Sand is a UIG contributor), manual AQ fixes, repeated costs for additional site visits, and time and money spent on must-reads.

Recommendations

Analysis of the above options to agree on the best solution to carry forward as a substantive change in the form of a Modification as required.

Workgroup's Assessment

The Workgroup considered the Review Group request and the proposal to extend the current read submission window for Class 4 meter points from 25 Supply Point Systems Business Days to a higher number. The review considered:

- The potential process impacts of extending the read window.
- What the optimal number of supply point business days might be for extending the read window.
- The views of PAC on the potential impact of valid readings not getting into settlement and the effect this would have on overall accuracy.
- The use of 'staggered benchmarks' for read submission and what these benchmarks should be set at.
- The content and questions to be included within a PAC RFI that was subsequently issued to Parties to inform the Review.
- The results of the PAC RFI.
- Whether the interaction between read performance obligations in TPD M5.9.4 is sufficiently clear.

Please refer to the Workgroup meeting minutes and Workgroup material for further information on the discussions held for this Request:

[Workgroup Meeting 23 November 2023](#)

[Workgroup Meeting 11 December 2023](#)

[Workgroup Meeting 25 January 2024](#)

[Workgroup Meeting 22 February 2024](#)

[Workgroup Meeting 28 March 2024](#)

[Workgroup Meeting 23 May 2024](#)

2 Impacts and Costs

CDSP Settlement Systems

Impacts on CDSP's settlement systems will need to be understood.

PAC's Performance Regime

Impacts on PAC's performance regime will need to be understood. Increased submissions of valid reads are the goal here. We need to ensure that poor-performing parties do not use any amendments to the windows and/or a failed valid read submission route as an opportunity for gaming.

Consideration of Wider Industry Impacts

Possible wider industry impacts and costs of the output of the Request are highlighted below. However, until more detail is worked through, specific impacts cannot be identified.

Impacts

Impact on Central Systems and Process	
Central System/Process	Potential impact
UK Link	<ul style="list-style-type: none"> Settlement systems, read performance reports
Operational Processes	<ul style="list-style-type: none"> Read submission, AQ correction, Must Reads, UIG allocation

Impact on Users	
Area of Users' business	Potential impact
Administrative and operational	<ul style="list-style-type: none"> Read submission, AQ correction, Must Reads, UIG allocation
Development, capital and operating costs	<ul style="list-style-type: none"> Cost to amend read submission processes
Contractual risks	<ul style="list-style-type: none"> N/a
Legislative, regulatory and contractual obligations and relationships	<ul style="list-style-type: none"> Must Reads, Read performance

Impact on Transporters	
Area of Transporters' business	Potential impact
System operation	<ul style="list-style-type: none"> N/a
Development, capital and operating costs	<ul style="list-style-type: none"> N/a
Recovery of costs	<ul style="list-style-type: none"> Fewer must-reads

Impact on Transporters	
Price regulation	<ul style="list-style-type: none"> N/a
Contractual risks	<ul style="list-style-type: none"> N/a
Legislative, regulatory and contractual obligations and relationships	<ul style="list-style-type: none"> Less must-reads
Standards of service	<ul style="list-style-type: none"> Less must-reads

Impact on Code Administration	
Area of Code Administration	Potential impact
Modification Rules	<ul style="list-style-type: none"> N/a
UNC Committees	<ul style="list-style-type: none"> PAC impacts
General administration	<ul style="list-style-type: none"> N/a
DSC Committees	<ul style="list-style-type: none"> N/a

Impact on Code	
Code section	Potential impact
	<ul style="list-style-type: none"> UNC TPD, M, 5.9.4, 5.9.9

Impact on UNC Related Documents and Other Referenced Documents	
Related Document	Potential impact
Network Entry Agreement (TPD I1.3)	<ul style="list-style-type: none"> N/a
General	Potential Impact
Legal Text Guidance Document	<ul style="list-style-type: none"> N/a
UNC Modification Proposals – Guidance for Proposers	<ul style="list-style-type: none"> N/a
Self-Governance Guidance	<ul style="list-style-type: none"> N/a
TPD	Potential Impact
Network Code Operations Reporting Manual (TPD V12)	<ul style="list-style-type: none"> N/a
UNC Data Dictionary	<ul style="list-style-type: none"> N/a
AQ Validation Rules (TPD V12)	<ul style="list-style-type: none"> Potentially
AUGE Framework Document	<ul style="list-style-type: none"> N/a

Impact on UNC Related Documents and Other Referenced Documents	
Customer Settlement Error Claims Process	<ul style="list-style-type: none"> • Potentially
Demand Estimation Methodology	<ul style="list-style-type: none"> • Potentially
Energy Balancing Credit Rules (TPD X2.1)	<ul style="list-style-type: none"> • N/a
Energy Settlement Performance Assurance Regime	<ul style="list-style-type: none"> • Yes
Guidelines to optimise the use of AQ amendment system capacity	<ul style="list-style-type: none"> • Potentially
Guidelines for Sub-Deduct Arrangements (Prime and Sub-deduct Meter Points)	<ul style="list-style-type: none"> • N/a
LDZ Shrinkage Adjustment Methodology	<ul style="list-style-type: none"> • N/a
Performance Assurance Report Register	<ul style="list-style-type: none"> • Yes
Shared Supply Meter Points Guide and Procedures	<ul style="list-style-type: none"> • N/a
Shipper Communications in Incidents of CO Poisoning, Gas Fire/Explosions and Local Gas Supply Emergency	<ul style="list-style-type: none"> • N/a
Standards of Service Query Management Operational Guidelines	<ul style="list-style-type: none"> • N/a
Network Code Validation Rules	<ul style="list-style-type: none"> • N/a
	<ul style="list-style-type: none"> • N/a
OAD	Potential Impact
Measurement Error Notification Guidelines (TPD V12)	<ul style="list-style-type: none"> • N/a
	<ul style="list-style-type: none"> • N/a
EID	Potential Impact
Moffat Designated Arrangements	<ul style="list-style-type: none"> • N/a
	<ul style="list-style-type: none"> • N/a
IGTAD	Potential Impact
	<ul style="list-style-type: none"> • Potential
DSC / CDSP	Potential Impact
Change Management Procedures	<ul style="list-style-type: none"> • N/a
Contract Management Procedures	<ul style="list-style-type: none"> • N/a

Impact on UNC Related Documents and Other Referenced Documents	
Credit Policy	<ul style="list-style-type: none"> N/a
Credit Rules	<ul style="list-style-type: none"> N/a
UK Link Manual	<ul style="list-style-type: none"> Potential

Impact on Core Industry Documents and other documents	
Document	Potential impact
Safety Case or other documents under Gas Safety (Management) Regulations	<ul style="list-style-type: none"> N/a
Gas Transporter Licence	<ul style="list-style-type: none"> N/a

Other Impacts	
Item impacted	Potential impact
Security of Supply	<ul style="list-style-type: none"> N/a
Operation of the Total System	<ul style="list-style-type: none"> N/a
Industry fragmentation	<ul style="list-style-type: none"> N/a
Terminal operators, consumers, connected system operators, suppliers, producers and other non-code parties	<ul style="list-style-type: none"> Yes

Cross-Code Impacts

IGT UNC, REC.

Central Systems Impacts

This is a Request Workgroup Report, and Central Systems impacts will be recognised in the New Modification being raised.

Panel Questions

No Panel Questions raised.

Workgroup Impact Assessment

The Workgroup considered the Review Group request and the proposal to extend the current read submission window for Class 4 meter points from 25 Supply Point Systems Business Days to a higher number. The review considered:

- The potential process impacts of extending the read window.
- What the optimal number of supply point business days might be for extending the read window.
- The views of PAC on the potential impact of valid readings not getting into settlement and the effect this would have on overall accuracy.
- The use of 'staggered benchmarks' for read submission and what these benchmarks should be set at.

- The content and questions to be included within a PAC RFI that was subsequently issued to Parties to inform the Review.
- The results of the PAC RFI.
- Whether the interaction between read performance obligations in TPD M5.9.4 is sufficiently clear.

Workgroup participants concluded that any extension period would need to strike a balance between extending as far as necessary, but no more than necessary so as not to delay the submission of valid meter readings.

The Proposer noted that the review group discussions had been extremely helpful in informing the next steps and that their intent was to raise a new Modification focused on:

- Introducing staggered benchmarks for read submission, between 10, 25, 45, and 80 SPBSDs; and,
- Removal of the word 'obtained' within 5.9.4 of TPB Section M and to replace it with the word 'Required', to facilitate an associated read submission reporting requirement.

The Proposer also considered that the Workgroup review could be closed.

One Workgroup participant noted that they intended to raise an alternative Modification, proposing staggered read submission benchmarks at 10, 25, and 45 SPBDs, but otherwise identical, noting that extending the window to 45 days on the basis that it would be unlikely to have any material impact on the volumes of valid meter readings that are being submitted within the 10 days but may allow for an increased volume of reads to be submitted (or resubmitted) beyond the current 25 days.

Please refer to the Workgroup meeting minutes and Workgroup material for further information on discussions held to consider the Request and the development of the new Modification:

[Workgroup Meeting 23 November 2023](#)

[Workgroup Meeting 11 December 2023](#)

[Workgroup Meeting 25 January 2024](#)

[Workgroup Meeting 22 February 2024](#)

[Workgroup Meeting 28 March 2024](#)

[Workgroup Meeting 23 May 2024](#)

3 Terms of Reference

Topics for Discussion

- Understanding the objective (Why Change?)
- Assessment of alternative means to achieve the objective
- Development of Solution (including business rules if appropriate)
- Assessment of Code-Specific Matters
- Assessment of the Solution (including business rules if appropriate)
- Assessment of impacts of the Request, including but not limited to Consumer and System Impacts
- Identification of potential impacts on other energy codes
- Consideration of potential performance assurance impacts
- Assessment of implementation costs of any solution identified during the Request

Outputs

Produce a Workgroup Report for submission to the UNC Modification Panel, containing the assessment and recommendations of the Workgroup including a draft Modification where appropriate.

Composition of Workgroup

The Workgroup is open to any party that wishes to attend or participate.

A Workgroup meeting will be quorate provided at least two Transporter and two User representatives are present.

Meeting Arrangements

Meetings will be administered by the Joint Office and conducted in accordance with the Code Administration Code of Practice (<https://www.gasgovernance.co.uk/cacop>)

4 Modification(s)

New Modification 0884 - Extending the PC4 Read Submission Window, has been raised (<https://www.gasgovernance.co.uk/0884>) and will proceed to the UNC Modification Panel for consideration on 20 June 2024.

The new Modification aims to extend the Supply Point Systems Business Days (SPSBD) beyond the current 25 SPSBD to allow validation of reads that are problematic a longer timeframe to rectify.

5 Recommendations

Workgroup's Recommendation to Panel

The Workgroup asks Panel to agree that this Request should be closed.