

Framework for the Appointment of an Independent Shrinkage Expert

Document Control

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Preamble

1. Development of Rules

The requirement to have in place a "Shrinkage and Leakage Model" (SLM) is specified in the Special Standard Conditions of the Transporter Licence. The Framework for the Appointment of an Independent

Shrinkage Expert (hereafter the “Framework”) will enable the Independent Shrinkage Expert (ISE) to annually develop the Independent Shrinkage and Leakage Model (ISLM) and Independent Shrinkage and Leakage Model Methodology (ISLMM), and deliver these to the Transporters and the Authority, ~~enabling an informed choice to use the SLM or the ISLM, and thereby comply with the obligation to provide as reasonably accurate account of Shrinkage and Leakage as possible. The ISLM will be developed so that, should Transporters wish to submit the ISLM in lieu of the SLM to the Authority, a submission that shall be in agreement with the Authority, the ISLM, associated documents, and activities will allow Transporters’ compliance with the Special Conditions of the Gas Transporter licence.~~ The ISE will use the ISLM and ISLMM to create an accurate account of Shrinkage. Where there is a difference between the quantity of Shrinkage that is calculated via the SLM and ISLM, the ISE will recommend to Transporters and Ofgem that the Independent Shrinkage and Leakage Model Multiplication Factor. If approved by Ofgem, Transporters will be obliged to apply this multiplier to the volumes of Shrinkage calculated. This will enable Transporters to accurately purchase gas to cover any losses.

2. Modifications

Should a Shipper or Transporter wish to propose modifications to any of the Framework, such proposed modifications shall be submitted to the Uniform Network Code Committee and considered by the Uniform Network Code Committee or any relevant sub-committee where the Uniform Network Code Committee so decide by majority vote.

3. Approved Modifications

In the event that a proposed modification is approved by a majority vote of the Uniform Network Code Committee, the modification shall be implemented.

Where the Uniform Network Code Committee fails to achieve majority approval the proposed modification shall be considered in accordance with the provisions set out in Section 7 of the Uniform Network Code Modification Rules unless the Uniform Network Code Committee determines otherwise

Each revised version of a Document shall be version controlled and retained by the Joint Office on their website.

Main body

1. Definitions

1.1 Unless otherwise stated, terms in this “Independent Shrinkage Expert Document” (“this Framework”) shall have the meanings given to them in the Uniform Network Code. Such terms will be capitalised within quotation marks where first used in the Framework.

1.2 In this Framework:

- “The Committee” - The Uniform Network Code Committee (UNCC), or an authorised technical workstream or sub committee appointed by the UNCC to administer the Independent Shrinkage Expert process.
- “Code Parties” – signatories to the Uniform Network Code

- “Generic Terms of Reference” – the standard terms of reference to be applied as basis of the contracts between the Gas Transporters and the ISE for the maintenance of the Shrinkage and Leakage Model
- [“Independent Shrinkage and Leakage Model Multiplication Factor”](#) - a multiplier that accounts for any under or over estimation made by Transporters when estimating the amounts of Shrinkage via the Shrinkage and Leakage Model. This must be used by Transporters to accurately account for Shrinkage where so directed by the Authority. For example, if the Transporter estimates 10 GWhs of natural gas have been lost to Shrinkage and the ISE estimates that 13.5 GWh of natural gas have been lost to Shrinkage, the Independent Shrinkage and Leakage Model Multiplication Factor will be 1.35.
- [“Stakeholder Evaluation Sub-Committee”](#) – a group of interested parties (including the CDSP), drawn from or nominated by The Committee, who will participate in the development of procurement materials (including terms and conditions) and the selection of a preferred tenderer for the role of ISE.

Commented [1]: adapted from https://www.gasgovernance.co.uk/sites/default/files/ggf/page/2018-08/Framework%20for%20the%20Appointment%20of%20an%20Allocation%20of%20Unidentified%20Gas%20Expert%20v8.1_0.pdf

2. The Framework

The process described here sets out:

- ISE appointment;
- Publication of the [Independent Shrinkage and Leakage Model \(ISLM\) and Independent Shrinkage and Leakage Model Methodology \(ISLMM\)](#);
- [High level process for the maintenance and development of the ISLM and the ISLMM](#);
- [The creation of the Independent Shrinkage and Leakage Model Multiplication Factor](#)
- ISE principles
 - In any and all activity undertaken by the ISE, including updating or replacing the National Leakage Tests (NLT) (if deemed appropriate by the ISE) through innovation, shall be administered via the principles of:
 - impartiality,
 - emissions reduction,
 - accuracy, and
 - best outcomes for end-consumers.

Commented [2]: terms updated

3. Responsibilities under the tender process for the position of ISE

[3.0 The Committee may delegate its obligations for the definition of criteria for appointment and for overseeing the selection process to the Stakeholder Evaluation Sub-Committee.](#)

Commented [3]: Pulled from AUG Framework 8.1 and redrafted so that its conditional "may delegate"

3.1 The CDSP, on behalf of the The Committee, will:

- 3.1.1 Produce a clear set of criteria for the appointment of the ISE detailing (without limitation):
- (a) the ability of the ISE to produce the ISLM [and the ISLM](#) -which shall be in line with the Generic Terms of Reference, contained in this Framework plus any other criteria agreed by The Committee;
 - (b) the evaluation of the cost of undertaking the role of the ISE over the period stated in the tender document;
 - (c) the consideration of the relevant knowledge and expertise of the candidates;
 - (d) ability of the prospective ISE to follow and take into account relevant industry developments; and
 - (e) Details of what [Independent Shrinkage and Leakage Model Multiplication Factor](#) multiplier should be used for each [LDZ discrete leak area](#).

3.1.2 Review this Framework and submit for approval to the UNC Modification Panel any proposed amendments.

3.2 The CDSP will ~~use all reasonable endeavours to:~~

- 3.2.1 use the criteria developed ~~under 3.1 by The Committee~~ to assess each submitted tender bid;
- 3.2.2 where more than one prospective candidate responds to the tender for the position of ISE ("the Interested Parties") the Gas Transporters and Shippers shall:
 - (a) Assess the Interested Parties from the criteria specified in the tender document;
 - (b) Select and appoint the appropriate Interested Party as the "Prospective ISE".
- 3.2.3 identify any improvements that may be made to the tender process, and detail those improvement to The Committee;
- 3.2.4 organise any meetings held in relation to the ISE appointment;
- 3.2.5 provide legal resource to prepare a tender document;
- 3.2.6 organise the advertisement of the tender to all Interested Parties, in accordance with national and European legislation;
- 3.2.7 communicate to ~~Code Parties Users~~ the progress and outcome of the tender process;
- 3.2.8 invite the Prospective ISE to take up the appointment;
- 3.2.9 where the selected ISE does not accept the appointment, invite the next most favoured ISE in turn; and
- 3.2.10 upon acceptance of appointment, establish the contract with the Prospective ISE, in accordance with the Generic Terms of Reference.

3.3 The Gas Transporters and Shippers will require the ISE:

- 3.3.1 to act with all due skill, care and diligence when performing its duties as the ISE and shall be impartial when undertaking the function of the ISE, ensuring that any values derived will be equitable in their treatment of Code Parties.
- 3.3.2 to compile the ISLM and ISLMM and calculate the Independent Shrinkage and Leakage Model Multiplication Factor in accordance with this Framework

4. Tendering process

~~4.0 The CDSP will procure this activity on behalf of the Gas Transporters and Shippers~~

4.1 This section details the processes undertaken by the ~~CDSP Gas Transporters and Shippers~~, to appoint an ISE using a tender process.

4.1.1 The ~~CDSP Gas Transporters and Shippers~~ will prepare a tender document to be sent when required to all Interested Parties.

4.1.2 The tender will detail:

- (a) that the aim of the tender is to appoint a Party, the ISE, to compile a publicly available ~~ISLM and ISLMM~~ that is used in the creation of ~~the ISLM~~;
- (b) that the ISE will create a methodology, an ISLMM, to populate the ~~ISLM~~ annually (the cadence of the production of the ISLMM, ISLM, and Independent Shrinkage and Leakage Model Multiplication Factor may need to change to cadence if appropriate);
- (c) that the ISE must provide the necessary information to ~~Code Parties the Gas Transporters and Shippers~~ in good time to allow the update of the ISLM by the ~~1st July each year~~;
- (d) the ISE must hold a public consultation to provide an opportunity to allow Code Parties to discuss the ~~ISLM and ISLMM~~, in accordance with the timetable contained within this Framework;
- (e) the requirement to allow ~~Code Parties Users~~ to submit representations and queries with regard to the ~~ISLM~~ in accordance with the timetable contained within this Framework;
- (f) that the ISE must consider adjusting ~~ISLM and/or the ISLMM~~ in response to those representations;

Commented [4]: Do we need to reference the stakeholder evaluation panel and process? Where in the AUG Framework is this? Its in section 3 - pull out https://www.gasgovernance.co.uk/sites/default/files/ggf/page/2018-08/Framework%20for%20the%20Appointment%20of%20an%20Allocation%20of%20Unidentified%20Gas%20Expert%20v8.1_0.pdf

Commented [5]: 2 shippers and 2 transporters to be quorate

Commented [6]: contract is signed by CDSP

Commented [7]: "Stakeholder Evaluation Sub-Committee" – a group of interested parties (including the CDSP), drawn from or nominated by The Committee, who will participate in the development of procurement materials (including terms and conditions) and the selection of a preferred tenderer for the role of AUG.

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Commented [9]: appropriate date?

(g) that the ISE must adhere to the Generic Terms of Reference contained within this Framework, as well as any other criteria The Committee notifies to the ~~CDSP Gas Transporters and Shippers~~ prior to the tender document being issued; and
(h) that the ISE maintains good relations with The Committee ~~and the CDSP, the Gas Transporters, and Shippers~~, to be available for discussion on any relevant issues, and to answer any general queries promptly.

4.1.3 When issued, the tender will be for an initial ~~term as agreed with the CDSP 2-5 year contract, with an option to extend as determined by the Gas Transporters and Shippers.~~

4.1.4 ~~The CDSP will administer the The Gas Transporters and Shippers will go through a~~ tender process and will conduct it in accordance with all relevant legislation and generally accepted best practice.

4.1.5 Each tender response will in particular detail:

- (a) how the prospective ISE will comply with the Generic Terms of Reference and any other criteria agreed prior to the tender;
- (b) an outline of the method to be used by the prospective ISE, and why such a proposed solution would be suitable;
- (c) an outline of the data that would need to be collated for such use, and the methods to be used for acquiring such data;
- (d) the likely time for such work to be carried out;
- (e) the cost of performing the services;
- (f) contact details that a Code Party may use to query any aspect of the tender or the ~~ISLM, ISLMM and Independent Shrinkage and Leakage Model Multiplication Factor~~ when produced. The ISE shall confirm to the Gas Transporters and Shippers before their appointment that they do not hold any interest or duty which would or potentially would conflict with the performance of their duties under their contract with the ~~CDSP Gas Transporters;~~

~~(g) their independence and impartiality, and their process for identifying and managing conflicts of interest during the lifetime of the contract;~~ and

(h) the mechanisms that will be employed to ensure independence and impartiality.

4.1.6 Once all tenders have been received the ~~CDSP Gas Transporters and Shippers~~ will select in accordance with the evaluation criteria the top-ranked tender for appointment.

4.1.7 Once the tender process has been completed the ~~CDSP Gas Transporters and Shippers~~ will use reasonable endeavours to contract with the highest ranked acceptable party that wishes to become the ISE by the ~~1st August. CDSP Gas Transporters and Shippers~~ will consider contracting with the next highest ranked party if they fail to reach agreement with the immediately previous higher ranked party.

4.1.8 In the event that the ~~1st August~~ deadline is not met, The Committee will decide by a majority vote on whether to:

- (a) maintain the current ~~ISLM and ISLMM~~ for another year; or
- (b) grant additional time to the ISE on the understanding that any additional time granted will not jeopardise the publication of the ~~ISLM and ISLMM.~~

4.1.9 Alternatively, by unanimous vote, to apply an ~~ISLM and ISLMM~~ that The Committee decides as appropriate;

4.1.10 Once the tender process has been completed and the ~~CDSP Gas Transporters and Shippers~~ have contracted with an interested party to be the ISE, the ~~CDSP Gas Transporters, Shippers,~~ and The Committee will review the tender process, and incorporate any updates that are believed are required to this document.

Commented [10]: is this the correct owner of the contract?

Commented [11]: appropriate date?

Commented [12]: 12-18 month lead time for AUG - most recent appointment.

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5. Generic Terms of Reference for Appointed ISE

5.1 This section will include the main principles the ISE will operate under, once appointed.

5.1.1 The ISE will create the ~~ISLM~~ by developing appropriate, detailed methodologies (the ~~ISLMM~~) and collecting necessary data.

5.1.1.1 Code Parties must comply the ISE's requests for data made under 5.1.1
5.1.1.2 non-compliance with 5.1.1 will be escalated to the UNCC, who in turn can escalate to the Authority

5.1.2 The decision as to the most appropriate methodologies and data will rest solely with the ISE taking account of any issues raised by any interested party during the development and compilation of the ISLM.

5.1.3 The ISE will determine what data is required from Code Parties (and other parties as appropriate) in order to ensure appropriate data supports the creation of the ISLM.

5.1.4 The ISE will determine what data is available from parties in order to ensure appropriate data supports the creation of ISLM, if deemed appropriate by the ISE, and parties should provide data where requested.

5.1.5 The ISE will determine what relevant questions should be submitted to Code Parties, and any other parties as deemed appropriate by ISE, in order to ensure appropriate methodologies and data are used in the creation of ISLM.

5.1.6 The ISE will use the latest data available where appropriate.

5.1.7 Where multiple data sources exist the ISE will evaluate the data to obtain the most statistically sound solution, will document the alternative options and provide an explanation for its decision.

5.1.8 Where data is open to interpretation the ISE will evaluate the most appropriate methodology and provide an explanation for the use of this methodology.

5.1.9 Where the ISE considers using data collected or derived through the use of sampling techniques, then the ISE will consider the most appropriate sampling technique and/or the viability of the sampling technique used.

5.1.9.1 The ISE will either procure services for the collection of data or collect their own data,

5.9.1.2 Procurement activity for 5.1.9 will be managed via UNCC

5.9.2.3 Approval for costs above and beyond the original scope should be approved by the UNCC.

5.1.10 The ISE will present the ISLM in draft form (the "Draft ISLM"), to Code Parties seeking views and will review all the issues identified and submitted in response.

5.1.11 The ISE will provide the Draft and final ISLM to relevant stakeholders for publication.

5.1.12 The Authority's final determination in this process shall be binding.

5.1.13 The ISE will undertake to ensure that all data that is provided to it by all parties will not be passed on to any other organisation, or used for any purpose other than the creation of the ISLM, and ensure that they are following GDPR and taking consideration of commercial sensitivities and intellectual property.

5.1.14 Intellectual property ~~is~~ ~~should this be~~ managed by CDSP ~~on behalf of Shippers and Transporters~~

5.1.14.1 the intellectual property should reside with the ISE, but be transferred to the new ISE on appointment. [This stipulation can be amended by contractual arrangements decided in the tender process.](#)

Commented [14]: Significant data spends need to go into the BP. And then ofgem approve. Need to figure out how much cash the ISE is allowed to spend. AUGE contract is subject to competitive tender, weighed on CBA. How would funding work in unison with the DPLA? Need to build DPLA into scope of the tenders. Should this go into framework. Do we want to be prescriptive in terms of the data that is made available to the ISE. "The ISE will use best available data including any produced via projects such as DPLA". No ceiling set for AUGE in terms of £. How did the CBA work for AUGE? There are budget stipulations for innov and advisory. Signed off with the UNCC.

Commented [15]: Within reason industry will provide data at no extra cost to the ISE.

Commented [16]: Does this need to be for "stakeholders" only?

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Commented [18]: Add text to section N of the TPD: "6. Independent Shrinkage Expert: 6.1 Parties must adhere to the stipulations of the Framework for the Appointment of an Independent Shrinkage Expert. 6.2 Where requested to by the Independent Shrinkage Expert, all parties must comply with requests for data. Any non-compliances will be escalated to the UNCC who may escalate to the Authority if appropriate".

[5.1.15 The ISE will calculate the Independent Shrinkage and Leakage Model Multiplication Factor. The Independent Shrinkage and Leakage Model Multiplication Factor is a multiplier that accounts for any under or over estimation made by Transporters when estimating the amounts of Shrinkage via the Shrinkage and Leakage Model. The Independent Shrinkage and Leakage Model Multiplication Factor must be used by Transporters to accurately account for Shrinkage where so directed by the Authority. For example, if the Transporter estimates via the SLM that 10 GWhs of natural gas have been lost to Shrinkage and the ISE estimates via the ISLM that 13.5 GWh of natural gas have been lost to Shrinkage, the Independent Shrinkage and Leakage Model Multiplication Factor will be 1.35.](#)

6. Responsibilities for the creation of the ISE

6.1 CDSP

At the end of each ISE year, regardless of any ISLM outcome, the UNCC shall decide on whether the CDSP shall seek feedback from the industry, including the ISE, on the activities and performance of the ISE and industry for the creation of the ISLM.

The CDSP shall produce a report for The Committee

6.2 Code Parties provision of data or information to the ISE

Where, the ISE requests data from Code Parties for the purpose of preparing the ISLM and ISLMM, the Code Parties shall use reasonable endeavours to provide the information requested within the timescales requested. Such timescales having being previously notified to the Code Parties.

Non-compliance with requests shall be escalated to the Committee/Authority.

6.3 Code Parties Raising issues for consideration during the consultation period.

Code Parties may submit topic areas for consideration by the ISE during the consultation process. The submission must include a clear explanation of the topic, the reasons why this topic is relevant to the ISLM, any accompanying data or suggestions as to how the data may be obtained by the ISE. Each topic submitted by a Code Party will be published (including the details of the Code Party) to the industry as part of the ISE's consultation response.

The ISE will provide a response to the topic detailing whether it is in or out of the scope of work and the rationale to support this.

6.4 Code Parties Raising issues for consideration outside of the consultation period.

Code Parties may submit topic areas for consideration by the ISE outside the consultation process. The submission must include a clear explanation of the topic, the reasons why this topic is relevant to the ISE, any accompanying data or suggestions as to how the data may be obtained by the ISE. Each topic submitted by a Code Party will be published (including the details of the Code Party) to the industry as part of the ISE's consultation response.

The ISE will log the topic and will consider it during the development of the next applicable ISLM and ISLMM

6.5~~6~~ Provision of and publication of data

A copy of all data and information requests from the ISE will be published to the industry as and when the request is made e.g. date, information request, request made to, data required by.

A record of all responses by organisation name (not anonymised), will be maintained and published. The report will show the response as one of “provided”, “not provided” (i.e. request acknowledged but reason for no provision provided), or “no response to request”.

Where applicable, a copy of the data provided to the ISE by the Gas Transporters and Shippers will be provided to the industry, in a suitable format. Where data is confidential or commercially sensitive, the fact that the data had been provided will be published, an organisation may request a copy of the information pertaining to them from the Gas Transporters and Shippers.

~~6.67 The CDSP, or similarly suitable regulated body, as decided by the Committee, shall procure the ISE on the Committee's behalf.~~

Commented [19]: this is covered in the tender process

Commented [20]: pull wording from the AUG

7. Creation of ISLMM

7.1 This section covers the activities and timescales for the creation, submission to The Committee and publication of the ISLMM by the ISE.

7.1.1 The ISE will use appropriate methodologies (ISLMM) for the calculation of the ISLM

7.1.2 The ISE will justify the appropriateness of these methodologies within the ISLMM

7.1.3 The draft ISLMM will be published on date so that Code Parties are able to provide commentary and consult

Commented [21]: date

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7.1.4 methodologies will be lead by principles of:

- impartiality,
- emissions reduction,
- accuracy, and
- best outcomes for end-consumers.

7.1.5 costs for methodologies will justified

7.1.5.1 Cost Benefit Analysis will be undertaken and consulted within the Committee

~~7.1.5.2 The cost of creating the ISLMM will be considered as part of the tender process. It is envisaged that the activities undertaken within the DPLA will be the bulk of the cost.~~

Commented [23]: reword

Commented [24]: uncertainty in the DPLA at the moment so may not be able to rely on the project.

Commented [25]: reword so encompass relevant projects

8. Creation of ISLM

8.1 This section covers the activities and timescales for the creation, submission to The Committee and publication of the ISLM by the ISE.

8.1.1 The ISE must provide a Draft ISLM, including the methodology, to the Joint Office for presentation and publication no later than 1st Feb each year. This date can be amended by the ISE as appropriate, and agreed with the Committee via a consultation.

Commented [26]: date

8.1.2 The Draft ISLM and presentation must detail:

- (a) How the ISE has adhered to the Generic Terms of Reference and to any other relevant provisions within its contract;
- (b) The methodology used by the ISE, and why such a process was suitable;
- (c) The data has been collated so far for such use, and the methods to be used for acquiring any further data; and
- ~~(d) Draft data and methodology for use in populating the ISLM.~~

8.1.3 Once published, any representations made in relation to the draft ISLM must be received ISE ~~within [28] calendar~~ days.

Commented [27]: date

8.1.4 The ISE will consider any submissions made, and will provide feedback for discussion at the meeting, which is to be held as soon as possible after the ~~1st April.~~

Commented [28]: GDNs start to pull data by the 1st of April

8.1.5 The ISE will review the ISLM in light of any comments (received in 7.1.3 & 7.1.4), and will adjust the ISLM where it believes appropriate.

8.1.6 The Draft ISLM document, as revised by the ISE in accordance with 7.1.4, will be republished by the ~~[15th mid-May]~~ on the Joint Office of Gas Transporters website.

Commented [29]: rework

8.1.7 The ISE will arrange a meeting to discuss the Draft ISLM (as revised), along with any changes made, to be held as soon as possible after the Draft SLM,.

8.1.8 Once the Draft ISLM (as revised) document have been published, the Gas Transporters and Shippers will organise a meeting with The Committee and the ISE for approval of the final document before the ~~1st July~~ ~~June~~. The Committee shall approve the Draft ISLM, in the form presented by the ISE, unless they unanimously agree changes to any part of the document. Any changes directed by The Committee in this fashion will be implemented by the ISE immediately. The approved Draft ISLM will be treated as the ~~Final~~ ISLM.

8.1.9 the Final ISLM will issued to Gas Transporters, Shippers, the UNCC, and the Authority for consideration on whether it is more accurate that the SLM ~~by and should therefore be used in the SLM's stead~~ 1st July.

8.1.10 where the Authority deems that the ISLM does represent a more accurate account of Shrinkage, the ISE will calculate the Independent Shrinkage and Leakage Model Multiplication Factor in accordance with 5.1.15.

Appendix

1 Text to be added to Section N of the UNC's Transportation Principle Document

The following text will be added to section N of the TPD to ensure that parties comply with ISE in the production of the ISLM and ISLMM

3.5

Not later than 31 July in each Formula Year, the ISE will provide a report setting out in respect of the Preceding Formula Year:

(a) values (for the whole year and/or on an average daily basis) of assessed LDZ shrinkage, as estimated in the Independent Shrinkage and Leakage Model via the Independent Shrinkage and Leakage Model Methodology, for each relevant LDZ together with a summary of the statistics and information from which such values were derived;

(b) a comparison of such assessed values with the values of LDZ shrinkage estimated by the Transporters;

(c) where there is a difference between LDZ shrinkage, as estimated by the Transporters, and LDZ shrinkage, as estimated by the ISE, the ISE will publish the Independent Shrinkage and Leakage Model Multiplication Factor to Transporters, Users, and the Authority;

(d) where the Authority has reviewed the Independent Shrinkage and Leakage Model Multiplication Factor together with all associated information as appropriate, and so validated that it provides a more accurate estimation, the Authority shall approve the Independent Shrinkage and Leakage Model Multiplication Factor for use by the Transporters;

(e) for the purpose of 3.5(d), Transporters must multiply the value of gas that they have estimated to have been lost as per their calculations under 3.3 by the Independent Shrinkage and Leakage Model Multiplication Factor; and

(f) Transporters must use the value derived under 3.5(e) to accurately purchase gas and report this to the Authority and Users.

3.6 For the purpose of calculating an independent estimate of shrinkage, as detailed within 3.5, the CDSP, on behalf of the UNCC and in line with the Framework for the Appointment of the independent Shrinkage Expert document, shall procure the role of the Independent Shrinkage Expert."

"6. Independent Shrinkage Expert: 6.1 Parties must adhere to the stipulations of the Framework for the Appointment of an Independent Shrinkage Expert.

6.2 Where requested to by the Independent Shrinkage Expert, all parties must comply with requests for data. Any non-compliances will be escalated to the UNCC who may escalate to the Authority if appropriate".